

Richard Quasarano SOCRE Environmental Project Manager San Diego Gas & Electric Company rquasarano@sdge.com

April 24, 2023

Louis Torres Project Manager California Public Utilities Commission 505 Van Ness Avenue San Francisco, CA 94102

Re: Minor Project Refinement No. 18 for the South Orange County Reliability Enhancement Project.

Mr. Torres:

San Diego Gas & Electric (SDG&E) is hereby requesting approval of Minor Project Refinement No. 18 (MPR-18) from the California Public Utilities Commission (CPUC) for the South Orange County Reliability Enhancement Project (SOCRE or Project). Approval of MPR-18 will authorize the use of a work area contiguous with the previously approved work area for location 18A. The proposed work area is located south of Avenida Pico on Marine Corps Base Camp Pendleton (MCBCP) withing SDG&E right-of-way. The proposed work area would be used to facilitate the extension of a brow ditch in order to divert surface runoff and preserve the integrity of the permanent pad. The requested additional work area will be approximately 410 square feet, or 0.009 acre. Please refer to **Attachment B, MPR-18 Figure** and **Attachment C, MPR-18 Site Photographs** to view the MPR-18 work area.

Attachment A: SOCRE Minor Project Refinement Form

Attachment B: MPR-18 Figure

Attachment C: MPR-18 Site Photographs

Preconstruction Requirements and Permit/Approvals

The activities described above will not change the conditions set forth in the CPUC's Notice to Proceed No. 7 (NTP-7) approval letter dated February 4, 2021, nor will it change the type of equipment, number of construction personnel, or the status of any Mitigation Monitoring Compliance and Reporting Plan pre-construction requirements described in NTP-7. No permits are required for activities that will be performed within the MPR-18 work area.

MPR-18 Request for Approval

SDG&E respectfully requests approval of MPR-18 to utilize a new work area to facilitate a brow ditch extension, by May 2, 2023. The new work area will be used in accordance with conditions

outlined in the CPUC's NTP-7 approval letter. Should you have any questions or need additional information, please do not hesitate to contact me at (858) 654-8211 or by email at rquasarano@sdge.com.

Sincerely,

Richard Quasarano

SOCRE Environmental Project Manager

cc: Kevin Kimball, WSP Fernando Guzman, WSP Omar Miranda, SDG&E

ATTACHMENT A MPR-18 Form



South Orange County Reliability Enhancement Project CPUC Minor Project Refinement Form

Minor project refinements are strictly limited to changes that will not trigger an additional permit requirement, do not substantially increase the severity of a previously identified significant impact based on criteria used in the FEIR, create a new significant impact, are located within the geographic boundary of the study area of the FEIR, and that don't conflict with any mitigation measure or applicable law or policy.

Date Requested: April 24, 2023			Report No.: 18			
Date Approved: TBD			Approval Agency: California Public Utilities Commission (CPUC).			
Property Owner(s): The Minor Project Refinement No. 18 (MPR-18) work area is located within the SDG&E right-of-way (ROW) on Marine Corps Base Camp Pendleton (MCBCP) property.			Location/Milepost: The MPR-18 work area is located south of Avenida Pico and west of the Talega Substation in San Diego County.			
•	t ive Cover : The 410 rk area is entirely w		Sensitive Resources: The MPR-18 work area is located in an area with high paleontological potential. See resource discussions below.			
Modification From:	☐ Permit ☐ Mitigation Measure	☐ Plan/Pro	cedure Specification Drawing			

San Diego Gas and Electric (SDG&E) is requesting approval of MPR-18 for an additional work area for the South Orange County Reliability Enhancement Project (SOCRE or Project). The new work area is contiguous with the location 18A work area (previously approved in Notice to Proceed No. 7 (NTP-7)) as shown in **Attachment B, MPR-18 Figure**. The proposed MPR-18 work area will total approximately 410 square feet (0.009 acre), of which 55 sq. ft (0.001 acre) are permanent impacts for a brow ditch extension, and 355 sq. ft. (0.008 acre) are temporary impacts for the additional workspace required to construct the brow ditch.

The MPR-18 work area addition will be utilized to extend the original brow ditch design at location 18A as a form of erosion control. Excavation will take place within the 55 sq. ft. permanent impact

area to construct the brow ditch at location 18A. This 15-foot area will be excavated using hand tools or a mini excavator to a width of two feet and a depth of two feet, and then backfilled with base to form a V-ditch. The 355 sq. ft. temporary impact area will be used as additional workspace required to perform the brow ditch expansion. Trimming (mowing) will be required for disturbed vegetation within the MPR-18 work area. **Attachment B, MPR-18 Figure** shows the location of the MPR-18 work area.

Following the use of the MPR-18 work area, the site will be restored and revegetated in compliance with APM AES-2, MM AES-2, the Stormwater Pollution Prevention Plan (SWPPP), and the Project's Mitigation Plan.

Describe how project refinement deviates from current project. Include photos.

<u>Original Condition</u>: The MPR-18 work area was not included in the approved Project. However, the MPR-18 work area is located within the geographic study area of the Final Environmental Impact Report (FEIR), and therefore has been previously analyzed.

<u>Justification for Change</u>: Following constructability review in the field, the construction contractor identified the need for the proposed brow ditch extension and associated MPR-18 work area as a form of erosion control for the retaining wall being constructed at location 18A. The brow ditch extension is necessary to adequately capture stormwater coming in from the southwest to drain the runoff away from the backside of the soldier beam wall. Addressing the impact of the runoff to the soldier beam wall by extending the brow ditch 15 feet west will preserve the integrity of the newly constructed pad within location 18A during Project use as well as operation and maintenance.

Maps & Figures: Refer to Attachment B, MPR-18 Figure, for a map of the proposed MPR-18 work area location. Refer to Attachment C, MPR-18 Site Photographs, for pictures of the current conditions within the MPR-18 work area.

<u>Environmental Impact</u>: Utilization of the MPR-18 work area would not change the nature or increase the severity of any impacts disclosed within the FEIR; would not result in alteration to Applicant Proposed Measures (APMs) or existing Mitigation Measures (MMs); would not require new mitigation measures; and would not require new permits or new regulatory approval. The MPR-18 work area is approximately 410 square feet combined (0.009 acre) and is located within disturbed habitat. Specific discussions for each resource area are provided below.

The proposed work area is contiguous to a previously approved Project component, location 18A, which was approved in NTP-7 and the Amended REIR document. Two temporary work areas included in NTP-7 and the REIR (located south of the location 18A work area) will no longer be used by the Project (see **Attachment B, MPR-18 Figure**). As such, the overall temporary impact was reduced in this area as final engineering eliminated the need for those temporary poles and associated work areas (see Disturbance Acreage Changes Section below for detail).

Vegetation removal will take place within the MPR-18 work area as necessary. The primary species that will be removed within the disturbed habitat are black mustard (*Brassica nigra*), Sahara mustard (*Brassica tournefortii*), and Italian rye grass (*Lolium multiflorum*). The overall temporary impact for the NTP-7 work areas on MCBCP is much less than what was proposed in the REIR document, and the extension of the brow ditch is a minor alteration in order to improve the design of the permanent pad and reduce erosion. REIR Approval Condition No. 1b states, "The NEPA PM [MCBCP] shall be notified of any significant changes to design, footprint, or Project scope. Certain changes will require additional NEPA [MCBCP] review." The minor extension of the brow ditch and addition of the MPR-

18 work area would not involve any new activities outside of the approved amended REIR scope or rise to the level of a significant change. All MPR-18 activities would take place in compliance with the amended REIR approval conditions.

<u>Concurrence (if appropriate)</u>: Concurrence is not required as the proposed work area for MPR-18 is located immediately adjacent to the previously approved location 18A work area. The MPR-18 requested work area is within the geographic study area analyzed in the California Environmental Quality Act (CEQA) review process.

Resources:

Biological	\boxtimes	No Resources		Resources		N/A, Change would
		Present		Present		not affect resources
	_					
Previous Biological S						
Biological resources a						
part of SDG&E's applie						
and Proponent's Envir						
within the CPUC-cond						
larger surrounding are J of the FEIR, the area						
is considered to be d						
disturbed area is dor						
tournefortii), and Italiar						
brome (<i>Bromus diandi</i>	-	•		,	•	. , , ,
polymorpha). An isola						
along with one native (
of the proposed MPR	-18 v	vork area. Low-c	luality	CSS exists no	orth of the	e MPR-18 work area,
however, the propose			itself	is not functioni	ing as lo	w-quality CSS, and is
considered to be distu	rbed	habitat.				
This 55 sq. ft. perman grass that will be rem temporary portion of the contains the one native Project's Mitigation Mc California sagebrush selection of the contains the one native Project's Mitigation Mc California sagebrush selection of the contains	oved he M ve Ca onitor shrub ction	for the excavati PR-18 work area alifornia sagebru ing, Compliance will be avoided nesting bird su will be performed	on. Va aroush sh sh sh and if pradirvey discoult	egetation trimm ind the brow di rub. In accorda Reporting Prog cticable. Addition consistent wit	ning will litch. This ance with tram (MM onally, in h the P	likely occur within the temporary work area MM BR-4 within the ICRP), removal of the compliance with MM roject's Nesting Bird n species occur.
Cultural		No Resources	\boxtimes	Resources		N/A, changes would
		Present		Present		not affect resources
D		D (D - f				
Previous Cultural Su Cultural and paleonto	•	_		Droject's stud	ly aroa (i	including the MDD 19
work area) were studie						
for the Project and P						
CEQA review process						
Environmentally Sens						
Therefore, no cultural					• •	

The MPR-18 work area is located within an area with high paleontological potential. Ground disturbance is anticipated within the 55 sq. ft. permanent impact area in the form of excavation. Therefore, in accordance with APM CUL-8 within the MMCRP and requirements in the Paleontological Monitoring and Treatment Plan (PMTP), paleontological monitoring will take place during ground disturbance.

Disturbance Acreage Changes:	\boxtimes	Yes	☐ No
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The proposed MPR-18 work area totals 410 sq. ft. (0.009 acre), of which 55 sq. ft. (0.001 acre) is permanent disturbance for the brow ditch extension and 355 sq. ft. (0.008 acre) is temporary disturbance.

It should be noted, two temporary work areas included in NTP-7 and the REIR located south of the location 18A work area will no longer be used by the Project. These work areas total 5,800 sq. ft. (0.133 acre). As such, the total temporary disturbance in the area of 18A would still result in an overall reduction of 5,445 sq. ft. (0.125 acre) with the addition of the MPR-18 area.

In NTP-7, the permanent disturbance associated with the approved location 18A work area was approximately 5,182 sq. ft. (0.118 acre). The additional 55 sq. ft. (0.001 acre) of permanent disturbance proposed in MPR-18 would result in a total of 5,237 sq. ft. (0.120) acre of permanent disturbance for location 18A.

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
Geology, Soils, and Seismicity	N N	MPR-18 activities do not involve the installation of any new facilities nor performance of any new activities. Utilization of the MPR-18 work area would not create any new geological related hazard not previously disclosed in the Project's FEIR, Section 4.6. Approximately 55 sq. ft. of permanent impacts from brow ditch excavation is required to safely divert surface runoff away from the soldier beam wall at location 18A and prevent erosion of the newly constructed pad. The NPDES Construction General Permit for the Project has required the development and implementation of a SWPPP. The BMPs and measures identified in the Project SWPPP would be employed during all land-disturbing activities. As such, activities proposed within the MPR-18 work area would not result in a new significant impact or a substantial increase in the severity of any previously identified significant impacts to geology, soils, or seismicity.
Agency Consultation?	☐ Y ☑ N	The proposed work area would not require agency consultation relating for geology, soils, or seismicity.

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
Hazardous Materials and Waste	☐ Y	MPR-18 does not involve the installation of any new facilities nor performance of any new activities. Accordingly, utilization of the new work area would not require any new potentially hazardous materials to be used, would not create any new hazardous waste, would not expose any sensitive receptors
	⊠N	not previously identified, and would not create any new hazard not previously disclosed in the Project's FEIR, Section 4.8. The measures identified within the Project MMCRP would be employed during all MPR-18 construction activities.
Agency Consultation?	☐ Y	The proposed work area would not require agency consultation relating to hazards or hazardous materials.
Hydrology	⊠ N ⊠ Y	The MPR-18 work area location is contiguous with location 18A, which is within 200 feet of an aquatic jurisdictional resource. As such, a 50-foot exclusionary buffer has been established around the jurisdictional feature and will be
	□ N	maintained during all construction activities in compliance with MM BR-1. The proposed extension of the brow ditch at location 18A is necessary to adequately capture and convey stormwater runoff coming in from the west away from the soldier beam wall at location 18A. The NPDES Construction General Permit issued for the Project has required the development of a Project SWPPP, containing measures to reduce or eliminate pollutants in storm water discharges from the site during construction that may otherwise violate water quality standards. All Project activities would be performed in accordance with the SWPPP as well as applicable measures from the MMCRP. As a result of the utilization of the brow ditch extension as a form of erosion control, the proposed MPR-18 activities would improve the overall drainage of the site by redirecting surface runoff in compliance with the current NPDES permit requirements addressed in the Project's FEIR, Section 4.9.
Agency Consultation?	□ Y⊠ N	The proposed work area would not require agency consultation relating to hydrology or water quality.
Cultural Resources	⊠ Y	No new significant impacts or a substantial increase in the severity of any previously identified significant impacts to cultural resources are anticipated to occur as a result of the MPR-18 work activities. Review of the Project's previous cultural resources survey reports (prepared for the PEA) determined that there were no cultural ESAs within 100 feet of the MPR-18 work area. Therefore, cultural monitoring will not
	□N	be required for MPR-18 work activities. Impacts would be similar to those disclosed within the Project's FEIR, Section

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
		4.5. Although no new or altered APMs or MMs would be required, the following APMs and MMs would be implemented for MPR-18 work activities:
		 APM CUL-1: Worker Training for Cultural Resources. APM CUL-8: Paleontological Monitoring. APM CUL-9: Discovery of Fossils. MM CUL-1: Supplemental Worker Training for Cultural Resources.
		No new significant impacts or a substantial increase in the severity of any previously identified impacts to paleontological resources are anticipated to occur as a result of the proposed new work area. The MPR-18 work area is located in an area with high paleontological potential that requires monitoring for ground disturbing activities per the PMTP. Excavation will take place within the permanent portion MPR-18 work area, therefore paleontological monitoring will be required for land disturbing activities. No impacts to paleontological resources are anticipated beyond what was disclosed within the Project's FEIR, Section 4.5.
Agency Consultation?	□ Y☑ N	Use of the proposed work area would not require agency or tribal consultation in relation to cultural or paleontological resources.
Traffic and Circulation	_ Y	The access road adjacent to the proposed MPR-18 work area is already utilized for utility ROW access. There would be no additional construction crews or change in equipment utilized for MPR-18 that would not already be accounted for in NTP-7. There are no traffic control permits required for the use of the MPR-18 work area, nor are they located adjacent to any public roads. Accordingly, traffic and circulation impacts resulting from the use of the MPR-18 work area would be similar to those disclosed in the FEIR, Section 4.15. No new or altered APMs or MMs would be required, and the following APM would be implemented for MPR-18 work activities:
	⊠ N	APM TR-4: Off Peak Deliveries
		Additionally, any anticipated access road closures or partial closures will be communicated to the public in advance. Signage is currently placed at worksite entrances notifying the public of possible access restrictions. As always, a spotter and qualified safety personnel will be present to manage any ingress or egress of pedestrians through the access road as needed.

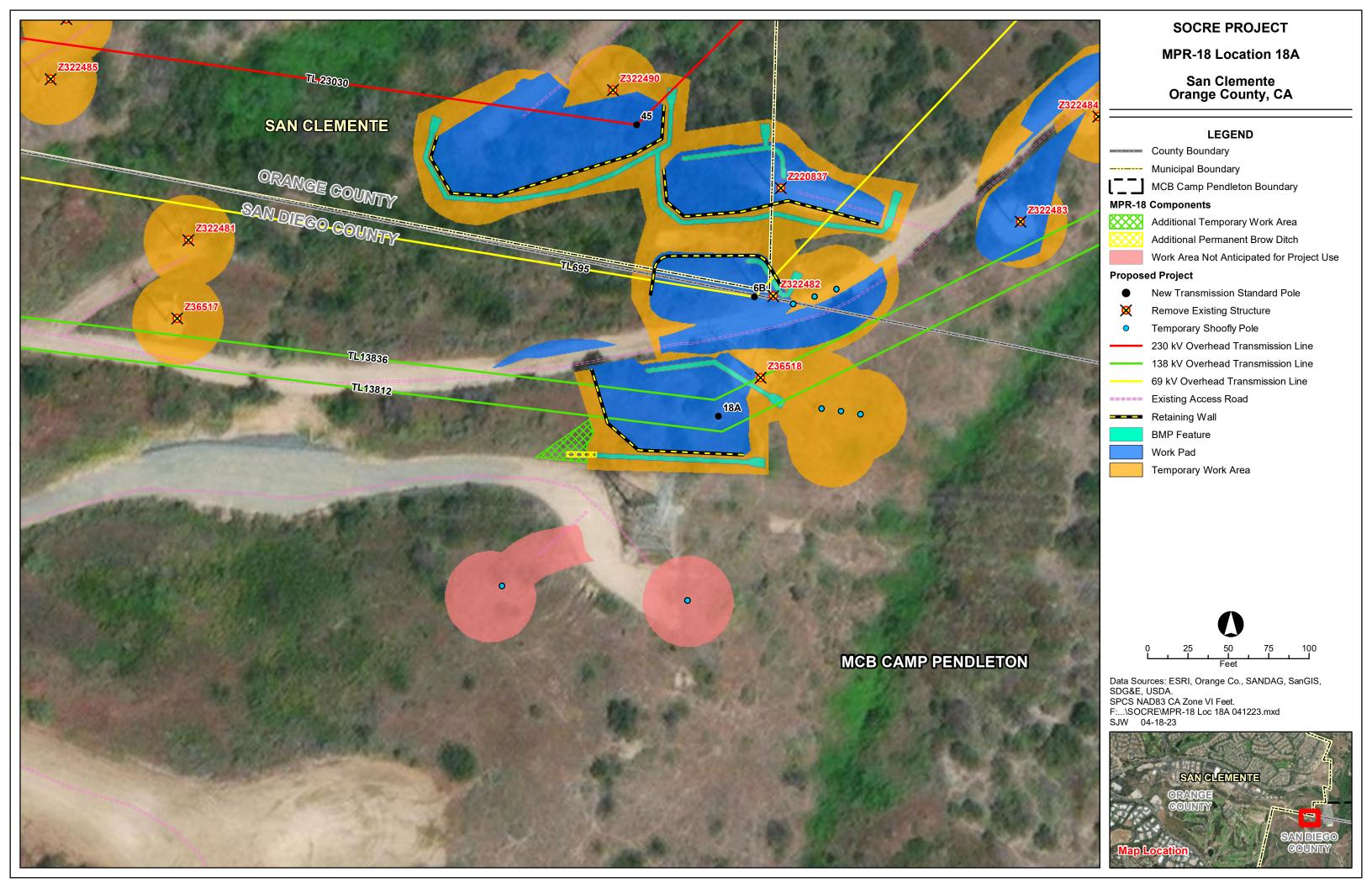
CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.			
Agency Consultation?	□ Y ⊠ N	The proposed work area would not require agency consultation relating to traffic and circulation.			
Air Quality	□ Y	The use of the MPR-18 work area would not result in new significant impacts or a substantial increase in the severity of			
	⊠N	impacts as analyzed and disclosed within the Project's FEIR, Section 4.3, as there are no new activities or equipment proposed as part of this MPR-18 request.			
Agency Consultation?	 Y N	The proposed work area would not require agency consultation relating to air quality.			
Noise and Vibration	☐ Y	The MPR-18 work area is not in proximity to any sensitive receptors. In addition, MPR-18 does not involve the installation of any new facilities, the performance of any new activities nor			
	⊠ N	the use of any new equipment. Therefore, utilization of the MPR-18 work area would not result in new significant impacts or a substantial increase in severity of any previously identified impacts to noise and vibration that were already analyzed in the Project's FEIR, Section 4.11.			
Agency Consultation?	□ Y⊠ N	The proposed work area would not require agency consultation relating to noise and vibration.			
Aesthetics/ Visual Resources	□ Y⊠ N	No change in impacts to aesthetics/visual resources would result from utilization of the MPR-18 work area. The proposed work area is located directly adjacent to an existing utility access road that does not contain any aesthetic resources. The temporary workspace area would be revegetated in accordance with the SWPPP and APM AES-2 following construction. The work area also cannot be readily viewed from any public viewpoints. Therefore, use of the MPR-18 work area would not result in a substantial increase in severity or a new significant impact from those analyzed and disclosed within the Project's FEIR, Section 4.1. No new or altered APMs or MMs			
		would be required, and the following APM would be implemented for MPR-18 work activities: • APM AES-1: Clean Work Areas • APM AES-2: Restoring Disturbed Areas • MM AES-2: Minimize Clearing and Ground Disturbance and Restore Disturbed Area to Pre-Project Conditions			

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.		
Agency Consultation?	☐ Y☑ N	The proposed work area would not require agency consultation relating visual resources.		
Vegetation and Wildlife		The use of the MPR-18 work area would not result in any new significant impacts or a substantial increase in severity of any previously identified impacts to biological resources. The proposed work area occurs within disturbed habitat dominated by black mustard (<i>Brassica nigra</i>), Sahara mustard (<i>Brassica tournefortii</i>), and Italian rye grass (<i>Lolium multiflorum</i>) with an understory of great brome (<i>Bromus diandrus</i>), red stemmed filaree (<i>Erodium cicutarium</i>) and bur clover (<i>Medicago polymorpha</i>).		
		Vegetation trimming will take place as needed within the work area. The vegetation within the work area has a high concentration of non-native, invasive species and does not contain any sensitive species. One California sagebrush shrub with an isolated cluster of minor's lettuce was observed on the eastern perimeter of the MPR-18 work area. This shrub will be avoided during vegetation trimming within the temporary workspace if practicable in accordance with MM BR-4.		
		Pre-construction nesting bird surveys will be conducted by an Avian Biologist no more than 7 days prior to vegetation trimming activities in the MPR-18 work area during the nesting season (January 1 — September 15) per the NBMP. Additionally, in compliance with MM BR-3, daily pre-construction clearance sweeps for sensitive species will be conducted within the suitable habitat in the vicinity of location 18A. Biological monitoring is not required within disturbed habitat, however biological spot checks will occur as needed.		
		Although no direct impacts to sensitive biological resources are anticipated as a result of the use of the MPR-18 work area, any indirect impacts that may occur to sensitive species in the vicinity of the work area will be mitigated in accordance with the MMs listed below:		
		 MM BR-1: Limit Construction to Designated Area and Protect Riparian, Aquatic and Wetland Area. MM BR-2: Biological Monitoring. MM BR-3: Preconstruction Surveys. MM BR-4: Limit Removal of Native Vegetation Communities and Trees. MM BR-6: Migratory Birds and Raptors Impact Reduction Measures. 		

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
		 MM BR-8: Western Burrowing Owl Impacts Reduction Measures MM BR-9: Invasive Plant Control Measures.
Agency Consultation?	⊠ Y □ N	Use of the proposed work area would not require agency consultation relating to vegetation and wildlife. However, if there are any special-status species identified within the proposed work area (or anywhere on MCBCP), SDG&E will notify MCBCP in accordance with requirements in the REIR.
Wildfire	N N N	The area in which the MPR-18 staging area is located is within a CPUC Tier 2 High Fire Threat District (HFTD). SDG&E and its contractors will conduct all activities in accordance with the Project's Construction Fire Prevention and Emergency Response Plan (CFPERP) requirements including but not limited to; • Requirements for equipping diesel and gasoline operated engines with spark arrestors, carrying emergency fire suppression equipment, • Carrying emergency fire suppression equipment, • Furnishing a water truck on or immediately adjacent to the proposed project work area, • Restricting smoking and vehicle idling, • Construction restrictions during elevated Red Flag Warning periods (as applicable) and elevated and extreme conditions; and • Conducting pre-activity tailgate meetings that include fire safety discussions. All MPR-18 activities would be performed in compliance with the CFPERP and SDG&E's Electric Standard Practice 113.3. Therefore, the proposed MPR-18 work area would not result in any new significant impacts or a substantial increase in severity of any previously identified impacts related to fires and wildfires that were analyzed in the FEIR, Section 4.8.
Agency Consultation?	⊠ Y □ N	SDG&E will coordinate with local emergency response agencies such as fire departments (including MCBCP fire departments) and police during NTP-7 construction, including the use of the MPR-18 work area. Emergency access will be maintained throughout construction.

Approvals	Date	Name (print)	Sign	ature				
San Diego Gas and Electric Project Manager		Omar Miranda			Reviewed			
San Diego Gas and Electric Environmental Project Manager		Richard Quasarano			Reviewed			
CPUC Project Manager		Louis Torres			Approved Approved with conditions (see below) Denied			
For CPUC Compliance Manager Use Only								
☐ Refinement Approved ☐ Refinement Denied ☐ Beyond Authority								
Conditions of Approval or Reason for Denial:								
Prepared by: Fernando Guzman, WSP, CPUC Compliance Manager Date:								

ATTACHMENT B MPR-18 Figure



ATTACHMENT C MPR-18 Site Photographs

SOCRE South Orange County Reliability Enhancement

MPR-18 PHOTO LOG



Photograph 1:

View of the staked MPR-18 work area. The proposed work area is west of and contiguous with the approved work area for location 18A, which has been previously approved under NTP-7. MPR-18 proposes the extension of the brow ditch design 15 feet to the west (yellow polygon), and a temporary workspace around the planned brow ditch extension (green polygon).

Facing: Northwest.



Photograph 2:

Dominant vegetation within the proposed work area consists of black mustard (Brassica nigra), Sahara mustard (Brassica tournefortii), and rye grass (Lolium multiflorum) with an understory of great brome (Bromus diandrus), red stemmed filaree (Erodium cicutarium), and bur clover (Medicago polymorpha). Facing: Southwest.



Photograph 3:

One native California sagebrush (Artemisia californica) shrub was observed on the eastern perimeter of the proposed MPR-18 work area (red circle) with an isolated cluster of miner's lettuce (Claytonia perfoliata). Low-quality coastal sage scrub (CSS) exists to the north of the proposed work area. Due to the native composition within the proposed area being under 5%, the work area is considered to be disturbed. Vegetation trimming will take place as needed for the temporary work area. Facing: West.



Photograph 4:

View of the proposed MPR-18 work area. Facing: East.