

Richard Quasarano SOCRE Environmental Project Manager San Diego Gas & Electric Company (T) 858-654-8211

May 29, 2020

Andrew Barnsdale Project Manager California Public Utilities Commission 505 Van Ness Avenue San Francisco, CA 94102

Re: Addendum No. 2 to the South Orange County Reliability Enhancement Project Minor Project Refinement No. 1.

Mr. Barnsdale:

On June 19, 2018 the California Public Utilities Commission (CPUC) approved San Diego Gas & Electric Company's (SDG&E) Minor Project Refinement No. 1 (MPR-1) for the South Orange County Reliability Enhancement Project (SOCRE or Project). MPR-1 authorized the use of a new temporary work area along the southern border of the future San Juan Capistrano Substation (Substation) to facilitate the construction of the Project's screening wall and security fence that was approved by the CPUC as part of the original Project. MPR-1 Addendum No. 1 authorized a new temporary driveway and security gate within the MPR-1 work area. SDG&E is hereby requesting approval of MPR-1 Addendum No. 2 to allow vegetation removal along the eastern side of the Substation within the MPR-1 work area. Please refer to Attachment A: MPR-1 Addendum No. 2 Figure and Attachment B: MPR-1 Addendum No. 2 Site Photographs for a map and pictures of the proposed location of vegetation removal.

Attachment A: MPR-1 Addendum No. 2 Figure Attachment B: MPR-1 Addendum No. 2 Site Photographs Attachment C: MPR-1 Addendum No. 2 Form (Revised May 29, 2020)

Proposed Modification to SOCRE MPR-1

As mentioned above, MPR-1 authorized SDG&E to use a 18,300 square-foot temporary work area along the southern border of the Substation for backcutting and construction access associated with the installation of the screen wall and permanent construction fence. In addition, approval was granted in MPR-1 Addendum No. 1 to add a temporary driveway and security gate to provide access to the upper yard of the Substation during construction. SDG&E is submitting MPR-1 Addendum No. 2 to allow vegetation removal along the eastern side of the Substation within the MPR-1 work area. Vegetation removal is anticipated to be required in order to facilitate the replacement of the security fence along the east side of the Substation approved in Notice to

Proceed No. 3 (NTP-3). Vegetation trimming may also occur prior to the fence replacement for security reasons to allow visibility to the outside of the existing fence.

Replacement of the existing security fence along the east side of the Substation with a new 10-foot chain-link security fence would take place during Phase 2 of construction (estimated to begin in 2021) and would take approximately 3 weeks. However, as previously stated, vegetation removal may take place prior to the fence replacement for security purposes. At the completion of construction, and consistent with MPR-1, the temporary work area would be restored to pre-Project conditions or pursuant to agreements with the landowner.

Preconstruction Requirements and Permit/Approvals

The activities described above would require alteration to MPR-1 Condition of Approval (COA)-3 and COA-4 to allow vegetation removal in the requested area. MPR-1 Addendum No. 2 would not require any other conditions set forth in the CPUC's MPR-1 approval letter dated June 19, 2018 to change, nor would it change the type of equipment, number of construction personnel, or the status of any Mitigation, Monitoring, Compliance and Reporting Program pre-construction requirements. No additional permits would be required for this work. SDG&E has an existing right-of-entry agreement with the landowner for the approved MPR-1 work activities and no additional agreements will be necessary for the vegetation removal activities described herein.

MPR-1 Addendum No. 2 Request for Approval

SDG&E respectfully requests approval of MPR-1 Addendum No. 2 to allow vegetation on the east side of the Substation to facilitate security fence replacement by June 12, 2020. 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: Joe Donaldson, Ecology and Environment, Inc. Jennifer Kaminsky, SDG&E Kenda Pollio, KP Environmental

ATTACHMENT A MPR-1 Addendum No. 2 Figure





ATTACHMENT B MPR-1 Addendum No. 2 Site Photographs

View of existing fence on east side of the Substation and vegetation. Vegetation will be removed as necessary upon approval of MPR-1 Addendum No. 2. Direction: SW -----****** X - 20 1111 X. Keep C

View of existing fence on east side of the Substation and vegetation. Vegetation will be removed as necessary upon approval of MPR-1 Addendum No. 2. Direction: N

COMMON

Miniar

View of existing fence on east side of the Substation from within the Substation. Vegetation outside of the existing security fence will be removed as necessary upon approval of MPR-1 Addendum No. 2. Direction: E

ATTACHMENT C MPR-1 Form (Revised)



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: June 8, 2018 (Revision 1: April 10, 2019, Revision 2: May 29, 2020)	Report No.: 1
Date Approved: TBD	Approval Agency: California Public Utilities Commission (CPUC). A City of San Juan Capistrano Encroachment Permit will be required for MPR-1 work activities (ministerial permit).
Property Owner(s): The new temporary workspace encroaches onto the property of two Homeowner's Associations (HOA).	Location/Milepost: The Minor Project Refinement No. 1 (MPR-1) temporary workspace area is located adjacent to the southern and eastern borders of the San Juan Capistrano Substation, in the City of San Juan Capistrano.
Land Use/Vegetative Cover: The MPR-1 area is adjacent to San Juan Capistrano Substation and is part of a residential area. The 18,300-square foot area (0.42- acre) consists of a mixture of disturbed/developed (3,500 square feet) and landscape/ornamental (14,800 square feet) habitat. Please note that property owners will be removing a few shrubs and trees from the MPR-1 area prior to SDG&E's use.	Sensitive Resources: There are no sensitive resources included in the MPR-1 temporary workspace area. See resource discussions below.
Modification Permit Plan/Prod	cedure Specification Drawing

San Diego Gas and Electric (SDG&E) is requesting approval of MPR-1 for a new temporary workspace area required to facilitate construction of the South Orange County Reliability Enhancement Project's (SOCRE or Project) screen wall located on the southern border of the future San Juan Capistrano Substation property, as well as for installation of the chain-link security fence located on the eastern border. The MPR-1 area extends from Camino Capistrano at the western extent to the northeast corner of the Substation at its eastern extent, near Calle Santa Rosalia. The

 \boxtimes Other:

Mitigation

Measure

total length of the area is approximately 1,100 feet, and the total area is approximately 18,300 square feet (0.42 acre).

The Substation's screen wall (also designed to act as a partial retaining wall) will be installed with a 5-foot offset from the existing Substation's southern property line and will require backcuts to install the wall foundations and allow equipment, vehicle and worker access during construction. There are two types of screen wall designs along the southern border, Type 1 and Type 2. The Type 1 will act as a screen wall and Type 2 will act as a partial retaining and screen wall. The walls will require a backcut of approximately 5 to 20 feet (at a depth of 8 to 15 feet) onto the adjacent property depending on soil conditions and the type of wall.

To facilitate this work, as well as for the installation of the chain-link security fence on the eastern property line, SDG&E is requesting temporary workspace for construction access. Vegetation removal will take place in the area designated for backcutting, and may be required within the area designated as temporary work area / vegetation removal shown in yellow in Figure 1. Vegetation or removal is anticipated to be necessary in the area designated as temporary work area / vegetation removal in order to facilitate the replacement of the security fence along the east side of the Substation described in Notice to Proceed No. 3 (NTP-3). Vegetation removal may also occur prior to the fence replacement for security reasons to allow visibility to the outside of the existing fence.

In addition, SDG&E will add a temporary driveway and security gate to provide access to the upper yard of the Substation during construction. Access to the upper yard of the Substation via the new driveway and gate will be for the use of SDG&E operations and maintenance personnel, so they can continue to safely maintain and operate the 138-kV equipment in the upper yard without needing to drive through the active construction currently occurring in the lower yard. In addition, SDG&E may utilize the temporary entrance occasionally during Phase 2 construction in the upper yard for the delivery of equipment and for an additional access point for construction personnel. Prior to using the temporary entrance during Phase 2 construction for equipment delivery and construction access, SDG&E will provide a description of the type and duration of the use for CPUC's review and approval. The use will also be consistent with the City of San Juan Capistrano's encroachment permit requirements.

Following the use of the temporary workspace, the area will be regraded and revegetated to pre-Project conditions by SDG&E or in coordination with the property owner. Work within the MPR-1 area is scheduled to begin approximately two weeks after SDG&E secures the necessary permits from the city. Construction of the screen wall and fence will occur in two phases, as construction of these components is dependent on the construction sequencing of the full build out of the Substation's 138 and 230 kV yard configurations. As such, construction of the screen wall and fence will occur intermittently over the 5 years of the Project. SDG&E operations and maintenance personnel will use the temporary access driveway through approximately May 2021, while Phase 1 construction activities in the 138/12 kV yard are occurring at the site. Occasional Phase 2 construction access will continue until the completion of the work in the upper yard anticipated year end of 2022. At the completion of construction, the temporary access driveway and gate will be removed and the temporary work area will be restored to pre-Project conditions or pursuant to agreements with the landowner. See Figure 1 which shows the sections of the wall and security fence that will be constructed during Phase 1 and Phase 2 of the Substation build out.

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

<u>Original Condition</u>: Final design of the screen wall and chain-link security fence was not complete at the time the SOCRE Final Environmental Impact Report (FEIR) was finalized and it was originally anticipated that the screen wall and chain-link security fence could be constructed from within the Substation property boundary. The construction methodology for maintaining the access road to the upper yard of the existing Substation through the Phase 1 construction area (and the resulting delays) was also not fully vetted from a constructability perspective. In addition, because of safety concerns, it is SDG&E's preference to not have operation and maintenance personnel continually drive through an active construction area.

<u>Justification for Change</u>: Following final design and constructability review in the field, the construction contractor identified the need to gain access on to the adjacent properties in order to facilitate the construction of the screen wall located on the southern border and the chain-link security fence located on the southern and eastern borders of the Substation. The wall requires backcuts to install the foundations and access is needed on the outside perimeter for equipment, vehicles and workers. Installation of the chain-link security fence will require construction access and vegetation trimming / removal. As such, additional temporary workspace is needed for construction of the southern screen wall and installation of the chain-link security fence.

Also identified during the constructability review was the need to add a temporary driveway and chain-link gate that would provide access to the upper yard for maintenance and operation personnel, as well as for occasional access during Phase 2 construction. Creation of the temporary access would allow SDG&E maintenance and operations personnel to safely bypass the active Phase 1 construction in the lower yard and would increase construction flexibility because the access road to the upper yard (through the Substation) would not have to be kept open continuously.

<u>Maps & Figures</u>: Refer to Figure 1 in **Attachment B, Figure**, for a map of the MPR-1 proposed temporary workspace area and location of the temporary driveway. Refer to **Attachment C, MPR-1 Site Photographs**, for pictures of the current conditions within the MPR-1 temporary workspace area.

<u>Environmental Impact</u>: Utilization of the additional temporary workspace area for construction of the San Juan Capistrano screen wall and chain-link security fence, as well as for installation of the new driveway and gate, 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 discretionary permits, new regulatory approval, or other new regulatory consultation. A ministerial encroachment permit from the City of San Juan Capistrano would be required for the new access off of Calle Bonita. Utilization of the temporary workspace immediately adjacent to the San Juan Capistrano Substation is anticipated to incrementally increase the total temporary impact area for the Project by approximately 0.42 acre of disturbed/developed and landscaped/ornamental habitat that contains no sensitive resources. The temporary workspace would be regraded and revegetated (as needed and in coordination with the property owner) to pre-Project conditions after the screening wall is installed. Specific discussions for each resource area are provided below.

<u>Concurrence (if appropriate)</u>: Concurrence is not required as the new proposed temporary workspace area for the San Juan Capistrano Substation is located immediately adjacent to the

original Substation location, and the temporary workspace area is within the geographic study area analyzed in the California Environmental Quality Act (CEQA) review process.

Resources:	
Biological	No Resources Resources Present N/A, Change would not Present affect resources
Biological resources wi reviewed, and docume SOCRE Project and Pr within the CPUC-cond resources are present condition of the MPR-1	urvey Report Reference: thin the San Juan Capistrano Substation and along the Project alignment were studied, nted as part of SDG&E's application for a Certificate of Public Necessity (CPCN) for the oponent's Environmental Assessment (PEA). Biological Resources were also discussed ucted CEQA review process. As per Section 4.4 of the FEIR, no sensitive biological within the MPR-1 study area. In January 2018, a Project biologist verified that the current area was consistent with the results provided in previous biological studies. Please refer rces Assessment that was included in the PEA for additional details regarding the MPR-1
Cultural	No Resources Resources Present Present
	N/A, changes would not affect resources
Cultural and paleontol alignment were studied	vey Report Reference: ogical resources within the San Juan Capistrano Substation and along the Project I, reviewed, and documented as part of SDG&E's application for a CPCN for the Project irrces were also discussed within the CPUC-conducted CEQA review process (see the 4.5).
Disturbance Acreage	Changes: 🛛 Yes 🗌 No
Original disturbance ac	reage: None (MPR-1 temporary workspace area was not included in the Project's FEIR).
New disturbance acrea	ge: 0.42 acre of temporary impact area

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,	Π Υ	MPR-1 does not involve the installation of any new facilities or performance of
and Seismicity	N	any new activities. Accordingly, utilization of the new temporary workspace area would not increase the severity of any previously identified impacts to geology, soils, and seismicity, and would not create any new geological related hazard not previously disclosed in the Project's FEIR, Section 4.6.
Agency Consultation?	Π Υ	The proposed temporary workspace area would not require agency consultation relating to geology, soils, or seismicity.
Consulation	N	relating to geology, solis, or seismony.
	Π Υ	

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	N	MPR-1 does not involve the installation of any new facilities or performance of any new activities. Accordingly, utilization of the new temporary workspace 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 not previously identified, and would not create any new hazard not previously disclosed in the Project's FEIR, Section 4.8.	
Agency Consultation?	□ Y ⊠ N	The proposed temporary workspace area would not require agency consultation relating to hazards or hazardous materials.	
Hydrology	☐ Y ⊠ N	Utilization of the new temporary workspace area would not result in new significant impacts or a substantial increase in severity of any previously identified impacts to hydrology and water quality that would be different from the impacts assessed in the Project's FEIR, Section 4.9. The temporary driveway would have applicable stormwater Best Management Practices installed (e.g., rumble strip, etc.) per the Project's Stormwater Pollution Prevention Plan (SWPPP). In addition, applicable APMs and MMs relating to hydrology and water quality that would be applied to the Substation property, would apply to the MPR-1 area, and would be implemented to mitigate for impacts related to hydrology and water quality.	
Agency Consultation?	□ Y ⊠ N	The new temporary workspace area would not require agency consultation relating to hydrology or water quality.	
Cultural Resources	×Υ	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 proposed new temporary workspace area. The new temporary workspace area is located near the boundary of an environmentally sensitive area. However, the area was previously surveyed for potential resources by an approved archaeological monitor and no surface resources were identified. Cultural resources and Native American monitors would be	
	N	 onsite for all ground-disturbing activities in compliance with Project requirements. Impacts would be similar to those disclosed within the Project's FEIR, Section 4.5. Although no new or altered APMs or MMs would be required, the following APMs and MMs would be implemented for MPR-1 work activities: APM CUL-1: Worker Training for Cultural Resources APM CUL-2: Cultural Resource Monitoring APM CUL-3: Avoid Known Cultural Resources APM CUL-4: Unanticipated Cultural Finds APM CUL-5: Curate Cultural Discoveries APM CUL-5: Archeological Monitoring Results Report APM CUL-7: Monitoring by Native Americans MM CUL-7: Supplemental Worker Training for Cultural Resources MM CUL-3: Qualified Cultural Resources Consultants MM CUL-3: Qualified Cultural Resources Consultants MM CUL-4: Native American Consultation and Participation Planning 	

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.	
		 anticipated to occur as a result of the proposed new temporary workspace area. Although the new temporary workspace area occurs within the vicinity of sensitive paleontological formations that may contain fossils, no impacts (or potential for impacts) to paleontological resources are anticipated beyond what was disclosed within the Project's FEIR, Section 4.5 and a paleontological monitor would be onsite for all ground disturbing activities in compliance with Project requirements. Although no new or altered APMs or MMs would be required, the following APMs and MMs would be implemented for MPR-1 work activities: APM CUL-8: Paleontological Monitoring APM CUL-9: Paleontological Monitoring MM CUL-6: Qualified Paleontological Consultants MM CUL-7: Paleontological Monitoring and Treatment Plan 	
Agency Consultation?	Υ	The area was previously surveyed for potential cultural and paleontological resources and existing APMs and MMs would adequately reduce the potential	
Consultation?	⊠ N	for impacts to cultural and paleontological resources consistent with the impacts disclosed within the Project's FEIR, Section 4.5. Therefore, no new agency or tribal consultation would be required.	

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.	
Traffic and Circulation	Y	Construction activities within the new temporary workspace area would not substantially affect traffic and circulation in a manner different from the impacts assessed as part of the Project's FEIR, Section 4.15. Work within the MPR-1 temporary workspace area would utilize construction crews and equipment that are already present on the Project area (e.g., San Juan Capistrano Substation). SDG&E operations and maintenance personnel would require an average of approximately one vehicle trip per day on Calle Bonita , so they can continue to maintain and operate the 138-kV equipment in the upper yard. In addition, the entrance may be used occasionally during Phase 2 construction for equipment delivery and as an additional access point for construction personnel. Utilization of the temporary entrance on a daily basis by operation and maintenance personnel would not be a significant change from the existing baseline traffic conditions. Furthermore, occasional use of the entrance during Phase 2 construction would not result in a significant increase in traffic or road closures and would require prior CPUC approval. No new or a significant increase to previously identified significant impacts would occur as a result of the MPR-1 activities. Although no new or altered APMs or MMs would be required, the following APMs and MMs would be implemented for MPR-1 work activities: APM TR-1: Avoid Traffic Near Schools APM TR-6: Traffic Control Plans MM TR-3: Emergency Access MM TR-4: City of San Juan Capistrano Traffic Engineer and Parks and Recreation Review MM TR-4: Content Requirements of the Traffic Control Plan	
	N N		
Agency Consultation?	Y	SDG&E would coordinate directly with the City in regard to traffic control plans and applicable ministerial encroachment and traffic control permits.	
Air Quality	□ Y ⊠ N	The use of the MPR-1 temporary workspace area would not result in new significant impacts or a substantial increase in the severity of impacts as analyzed and disclosed within the Project's FEIR, Section 4.3, as there are no new activities proposed as a part of this MPR-1 request.	
Agency Consultation?	□ Y ⊠ N	The new temporary workspace area would not require agency consultation relating to air quality.	

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.
Noise and Vibration	□ Y ⊠ N	Utilization of the new temporary workspace 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, as there are no new activities proposed as a part of this MPR-1 request.
Agency Consultation?	□ Y ⊠ N	The new temporary workspace area would not require agency consultation relating to noise and vibration.
Aesthetics/ Visual Resources	X Y	No permanent change in impacts to aesthetics/visual resources would result from utilization of the new temporary workspace as the temporary access gate would be installed along the existing chain-link security fence. The temporary driveway, gate and fence will be removed and the workspace area would be revegetated to pre-Project conditions (in coordination with the applicable
	□ N	property owner) upon completion of the screen wall and fence installation which is expected to be completed by the end of 2022. Vegetation and tree removal within the backcut area, temporary driveway, and the designated area along the east side of the Substation would result in temporary impacts to aesthetic resources. However, with revegetation and installation of the screen wall within the backcut area, temporary impacts associated with MPR-1 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. Vegetation trimming / removal would be limited to the extent practicable, to allow construction access and addresss safety concerns. The temporary impacts associated with MPR-1 workspace would also not require new or altered APMs or MMs. SDG&E would implement APM AES-2 (Restoring Disturbed Areas), which would ensure temporary impacts would remain less than significant.
Agency Consultation?	□ Y ⊠ N	The new temporary workspace area would not require agency consultation relating to visual resources.
	Y	

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.	
Vegetation and Wildlife	⊠ N	 The use of the new temporary workspace would not result in new significant impacts or a substantial increase in severity of any previously identified impacts to biological resources. The proposed 18,300 square-foot impact area occurs within disturbed/developed and landscape/ornamental habitat and does not include any sensitive biological resources or habitat as described in the Project's FEIR Section 4.4. A few ornamental trees would be removed by the property owner prior to SDG&E's use of the area and SDG&E would remove some landscape/ornamental vegetation associated with the installation of the temporary driveway, chain-link security fence, backcutting and construction access as needed. Impacts to vegetation and wildlife would be mitigated through implementation of Project APMs and MMs. In coordination with the property owners, the area would be returned to pre-construction conditions after the screening wall and security fence is completed. Although no new or altered APMs or MMs would be required, the following APMs and MMs would be implemented for MPR-1 work activities: APM BR-1: Limit Construction to Designated Areas and Protect Riparian, Aquatic and Wetland Areas. MM BR-2: Biological Monitoring. MM BR-3: Preconstruction Surveys. MM BR-6: Migratory Birds and Raptors Impact Reduction Measures. MM BR-8: Western Burrowing Owl Impacts Reduction Measures. MM BR-9: Invasive Plant Control Measures. 	
Agency	Y	The new temporary workspace area would not require agency consultation	
Consultation?	N N	relating to vegetation, wildlife, or other biological resources.	

Approvals	Date	Name (print)	Signature	
San Diego Gas and Electric Project Manager		Jennifer Kaminsky		Reviewed
San Diego Gas and Electric Environmental Project Manager		Richard Quasarano		Reviewed
CPUC Project Manager		Andrew Barnsdale		 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:	Date: