



Richard Quasarano
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April 21, 2020

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

Re: Minor Project Refinement No. 7 for the South Orange County Reliability Enhancement Project.

Mr. Barnsdale:

San Diego Gas & Electric (SDG&E) is hereby requesting approval of Minor Project Refinement No. 7 (MPR-7) from the California Public Utilities Commission (CPUC) for the South Orange County Reliability Enhancement Project (SOCRE or Project). Approval of MPR-7 will authorize the use of a temporary work area adjacent to the access road west of transmission standard pole #13 (Location 13) and east of existing structure Z198320. The temporary work area would be used as a turn-around area for construction equipment on the single-lane access road. The requested additional work area will total 3,218 square feet, or .07 acres. The requested MPR-7 work area is located entirely within the SDG&E right-of-way (ROW) in San Juan Capistrano, and will be used to facilitate construction activities east of Interstate 5 (I-5). Please refer to **Attachment B, MPR-7 Figure** and **Attachment C, MPR-7 Site Photographs** to view the MPR-7 work area.

Attachment A: SOCRE Minor Project Refinement Form
Attachment B: MPR-7 Figure
Attachment C: MPR-7 Site Photographs

Description of MPR-7 Workspace and Activities

As mentioned above, MPR-7 would authorize SDG&E to use a new temporary work area (totaling 3,218 square-feet) adjacent to the access road west of Location 13. The additional work area is necessary to provide safe and practical access to complete construction activities east of I-5, primarily for Locations 11-13. The single-lane access road is too narrow for equipment to turn around, as is the spur road to existing structure Z198320. MPR-7 is proposing to remove vegetation and perform minor grading along the north and south sides of the spur road in order to provide adequate space for equipment to turn-around, or turn-out to get out of the way from oncoming vehicles (See **Attachment C, MPR-7 Figure**). The MPR-7 work area will also be used for temporary staging for concrete trucks or other construction equipment as needed. Portions of fence

along the north and south sides of the spur road would be removed during use of the MPR-7 work area and replaced once construction activities are complete.

Vegetation removal and minor grading will take place within the MPR-7 work area as described and as necessary to allow safe driving access for construction equipment and vehicles. No trees will be removed as part of MPR-7 activities. The MPR-7 work area will be utilized for the duration of construction east of I-5 and activities will begin immediately following MPR-7 approval. Following the use of the MPR-7 temporary work area, the area will be restored to pre-Project conditions based on pre-Project photo documentation by SDG&E, and in coordination with the property owner.

Preconstruction Requirements and Permit/Approvals

The activities described above will not change the conditions set forth in the CPUC's Notice to Proceed No. 6 (NTP-6) approval letter dated October 30, 2019, 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-6. No permits are required for activities that will be performed within the MPR-7 work area. The property owner has been notified by SDG&E that this additional work area would be utilized for the proposed activities following MPR-7 approval, and they do not have any concerns or objections. Since MPR-7 activities will occur entirely within SDG&E ROW, no lease agreement is required.

MPR-7 Request for Approval

SDG&E respectfully requests approval of MPR-7 to utilize the new temporary work area as a turn-around area, by May 4, 2020. The new temporary work area will be used in accordance with conditions outlined in the CPUC's NTP-6 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: Joe Donaldson, Ecology and Environment, Inc.
Jennifer Kaminsky, SDG&E
Kenda Pollio, KP Environmental

ATTACHMENT A
MPR-7 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 21, 2020

Report No.: 7

Date Approved: TBD

Approval Agency: California Public Utilities Commission (CPUC).

Property Owner(s): The Minor Project Refinement No. 7 (MPR-7) temporary work area is entirely within SDG&E right-of-way (ROW).

Location/Milepost: The MPR-7 temporary work area is located west of new transmission standard pole #13 (Location 13) and east of existing structure Z198320, in the City of San Juan Capistrano.

Land Use/Vegetative Cover: The 3,218-square foot MPR-7 work area (0.07-acre) is entirely within disturbed habitat.

Sensitive Resources: There are no sensitive resources in the MPR-7 temporary work area. See resource discussions below.

Modification From:

<input type="checkbox"/> Permit	<input type="checkbox"/> Plan/Procedure	<input type="checkbox"/> Specification	<input type="checkbox"/> Drawing
<input type="checkbox"/> Mitigation Measure	<input checked="" type="checkbox"/> Other:		

San Diego Gas and Electric (SDG&E) is requesting approval of MPR-7 for a new temporary work area to be used as a turn-around area for the South Orange County Reliability Enhancement Project (SOCRE or Project). The new temporary work area is located adjacent to the access road west of Location 13 and east of existing structure Z198320, previously approved in Notice to Proceed No. 6 (NTP-6). The new MPR-7 work area will total approximately 3,218 square feet (0.07 acre).

The additional work area is necessary to provide safe and practical access to complete construction activities east of I-5, primarily for Locations 11-13. The single-lane access road is too narrow for equipment to turn around, as is the spur road to existing structure Z198320.

MPR-7 is proposing to remove vegetation and perform minor grading along the north and south sides of the spur road in order to provide adequate space for equipment to turn-around, or turn-out to get out of the way from oncoming vehicles. The MPR-7 work area will also be used for temporary staging for concrete trucks or other construction equipment as needed. Portions of fence along the north and south sides of the spur road would be removed during use of the MPR-7 work area and replaced once construction activities are complete.

Vegetation removal and minor grading will take place within the MPR-7 work area as described and as necessary to allow safe driving access for construction equipment and vehicles. No trees will be removed as part of MPR-7 activities. The MPR-7 work area will be utilized for the duration of construction east of I-5 and activities will begin immediately following MPR-7 approval. Following the use of the MPR-7 temporary work area, the area will be restored to pre-Project conditions based on pre-Project photo documentation by SDG&E, and in coordination with the property owner. **Attachment B, MPR-7 Figure** shows the location of the MPR-7 temporary work area.

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

Original Condition: The Project's Final Environmental Impact Report (FEIR) did not identify the need for a turn-around area in this location to complete construction activities. However, since the MPR-7 work area is located immediately adjacent to the NTP-6-approved access road, it is within the geographic study area of the FEIR, and therefore, has been previously analyzed.

Justification for Change: Following constructability review in the field, the construction contractor identified the need to gain access to the MPR-7 turn-around work area in order to facilitate construction activities, as there are no other viable turn-around areas in the vicinity. Although Location 13 has a large space for its permanent pad, it is on a steep incline and not practical for use as a turn-around for vehicles and equipment coming from the west. Vegetation will be removed as described; however, no trees will be removed within the MPR-7 work area.

Maps & Figures: Refer to **Attachment B, MPR-7 Figure**, for a map of the proposed MPR-7 temporary work area location, which includes the direction of the point of view for each picture included in **Attachment C**. Refer to **Attachment C, MPR-7 Site Photographs**, for pictures of the current conditions within the MPR-7 temporary work area.

Environmental Impact: Utilization of the MPR-7 turn-around 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. Utilization of the MPR-7 temporary work area is anticipated to increase the total temporary impact area for the Project by approximately 0.07 acre of disturbed habitat that contains no sensitive resources. Following the use of the MPR-7 temporary work area, the area will be restored to pre-Project conditions based on pre-Project photo documentation by SDG&E, and in coordination with the property owner. Specific discussions for each resource area are provided below.

Concurrence (if appropriate): Concurrence is not required as the proposed work area for MPR-7 is located immediately adjacent to the previously approved access road, and the new temporary work area is within the geographic study area analyzed in the California Environmental Quality Act (CEQA) review process.

Resources:

Biological No Resources Present Resources Present N/A, Change would not affect resources

Previous Biological Survey Report Reference:
 Biological resources along the Project alignment were studied, reviewed, and documented as part of SDG&E's application for a Certificate of Public Necessity (CPCN) for the SOCRE Project and Proponent's Environmental Assessment (PEA). Biological Resources were also discussed within the CPUC-conducted CEQA review process. Consistent with Section 4.4 of the FEIR, no sensitive biological resources are present within the MPR-7 work area. A pre-construction survey was conducted for the MPR-7 work area on April 10, 2020 which encompassed the MPR-7 work area. No suitable habitat for special-status species was identified during the survey. The Project biologist verified that the current condition of the MPR-7 work area was consistent with the results provided in previous biological studies. The work area is entirely within disturbed habitat with a high cover of non-native, invasive species.

Cultural No Resources Present Resources Present
 N/A, changes would not affect resources

Previous Cultural Survey Report Reference:
 Cultural and paleontological resources within the Project's study area (including the MPR-7 work area) were studied, reviewed, and documented as part of SDG&E's application for a CPCN for the Project and PEA. These resources were also discussed within the CPUC-conducted CEQA review process (see the Project's FEIR, Section 4.5). There are no sensitive cultural resources within the MPR-7 work area.

Disturbance Acreage Changes: Yes No

Original disturbance acreage: None, the MPR-7 turn-around work area was not anticipated to be required for Project construction.

New disturbance acreage: 0.07 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, and Seismicity	<input checked="" type="checkbox"/> Y	The vegetation removal and minor grading activities that would take place to prepare the MPR-7 work area as a turn-around 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. MPR-7 does not involve the installation of any new facilities or performance of any new activities. Accordingly, utilization of the new temporary work area would not create any new geological related hazard not previously disclosed in the Project's FEIR, Section 4.6.
	<input type="checkbox"/> N	
	<input type="checkbox"/> Y	

Agency Consultation?	<input checked="" type="checkbox"/> N	The proposed temporary work area would not require agency consultation relating to geology, soils, or seismicity.
Hazardous Materials and Waste	<input type="checkbox"/> Y	MPR-7 does not involve the installation of any new facilities or performance of any new activities. Accordingly, utilization of the new temporary 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 not previously identified, and would not create any new hazard not previously disclosed in the Project's FEIR, Section 4.8.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The proposed temporary work area would not require agency consultation relating to hazards or hazardous materials.
	<input checked="" type="checkbox"/> N	
Hydrology	<input type="checkbox"/> Y	Utilization of the new temporary work 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 Applicable APMs and MMs relating to hydrology and water quality that would be applied to NTP-6, would apply to the MPR-7 area, and would be implemented to mitigate for impacts related to hydrology and water quality. <ul style="list-style-type: none"> • MM HAZ-5: Discovery of an Unrecorded Oil or Gas Well • MM WQ-1: Pesticide Application
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The new temporary work area would not require agency consultation relating to hydrology or water quality.
	<input checked="" type="checkbox"/> N	
Cultural Resources	<input checked="" type="checkbox"/> 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-7 temporary work area. Review of the Project's previous cultural resources survey reports (prepared for the PEA) confirmed the lack of previously recorded cultural resources in the MPR-7 work area. Although vegetation removal and minor grading activities will take place within the MPR-7 work area, the work area is not within 100 feet of a cultural Environmentally Sensitive Area, therefore cultural monitoring is not anticipated to be required. 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-7 work activities: <ul style="list-style-type: none"> • APM CUL-1: Worker Training for Cultural Resources • MM CUL-1: Supplemental Worker Training for Cultural Resources No new significant impacts or a substantial increase in the severity of any previously identified significant impacts
	<input type="checkbox"/> N	

		<p>to paleontological resources are anticipated to occur as a result of the proposed new temporary work area. No impacts (or potential for impacts) to paleontological resources are anticipated beyond what was disclosed within the Project's FEIR, Section 4.5. Paleontological monitoring will take place during MPR-7 grading activities as required by the Paleontological Monitoring and Treatment Plan, or at the discretion of the Qualified Paleontological Consultant. No new or altered APMs or MMs would be required, and the following APMs would be implemented for MPR-7 work activities:</p> <ul style="list-style-type: none"> • APM CUL-8: Paleontological Monitoring • APM CUL-9: Discovery of Fossils
Agency Consultation?	<input type="checkbox"/> Y	The MPR-7 work area would not require agency or tribal consultation in relation to cultural or paleontological resources.
	<input checked="" type="checkbox"/> N	
Traffic and Circulation	<input type="checkbox"/> Y	<p>Construction activities within the new temporary work 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. There would be no additional construction crews or change in equipment utilized for MPR-7, that would not already be accounted for in NTP-6.</p> <p>No new or significant increase to previously identified significant impacts would occur as a result of the MPR-7 activities. No new or altered APMs or MMs would be required, and the following APM would be implemented for MPR-7 work activities:</p> <ul style="list-style-type: none"> • APM TR-4: Off Peak Deliveries
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The new temporary work area would not require agency consultation relating to traffic and circulation.
	<input checked="" type="checkbox"/> N	
Air Quality	<input type="checkbox"/> Y	The use of the MPR-7 temporary work 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 or equipment proposed as part of this MPR-7 request.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The new temporary work area would not require agency consultation relating to air quality.
	<input checked="" type="checkbox"/> N	
Noise and Vibration	<input type="checkbox"/> Y	Utilization of the new temporary 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

	<input checked="" type="checkbox"/> N	already analyzed in the Project's FEIR, Section 4.11, as there are no new activities proposed as part of this MPR-7 request, nor are there any sensitive receptors within the immediate vicinity.
Agency Consultation?	<input type="checkbox"/> Y	The new temporary work area would not require agency consultation relating to noise and vibration.
	<input checked="" type="checkbox"/> N	
Aesthetics/ Visual Resources	<input checked="" type="checkbox"/> Y	No permanent change in impacts to aesthetics/visual resources would result from utilization of the MPR-7 work area. The portions of the fence that will be removed to create the turn-around area as part of MPR-7 will be replaced following construction. The MPR-7 work area would be restored to pre-Project conditions as required upon completion of Project activities. Use of the MPR-7 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 APMs and MMs would be implemented for MPR-7 work activities: <ul style="list-style-type: none"> • APM AES-1: Clean Work Area • APM AES-2: Restoring Disturbed Area • MM AES-2: Minimize Clearing and Ground Disturbance and Restore Disturbed Area to Pre-Project Conditions • MM AES-3: Screen or Effectively Locate Laydown Areas
	<input type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The new temporary work area would not require agency consultation relating to visual resources.
	<input checked="" type="checkbox"/> N	
Vegetation and Wildlife	<input checked="" type="checkbox"/> Y	The use of the new temporary 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 (totaling 3,218 square feet) occurs within disturbed habitat and does not include any sensitive biological resources as described in the Project's FEIR Section 4.4. Vegetation will be removed as part of MPR-7 activities; however, the vegetation that will be removed is comprised of non-native and invasive species. No trees will be removed as part of MPR-7 activities. <p>Although no direct impacts to sensitive biological resources are anticipated as a result of the use of the MPR-7 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:</p>
	<input type="checkbox"/> N	

		<ul style="list-style-type: none"> • 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. • MM BR-9: Invasive Plant Control Measures.
Agency Consultation?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	The new temporary work area would not require agency consultation relating to vegetation and wildlife.

Approvals	Date	Name (print)	Signature	
San Diego Gas and Electric Project Manager		Jennifer Kaminsky		<input type="checkbox"/> Reviewed
San Diego Gas and Electric Environmental Project Manager		Richard Quasarano		<input type="checkbox"/> Reviewed
CPUC Project Manager		Andrew Barnsdale		<input type="checkbox"/> Approved <input type="checkbox"/> Approved with conditions (see below) <input type="checkbox"/> Denied
For CPUC Compliance Manager Use Only				
<input type="checkbox"/> Refinement Approved		<input type="checkbox"/> Refinement Denied		<input type="checkbox"/> Beyond Authority

<p>Conditions of Approval or Reason for Denial:</p> <p>Prepared by: Joe Donaldson, E&E, CPUC Compliance Manager Date:</p>
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






ATTACHMENT B
MPR-7 Figure

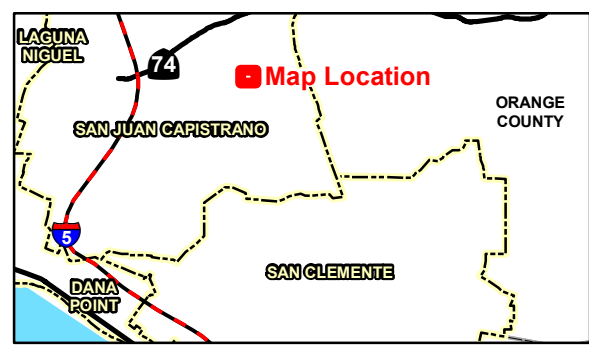
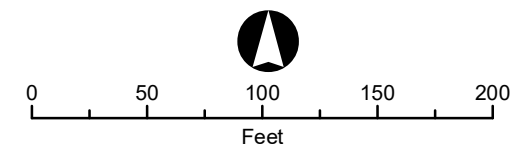
SOCRE PROJECT

**MPR-7 Figure 1
Structure Location 12**

**San Juan Capistrano
Orange County, CA**

LEGEND

-  Photo Viewpoint (with Direction)
-  Interstate
-  State Highway
-  County Boundary
-  Municipal Boundary
-  USACOE - Jurisdictional Extent
-  CDFW - Jurisdictional Extent
- MPR-7 Component**
-  Additional Temporary Work Area
- Other Project Components**
-  New Transmission Standard Pole
-  Remove Existing Structure
-  230 kV Overhead Transmission Line
-  Existing Overhead Transmission Line to be Removed
-  Existing Access Road
-  Retaining Wall
-  BMP Feature
-  Work Pad
- Temporary Work Areas:**
-  Staging Area
-  Work Area



ATTACHMENT C
MPR-7 Site Photographs

Photo 1: View of approximate location of MPR-7 turn-around area and spur road in the middle, facing E.



Photo 2: View of approximate location of MPR-7 turn-around area, facing NW.



Fence portion in berm

Photo 3: View of approximate location of southern portion of MPR-7 turn-around area, facing W.



This stake indicates anticipated section of fence to be removed

Photo 4: View of approximate location of southern portion of MPR-7 turn-around area, facing SE.

