PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

February 5, 2018

Ms. Jennifer Kaminsky
San Diego Gas and Electric Company
1010 Tavern Road
Alpine, CA 91901

RE: Sycamore- Peñasquitos 230-kV Transmission Line Project—Review of Minor Project Refinement #13 Request

Dear Ms. Kaminsky,

On January 30, 2018, SDG&E submitted Minor Project Refinement (MPR) #13 for approval by the California Public Utilities Commission (CPUC) for the Sycamore-Peñasquitos 230-kV Transmission Line Project (Project). MPR #13 authorizes SDG&E to install five guy wire anchors within an existing dirt access road between structures P05 and P06, as shown in Exhibit 1 (attached). The anchors will be used to attach guy wires that will help stabilize and support structure P05 during trenching and retaining wall construction activities.

The Project was evaluated in accordance with the California Environmental Quality Act (CEQA) and a Final Environmental Impact Report (FEIR) was prepared by the CPUC. The CPUC voted to approve the environmentally superior alternative, Alternative 5, on October 13, 2016 (Decision 16-10-005), and a Notice of Determination was filed with the State Clearinghouse (SCH# 2014081031). The mitigation measures (MMs) and Applicant Proposed Measures (APMs) described in the FEIR were adopted by the CPUC as conditions of Project approval. The CPUC also adopted a Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) to ensure compliance with all APMs and MMs during Project implementation.

This letter documents the CPUC's thorough evaluation of all activities covered in this MPR request, including the CPUC evaluation table provided with the MPR analysis (See Attachment A). The evaluation process ensures that all MMs applicable to the location and activities covered in the MPR are implemented as required in the CPUC's decision. The evaluation process further ensures that the following criteria are met:

- Modifications would not be outside the geographic boundary of the study area utilized in the FEIR.
- A new significant impact or substantial increase in the severity of a previously identified significant impact would not be created, based on the thresholds used in the FEIR.
- Additional permit requirements would not be triggered that are not defined in the FEIR or MMCRP.
- There would not be a conflict with any APM or MM, and the modifications would not result in a new conflict with any applicable guideline, ordinance, code, rule, regulation, order, decision, statute, or policy not already identified within the FEIR.
- Modifications would not require new conditions for approval, without which the modifications would result in a new significant impact or substantially increase the severity of a previously identified significant impact.

MPR #13 is granted by the CPUC for the proposed activities based on the factors described below.

SDG&E MPR #13 Request. Excerpts from the SDG&E MPR #13 Request, received February 1, 2018, are presented below (indented):

> Under this proposed refinement, SDG&E is requesting authorization from the California Public Utilities Commission (CPUC) to install five guy wire anchors within an existing dirt access road between structures P05 and P06. The anchors would be used to attach guy wires that will help stabilize and support structure P05 during trenching and retaining wall construction activities. The use of the existing dirt access road between P05 and P06 is an approved Project access road; however, ground disturbing activities (other than standard maintenance activities such as resurfacing and smoothing with a grader, installing water bars, etc.) was not an approved activity identified in the Project's Final Environmental Impact Report (FEIR).
>
> The guy wire anchors will be installed along the southern edge of the access road between P05 and P06. The stakes shown in the photographs provided in Attachment 2 show the approximate location of where the proposed guy wire anchors will be installed. The guy wire anchors will be approximately 10 feet (ft.) apart from each other.
>
> Guy wire anchor installation will require an approximately 20-24 inch diameter hole to be augured at an approximate depth of 6-8 ft. Additionally, a small 4 inch slot will be dug next to each augured hole that will intersect with the bottom of the augured hole where a cross plate will be installed. Each anchor will connect to a guy wire that will connect to structure P05 at differing heights and angles.
>
> No vegetation trimming or removal is proposed in this refinement.

CPUC Evaluation of MPR #13 Request

In accordance with the MMCRP, the MPR #13 request was reviewed by CPUC to confirm that no new impacts or increase in impact severity would result from the requested MPR activities. The following discussion summarizes this analysis for biological resources, cultural and paleontological resources, and other issue areas. A list of bulleted conditions is presented to define additional information and clarifications regarding mitigation measure requirements.

Biological Resources
The proposed refinement area consists primarily of an existing dirt access road that is currently used for the approved Project. No sensitive biological resources exist within the proposed refinement area. To the north and south of the proposed refinement area is southern mixed chaparral habitat, however all construction activities proposed will be within the existing dirt access road. Nest surveys will be conducted regularly to determine the presence of nesting birds, and buffers will be established, if necessary, as required by APM BIO-2 and Mitigation Measure Biology-7. There will be no new impacts on sensitive habitat, avian species, or sensitive or special-status species utilizing the habitat in the proposed refinement areas, and no increase in the severity of a previously identified impact on biological resources as identified in the FEIR.

Cultural and Paleontological Resources
A cultural resource records search covering the proposed refinement area was conducted for the FEIR in 2016, and updated in January 2017 by SDG&E. No cultural or paleontological resources have been

recorded within the proposed refinement area, and no new surveys of the area were completed. A desktop review of the proposed refinement area was conducted by AECOM in January 2018. A survey of the proposed refinement area was not recommended due to the low potential for cultural resources to occur. Any cultural resources within this area are likely to have been destroyed by development. However, the proposed refinement is entirely underlain by high sensitivity Stadium Conglomerate. Through implementation of Mitigation Measure MM Paleontology-1 and MM Paleontology-3, impacts to paleontological resources would remain less than significant with mitigation. The proposed refinement would not result in a new impact, or increase the severity of a previously analyzed impact on cultural or paleontological resources.

Other Issue Areas

The proposed refinement areas would not result in a new impact, or increase the severity of a previously analyzed impact on aesthetics, agriculture and forestry, air quality, fire and fuels management, geology and soils, greenhouse gases, hazards and hazardous materials, hydrology and water quality, land use, noise, public services, recreation, transportation and traffic, or utilities and service systems.

MPR #13 Conditions of Approval

MPR #13 is approved by the CPUC with conditions. The conditions presented below shall be met by SDG&E and its contractors:

1. All applicable Project MMs, APMs, compliance plans, and permit conditions shall be implemented. Some measures have on-going/time-sensitive requirements and shall be implemented prior to and during construction, where applicable. Prior to construction, SDG&E must submit all applicable permits to the CPUC.
2. Copies of all relevant permits, compliance plans, and this MPR, shall be available on site for the duration of construction activities.
3. SDG&E shall provide paleontological monitoring for the duration of ground-disturbing activities.
4. SDG&E shall implement appropriate dust controls at the MPR #13 work area in accordance with the approved Dust Control Management Plan, and SWPPP. SDG&E shall use non-potable water for dust control, as required by MM Utilities-1.
5. SDG&E shall implement all appropriate erosion and sediment control BMPs for the MPR #13 work area as defined in the SWPPP, and as specified by the Qualified SWPPP Practitioner. Sediment and erosion control BMPs shall be properly maintained throughout the duration of construction activities.
6. SDG&E shall properly store all hazardous materials and contain and dispose of contaminated soils and materials as described in the CPUC-approved Hazardous Substance Control and Emergency Response Plan.
7. All complaints received by SDG&E shall be logged and reported immediately to the CPUC. This includes complaints relevant to traffic, as well as lighting, noise and dust, etc. Where feasible, complaints shall be resolved, depending on the nature of the complaint, through construction site or activity modifications.
8. All workers shall receive Safety and Environmental Awareness Program (SEAP) training prior to work at the MPR #13 work area. A log shall be maintained on site with the names of all crew personnel who have received training. All training participants shall wear their SEAP hard-hat sticker for ease of compliance verification.
9. No additional tree removal or tree pruning in or adjacent to MPR #13 work area shall occur unless the SDG&E construction safety advisor determines that an imminent threat to worker and/or public

safety exists. The CPUC shall be advised of any tree removals or tree pruning efforts within 24 hours of their occurrence.

10. Nest surveys shall be conducted prior to establishment of the proposed refinement area.

Please contact me if you have any questions or concerns regarding this MPR approval.

Sincerely,

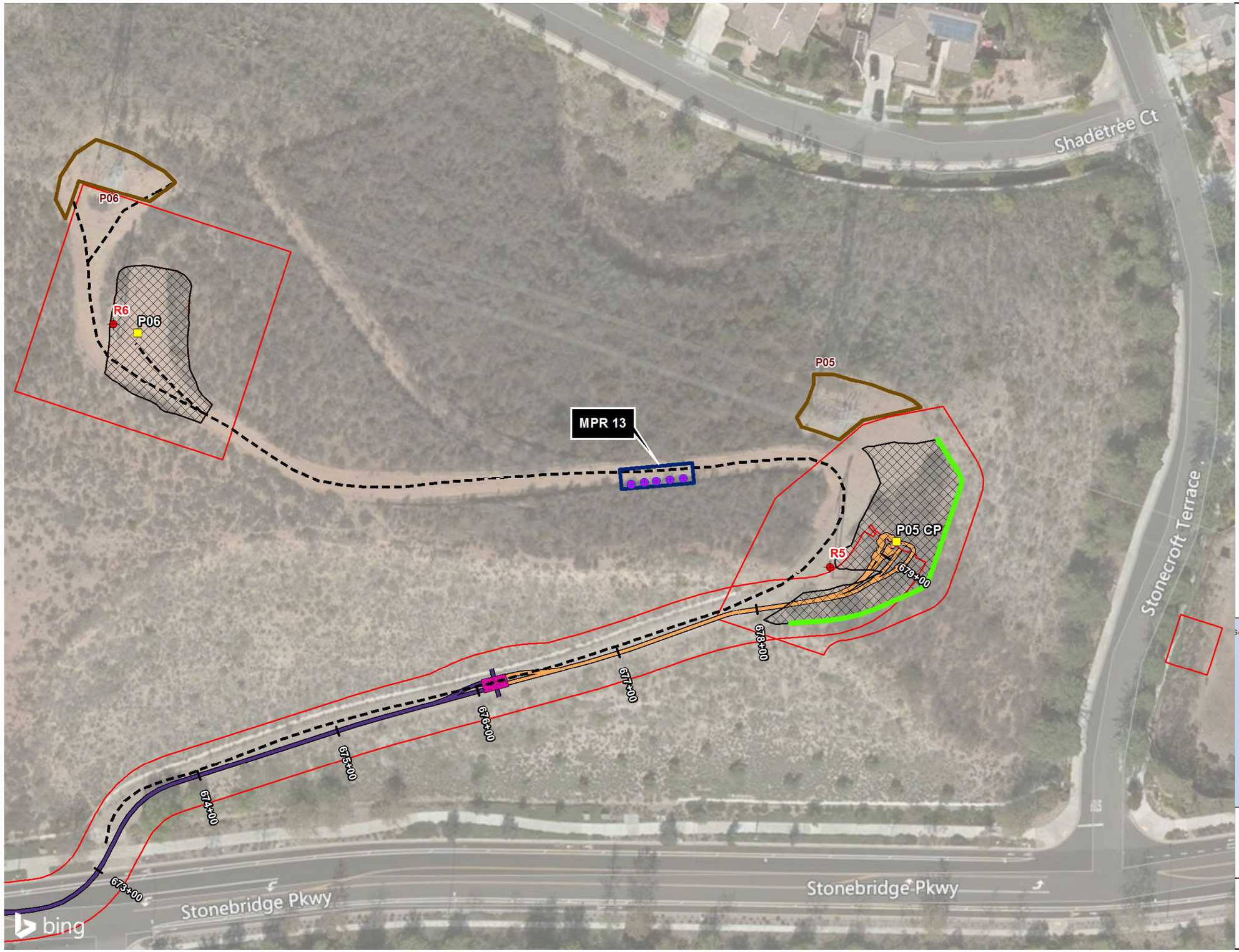
Billie Blanchard

Billie Blanchard
Project Manager
Energy Division, CEQA Unit

cc: Lonn Maier, CPUC Supervisor
Marcelo Poirier, CPUC Attorney
Susanne Heim, Panorama Environmental
Sheila Hoyer, Panorama Environmental
Edith Moreno, SDG&E
Ron Walker, AECOM

Exhibit 1: MPR #13 Figure
Attachment A: CPUC Evaluation of Minor Project Refinement #13

Exhibit 1: MPR #13 Figure



Legend

- MPR-13 (0.02 Acre)
- Anchor Points
- Stations

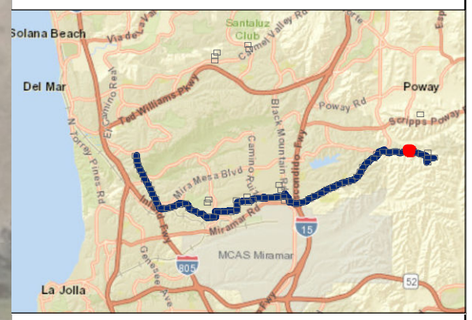
Segment B

- Segment 3, Section 16
- Segment 3, Section 17

Structures

Type

- Proposed Structure
- Removed Poles
- Retaining Wall
- Access Road
- Permanent Impact
- Underground Vault
- Temporary Work Space
- MPR 5 Workspaces



65 32.5 0 65 Feet

1:780 1 inch = 65 feet

Figure 1
Sycamore to Peñasquitos
230kV Transmission Line Project
MPR13

P:_6052\60528384_SXPQ_Constru\900-CAD-GIS\920-929 GIS-Graphics\922_Maps\Special_Requests\MPR13_refined_area.mxd, 1/30/2018, paul.moreno

1/30/2018

Attachment A: CPUC Evaluation of Minor Project Refinement #13

Would the Proposed Project refinements result in a new impact, or increase the severity of a previously analyzed impact on:	No	Yes
Aesthetics (e.g., damage scenic resources or vistas, degrade the existing visual character of the site and its surroundings, or create sources of light or glare)? *FEIR Significance: Significant and Unavoidable*	☒	☐
Summary of Proposed Project Refinement Impacts on Aesthetics: The proposed refinement would not result in a new impact, or increase the severity of a previously analyzed impact on aesthetics as identified in the FEIR.		
Agriculture and Forestry Resources (e.g., convert Farmland to nonagricultural use, or create a conflict with existing agricultural zoning or a Williamson Act)? *FEIR Significance: Less than Significant*	☒	☐
Summary of Proposed Project Refinement Impacts on Agriculture and Forestry Resources: The proposed refinement would not convert agricultural land to non-agricultural use, or result in the loss of agricultural land. The proposed refinement would not result in a new impact, or increase the severity of a previously analyzed impact on agriculture or forestry resources.		
Air Quality (e.g., produce criteria air pollutant emissions, or expose sensitive receptors to additional pollutants)? *FEIR Significance: Significant and Unavoidable*	☒	☐
Summary of Proposed Project Refinement Impacts on Air Quality: Activities associated with utilization of the proposed refinement area (such as the type of equipment used and run time of equipment) would be consistent with those included in the FEIR. Impacts on air quality would remain significant and unavoidable with the implementation of APM Air-2, and Mitigation Measures Air-3, and Air-4. The proposed refinement would not result in a new impact, or increase the severity of a previously analyzed impact on air quality.		
Biological Resources (e.g., have an adverse effect on sensitive or special-status species; impact riparian, wetland, or any other sensitive habitat; or conflict with local policies or ordinances protecting biological resources)? *FEIR Significance: Less than Significant with Mitigation*	☒	☐
Summary of Proposed Project Refinement Impacts on Biological Resources: There are no biological resources in the proposed refinement area. No special-status species or sensitive habitats are known to occur within the proposed refinement area. Nest surveys would be conducted prior to the establishment of the proposed refinement area, and buffers would be established, if necessary, as required by APM BIO-2 and Mitigation Measure Biology-7. Impacts on biological resources would remain less than significant. The refinement would not result in a new impact, or increase the severity of a previously analyzed impact on biological resources.		
Cultural and Paleontological Resources (e.g., cause an adverse change to a significant historical, archeological, or paleontological resource)? *FEIR Significance: Less than Significant with Mitigation*	☒	☐
Summary of Proposed Project Refinement Impacts on Cultural and Paleontological Resources: A cultural resource records search covering the proposed refinement was conducted for the FEIR in 2016 and updated in January 2017 by SDG&E, and a desktop review of the proposed refinement area was conducted by AECOM in January 2018. No cultural or paleontological resources have been recorded within the proposed refinement area. The proposed refinement is entirely underlain by high sensitivity Stadium Conglomerate. Through implementation of MM Paleontology-1, and MM Paleontology-3, impacts to paleontological resources would remain less than significant with mitigation. The proposed refinement would not result in new impacts or increase in the severity of a previously identified impact on cultural and paleontological resources as identified in the FEIR.		

Attachment A: CPUC Evaluation of Minor Project Refinement #13 (Cont.)

Would the Proposed Project refinements result in a new impact, or increase the severity of a previously analyzed impact on:	No	Yes
Fire and Fuels Management (e.g., cause of expose people or structures to fire hazards, or create a conflict with a Fire Management Plan?) *FEIR Significance: Less than Significant with Mitigation*	☒	☐
Summary of Proposed Project Refinement Impacts on Fire and Fuels Management: Activities associated with utilization of the proposed refinement area would be consistent with those discussed in the FEIR. The proposed refinement is located within the same fire hazard area as discussed in the FEIR, and the potential for fire ignition would remain less than significant with implementation of the revised Construction Fire Prevention Plan. The refinement would not result in a new impact, or increase the severity of a previously analyzed impact on fire or fuels management.		
Geology and Soils (e.g., cause or expose people or structures to geologic or soil hazards, including erosion or loss of topsoil)? *FEIR Significance: Less than Significant with Mitigation*	☒	☐
Summary of Proposed Project Refinement Impacts on Geology and Soils: The proposed refinement area is within an existing dirt access road that is part of the approved Project. The proposed refinement was previously surveyed for geological hazards as described in the geotechnical reports submitted to the CPUC on November 18, 2016, and as analyzed in the FEIR. The proposed refinement would not result in a new impact, or increase the severity of a previously analyzed impact on geologic resources as identified in the FEIR.		
Greenhouse Gas Emissions (e.g., produce criteria greenhouse gas pollutants, or expose sensitive receptors to additional pollutants)? *FEIR Significance: Less than Significant with Mitigation*	☒	☐
Summary of Proposed Project Refinement Impacts on Greenhouse Gas Emissions: The level of equipment use and run time of equipment required for the proposed refinement would be consistent with the equipment use and run time estimates included in the FEIR. The implementation of APM AIR-5 and Mitigation Measure GHG-1 would reduce the impacts on greenhouse gas emissions to less than significant. The proposed refinement would not result in a new impact, or increase the severity of a previously analyzed impact on greenhouse gas emissions.		
Hazards and Hazardous Materials (e.g., create or increase the exposure of people or structures to hazardous materials, involve the use of additional hazardous materials or equipment, or interfere with an adopted emergency plan)? *FEIR Significance: Less than Significant with Mitigation*	☒	☐
Summary of Proposed Project Refinement Impacts on Hazards and Hazardous Materials: The proposed refinement would require use of the same types of equipment and hazardous materials that were analyzed in the FEIR. The proposed refinement area does not contain known hazardous materials sites. The implementation of APMs HAZ-1, HAZ-2, and HAZ-3, and Mitigation Measures Hazards-2, and Hazards-3 would reduce the impacts on hazards and hazardous materials to less than significant. The proposed refinement would not result in a new impact, or increase the severity of a previously analyzed impact on hazards and hazardous materials.		

Attachment A: CPUC Evaluation of Minor Project Refinement #13 (Cont.)

Would the Proposed Project refinements result in a new impact, or increase the severity of a previously analyzed impact on:	No	Yes
Hydrology and Water Quality (e.g., degrade water quality, discharge waste or sediment, deplete groundwater, alter the existing drainage pattern, create additional runoff water or polluted runoff, place structures in a 100-year flood hazard area, or expose people or structures to a significant risk involving flooding)? *FEIR Significance: Less than Significant with Mitigation*	☒	☐

Summary of Proposed Project Refinement Impacts on Hydrology and Water Quality:

The proposed refinement would be located within the area previously surveyed for hydrological resources and would remain consistent with the impacts on hydrological resources and water quality analyzed in the FEIR. The proposed refinement would be located within an existing dirt access road that is located within the Peñasquitos Watershed. The proposed refinement area does not contain jurisdictional waters and is not located within a flood hazard. The implementation of Mitigation Measure Hydrology-1 would reduce impacts on hydrology and water quality to less than significant. The proposed refinement would not result in a new impact, or increase the severity of a previously analyzed impact on hydrology and water quality.

Land Use and Planning (e.g., conflict with a land use plan, policy, or regulation of an agency with jurisdiction over the project, or conflict with a habitat conservation plan)? *FEIR Significance: No Impact*	☒	☐

Summary of Proposed Project Refinement Impacts on Land Use and Planning:

The proposed refinement would be located within the same area as the Project analyzed in the FEIR. The proposed refinement would have no impact on land use and planning.

Noise (e.g., expose sensitive receptors to additional noise or vibration)? *FEIR Significance: Significant and Unavoidable*	☒	☐

Summary of Proposed Project Refinement Impacts on Noise:

Activities associated with utilization of the proposed refinement area (such as use of heavy equipment) would be consistent with those discussed in the FEIR. The proposed refinement area is not located in proximity to sensitive receptors (e.g. residents/schools). Construction activities occurring in association with the proposed refinement would result in noise impacts that are significant and unavoidable. The proposed refinement would not result in a new impact, or increase the severity of a previously analyzed impact on noise.

Public Services (e.g., result in adverse impacts on government facilities that provide a public service)? *FEIR Significance: Less than Significant*	☒	☐

Summary of Proposed Project Refinement Impacts on Public Services:

The proposed refinement would not result in additional lane closures on public roads or delays affecting a different roadway than analyzed in the FEIR. SDG&E would continue to coordinate with local fire and police services throughout construction. The proposed refinement would not be located near a school or within a park. The proposed refinement would not result in a new impact, or increase the severity of a previously analyzed impact on public services.

Recreation (e.g., increase the use of, or cause adverse effects on, parks or other recreational facilities)? *FEIR Significance: Less than Significant with Mitigation*	☒	☐

Summary of Proposed Project Refinement Impact on Recreation:

The proposed refinement would not be located within a park, preserve, or trail. The refinement area would not impact parks or recreational facilities. The proposed refinement would not result in a new impact, or increase the severity of a previously analyzed impact on recreation.

Attachment A: CPUC Evaluation of Minor Project Refinement #13 (Cont.)

Would the Proposed Project refinements result in a new impact, or increase the severity of a previously analyzed impact on:	No	Yes
Transportation and Traffic (e.g., increase traffic congestion or degrade performance of the circulation system, taking into account all modes of transportation, or increase hazards due to a design feature)? *FEIR Significance: Less than Significant with Mitigation*	☒	☐

Summary of Proposed Project Refinement Impacts on Transportation and Traffic:

The proposed refinement would not result in a substantial increase in vehicle traffic, or lane closure, nor would it result in the loss of parking consistent with the analysis in the FEIR. The proposed refinement would not require changes to the Construction Transportation Management Plan. Helicopters would not be used as part of the proposed refinement. The proposed refinement would not result in a new impact, or increase the severity of a previously analyzed impact on transportation and traffic.

Utilities and Service Systems (e.g., result in the construction of new or expansion of existing water or stormwater drainage facilities, require additional water entitlements, create new solid waste disposal needs)? *FEIR Significance: Less than Significant with Mitigation*	☒	☐

Summary of Proposed Project Refinement Impacts on Utilities and Service Systems:

The proposed refinement would not involve the construction of new, or expansion of existing water facilities, stormwater drainage facilities, and/or require water entitlements, or creation of new solid waste disposal needs. The proposed refinement would not result in a new impact, or increase the severity of a previously analyzed impact on utilities.