

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 15, 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 #15 Request

Dear Ms. Kaminsky,

On June 12, 2018, SDG&E submitted Minor Project Refinement (MPR) #15 request for approval by the California Public Utilities Commission (CPUC) for the Sycamore-Peñasquitos 230-kV Transmission Line Project (Project). MPR #15 authorizes the installation of stormwater management features by the CC MM CP structure as shown in Exhibit 1 (attached).

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

SDG&E MPR #15 Request. Excerpts from the SDG&E MPR #15 Request, received June 12, 2018, are presented below (indented):

Under this proposed refinement, San Diego Gas and Electric (SDG&E) is requesting authorization from the California Public Utilities Commission (CPUC) to install stormwater management features by the CC MM CP structure. Under this proposed refinement, SDG&E seeks to place rip rap within a barren dirt area (Location 1), which will be located entirely in the approved temporary work space surrounding CC MM CP. Establishment of Location 1 would not require grading and/or removal of vegetation. In addition, an earthen berm would be constructed (Location 2). The earthen berm would require minimal vegetation removal and/or grading via a backhoe, excavator, or similar construction equipment. An additional temporary work space (Location 3) would be used for the construction of the earthen berm and repair of erosion rills. This temporary work space may require removal or crushing of the existing vegetation. In total, approximately .003 acre of permanent impacts and .01 acre of temporary impacts is proposed as part of this proposed refinement.

CPUC Evaluation of MPR #15 Request

In accordance with the MMCRP, the MPR #15 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 air quality, 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 of barren dirt and disturbed habitat. All sites associated with the proposed action were surveyed for biological resources. The survey results were negative. Vegetation mapping for the Project was completed in 2016. Location 1 was identified as disturbed Diegan coastal sage scrub, and Locations 2 and 3 were identified as disturbed habitat. A site assessment was conducted on July 5, 2018 by the Qualified Biologist. The assessment determined Location 1 consists of a barren dirt area, and Locations 2 and 3 consist of disturbed habitat with individuals of salt bush (*Atriplex sp.*), as well as non-native species such as *Bromus madritensis*, *Salsola tragus*, and *Brassica nigra*. All work areas will be clearly delineated to ensure construction personnel stay within approved project limits.

In addition, the proposed refinement area would be established during the nesting bird season. Nest surveys would be conducted regularly to determine the presence of nesting birds, and buffers will be established, if necessary, as required by APM BIO-2: SDG&E Subregional Natural Community Conservation Planning (NCCP) and MM Biology-7: Mitigation for Bird Species. 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

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. The Qualified Archaeologist confirmed the absence of cultural resources, based on desktop analysis. Due to the moderate to high potential for buried deposits to occur in the area, archaeological and/or Native American monitoring may be required by the Qualified Archaeologist if ground-disturbing activities occur. 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 area 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 #15 Conditions of Approval

MPR #15 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 during construction, where applicable. 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. Wildlife found to be trapped shall be removed by a qualified biological monitor.
4. SDG&E shall implement appropriate dust controls at the MPR #15 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 #15 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 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 #15 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 #15 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,



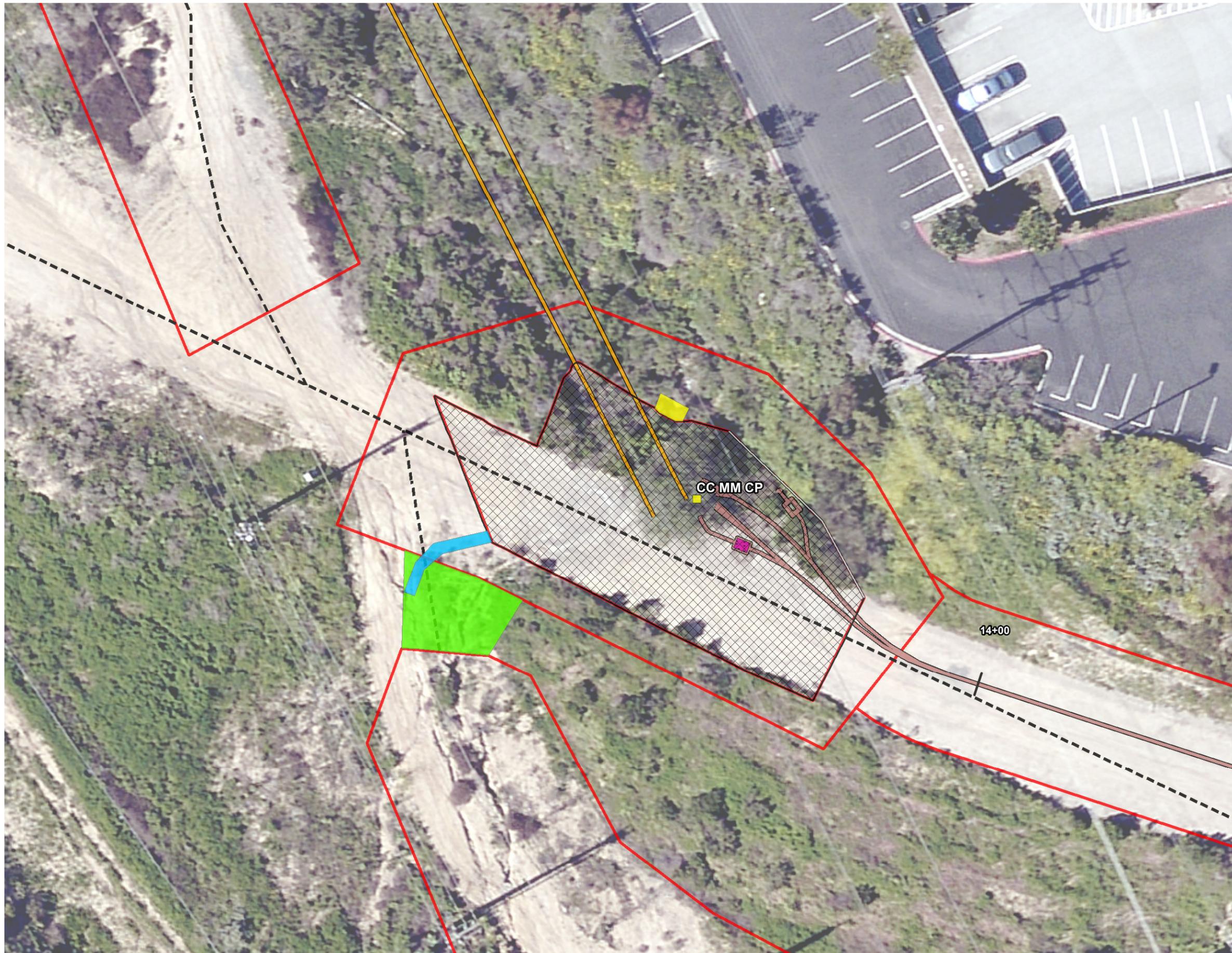
Ms. Jennifer Kaminsky
June 13, 2018
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Billie Blanchard
Project Manager
Energy Division, CEQA Unit

cc: Lonan Maier, CPUC Supervisor
Marcelo Poirier, CPUC Attorney
Susanne Heim, Panorama Environmental
Sheila Hoyer, Panorama Environmental
Jessica Hing, Panorama Environmental
Ron Walker, AECOM

Exhibit 1: MPR #15 Figure
Attachment A: CPUC Evaluation of Minor Project Refinement #15

Exhibit 1: MPR #15 Figure



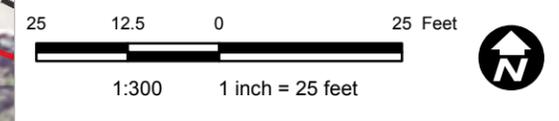
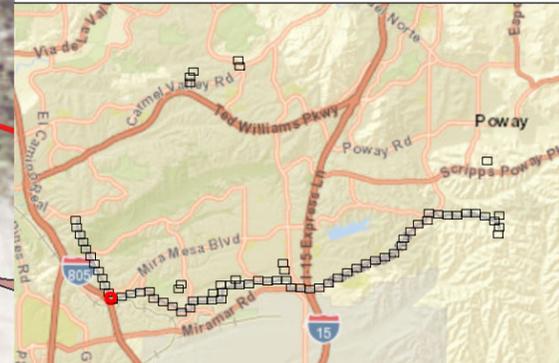
Legend

MPR 15

- Location 1 - Permanent Work Space (8'x5')
- Location 2 - Permanent Work Space (28'x3')
- Location 3 - Temporary Work Space (28'x20')

Approved Project Features

- Proposed Structure
- Retaining Wall
- Access Roads
- Permanent Impact
- Underground Vault
- Temporary Work Space
- 230 kV Overhead
- 230 kV Underground



**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area -
MPR 15**

Attachment A: CPUC Evaluation of Minor Project Refinement #15

Would the Proposed Project refinements result in a new impact, or increase the severity of a previously analyzed impact on:	No	Yes
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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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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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)?	<input type="checkbox"/>	<input type="checkbox"/>
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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: Vehicle and Equipment Exhaust Controls, and MM Air-3: Dust Control Management Plan, and MM Air-4: Use of Tier 3 Equipment. 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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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FEIR Significance: Less than Significant with Mitigation

Summary of Proposed Project Refinement Impacts on Biological Resources:

Vegetation mapping for the Project was completed in 2016. Location 1 was mapped as disturbed Diegan coastal sage scrub, and Locations 2 and 3 were mapped as disturbed habitat. A site assessment was conducted on July 5, 2018 by the Qualified Biologist. The assessment determined Location 1 consists of a barren dirt area, and Locations 2 and 3 consist of disturbed habitat with individuals of salt bush (*Atriplex* sp.) and non-native species such as *Bromus madritensis*, *Salsola tragus*, and *Brassica nigra*. Per the SDG&E NCCP required in APM BIO-2: SDG&E Subregional NCCP, no mitigation is required for permanent or temporary impacts to non-sensitive habitat communities such as bare ground, landscape/ornamental, and disturbed areas. Temporary impact areas would be stabilized as required by the Project Stormwater Pollution Prevention Plan.

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 MM Biology-7: Mitigation for Bird Species. 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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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FEIR Significance: Less than Significant with Mitigation

Summary of Proposed Project Refinement Impacts on Cultural and Paleontological Resources:

Attachment A: CPUC Evaluation of Minor Project Refinement #10 (Cont.)

Would the Proposed Project refinements result in a new impact, or increase the severity of a previously analyzed impact on:

No Yes

The proposed refinement area was included in a records search extending 0.50 mile beyond the project components that was completed for the FEIR in 2016, and updated by SDG&E in January 2017. All ESAs in the vicinity of project work areas have been flagged for avoidance, and none are in the vicinity of the proposed refinement. In accordance with MM Cultural Resources-1: Cultural Resources Monitoring, Evaluation, and Treatment of Resources, monitoring by an archaeological monitor and a Native American monitor may be recommended by the Qualified Archaeologist during ground-disturbing activities. Through implementation of MM Cultural Resources-1, MM Paleontology-1: Paleontological Monitoring, and MM Paleontology-3: Avoidance of Resources or Other Methods of Mitigation, impacts to historical, archaeological, or 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.

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 is located along the current overhead alignment, and adjacent to overhead structure CC MM CP. It is located in an area previously surveyed for geological hazards, and as analyzed in the FEIR. The proposed refinement was previously surveyed for geological hazards as described in the 2016 geotechnical reports, 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: Consistency with AB 32 and MM GHG-1: Disposal of Organic Matter 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 APM HAZ-1: Safety and Environmental Awareness Program, APM

Attachment A: CPUC Evaluation of Minor Project Refinement #10 (Cont.)

Would the Proposed Project refinements result in a new impact, or increase the severity of a previously analyzed impact on:

No Yes

HAZ-2: Consistency with State and Federal Regulations, and APM HAZ-3: SDG&E Compliance Management Programs, and MM Hazards-2: Spill Prevention, Control, and Countermeasure Plan, and MM Hazards-3: Hazardous Substance Control and Emergency Response Plan 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.

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:

This refinement is being proposed to improve the flow of stormwater, and would result in an improvement over pre-construction condition. The proposed refinement would be 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 area does not contain jurisdictional waters and is not within a flood hazard. The implementation of MM Hydrology-1: Stormwater Pollution Prevention Plan and Treatment of Shallow Groundwater Discharge 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 would be consistent with those discussed in the FEIR. The implementation of MM Noise-2: Noise-suppression Techniques would still 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 as required by MM Traffic-6: Restrict Road Closures and Maintain Access and MM Traffic-8: Notify Emergency Personnel of Road Closures. 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.

Attachment A: CPUC Evaluation of Minor Project Refinement #10 (Cont.)

Would the Proposed Project refinements result in a new impact, or increase the severity of a previously analyzed impact on:	No	Yes
Recreation (e.g., increase the use of, or cause adverse effects on, parks or other recreational facilities)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>FEIR Significance: Less than Significant with Mitigation</i>		

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.

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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>FEIR Significance: Less than Significant with Mitigation</i>		

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. The proposed refinement would not result in a substantial increase in vehicle traffic, lane closure, or result in the loss of parking, consistent with the analysis in the FEIR. 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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>FEIR Significance: Less than Significant with Mitigation</i>		

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.