

## 3.0 Introduction to the Initial Study

### 3.1 Proposed Project Overview

Pursuant to the California Public Utilities Commission's (CPUC) General Order 131-D, San Diego Gas & Electric Company (SDG&E), a regulated California utility, filed an application (A.17-06-029) with the CPUC on June 28, 2017, for a Permit to Construct the TL674A Reconfiguration and TL666D Removal Project (proposed project). The application includes the Proponent's Environmental Assessment prepared by SDG&E pursuant to the CPUC's Rules of Practice and Procedure Rule 2.4 (CEQA Compliance). The CPUC deemed the application complete on September 27, 2017.

The proposed project would consist of the following four components:

**TL674A Reconfiguration:** Removal of approximately 700 feet of 69-kilovolt (kV) overhead tap; installation of about 1.1 miles of underground duct bank with four vaults to connect TL674A (renamed TL6973 as part of the project) to the Del Mar Substation.

**TL666D Removal:** Removal of approximately 6 miles of 69-kV overhead power line between the Del Mar Substation and the intersection of Vista Sorrento Parkway and Pacific Plaza Drive.

**C510 Conversion:** Conversion of approximately 3,900 feet of existing 12-kV overhead distribution line to an underground configuration within San Dieguito and Racetrack View Drive; removal of five poles adjacent to Racetrack View Drive; and installation of several poles to connect existing overhead lines to new underground configuration.

**C738 Conversion:** Conversion of approximately 630 feet of existing 12-kV overhead distribution line to an underground configuration within the Sorrento Valley multi-use path, with removal of distribution line poles and installation of several new poles and risers.

The proposed project would also include the removal and replacement of a circuit breaker at the existing Del Mar Substation to accommodate increased ampacity associated with TL6973.<sup>1</sup>

The proposed project would address the safety, environmental quality, and reliability of the local area electrical network, allowing SDG&E to meet internal design standards as well as industry standards.

---

<sup>1</sup> Ampacity is defined as the maximum amount of current that an electrical conductor can safely carry.

## 3.2 Environmental Analysis

### 3.2.1 CEQA Lead Agency

The CPUC is the lead agency for review of the proposed project under CEQA because the CPUC is the agency that must decide whether to adopt the Mitigated Negative Declaration (MND) and to approve or deny the Permit to Construct.

### 3.2.2 Initial Study Purpose

This Initial Study (IS) has been prepared pursuant to the California Environmental Quality Act (CEQA), the amended State CEQA Guidelines (14 California Code of Regulations 15000 et seq.) and the CPUC CEQA rules (Rule 2.4). As described in Section 15063 of the CEQA Guidelines, an IS serves as a preliminary investigative tool to identify potential environmental effects. It is recommended as the basis for determining whether to prepare an environmental impact report (EIR), which is supported by evidence in the record, all potentially significant impacts associated with proposed construction, operation and maintenance of the project can be mitigated to levels below significance; therefore, the CPUC may adopt an MND in accordance with Public Resources Code section 21080.

### 3.2.3 Initial Study Content

The CEQA Guidelines reflect the requirements set forth in Chapter 3, Title 14 of the Public Resources Code and provide objective criteria and procedures for the orderly evaluation of projects and the preparation of environmental impact reports, negative declarations and mitigated negative declarations by public agencies, such as the CPUC. The Guidelines address legislative directives and initiatives, reflect court decisions interpreting the CEQA statute and incorporate practical planning considerations in environmental analyses. The IS's analyses are based on information from SDG&E's Preliminary Environmental Assessment and associated submittals, a site visit, CPUC data requests, and additional research. The content and analysis in this IS is based on the ~~current~~ CEQA Guidelines Appendix G environmental checklist in force at the date of publication of the Draft IS/MND, which includes 89 questions contained in the ~~19~~ 20 topics presented below.

- Aesthetics
- Agricultural Resources
- Air Quality
- Greenhouse Gases
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gases
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Traffic and Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Mandatory Findings of Significance

### 3.2.4 CEQA Guidelines and Appendix G Environmental Checklist Update

In 2013, the Governor’s Office of Planning and Research (OPR) initiated a comprehensive, multi-year effort aimed at updating the CEQA Guidelines and Appendix G environmental checklist. The reasons supporting the update are multifold: lawmakers have recently adopted various legislation amending the CEQA statute and Guidelines, including major reforms pertaining to the metrics used in evaluating transportation impacts to the introduction of new environmental topics on the environmental checklist, such as tribal cultural resources resulting from recent legislation (AB 52). The California Supreme Court has also published several decisions that affect the CEQA practice Guidelines. The updated CEQA Guidelines were adopted on December 28, 2018, after publication and circulation of the Draft IS/MND for the proposed project.

The adopted amendments to the CEQA Guidelines fall into two categories: (1) those dealing with efficiency and organizational improvements, and (2) those that represent major substantive improvements. The emphasis of this review is to focus on those changes to the Guidelines that could represent new information or result in effects of substantially greater severity than those evaluated for the proposed project using the ~~current~~ previous version of the Appendix G environmental checklist. Potential efficiency improvements address: using regulatory standards in the CEQA process; determining whether a project is “within the scope” of a program EIR; clarifying how and when tiering rules apply; detailing how and when to use certain environmental exemptions; and amendments pertaining to remand and remedies for projects subject to injunction or other court action. The emphasis of this review ~~would be~~ is restricted to the changes to Appendix G, environmental checklist.

The amendments ~~would~~ eliminate some duplicative questions and some issues ~~would be~~ have been reorganized. For example, the previous Guidelines ~~currently~~ included two questions pertaining to whether a project would conflict with a habitat conservation plan and other related plans in two separate sections: biological resources and land use planning. OPR ~~proposes to delete~~ the question from the land use and planning section. The question in the biological resources section would remain unchanged. As ~~currently proposed~~ adopted, the amendments ~~would~~ relocate questions related to paleontological resources from cultural resources to geology as directed in Assembly Bill 52 (Gatto 2014). These changes would not materially affect the conclusions reached in this study relating to biological resources, cultural resources or land use (see Sections 5.4, “Biological Resources,” 5.5, “Cultural Resources,” and 5.10, “Land Use and Planning,” for more information).

With respect to population growth, the newly adopted Appendix G ~~currently~~ asks ~~whether a project would cause substantial population growth. This would be changed if the current amendments were adopted to ask~~ whether such growth would be *unplanned*. Planned growth may result in environmental effects, though these impacts are assumed to be analyzed in connection with a land use plan or regional plan accounting for that population growth. Unplanned growth is assumed to occur in an absence of plan or program that could cause significant effects on the environment. As described in Section 5.13, “Population and Housing,” of the IS, the proposed project would not induce growth or displace numbers of people or housing. The proposed project would involve utility reliability and maintenance activities. It would not generate population growth directly nor would it result in availability of surplus energy

1 resources that could indirectly induce population growth. No changes to the project’s less-than-significant  
2 impacts would be warranted by the ~~adopting~~ amended Guidelines.

3  
4 The Guidelines ~~propose~~ includes an amendment to Aesthetics by revising the question whether a project  
5 would “degrade the existing visual character of a site.” Given the difficulty in often analyzing this  
6 potential impact objectively, OPR ~~proposes to revised~~ the criterion to ask whether the project is consistent  
7 with zoning or other regulations governing visual character. Because the proposed project is not subject to  
8 local zoning or any other similar local land use regulation, the ~~proposed~~ adopted checklist amendment  
9 would not apply to the project’s analyses or the less-than-significant conclusions reached for the topic of  
10 aesthetics.

11  
12 Major substantive improvements include guidance regarding how to analyze a project’s energy usage and  
13 impacts. Previously located in Guidelines Appendix F and often limited to EIRs, the energy impact  
14 analysis ~~would~~ is now ~~be~~ included in Appendix G and require agencies to address energy consumption as  
15 part of all of their CEQA processes. The amended Checklist ~~would be amended to~~ includes the following  
16 questions: Would the project result in potentially significant environmental impact due to wasteful,  
17 inefficient or unnecessary consumption of energy, or wasteful use of energy resources, during project  
18 construction or operation, or, conflict with or obstruct a state or local plan for renewable energy or energy  
19 efficiency?

20  
21 The proposed project would involve electric utility line reconfiguration, removal, and maintenance. Most  
22 of the proposed project’s energy consumption would occur during construction activities and primarily  
23 associated with fuel consumption from vehicle trips and construction equipment use. The proposed  
24 project would not involve consumption of other sources of energy, such as electricity or natural gas. As  
25 described in Section 5.7, “Greenhouse Gases,” the proposed project would be required to comply with  
26 federal and state standards addressing fuel efficiency for light- and heavy-duty vehicles. Additionally,  
27 the increasingly stringent state and federal regulations on engine efficiency combined with local,  
28 state, and federal regulations limiting engine idling times from equipment would further reduce the  
29 amount of fuel demand during project construction. As shown in Section 5.7, the project would not  
30 conflict with relevant plans involving renewable energy and energy efficiency, such as the statewide  
31 Climate Change Scoping Plan, the San Diego Association of Government’s 2014 Regional Energy  
32 Strategy, and the City of San Diego Climate Action Plan. Because the proposed project would avoid the  
33 wasteful and inefficient use of transportation fuel and would not conflict with state and local policies  
34 on renewable energy and energy efficiency, impacts to energy resources would be less than significant.

35  
36 The Checklist adds new questions related to transportation and wildfire, pursuant to Senate Bill 743  
37 (Steinberg 2013), and Senate Bill 1241 (Kehoe 2012), respectively, as well as water demand. Amended  
38 ~~Proposed~~ Guidelines Section 15064.3, “Determining the Significance of Transportation Impacts”  
39 addresses the use of Level of Service as a metric for determining the significance of transportation  
40 impacts under CEQA and phases that out by the year 2020. After that time, agencies would use a “vehicle  
41 miles traveled” (VMT) metric to evaluate transportation effects. This metric better aligns with tracking  
42 other statewide environmental goals, such as reducing greenhouse gases. Projects that reduce VMT will  
43 be presumed to have a less than significant impact. This section also discusses the modeling that may be  
44 used to analyze VMT. As discussed in Section 5.16, “Transportation and Traffic,” the analysis conducted

1 for this project anticipated this regulatory changed and addressed it appropriately. The implementation of  
2 VMT as the metric for determining the significance of transportation impacts would not affect the  
3 analysis or conclusions reached for the project's transportation impacts evaluated in Section 5.16 in this  
4 IS/MND.

5  
6 The updated Appendix G also includes the analysis of potential wildfire risks. The amended Checklist  
7 includes the following questions, to be considered for projects that are located in or near state  
8 responsibility areas, or lands classified as "Very High" Fire Hazard Severity Zones.

9  
10 Would the project:

- 11 a) Substantially impair an adopted emergency response plan or emergency evacuation plan?;  
12 b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose  
13 project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a  
14 wildfire?;  
15 c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks,  
16 emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may  
17 result in temporary or ongoing impacts to the environment?; or  
18 d) Expose people or structures to significant risks, including downslope or downstream flooding or  
19 landslides, as a result of runoff, post-fire slope instability, or drainage changes?;

20  
21 A brief discussion of wildfire hazards within and surrounding the proposed project area, as well as an  
22 analysis of potential wildfire risks associated with implementation of the proposed project, is included in  
23 Section 5.8, "Hazards and Hazardous Materials". As displayed on Figure 5.8-2, the majority of the  
24 proposed project area falls within a "Very High" Fire Hazard Severity Zone. While construction activities  
25 in general present a slightly elevated fire risk associated with the use of combustion engines which could  
26 feasibly produce a spark, such risks would be substantially minimized through required implementation  
27 of the applicant's existing *Operations and Maintenance Wildland Fire Prevention Plan*.

28  
29 If overhead electrical utility infrastructure malfunctions and sparks, wildfires can result, especially in  
30 wildfire-susceptible regions such as the proposed project area (Russell, Benner, and Wischkaemper  
31 2012). Upon project completion, existing overhead electric utility infrastructure would be removed from  
32 vegetated areas throughout the surrounding "Very High" Fire Hazard Severity Zone. Utility lines that  
33 would be reconfigured as part of the proposed project would be installed in an underground orientation  
34 within existing paved roadways during the proposed project operational phase. Therefore, removal of the  
35 overhead electric utility infrastructure drastically reduces the risk of utility line-caused wildfires within  
36 the proposed project area, and wildfire-related impacts associated with proposed project implementation  
37 would be less than significant.

38  
39 ~~Proposed~~ Newly adopted Guidelines Section 15155(f) ~~would~~ require agencies to consider the degree of  
40 certainty that exists regarding project water supplies throughout the life of the project. Agencies must also  
41 evaluate the pros and cons of a project based on water demand. If an agency cannot determine that water  
42 will be available for the life of the project, potential alternative water supplies and their respective  
43 environmental impacts must be evaluated. The project's water demands relate primarily to water needed  
44 for fugitive dust suppression. The applicant provided a detailed breakdown of the assumptions

1 undergirding the up to 707,000 gallons of water that could be required for purposes of suppressing dust  
2 on unpaved roads and in and around work areas. The ~~proposed~~adopted amendment would be satisfied  
3 with the water demand estimates that have been disclosed in Section 5.18, “Utilities and Service  
4 Systems.”  
5

### 6 **3.2.5 Revisions to the Draft IS/MND and Why Recirculation Is Not Required**

7  
8 On February 5, 2019, the applicant submitted to the CPUC an email request to include supplemental  
9 information related to removal and replacement of a circuit breaker within the existing Del Mar  
10 Substation. According to the applicant, this work may be required in order to accommodate increased  
11 ampacity associated with the new TL6973 segment that would be established as part of the proposed  
12 project. Details related to the potential circuit breaker removal and replacement work are included as text  
13 revisions to the Draft IS/MND in Chapter 4.0, “Project Description,” Sections 4.5.2 and 4.6. Text  
14 revisions have also been incorporated in the relevant environmental analyses (see specifically Sections  
15 5.3, “Air Quality”; 5.6, “Geology and Soils”; 5.7, “Greenhouse Gases”; 5.8, “Hazards and Hazardous  
16 Materials”; 5.12, “Noise”; 5.16, “Transportation and Traffic”; and 5.19, “Mandatory Findings of  
17 Significance”) to sufficiently cover any potential environmental effects associated with the circuit breaker  
18 removal and replacement work as a component of the overall project evaluated in this IS.  
19

20 Section 15073.5 of the State CEQA Guidelines requires recirculation of a Negative Declaration when the  
21 document must be “substantially revised” after public notice of its availability has previously been given  
22 pursuant to Guidelines Section 15072, but prior to its adoption. A “substantial revision” as defined in  
23 Guidelines Sections 15073.5(b) entails:  
24

- 25 (1) [identification of] a new, avoidable significant effect and mitigation measures or project revisions  
26 [that] must be added [to the Negative Declaration] in order to reduce the effect to insignificance;  
27 or  
28 (2) the lead agency determines that the proposed mitigation measures or project revisions will not  
29 reduce potential effects to less than significant levels and new measures or revisions must be  
30 required.  
31

32 Recirculation is not required pursuant to CEQA Guidelines Section 15073(c) under the following  
33 circumstances: (1) mitigation measures are replaced with equal or more effective mitigation measures; (2)  
34 new project revisions are added in response to written or verbal comments on the project’s effects  
35 identified in the proposed negative declaration, that are not new or avoidable significant effects; (3)  
36 measures or conditions of approval are added after the circulation of the negative declaration that are not  
37 required by CEQA, that do not create new significant environmental effects and are not necessary to  
38 mitigate an avoidable significant effect; and (4) new information is added to the negative declaration that  
39 merely clarifies, amplifies, or makes insignificant modifications to the negative declaration.  
40

41 The current revisions and clarifications to the proposed project do not amount to “substantial revisions”  
42 because no new avoidable effect has been identified resulting from the circuit breaker removal and  
43 replacement work described by the applicant. The potential activities at the Del Mar Substation would not  
44 result in any new significant impacts in the Draft IS/MND, nor would these changes increase the severity

1 of any of the project’s less-than-significant impacts identified in the Draft IS/MND. Mitigation measures  
2 identified in this Final IS/MND would continue to be required in order to reduce or avoid the less-than-  
3 significant environmental impacts of the project, and the additional work incorporated through revisions  
4 to this Final IS/MND would not eliminate the need to implement any of the mitigation measures  
5 identified in the Draft IS/MND or necessitate any substantial revisions. Finally, no new or modified  
6 measures would be required in order to mitigate environmental impacts that may be associated with the  
7 circuit breaker removal and replacement at the Del Mar Substation because no significant impacts or  
8 impacts of greater severity would occur if this additional project component were implemented as  
9 described in text revisions in Chapters 4.0, “Project Description” and 5.0, “Environmental Setting and  
10 Impacts.”

### 11 **3-2.5 3.2.6 Initial Study Organization**

12 The IS has been organized into the following sections:

- 13
- 14
- 15
- 16 • **Chapter 3.0: Introduction.** Provides an introduction and overview of the proposed project and  
17 the CEQA process, and identifies key areas of environmental analysis.
- 18 • **Chapter 4.0: Project Description.** Presents the project objectives and provides an in-depth  
19 description of the proposed project, including construction details and methods.
- 20 • **Chapter 5.0: Environmental Setting and Impacts.** Includes a description of the existing  
21 conditions and the analysis of the proposed project’s potential environmental impacts, and  
22 identifies mitigation measures to reduce potentially significant impacts to less-than-significant  
23 levels.
- 24 • **Chapter 6.0: Mitigation Monitoring and Reporting Plan.** Identifies the monitoring  
25 requirements for applicant proposed measures, mitigation measures that SDG&E must implement  
26 as part of the proposed project, actions required in order to implement these measures, as well as  
27 monitoring requirements and the timing of implementation for each measure.
- 28 • **Chapter 7.0: Responses to Comments.** Includes responses to comment letters received during  
29 the Draft IS/MND public review period.
- 30 • **Chapter 8.0: Other Revisions to IS/MND.** Includes revisions identified as needed to clarify the  
31 Draft IS/MND.
- 32 • **Chapter 9.0: List of Preparers.** Includes the list of professionals involved during preparation of  
33 the IS/MND.
- 34 • **Appendices:** Includes revised air quality and greenhouse gas emissions estimated from the  
35 California Emissions Estimator Model (CalEEMod), including tabulation of helicopter emissions;  
36 biological survey reports; revised master table of special status species occurrence potentials;  
37 cultural resources documentation; database search records of hazardous materials sites; land use  
38 policy matrix; tribal consultation correspondence; paleontological technical study; and detailed  
39 project components maps, and correspondence with the California Department of Parks and  
40 Recreation.
- 41

1 **References**

2 B. D. Russell, C. L. Benner and J. A. Wischkaemper, "Distribution feeder caused wildfires: Mechanisms  
3 and prevention," *2012 65th Annual Conference for Protective Relay Engineers*, College Station,  
4 TX, 2012, pp. 43-51.

5 <http://ieeexplore.ieee.org/stamp/stamp.jsp?tp=&arnumber=6201220&isnumber=6201216> .

6 Accessed February 21, 2019.

7  
8 Gatto. 2014. Assembly Bill No. 52. Native Americans: California Environmental Quality Act. Available  
9 at [https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=201320140AB52](https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201320140AB52) .

10 Accessed February 21, 2019.

11  
12 Kehoe. 2012. Senate Bill 1241. Land use: general plan: safety element: fire hazard impacts. Available at  
13 [http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=201120120SB1241](http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201120120SB1241) . Accessed

14 February 21, 2019.

15  
16 Steinberg. 2013. Senate Bill 743. Environmental quality: transit oriented infill projects, judicial review  
17 streamlining for environmental leadership development projects, and entertainment and sports  
18 center in the City of Sacramento.

19 [https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=201320140SB743](https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201320140SB743) . Accessed

20 February 21, 2019.