

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 12, 2018

Mr. Michael Calvillo
Pacific Gas and Electric Company
1455 Shaw Ave, Bag 23
Fresno, CA 93710-8001

RE: Sanger Substation Expansion Project—Review of Minor Project Refinement #1 Request

Dear Mr. Calvillo,

On May 24, 2018, PG&E submitted the revised request for Minor Project Refinement (MPR) #1 for approval by the California Public Utilities Commission (CPUC) for the Sanger Substation Expansion Project (Project). The “power line reconfiguration” component of the project design, as discussed in the IS/MND (March 2017), includes replacing 18 wood poles and 17 Lattice Steel Towers (LSTs) with 29 Tubular Steel Poles (TSPs). MPR #1 would change this to replacing 18 wood poles and 17 LSTs with 28 TSPs and 2 wood poles.

The Project was evaluated in accordance with the California Environmental Quality Act (CEQA) and an Initial Study/Mitigated Negative Declaration (IS/MND) was prepared by the CPUC. The CPUC issued a Permit to Construct the Project on July 13, 2017 (Decision 17-07-008), and a Notice of Determination was filed with the State Clearinghouse (SCH# 2017012039). The mitigation measures (MMs) and Applicant Proposed Measures (APMs) described in the Final IS/MND were adopted by the CPUC as conditions of Project approval. The CPUC also adopted a Mitigation Monitoring and Reporting Plan (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:

- Refinements would not be outside the geographic scope of the study area utilized in the IS/MND.
- 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 IS/MND.
- Additional permit requirements would not be triggered that are not defined in the IS/MND or MMCRP.
- There would not be a conflict with any APM or MM, and the refinements 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 IS/MND.
- 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 #1 is granted by the CPUC for the proposed activities based on the factors described below.

PG&E MPR #1 Request. Excerpts from the PG&E MPR #1 Request, received May 24, 2018, are presented below (indented):

The “power line reconfiguration” component of the project design, as discussed in the MND (March 2017), includes replacing 18 wood poles and 17 Lattice Steel Towers (LSTs) with 29 Tubular Steel Poles (TSPs). The final design now proposed is to replace 18 wood poles and 17 LSTs with 28 TSPs and 2 wood poles.

In addition, after further refinement of engineering design, two new wood poles (instead of the previously proposed TSPs) will replace one existing LDSP pole south of the substation. PG&E is proposing to use wood poles instead of TSPs because an existing gas line was discovered in the area, and the wood poles would avoid any arc-flash hazards. The locations of four other TSPs have also been adjusted as described below. These changes are shown in the attached and revised figures accompanying this summary. Specifically, they include:

- Pole #11– A TSP was previously proposed in this location immediately south of E. Jensen Avenue near the southeast corner of the substation. During final design, it was determined that the proposed TSP would need to be replaced with a new wood pole and the location offset from the previous location slightly by 8 feet north and 8 feet east. This new wood pole will require two guy lines and one anchor. The pole type and location was changed due to the presence of an existing gas line.
- Pole #54 – During final design, it was determined that a new wood pole rather than a TSP would be required in this location due to the presence of the existing gas line.
- Pole #55 – The existing LDSP in this location would be removed and the new wood pole (pole #54) would be placed 10’ north of the existing pole #55.
- Pole #1 – The location of this new TSP, near the northeast corner of the planned substation expansion footprint and east of S. McCall Avenue, would move approximately 8’ south of the previous location. This pole was shifted away from S. McCall Avenue due to new restrictions on clearances from Fresno County.
- Pole #10 – This pole is located in an agricultural field approximately 750’ east of the existing substation. The location of this pole is proposed to be moved approximately 14’ south and 15’ west of its previous location. The decision to move Pole #10 was done to move further away from the existing tower near this location to avoid the tower foundation during construction. A new location was proposed out of the agricultural field and closer to the access road for ease of construction.
- Pole #8 – This proposed TSP, located west of S. McCall Avenue, would move approximately 2’ north and 31’ west from its previous location. Due to the change in location of Pole #10, pole #8 had to be moved to accommodate the new angle of the line.
- Pole #24 – Pole 24 is located approximately 2,100 feet to the west of the substation, just east of S. Thompson Avenue. As compared to its previous location, this pole would move approximately 8’ to the south to relocate it out of the existing farm access road.

CPUC Evaluation of MPR #1 Request

In accordance with the MMCRP, the MPR #1 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, transportation and traffic, 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 is primarily agricultural. On March 30, 2012 and April 14, 2015, the project area, which includes the proposed refinement area, was surveyed by a qualified biological consultant for sensitive plant and wildlife species detectable during each time of year.

During 2012 and 2015 field surveys completed for the Final IS/MND, no special-status plant species were observed, and it was determined that the project area, including the proposed refinement area, does not support sufficient habitat for any of the 20 special-status plant species within the Sanger quadrangle and the eight surrounding quadrangles. Additionally, no special status wildlife species were observed during 2012 or 2015 surveys.

Focused special-status raptor surveys were conducted in on April and June 2017, and on April 14-15, 2018. No special-status raptor species were observed in 2017 or 2018 surveys. However, in 2017, an active Red-Tailed Hawk nest was observed approximately 780 feet east of the substation site, within the minor project refinement area. Additionally, a suspected American Kestrel nest was observed within the substation site. In 2018, a Red-Tailed Hawk was observed again, in an incubation position in a tower approximately 780 feet east of the substation site, in the refinement area. An American Kestrel was observed in 2018, but no American Kestrel nests were observed.

All work areas will be clearly delineated with signs, lathe, and/or flagging to ensure construction personnel stay within approved project limits. Furthermore, the proposed refinement area will be established outside of the nesting season to prevent interference with nesting birds, including raptors.

With the implementation of appropriate mitigation measures, there will be no new impacts to 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 Final IS/MND.

Cultural and Paleontological Resources

A cultural resource records search, covering the proposed project area, including the refinement area, was conducted for the Final IS/MND on March 12, 2012. From the records search, it was determined that the project area and areas within 0.5 miles of the project area had not been previously surveyed, and there are no previously recorded cultural resources within that site. Pedestrian surveys were conducted in March and April 2012, with a supplementary pedestrian survey in June 2012. The existing substation site was not surveyed due to extensive ground surface modification. No known archaeological resources or historic resources that are eligible for listing on the California Register of Historical Resources (CRHR) are located in proposed refinement area. No cultural resources are recorded in the vicinity of the proposed refinement.

In March 2012 and September 2016, PG&E contacted tribes previously identified on the California Native American Heritage commission (NAHC), with additional follow-up contact in November, 2015. None of the six contacted tribal representatives requested further project participation, through an individual from the Table Mountain Rancheria tribe requested notification of discovery and identification of cultural resources, and an individual from the Santa Rosa Rancheria Tachi Yokut Tribe recommended that construction be monitored by an archaeologist, and that all involved parties be made aware of the

prescribed actions to be taken in the event of an unanticipated discovery of any cultural resources. Ground-disturbing project activities, including those occurring within the proposed refinement area, would be monitored by a qualified archaeologist.

A paleontological records search was conducted in June 2012, and a pedestrian survey at the proposed project area, including the refinement area, was conducted in March, 2015, both for the Final IS/MND. While the area is underlain by deposits with a high potential to support paleontological resources, no such resources are known to exist below the site. Ground-disturbing activities in undisturbed soils 10 feet below the surface will be monitored by a paleontological monitor.

The proposed refinement would not result in any new impacts or increase the severity of a previously analyzed impact on cultural or paleontological resources as identified in the Final IS/MND.

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, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use, noise, public services, recreation, transportation and traffic, or utilities and service systems.

MPR #1 Conditions of Approval

MPR #1 is approved by the CPUC with conditions. The conditions presented below shall be met by PG&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, PG&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. PG&E shall implement appropriate dust controls at the MPR #1 work area in accordance with the approved Dust Control Plan, and SWPPP.
5. PG&E shall implement all appropriate erosion and sediment control BMPs for the MPR #1 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. All ground-disturbing activities (e.g., grading, trenching, etc.) shall be monitored by a CPUC-approved biological monitor, archaeological monitor, and paleontological monitor in accordance with MM BIO-3, MM BIO-4, MM CUL-1, and MM CUL-4, where appropriate. In the event of observation of sensitive biological resources onsite, or an archaeological or paleontological discovery, all construction activity associated with MPR #1 shall be halted, and procedures shall be followed in accordance with the appropriate mitigation measures and protocols. If a cultural resource is encountered and is determined to be associated with California Native American Tribe(s), PG&E shall coordinate with the CPUC and with the Tribe(s) to determine appropriate mitigation procedures, as discussed in MM CUL-5.
7. PG&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.

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8. All complaints received by PG&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.
9. All workers shall receive Worker Environmental Awareness Program (WEAP) training prior to work at the MPR #1 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 WEAP hard-hat sticker for ease of compliance verification.

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

Sincerely,



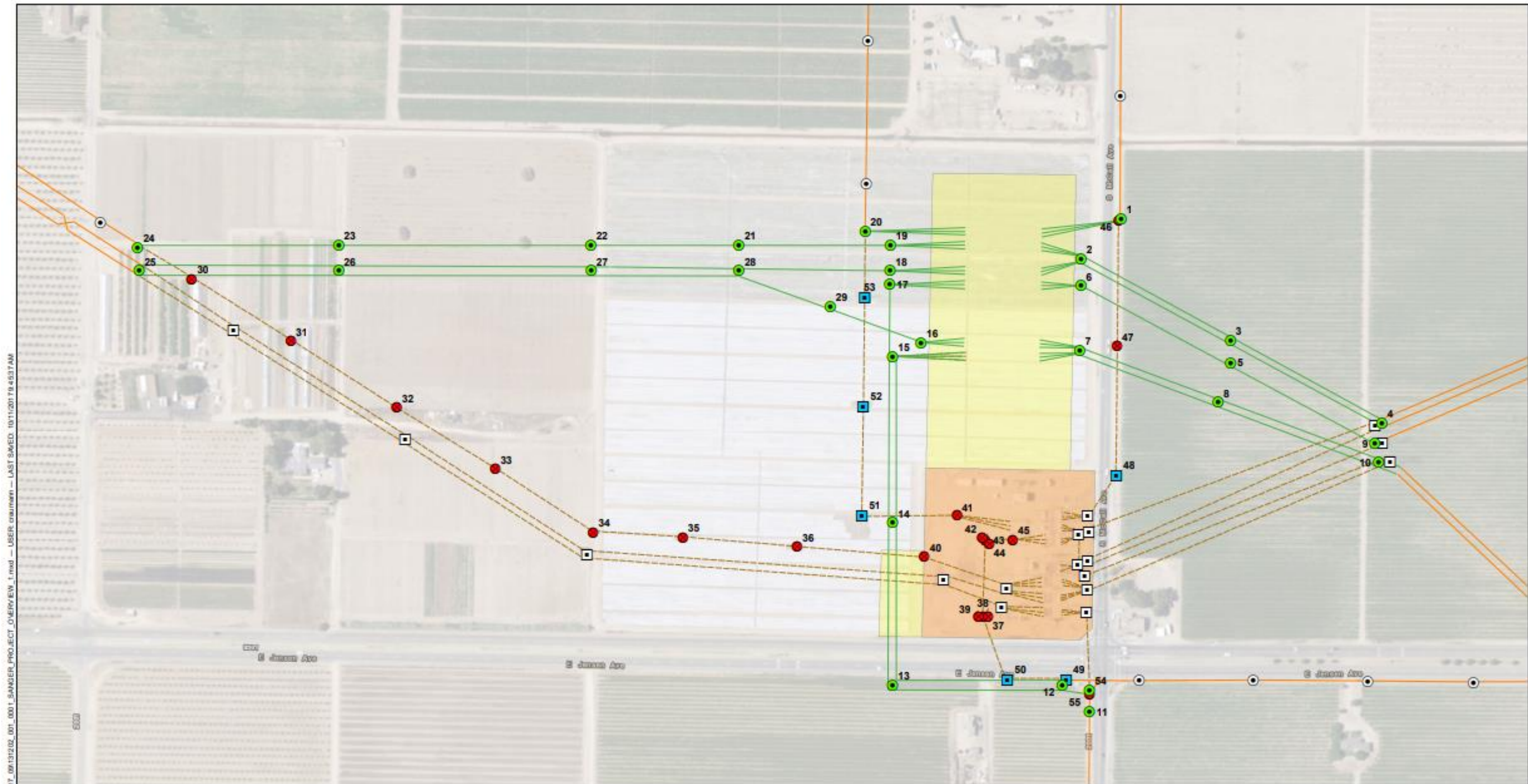
Billie Blanchard
CPUC Project Manager
Energy Division, CEQA Unit

cc: Molly Sterkel, CPUC Program Manager
Lonn Maier, CPUC Supervisor
Greg Heiden, CPUC Attorney
Silvia Yánez, Environmental Monitoring Manager (E & E)
Ilja Nieuwenhuizen, Environmental Monitoring Supervisor (E & E)
JoLynn Lambert, PG&E Regulatory Affairs
Shruti Ramaker, Haley & Aldrich, Inc.

Exhibit 1: MPR #1 Map

Exhibit 2: CPUC Evaluation of Minor Project Refinement #1

Exhibit 1: MPR #1 Map

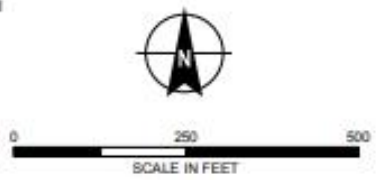


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| ⊙ | EXISTING POLE TO REMAIN | — | PLANNED NEW POWER LINE |
| □ | EXISTING TOWER TO BE REMOVED | — | EXISTING POWER LINE TO REMAIN |
| ● | EXISTING POLE TO BE REMOVED | - - - | POWER LINE TO BE REMOVED (UNDERBUILD TO REMAIN) |
| ■ | EXISTING POLE TO BE TOPPED | ■ | EXISTING SUBSTATION FOOTPRINT |
| ● | NEW POLE TO BE INSTALLED | ■ | PLANNED SUBSTATION EXPANSION FOOTPRINT |

NOTES

1. THIS FIGURE IS BASED ON FIGURE 2-2, PROJECT OVERVIEW MAP, PRODUCED BY CARDNO FOR PG&E, DATED 9/1/2016.
2. AERIAL IMAGERY SOURCE: ESRI



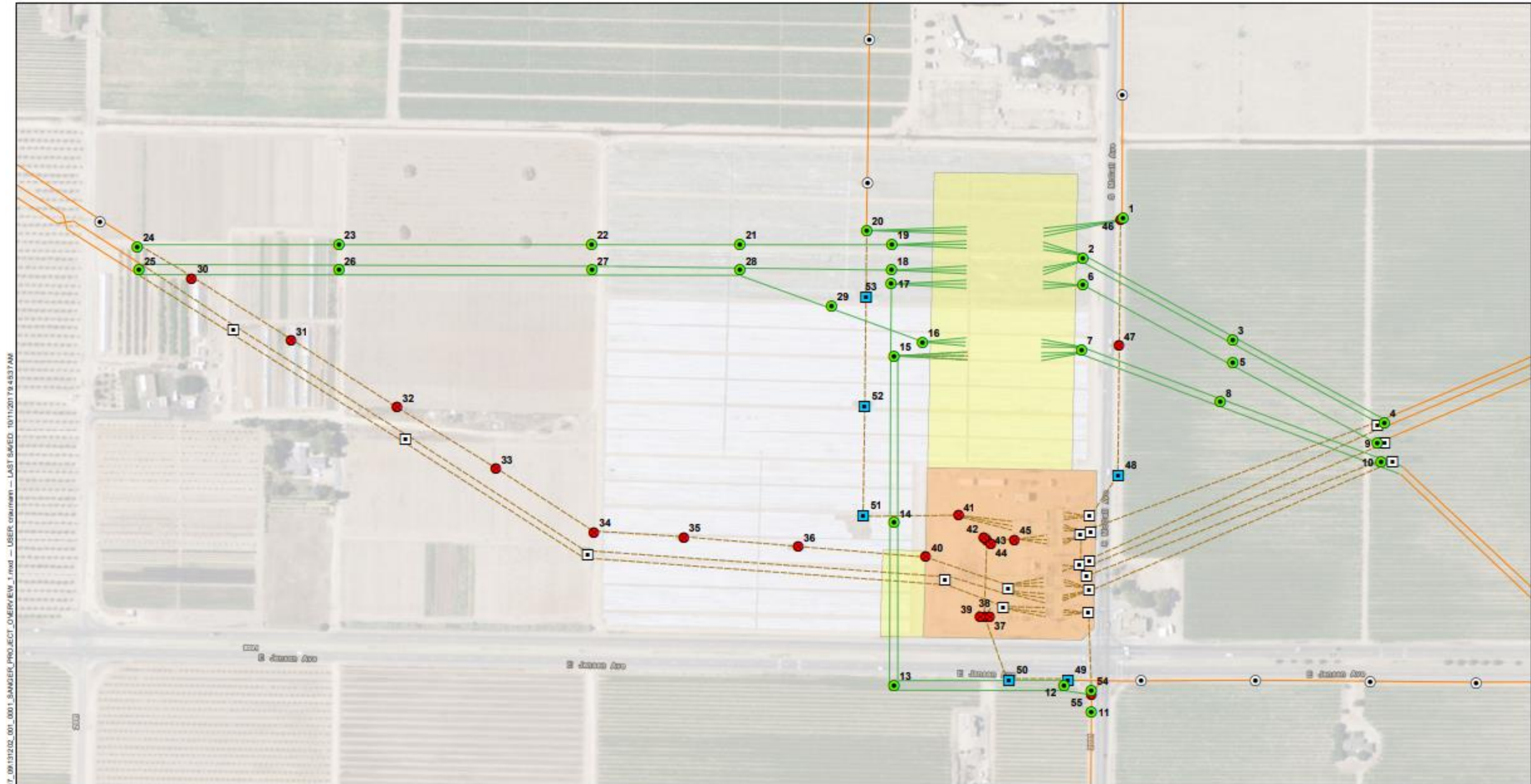
HALEY ALDRICH

PG&E SANGER SUBSTATION EXPANSION PROJECT
FRESNO COUNTY, CALIFORNIA

REVISED PROJECT OVERVIEW

OCTOBER 2017

FIGURE 2



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| ● | EXISTING POLE TO REMAIN | — | PLANNED NEW POWER LINE |
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| ● | EXISTING POLE TO BE REMOVED | - - - | POWER LINE TO BE REMOVED (UNDERBUILD TO REMAIN) |
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HALEY ALDRICH PO&E SANGER SUBSTATION EXPANSION PROJECT
FRESNO COUNTY, CALIFORNIA

REVISED PROJECT OVERVIEW

OCTOBER 2017 FIGURE 2

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**Exhibit 2: CPUC Evaluation of Minor
Project Refinement # 1**

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

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)?

Final IS/MND Significance: Less than Significant with Mitigation for night-time construction lighting

No	Yes
<input checked="" type="checkbox"/>	<input type="checkbox"/>

Summary of Proposed Project Refinement Impacts on Aesthetics:

The proposed refinement would not increase the impact to the visual quality of the area. The proposed refinement would be temporary in nature and would not result in a new impact, or increase the severity of a previously analyzed impact on aesthetics as identified in the Final IS/MND

AGRICULTURE & FORESTRY RESOURCES.

(e.g., convert Farmland to nonagricultural use, or create a conflict with existing agricultural zoning or a Williamson Act)?

Final IS/MND Significance: Less than Significant with Mitigation for temporary conversion impacts

No	Yes
<input checked="" type="checkbox"/>	<input type="checkbox"/>

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 in a manner that would be substantially different from that in prior approved project designs. 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)?

Final IS/MND Significance: Less than Significant Impact

No	Yes
<input checked="" type="checkbox"/>	<input type="checkbox"/>

Summary of Proposed Project Refinement Impacts on Air Quality:

Activities associated with the proposed project refinement (such as the type of construction equipment used and the run time of construction equipment) would be consistent with those discussed in the Final IS/MND. Impacts on air quality associated with the proposed project refinement would therefore remain less than significant. The proposed refinement would not result in new or increased impacts to 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)?

No **Yes**

Final IS/MND Significance: Less than Significant with Mitigation for sensitive wildlife species

Summary of Proposed Project Refinement Impacts on Biological Resources:

The proposed project refinement would occur entirely within disturbed agricultural lands, and would not result in an increase in impacts associated with degradation of habitat that would be likely to support special-status species. The proposed project refinement area is fully within areas previously surveyed during special-status species surveys, no special-status plant or wildlife species were observed, though it was determined that there is moderate potential for Swainson’s Hawk (a species designated as Threatened under the California Endangered Species Act) to occur. Raptors were identified within the proposed project refinement area during focused 2017 and 2018 raptor surveys, but Swainson’s Hawk was not observed, and no identified raptor species were special-status species. To further minimize the potential for impacts to special-status species, MM BIO-2, MM BIO-3, MM BIO-4, MM BIO-6, and MM BIO-7 all contain specific biological monitoring and avian protection requirements, which would apply to all raptors identified onsite, including raptors designated as special-status species. The proposed project refinement would not result in a new impact or increase the severity of a previously analyzed impact on biological resources.

CULTURAL & PALEONTOLOGICAL RESOURCES

(e.g., cause an adverse change to a significant historical, archeological, or paleontological resource)?

No **Yes**

Final IS/MND Significance: Less than Significant with Mitigation for archaeological resources

Summary of Proposed Project Refinement Impacts on Biological Resources:

The proposed refinement area was included in a 2012 records search extending 0.50 mile beyond the project components, and the proposed project area was surveyed during 2012 pedestrian cultural resources surveys. No known archaeological resources or historic resources that are eligible for listing on the California Register of Historical Resources (CRHR) were identified during surveys, including within the proposed refinement area. A paleontological records search of the proposed project area, including the proposed project refinement area, was conducted in 2012, and a pedestrian survey was conducted in 2015. No resources were identified. However, in the unanticipated circumstance of the discovery of previously unidentified cultural or paleontological resources within the proposed project refinement area during construction, PG&E would adhere to the monitoring, notification, and cataloguing protocols described in MM CUL-1, MM CUL-3, MM CUL-4, and MM CUL-5. Because activities in the refinement area would be occurring in an area already analyzed for the potential for impacts to cultural and paleontological resources, the proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on cultural or paleontological resources.

GEOLOGY AND SOILS.

Geology and Soils (e.g., cause or expose people or structures to geologic or soil hazards, including erosion or loss of topsoil)?

No **Yes**

Final IS/MND Significance: Less than Significant

Summary of Proposed Project Refinement Impacts on Geology and Soils:

The proposed refinement would involve ground-disturbing activities, vegetation removal, and minor grading/leveling of slopes to provide level work spaces. The proposed use of the refinement area would be similar to the Final IS/MND analysis. 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 Final IS/MND.

GREENHOUSE GAS EMISIONS.

(e.g., produce criteria greenhouse gas pollutants, or expose sensitive receptors to additional pollutants)?

No **Yes**

Final IS/MND Significance: Less than Significant

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 Final IS/MND. Therefore, the proposed refinement would not result in a new impact, or increase the severity of a previously analyzed impact on greenhouse gas emissions.

HAZARDS & 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)?

No **Yes**

Final IS/MND Significance: Less than Significant with Mitigation

Summary of Proposed Project Refinement Impacts on Hazards and Hazardous Materials:

Activities in the proposed project refinement would require use of the same types of equipment and hazardous materials that were analyzed in the Final IS/MND, and would comply with all safety measures described in MM HAZ-1 and MM HAZ-2. 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 & 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)?

No **Yes**

Final IS/MND Significance: Less than Significant with Mitigation

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

The proposed refinement would be within the area previously analyzed for hydrological resources and would remain consistent with the impacts to hydrological resources and water quality analyzed in the Final IS/MND. Activities that would occur within the proposed project refinement area would use similar quantities of water compared to activities previously analyzed in the Final IS/MND, and would not be occurring within areas of substantially different drainage patterns in a manner that could potentially alter runoff. Therefore, 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.

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)?

No	Yes
<input checked="" type="checkbox"/>	<input type="checkbox"/>

Final IS/MND 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 Final IS/MND. The proposed refinement would have no impact on land use and planning.

MINERAL RESOURCES.

(e.g., reduce availability of a known mineral resource and/or a locally important mineral resource recovery site)?

No	Yes
<input checked="" type="checkbox"/>	<input type="checkbox"/>

Final IS/MND Significance: No Impact

Summary of Proposed Project Refinement Impacts on Mineral Resources:

No mining or other mineral extraction activities occur within or adjacent to the proposed project refinement area. Therefore, the refinement would not result in a new impact on mineral resources.

NOISE.

(e.g., expose sensitive receptors to additional noise or vibration)?

No	Yes
<input checked="" type="checkbox"/>	<input type="checkbox"/>

Final IS/MND Significance: Less than Significant

Summary of Proposed Project Refinement Impacts on Noise:

Activities associated with construction and utilization of the proposed refinement area (such as use of heavy equipment) would be consistent with those discussed in the Final IS/MND. Sensitive receptors identified in the Final IS/MND would be the same as sensitive receptors to the proposed project refinement area. The implementation of APM NOI-1, APM NOI-2, and APM NOI-3, as described in the Final IS/MND, would ensure that activities within the proposed project refinement area would not result in new impact or an increase in the severity of a previously analyzed impact on noise.

POPULATION & HOUSING.

(e.g., result in substantial population growth or displace people or housing)?

No	Yes
<input checked="" type="checkbox"/>	<input type="checkbox"/>

Final IS/MND Significance: Less than Significant

Summary of Proposed Project Refinement Impacts on Population & Housing:

The proposed refinement would not require a quantity of construction workers that was otherwise not analyzed in the Final IS/MND, nor would it displace people or housing from the surrounding area. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on Population & Housing.

PUBLIC SERVICES.

(e.g., result in adverse impacts on government facilities that provide a public service)?

No

Yes

Final IS/MND Significance: No Impact

Summary of Proposed Project Refinement Impacts on Public Services:

The proposed refinement would not be located near a school or hospital or within a park, and would not interfere with police or fire services within the broader geographic area. 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)?

No

Yes

Final IS/MND Significance: Less than Significant

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 & 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)?

No

Yes

Final IS/MND Significance: Less than Significant with Mitigation

Summary of Proposed Project Refinement Impacts on Transportation & Traffic:

Construction activities within the proposed project refinement area, and associated vehicular equipment that would support such activities, would be similar to those analyzed in the Final IS/MND, and therefore would not result in an increase in vehicle traffic, hazardous intersections, road damage, or lane closures. Through the incorporation of the Traffic Management Plan described in MM TRAN-1, impacts to transportation and traffic associated with the proposed project refinement area would remain less than significant with mitigation and there would be no new impacts, or increased severity of impacts, beyond those previously analyzed.

UTILITIES & 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)?

No

Yes

Final IS/MND Significance: Less than Significant

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

The proposed project refinement would not involve the construction of new, or expansion of existing water facilities or stormwater drainage facilities, nor would the refinement require 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 and service systems.