

PUBLIC UTILITIES COMMISSION

300 CAPITAL MALL, 5th FLOOR
SACRAMENTO, CA 95814



June 16, 2020

VIA MAIL AND EMAIL

Ms. Keri Cuppage, CPM, Environmental Compliance Manager
San Diego Gas & Electric Company
8330 Century Park Court
San Diego, CA 92123-1530

Re: California Public Utilities Commission (CPUC) Review of Artesian Substation Expansion Project –
San Diego Gas & Electric Company (SDG&E) Minor Project Refinement (MPR) Request #3

Dear Ms. Cuppage,

The CPUC Infrastructure Planning and California Environmental Quality Act (CEQA) Energy Division has conducted a review of Artesian Substation Expansion Project (Project) – SDG&E MPR Request #3 submitted to the CPUC on June 3, 2020, and (as revised) resubmitted June 12, 2020. The requested change is to clear and level an area southwest of the Artesian Substation for temporary placement of two construction trailers. The MPR Request #3 area (MPR-3 Area) is located within the geographic boundary of the study area, as described in the Artesian Substation Expansion Project Initial Study/Mitigated Negative Declaration (IS/MND), published February, 2018. The MPR-3 Area partially overlaps with the permitted project area and with an existing spur road and operation and maintenance work pad, and is adjacent to a pull site identified in Figure 2-5a in the IS/MND.

SDG&E states in the MPR Request #3 that site preparation for the construction trailer pad would involve approximately 0.14 acre of ground disturbance and soil handling estimated to include 140 cubic yards (cy) of cut, 130 cy of net import and 270 cy of fill, which would be sourced from the onsite excavation of the eastern Artesian Substation parcel. The requested MPR-3 work includes relocation of a spur road (used to access two existing powerline structures) and restoration following trailer removal at the completion of the Project. A temporary potable water line (1,300 feet in length), temporary powerline (1,000 feet in length) and a low voltage (600-amp 12/240 volt) electrical meter with two temporary transformers would be installed to supply water and power to the construction trailers. As stated in the MPR Request #3, in the event that temporary power cannot be set up immediately, a portable 25 horsepower gasoline-powered generator may be used for up to two months. SDG&E provided a list of construction equipment, timeframe for construction, and CalEEMOD emissions modeling to quantify air pollutant emissions associated with the MPR Request #3.

The MPR Request #3 and associated documentation was evaluated by the CPUC and an Environmental Science Associates (ESA) Air Quality Technical Specialist, Matt Fagundes, who provided input on suggested revisions to the Request dated June 3, 2020 and requested back-up documentation of CalEEMOD emissions modeling data to ensure that an appropriate level of review was conducted. SDG&E responded directly and provided the additional requested emissions documentation on June 11, 2020 and a revised MPR-Request #3 on June 12, 2020.

The ESA Biologist and Lead Monitor, Alanna Sullivan reviewed the activities proposed under MPR Request #3 for consistency with the SDG&E Natural Communities Conservation Plan. ESA biologists had an opportunity to visually inspect the MPR3 Area during a monitoring site visit June 9, 2020. Following the site visit, ESA Biologist and Lead

Monitor, Alanna Sullivan, provided concurrence with the characterization of MPR-3 Area, as disturbed and bare ground. The requested use of MPR-3 Area would not result in any changes to impact conclusions provided in the IS/MND with implementation of relevant Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) listed in the Project's Mitigation Monitoring Reporting and Compliance Program (MMRCP), including, but not limited to pre-construction surveys for special-status species and nesting birds and implementation of the Stormwater Pollution Prevention Plan. Approval of this MPR does not constitute a substantive change to requirements in the MMRCP.

The CPUC/ESA believes that inclusion of the MPR-3 Area for temporary use as a site for the project's construction trailers, as described by SDG&E in the June 12, 2020 revised MPR Request #3, would not result in any changes to the impact conclusions provided in the IS/MND with implementation of relevant APMs and MMs listed in the MMRCP. The MMs AIR-1 and HAZ-1 in particular would be applicable to MPR-3, due to the close proximity of the MPR-3 Area to the Artesian Substation. Therefore, to ensure comprehensive tracking for the Project's overall emissions such that no changes to the significance determinations in the IS/MND would occur as a result of the approval of MPR Request #3, the following conditions shall be implemented:

1. SDG&E (and/or its designated construction contractor(s)) shall ensure that at least 89 percent of all diesel-powered equipment use (tracked as horse-power hours) during construction activities at Artesian Substation, including construction activities associated with Minor Project Refinement 3) is from equipment that meet USEPA-certified Tier 4 standards, the highest USEPA-certified tiered emission standards, or are otherwise equipped with Level 3 diesel particulate filters (DPFs).

Moreover, it should be noted that the activities proposed under the MPR Request #3, shall be considered part of the overall Artesian Substation Expansion Project (as refined), and would therefore be subject to the same applicable Mitigation Measures and APMs identified in the Final IS/MND including, but not limited to pre-construction surveys for special status species and nesting birds, implementation of worker environmental awareness training, and Stormwater Pollution Prevention Plan conditions, etc. As stated in the MPR Request #3, implementation of the requested MPR-3 construction activities would not trigger additional permit requirements (such as a new or revised City of San Diego Grading Permit), create a new significant impact, or increase the severity of a previously identified impact. Therefore, MPR Request #3 is considered acceptable and is approved by the CPUC.

Sincerely,



Patricia Kelly
Project Manager
Energy Division, CEQA Unit

cc: Mary Jo Borak, CPUC Energy Division
Maria Hensel, Julie Watson, ESA