

## PUBLIC UTILITIES COMMISSION

300 CAPITAL MALL, 5<sup>th</sup> FLOOR  
SACRAMENTO, CA 95814



October 15, 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 #4

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 #4 submitted to the CPUC on October 8, 2020. As detailed in the MPR Request #4, the requested change is to allow for minor revisions to four temporary work areas associated with construction of the 69kV power line reconductoring. The proposed change would include both a shift and expansion of temporary work space to allow for safe working areas for construction of the 69kV power line reconductor and pole replacement phase of the Project. An adjustment of the work areas would not include changes to the duration or nature of construction when compared to the approved Project. The MPR Request #4 areas (MPR-4 Areas) are located within the geographic boundary of the study area, as described in the Project's Initial Study/Mitigated Negative Declaration (IS/MND), published February, 2018.

SDG&E states in the MPR Request #4 that all work proposed is within the IS/MND study area and does not trigger permits from other agencies. Although temporary impacts would result from the requested expansion of work areas, the requested modifications to MPR4 Areas would not result in new impacts when compared to the impacts disclosed in the Final IS/MND.

On behalf of the CPUC, ESA Biologist and Lead Monitor, Alanna Sullivan reviewed the activities proposed under MPR Request #4 for consistency with the IS/MND. Additionally, ESA biologist Adrienne Lee had an opportunity to visually inspect the all four MPR-4 Areas and document conditions prior to work related to MPR Request #4 during a monitoring site visit on October 13, 2020. These MPR4 Areas included Location 33, Stringing Site 12, Stringing Site 13, and Stringing Site 19. Following the monitoring visit, Ms. Lee confirmed that sensitive species and aquatic resources were flagged as avoidance areas.

Based on the information provided in the MPR Request #4, Alanna Sullivan has provided concurrence that the revisions to the four temporary work areas 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 if work is to occur within bird breeding season (February 1–August 31) and implementation of the Stormwater Pollution Prevention Plan measures, including implementing best management practices (BMPs) such as silt fencing and straw wattles made of all natural fibers where BMPs are needed to protect resources.

The activities proposed under the MPR Request #4, shall be considered part of the overall Artesian Substation Expansion Project (as refined), and are therefore subject to the same applicable Mitigation Measures and APMs identified in the Final IS/MND including, but not limited to implementation of worker environmental awareness training, pre-construction surveys for special status species and nesting birds, resource protection BMPs and conditions in the Project's Stormwater Pollution Prevention Plan, as applicable.

Specifically, it is expected that, as stated in APM-8: *“(i)f modifications to the pole work areas are required to conduct the work, SDG&E’s on-site environmental monitors, as appropriate will assist construction crews in the field to locate pole work areas that avoid and minimize impacts to sensitive environmental resources.”* Following temporary use of the work areas at the completion of construction, it is expected that SDG&E take reasonable measures to clean up and restore areas temporarily disturbed, in a manner similar to pre-construction conditions, while respecting necessary firebreak clearance requirements, as described in Section 2.6.4.2 the IS/MND.

The CPUC believes that the temporary use of the MPR-4 Areas as work areas associated with construction of the 69kV power line reconductor and pole replacement as described by SDG&E in the October 8, 2020 MPR Request #4, would not result in any changes to the impact conclusions provided in the IS/MND. Approval of this MPR does not constitute a substantive change to requirements in the MMRCPP. As stated in the MPR Request #4, implementation of the requested MPR-4 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 #4 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