

PUBLIC UTILITIES COMMISSION

300 CAPITAL MALL, 5th FLOOR
SACRAMENTO, CA 95814



October 30, 2019

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 #1

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 #1 submitted to the CPUC on October 4, 2019. The request would allow for approximately 5,400 square foot of additional exclusion area (MPR Area 1) located within the 5-acre Carmel Valley Road Staging Yard to be utilized as part of the overall staging yard increasing the overall disturbance acreage from 5.1 to 5.2 acres.

The MPR Request #1 Area 1 is located within the geographic boundary of the study area, as shown on the Artesian Substation Expansion Project Initial Study/Mitigated Negative Declaration (IS/MND), published February, 2018.

SDG&E states in the MPR Request #1 that the MPR Area 1 was previously mapped as non-native grassland and designated as an exclusion area as a result of preliminary vegetation mapping conducted in 2015. SDG&E asserts that MPR Area 1, located in the center of the staging area, is now considered disturbed habitat, and is routinely used as a staging/storage area by various entities that temporarily lease, from the property owner, and utilize the Carmel Valley Road staging area. The MPR Request #1 also states that repeated (prior) use of MPR Area 1 has resulted in compacted soil that lacks burrows or other evidence of use by mammal species and asserts this is a characteristic of disturbed land rather than a sensitive habitat community. The MPR Area 1 is not within 100-feet of any previously-documented cultural resources.

The CPUC/Environmental Science Associates (ESA) project management team and ESA biologists had an opportunity to visually inspect the MPR Area 1 during a site visit September 23, 2019. Following the site visit, ESA Biologist and Lead Monitor, Alanna Sullivan, provided concurrence with this characterization of MPR Area 1, as disturbed. The requested use of MPR Area 1 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.

The CPUC believes that inclusion of MPR Area 1 for use as part of the larger staging area, as described by SDG&E in their October 4, 2019 request, 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. No changes would occur as a result of the

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MPR Request #1 that would trigger additional permit requirements, create a new significant impact, or increase the severity of a previously identified impact. Therefore, MPR Request #1 is considered acceptable and is approved by the CPUC.

Sincerely,



Patricia Kelly
Project Manager
Energy Division, CEQA Unit

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