



Artesian 230kV Substation Expansion Project CPUC Minor Project Refinement Form

Minor project refinements are strictly limited to changes that will not trigger an additional permit requirement (except local government ministerial permits and associated requirements), do not substantially increase the severity of a previously identified significant impact based on criteria used in the IS/MND, create a new significant impact, are located within the geographic boundary of the study area of the IS/MND, and that don't conflict with any mitigation measure or applicable law or policy.

Date Requested:
October 4, 2019

Report No.:

Date Approved:

Approval Agency: California Public Utilities Commission (CPUC).

Property Owner(s):
Poway Unified School District

Location/Milepost: The Minor Project Refinement No. 1 (MPR-1) temporary workspace area is located within the Carmel Valley Road Staging Yard.

Land Use/Vegetative Cover:
Disturbed Habitat

Sensitive Resources:
None

Modification From:

<input type="checkbox"/> Permit	<input type="checkbox"/> Plan/Procedure	<input type="checkbox"/> Specification	<input type="checkbox"/> Drawing
<input type="checkbox"/> Mitigation Measure	<input checked="" type="checkbox"/> Other:		

Initial Study/Mitigated Negative Declaration (IS/MND) for the San Diego Gas & Electric Company's Artesian 230kV Substation Expansion Project. Prepared for the California Public Utilities Commission (CPUC A.16-08-010), dated February 2018.

Notice to Proceed (NTP) request for the Artesian 230/60 kV Substation Expansion Project. Authorized by the CPUC on September 18, 2019.

Describe how project refinement deviates from current project. Include photos.

The requested change is to add an approximately 5,400-square-foot area (Minor Project Revision [MPR]-1 Area) that was previously excluded from within the Carmel Valley Road Staging Yard into the staging yard impact area.

Original Condition:

The following is verbiage from the IS/MND:

"It is anticipated the Carmel Valley Road Staging Yard would act as the primary staging yard during construction of the Proposed Project. The Carmel Valley Road Staging Yard is a five-acre site located on



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a larger parcel (approximately 25 acres) at the corner of Carmel Valley Road and Camino Del Sur. The staging yard is on a relatively flat area and has been previously grubbed and graded. Access to this staging yard would be via Camino Del Sur.”

An approximately 5-acre area on the western side of the 25-acre parcel referenced above was mapped as the Carmel Valley Staging Yard. During a preliminary vegetation mapping effort in 2015, an approximately 5,400-square-foot portion of the Carmel Valley Road Staging Yard (MPR-1 Area) was mapped within that 5-acre area as non-native grassland and was subsequently excluded from the staging yard impact area thereafter, as depicted in the IS/MND and Figure 3 of the Notice to Proceed (NTP) request, authorized by the CPUC on September 18, 2019. The reason this area was excluded from the staging yard was to avoid triggering mitigation for impacts to non-native grassland, which is a vegetation community designated as sensitive by the SDG&E Natural Communities Conservation Plan (NCCP).

Per the NCCP, grassland *“includes both areas dominated by native bunchgrasses and previously disturbed areas dominated by non-native grasses and other annual species. Characterized by a moderate to dense herbaceous cover of the perennial, tussock-forming species, purple needlegrass, and most closely corresponds to Holland’s (1986) valley needle grassland. Located on fine-textured clay soils that are moist or wet in winter, but very dry in summer. Nonnative grassland generally occurs on fine-textured loam or clay soils which are moist or even waterlogged during the winter season and very dry during summer and fall. It is characterized by a dense to sparse cover of annual grasses, often with native or non-native annual forbs (Holland 1986). This habitat is a disturbance-related community most often found in old fields or openings in native scrub habitats.”*

Justification for Change:

The MPR-1 Area is located near the center of the staging yard (see attached map) and it would be beneficial to utilize the area for project-related staging activities. In addition, the MPR-1 Area is no longer considered a sensitive vegetation community. The classification of non-native grassland was a very conservative classification for the marginal habitat that occurs in the MPR-1 Area. Since then, the area has been repeatedly disturbed and used for staging for other projects, as is evident in Google Earth historical aerial imagery. Therefore, the MPR-1 Area can be classified as disturbed habitat, as further explained in the Environmental Impact section of this MPR request.

Maps & Figures:

Refer to NTP Figure 3 and the MPR-1 Area map included with this request. Because the MPR-1 Area is within the footprint of the 25-acre parcel identified for utilization of the Carmel Valley Road staging yard, MPR-1 Area is within the geographic study area of the IS/MND for the Project.

Environmental Impact:

The MPR-1 Area, previously mapped as non-native grassland within the Carmel Valley Road Staging Yard, is now considered disturbed habitat under the NCCP due to changing land use patterns and species composition that have been observed since the original mapping of the area in 2015. Per the NCCP, disturbed habitat includes, *“any land on which the native vegetation has been significantly altered by agriculture, grazing of domestic animals, construction, or other land-clearing activities. Locally found in vacant lots, roadsides, construction staging areas, or abandoned fields, and is dominated by non-native annual species and non-native broadleafed species. Some potential inclusions are grassland and developed areas.”*

The MPR-1 Area proposed for use as part of the Carmel Valley Road Staging Yard impact area, along with the area already designated as the staging yard impact area, is routinely used as a staging/storage area for various entities that include earth moving equipment, stockpile staging, and vehicle parking. These recent past uses of the site resulted in continued disturbance of the existing habitat, which has contributed to the recruitment of invasive species. Per the NCCP definition of disturbed habitat above, areas where native vegetation has been significantly altered and have been affected by construction or other land clearing activities are considered disturbed. While non-native grass species are present within the MPR-1 Area, these species are considered opportunistic and invasive, and together with other observed forb species, indicate a significant departure in species diversity and richness from the expected traits of non-native and native grassland habitats. Furthermore, repeated use of the MPR-1 Area for staging over several years has resulted



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in compact soil that lacks burrows or other evidence of use by fossorial mammal species; this compaction is a characteristic of disturbed habitat rather than a sensitive habitat community. While the proportion of grasses to forbs can assist in the distinction between non-native grassland and disturbed habitat, the overall function of the ecosystem in the area is a primary driver between the distinction between these two habitat types.

The classification of the MPR-1 Area as disturbed habitat is consistent with the IS/MND, (Environmental Setting [Figure 3.4-1H: Vegetation Communities]). Furthermore, the MPR-1 Area is not within 100 feet of any previously-documented cultural resource. Use of the MPR-1 area would not increase impacts to air quality or noise because it would not result in additional equipment use for the project. Therefore, use of the MPR-1 Area for staging activities would not result in significant environmental impacts.

The following photographs, taken on September 16, 2019, display habitat within the MPR-1 Area as well as within the approved Carmel Valley Road Staging Yard surrounding the MPR-1 Area.

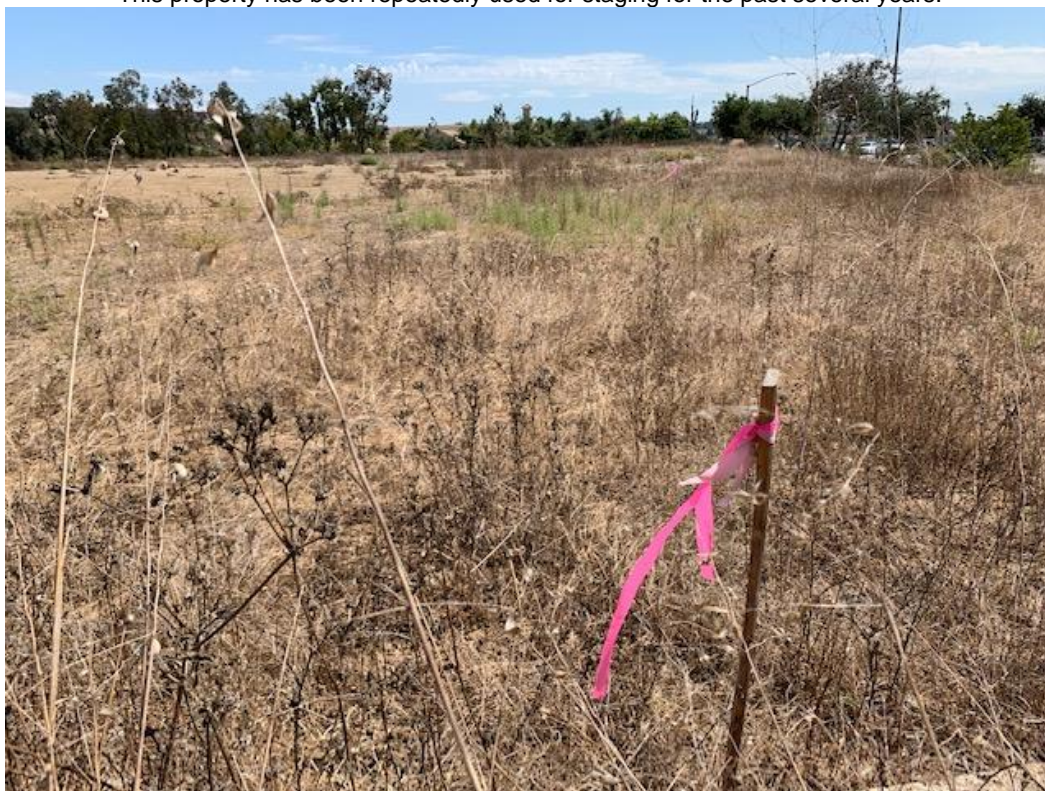


Photograph 1: North-facing view of MPR-1 Area, surrounded by stakes with green flagging. The MPR-1 Area consists of disturbed habitat containing non-native grasses with an influx of invasive species including common sow-thistle (*Sonchus oleraceus*), curly dock (*Rumex crispus*), and tamarisk (*Tamarix* sp.). This area is further surrounded by bare ground, gravel, pavement, and disturbed habitat.

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Photograph 2: Southeast-facing view of pavement and disturbed habitat within boundary of Carmel Valley Staging Yard. This property has been repeatedly used for staging for the past several years.



Photograph 3: Southeast-facing view of disturbed habitat and bare ground within the Carmel Valley Staging Yard.



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Photograph 4: Northeast-facing view of the Carmel Valley Staging Yard. Much of the property within the yard surrounding MPR-1 consists of pavement, bare ground, and areas covered with gravel.

Concurrence (if appropriate):

Concurrence for use of MPR1 Area is not required. SDG&E's lease with the Property owner covers the area in question and use of the staging yard is not subject to any regulatory approval.



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<u>Resources:</u>			
Biological	<input checked="" type="checkbox"/> No Resources Present	<input type="checkbox"/> Resources Present	<input type="checkbox"/> N/A, Change would not affect resources
Previous Biological Survey Report Reference: Chambers Group, Inc. 2016. <i>Biological Technical Report for the San Diego Gas & Electric Company Artesian Substation Expansion Project</i> , San Diego County, California. July 2016. Environmental Science Associates (ESA). <i>San Diego Gas and Electric Artesian 230kV Substation Expansion Project Final Initial Study/Mitigated Negative Declaration</i> . Prepared for the California Public Utilities Commission (CPUC). March 2019. San Diego Gas & Electric Company (SDG&E) 1995. <i>San Diego Gas and Electric Company Subregional Natural Community Conservation Plan</i> . SDG&E 2016. <i>SDG&E Proponents Environmental Assessment for the Artesian 230 kV Substation Expansion Project (A.16-08-010) Volumes I and II</i> .			
Cultural	<input type="checkbox"/> No Resources Present	<input type="checkbox"/> Resources Present	<input checked="" type="checkbox"/> N/A, changes would not affect resources
Previous Cultural Survey Report Reference: ASM Affiliates 2015. <i>Supplemental Survey for Camino Del Sur Yard 2 in SDG&E's Proposed Sycamore to Penasquitos Transmission Line Project (SX to PQ)</i> , San Diego County, California.			
<u>Disturbance Acreage Changes:</u> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
Original disturbance acreage: 5.1 acres			
New disturbance acreage: 5.2 acres			



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Comparison of Environmental Effects and Permitting

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
Geology, Soils, and Seismicity	<input type="checkbox"/> Y	Use of the MPR-1 Area would not affect CEQA impacts relating to geologic hazards, including seismicity. There would be no additional impacts to soils from use of the Area. The staging yard would not be exposed to any increased risk from geologic hazards with the addition of the MPR-1 Area. Therefore, no new or more severe impacts would occur.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	Agency approval (i.e., grading permit or similar process) is not required for use of the MPR-1 or the Staging Yard as a whole because the site was previously graded. Due to the lack of site development work and no permanent structures being installed, a geotechnical investigation is not required.
	<input checked="" type="checkbox"/> N	
Hazardous Materials and Waste	<input type="checkbox"/> Y	Use of the MPR-1 Area would not affect CEQA impacts relating to hazardous materials and wastes. The addition of the Area would not result in an increase of construction equipment, vehicles, hazardous materials used onsite, or hazardous waste generated. There would be no additional activities resulting in an increase threat or risk derived from the use of hazardous substances. Therefore, no new or more severe impacts would occur.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	Additional agency consultation or approval would not be required for the use of MPR-1 area. Use of the Area would not affect the use or disposal of hazardous materials or wastes.
	<input checked="" type="checkbox"/> N	
Hydrology	<input type="checkbox"/> Y	Use of the MPR-1 Area would not affect CEQA impacts relating to hydrology and water quality. The addition of the Area would not result in an increase of construction equipment, vehicles, or impervious area at the staging yard site. There would be no increase in water usage or any additional activities that would degrade water quality. Therefore, no additional impacts would occur.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	Use of MPR-1 Area will not affect the SWPPP, project coverage under the Construction General Permit, or the Water Reclamation and Recycling (WRR) permit. The addition of the Area will alter the location of some SWPPP and WRR BMPs as the Area was previously identified as an ESA. However, this would not require additional agency consultation or new permits.
	<input checked="" type="checkbox"/> N	
Cultural Resources	<input type="checkbox"/> Y	Use of the MPR-1 Area does not affect cultural resources. The Area is not within 100 feet of any previously-documented cultural resource. Therefore, no new or more severe impacts would occur.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	Because the MPR-1 Area is not within 100 feet of any previously-document cultural resource, use of the Area would not affect any cultural resources and additional consultation would not be required.
	<input checked="" type="checkbox"/> N	



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CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
Traffic and Circulation	<input type="checkbox"/> Y	Use of the MPR-1 Area would not affect CEQA impacts relating to traffic and circulation. The Area is within the existing staging yard boundary. There would not be change to traffic conditions on Camino Del Sur, Carmel Valley Road, or other surrounding streets. There would not be a noticeable increase in vehicles driving in and out of the staging area (a small number of one-time delivery trips for extra base may be required). Therefore, no new or more severe impacts would occur.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	Agency Consultation is not required for use of the MPR-1 Area. The Area is located within the existing staging yard boundary. There would be no new encroachment permits or changes to traffic control plan requirements.
	<input checked="" type="checkbox"/> N	
Air Quality	<input type="checkbox"/> Y	Use of the MPR-1 Area would not affect CEQA impacts relating to air quality. The Area adds additional square footage to the staging yard, but it does not result in additional equipment use that would increase air quality impacts. Regional emissions of criteria pollutants would be almost identical to the approved project. Therefore, no new or more severe impacts would occur.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	Additional agency consultation or approval would not be required for the use of MPR-1 area. Use of the Area would not affect output of emissions and would not trigger any requirement for agency consultation or regulatory approval.
	<input checked="" type="checkbox"/> N	
Noise and Vibration	<input type="checkbox"/> Y	Use of the MPR-1 Area would not affect CEQA impacts relating to noise and vibration. The Area adds additional square footage to the staging yard, but it does not result in additional equipment or use of equipment that would increase noise impacts. Because the Area is within the existing substation boundary, the distance any sensitive noise areas would not be decreased. Therefore, no or more severe impacts would occur.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The Project must comply with the City of San Diego's noise ordinance. The MPR-1 Area is within the existing staging yard boundary and impacts have already been evaluated in the Initial Study/Mitigated Negative Declaration. Addition of the Area would not require consultation with the City.
	<input checked="" type="checkbox"/> N	
Aesthetics/ Visual Resources	<input type="checkbox"/> Y	Use of the MPR-1 Area would not affect CEQA impacts relating to aesthetics or visual resources. The Area is located near the center of the approximately 5-acre staging yard. Any equipment, vehicles, or materials located in the 5,400-square-foot Area would not create any additional impacts to aesthetics or visual resources.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	Agency Consultation is not required for use of the MPR-1 Area. The CPUC has exclusive jurisdiction over the siting, design, and construction of the Project.
	<input checked="" type="checkbox"/> N	
Vegetation and Wildlife	<input type="checkbox"/> Y	The MPR-1 Area does not contain sensitive vegetation communities or provide potential habitat for sensitive plant or wildlife species. MPR-1 consists of Disturbed Habitat, as described in the Environmental Impact section of this MPR Request. Therefore, no impacts to vegetation or wildlife considered sensitive under CEQA are expected as a result of adding the Area to the Carmel Valley Staging Yard temporary impact area.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	Because the MPR-1 Area is disturbed habitat, no new or additional consultation, reporting, or permitting is required with the Wildlife Agencies.
	<input checked="" type="checkbox"/> N	



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Approvals	Date	Name (print)	Signature	
San Diego Gas and Electric Project Manager		Irina Peterson		<input type="checkbox"/> Reviewed
San Diego Gas and Electric Environmental Project Manager		Eden Nguyen Kilburg		<input type="checkbox"/> Reviewed
CPUC Project Manager		Pat Kelly		<input type="checkbox"/> Approved <input type="checkbox"/> Approved with conditions (see below) <input type="checkbox"/> Denied

For CPUC Compliance Manager Use Only

☐ Refinement Approved ☐ Refinement Denied ☐ Beyond Authority

Conditions of Approval or Reason for Denial:

Prepared by:

Date:

MPR FIGURES



Artesian 230kV Substation
Expansion Project

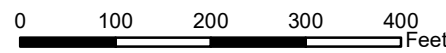
MPR-1 AREA

(Depicted on NTP2 - Figure
2 Carmel Valley
Road Staging
Yard Map

Legend

- Property Owner Access
- Staging Yard Boundary

SDG&E is providing this map with the understanding
that the map is not survey grade.



Content may not reflect National Geographic's current map policy. Sources:
National Geographic, Esri, Garmin, HERE, UNEP-WCMC, USGS, NASA,
ESA, METI, NRCAN, GEBCO, NOAA, increment P Corp.
Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus
DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community; NAIP,
2014; TRC, 2016; SDG&E, 2016