

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 21, 2016

Ms. Shivani Sidhar
San Diego Gas and Electric Company
8330 Century Park Court, CP31F
San Diego, CA 92123

RE: Notice to Proceed

Dear Ms. Sidhar,

A Final Environmental Impact Report (FEIR) for the Salt Creek Substation Project was adopted by the California Public Utilities Commission (CPUC) on May 12, 2016. The CPUC approved the environmentally superior alternative, Alternative 2 – Salt Creek Substation and TL 6910 loop-in (Project); TL 6965 was not approved. The mitigation measures (MMs) and Applicant Proposed Measures (APMs) described in the FEIR were adopted as conditions of approval. The CPUC also adopted a Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) to ensure compliance with all APMs and MMs during Project implementation. The MMCRP describes the CPUC Notice to Proceed (NTP) process, which requires SDG&E to obtain an approval letter from the CPUC, authorizing Project related work to proceed.

On June 10, 2016, SDG&E submitted an NTP Request to commence construction activities for the approved Project (i.e., Alternative 2). This letter authorizes SDG&E to commence work described in the NTP Request (Attachment 1) on a conditional basis. The conditions of approval for commencing work are described here.

NTP Request

SDG&E requested NTP from the CPUC to begin construction of the Salt Creek Substation, a new low profile, 120-MVA, 69/12-kV electric distribution substation. The construction would include installation of three distribution circuits to connect to an existing distribution network at Hunte Parkway. Construction will also include an underground loop-in of an existing 69-kV power line (TL 6910) and potentially fiber optic line located in the SDG&E utility corridor adjacent to the substation. The substation will be unattended and automated. The substation facilities include:

- Two 69/12-kV low profile 30-MVA transformer banks
- Steel 69-kV bus and associated disconnects
- Six 69-kV gas circuit breakers
- 12-kV switchgear with four 12-kV circuit positions each
- Two 12-kV metal-enclosed capacitor banks
- 69-kV and 12-kV associated relays, controls, and station batteries inside a 40-foot long by 20-foot wide enclosed all-weather structure
- Three distribution circuits
- Microwave dish

Additional facilities located inside the enclosed all-weather structure would include metering, Supervisory Control and Data Acquisition (SCADA), and security and communications equipment. The 2.4-acre substation pad would be covered in gravel and a 10- to 12-foot high masonry wall would enclose the substation. The substation would be accessed via a 30-foot wide driveway from Hunte Parkway into the east side of the substation.

Construction activities will include:

- Grading and site development
- Temporary power for construction
- Equipment/materials staging and storage
- Installation of below-grade and above-grade substation components
- Utilities installation
- Testing and energization

Construction is expected to last 18 to 24 months, starting June 27, 2016.

Authorization of NTP

This NTP authorizes SDG&E to commence all construction and mitigation activities for the approved Project (Alternative 2), as described in the FEIR.

NTP Conditions of Approval

The NTP is approved by the CPUC with conditions.

Pre-Construction Conditions of Approval

SDG&E will need to comply with the following conditions of approval prior to beginning work:

1. **Notifications.** SDG&E shall provide the CPUC with evidence of the remaining notifications listed in Table 1.
2. **Permits.** SDG&E shall provide the CPUC with the permit listed in Table 2.
3. **Pre-construction Surveys.** SDG&E shall conduct pre-construction surveys as required by project APMs and MMs, and submit the results to the CPUC. The required pre-construction surveys that must be conducted prior to beginning the work described in the NTP are summarized in Table 3.

Table 1: Notifications

Notifications	Requirement	Schedule	Notes
Fire prevention and response	MM Hazards-1	No less than 7 days prior to construction	Submit verification of consultation with CAL FIRE and the local fire departments to the CPUC.
Public awareness of construction	MM Noise-1 APM REC-1	No less than 1 week prior to construction	Submit a map showing the notification area and locations where signs will be posted to the CPUC. The CPUC approved the notice on 6/9/2016.

Table 2: Permits

Permit	Agency	Schedule	Notes
Reclaimed Water Permit	Otay Water District CPUC	Application to the Otay Water District was submitted on 2/3/16 Will be complete when Contractor pulls the final permit	Submit an authorized reclaimed water permit to the CPUC prior to using recycled water for the project.
Traffic Control Permit	City of Chula Vista	Obtain a minimum of 2 working days prior to starting work, or 5 days prior if work will affect an existing traffic signal	Provide a copy to CPUC.
Temporary Power Permit		Obtain prior to construction	Provide a copy to CPUC.

Table 3: Pre-Construction Surveys

Pre-construction Surveys	Requirement	Schedule	Notes
Special-Status Wildlife	APM BIO-2 MM Biology-1a SDG&E Subregional NCCP	Survey - No more than 30 days prior to construction Pre-Activity Survey Report - No more than 7 days prior to construction	A verification study of all project work areas must be completed no more than 30 days prior to surface disturbance by the Qualified Biologist.
Western Burrowing Owl (WBO)	APM BIO-1 Burrowing Owl Monitoring and Mitigation Plan	Within 24 hours prior to initiation of construction activities	Conduct a final take avoidance survey in suitable WBO habitat located within project work areas and a 100-foot surrounding buffer by a Qualified Biologist, and submit a letter report to CDFW and CPUC. If occupied burrows are encountered, additional reporting is required. If more than 30 days pass between the take avoidance survey and initiation of Project activities, additional take avoidance surveys may be required, depending on what actions have been implemented to deter WBO from moving into the Project footprint.
Nesting Birds	MM Biology-6	No more than 48 hours prior to the start of ground or vegetation-disturbing activities	Survey project work areas, and within variable buffer distances (150 feet - 1 mile) by a CPUC-approved biologist.
Rare and Special-Status Plants	APM BIO-2 MM Biology-1a SDG&E Subregional NCCP Special-Status Plan Relocation and Monitoring Plan	Prior to construction	Survey natural work areas for rare and special-status plants prior to construction by a CPUC-approved botanist. Submit a Pre-activity Survey Report to CPUC that documents the results of the survey. The Pre-activity Survey Report shall include a library of rare plant locations known to SDG&E occurring within the project area.

Other Conditions of Approval

SDG&E will need to comply with the following conditions during construction:

1. **Mitigation Plans.** SDG&E shall submit and address CPUC comments on the Plans listed in Table 4, as required in the MMCRP.
2. **Special-status Plant Mitigation.** The CPUC is in the process of reviewing SDG&E’s proposal to apply the purchase of conveyance lands in Otay Ranch Preserve to mitigate for impacts to Palmer’s grappling hook. Should the CPUC determine that the purchase of conveyance lands does not meet the requirements of Mitigation Measure Biology-2 to preserve comparable special-status plant resources, SDG&E shall revise the draft Salvage and Relocation Plan for Special-Status Plants to the satisfaction of CPUC and then implement the plan accordingly. Until the CPUC approves of any alternative mitigation proposal, SDG&E shall collect and store the required amount of Palmer’s grappling hook seed to comply with the salvage and relocation requirements of Mitigation Measure Biology-2.

Table 4: Plans

Plan	Requirement	MMCRP Schedule	Notes
Landscape and Irrigation Plan and Temporary Impact Restoration Plan	MM Aesthetics-1 MM Biology-11	No less than 120 days prior to acquisition of landscape materials	SDG&E has submitted a draft plan and is revising the plan to address CPUC comments.
Spill Prevention, Control, and Countermeasure (SPCC) Plan	APM HAZ-1	No less than 30 days prior to installation of transformers at the Salt Creek Substation	Complete at least 30 days prior to transformer installation.

Ms. Shivani Sidhar

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If you have any questions or would like further clarification, please contact me at connie.chen@cpuc.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Connie', with a long horizontal flourish extending to the right.

Connie Chen

Project Manager

Energy Division, CEQA Unit

cc: Susanne Heim, Panorama Environmental
Aaron Lui, Panorama Environmental
Sheila Hoyer, Panorama Environmental

Attachment 1: SDG&E NTP Request

Attachment 1:

Salt Creek Substation NTP Request



June 2, 2016

Dear Connie,

Thank you for the opportunity to review the MMCRP and for scheduling regular progress meetings. We look forward to working with you and your consultant team on the construction phase of the project. We were tasked with several action items from our meeting on May 25, 2016. In addition, there are several notifications/submittals required prior to the start of construction. Enclosed herein, are several of those required submittals.

Action Items from Meeting on May 25, 2016

1. Submit contacts for “roles and responsibility” -Appendix D. (Also, provide a separate sheet with phone numbers.)

Attachment 1 identifies SDG&E key team members and contact information for the inclusion in Appendix D. Note, that per our conversation on May 25th, contact information for individuals should be considered confidential.

2. Submit Special Status Plant Mitigation Plan

SDG&E is reviewing the memo provided by the CPUC on May 26th and will respond as soon as possible.

3. Submit comments to the MMCRP

SDG&E appreciates the opportunity to review the MMCRP. SDG&E wishes to clarify the requirement for MM Biology-3 requirement for vehicle wash logs. Attachment 2 includes details on what/when vehicles would be washed vs. inspected.

4. Submit NTP request

SDG&E will be submitting an NTP request for the project in early June.

5. Submit Environmental Training Program PowerPoint (1-pager to follow)

Provided in Attachment 3 is the PowerPoint for the WEAP Training. SDG&E will also be preparing a one-page tri-fold pamphlet to complement the PowerPoint Training.

6. Submit pre-construction surveys

SDG&E has prepared a proposed survey schedule to complete the necessary pre-construction surveys. This survey schedule is provided in Attachment 4. Provided in Attachment 5 are survey and monitoring reports for activities conducted to date, in compliance with the CPUC approved BUOW Mitigation Plan.

AECOM will be submitting resumes for specialty monitors next week.

Permit Submittals (CPUC Table C-1)

1. Grading Permit



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SDG&E has obtained a grading permit from the City of Chula Vista. This permit is provided in Attachment 6. Please note that a separate structural permit for the construction of the walls is not required by the City of Chula Vista.

2. Revised SWPPP & SWQMP

Based on CPUC comments provided on May 23, 2016, the SWPPP is being revised to be consistent with the SWQMP.

3. Landscape and Irrigation Plan and Temporary Restoration Plan

AECOM is revising the Landscape Irrigation and Temporary Restoration Plan. The revised plan will be submitted in early June.

Plan Submittals (CPUC Table C-2)

1. Revised HSMERP

The revised HSMERP, addressing CPUC comments provided on May 23, is provided in Attachment 7.

Notification Submittals (CPUC Table C-3)

Several notification requirements were identified as pending in the CPUC tracking table C-3. The following information is being provided to address a number of these notification requirements.

1. Final Project Design and Anticipated Schedule

Final site development plan drawings are provided in Attachment 8. Project construction is currently scheduled to begin on June 27, 2016.

2. Seed Mixes, plants, and weed-free erosion control materials

Seed mixes and container plant lists were provided to the CPUC as part of the temporary revegetation and landscape plan submittal. Weed-free erosion control materials were provided as part of the SWPPP submittal. SDG&E monitors will verify that products brought onsite are in compliance with these plans, and are weed-free.

3. Native American Consultation

Per the requirement of the MMCRP, SDG&E is notifying the tribes of planned construction and will request their input. Consultation letters are expected to be distributed by this Friday, June 3rd. The letter template that is being distributed is provided in Attachment 9.

4. Organic Waste Disposal

Organic waste is anticipated to exceed the 8 cubic yard limits during clearing and grubbing. During that time, SDG&E will dispose of green waste at the following approved facility:

San Pasqual Valley Soils
16111 Old Milky Way, Escondido, CA 92027
760.746.4769



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5. Public awareness of Construction

Provided in Attachment 10 is a copy of the draft public notification letter, a list of the notified individuals, and a copy of the sign to be posted along the fence on Hunte Parkway. Per the TMP, sign spacing is 350', and signs would also be posted at each end of the project site.

Additional signs would be posted within 200' of trail closures areas, and tow-away signs would be posted for the temporary removal of street parking.

6. Existing utility avoidance

SDG&E has coordinated with the City of Chula Vista and Otay Water District to locate and identify underground utilities. The existing water and sewer lines have been reviewed per the grading permit. SDG&E is required by law (California Law, Government Code 4216) and will notify DigAlert per the required time frame of at least two (2) and no more than fourteen (14) days prior to excavation commencement for utility markings.

7. Volatile organic Compound Emissions (VOC) Submittal

VOC compliance will be ongoing throughout construction. SDG&E will require the contractor/vendor submit the MSDS sheet to SDG&E for all products being brought onsite, one week prior to being brought onsite. MSDS sheets, and intended use of the product, will be reviewed by SDG&E air quality specialists for compliance with SCAQMD Rules. If VOCs exceed allowable levels, SDG&E will require the contractor to identify an alternative product for use that meets the SCAQMD Rules.

If you have any questions, please contact myself or Keri Cuppage.

Thank you,

Rich Quasarano, SDG&E – Environmental Compliance Manager

Attachment 2

Vehicle Wash Log Clarification

Mitigation Measure Biology-3 states that construction equipment will be cleaned before entering all project areas and wash logs will be kept. Mitigation Measure Biology-3 specifically addresses construction equipment involved in ground disturbing activities, and does not haul-trucks traveling to and from the project site. The mitigation measure is designed to stop ground disturbing equipment such as graders, dozers, front loaders, fork lifts, bob cats, skid loaders, and excavators, from bringing invasive, noxious plant seeds onto the site. The wash logs will be completed on all equipment trailered onto the site, any equipment involved in ground disturbance, and on tools used for vegetation clearing. Haul-trucks, and other transportation vehicles, staying on access roads and the designated haul route would not be inspected or washed, given that the vegetation would have been removed from the travel areas prior to use.

Attachment 4

Pre-Construction Survey Schedule

Planned Biological Field Surveys for Salt Creek based on starting date of June 27, 2016

Survey Type	Scheduled Date	Notes
MM BIO 1a	Wednesday June 15, 2016	Pre-activity surveys were conducted and a Pre-Activity Survey Report was prepared. A verification study will be conducted no earlier than 30 days prior to surface disturbance
MM BIO-6 Nesting bird surveys	Friday June 24, 2016	Nesting bird surveys to be conducted 48 hours prior to start of any ground disturbing activities.
MM BIO-7 Western Yellow Bat Survey	NA, see notes	The project site does not support any suitable habitat for western yellow bat, no survey required.
MM BIO-8 San Diego desert woodrat	NA, see notes	The site has been surveyed for burrowing owl occupancy weekly since February 2016, for approximately 46 site visits and there have been no sightings of San Diego desert woodrat middens on site or within 5 feet of the site, no survey required.
APM BIO-1 Burrowing owl	Ongoing	SDG&E is adhering to approved "Burrowing Owl Monitoring and Mitigation Plan". WBO surveys on-going since January 2016