

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



November 29, 2017

Ms. Jennifer Kaminsky
San Diego Gas and Electric Company
1010 Tavern Road
Alpine, CA 91901

RE: Sycamore – Peñasquitos 230-kV Transmission Line Project—Review of Minor Project Refinement #10 Request

Dear Ms. Kaminsky,

On November 29, 2017, SDG&E submitted Minor Project Refinement (MPR) #10 for approval by the California Public Utilities Commission (CPUC) for the Sycamore-Peñasquitos 230-kV Transmission Line Project (Project). MPR #10 authorizes a newly identified underground route option for the crossing of Interstate (I)-15, using a tunnel bore machine (TBM) to install the 230 kilovolt (kV) line under I-15, as shown in Exhibit 1 (attached).

The Project was evaluated in accordance with the California Environmental Quality Act (CEQA) and a Final Environmental Impact Report (FEIR) was prepared by the CPUC. The CPUC voted to approve the environmentally superior alternative, Alternative 5, on October 13, 2016 (Decision 16-10-005), and a Notice of Determination was filed with the State Clearinghouse (SCH# 2014081031). The mitigation measures (MMs) and Applicant Proposed Measures (APMs) described in the FEIR were adopted by the CPUC as conditions of Project approval. The CPUC also adopted a Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) to ensure compliance with all APMs and MMs during Project implementation.

This letter documents the CPUC's thorough evaluation of all activities covered in this MPR request, including the CPUC evaluation table provided with the MPR analysis (See Attachment A). The evaluation process ensures that all MMs applicable to the location and activities covered in the MPR are implemented as required in the CPUC's decision. The evaluation process further ensures that the following criteria are met:

- Modifications would not be outside the geographic boundary of the study area utilized in the FEIR.
- A new significant impact or substantial increase in the severity of a previously identified significant impact would not be created, based on the thresholds used in the FEIR.
- Additional permit requirements would not be triggered that are not defined in the FEIR or MMCRP.
- There would not be a conflict with any APM or MM, and the modifications would not result in a new conflict with any applicable guideline, ordinance, code, rule, regulation, order, decision, statute, or policy not already identified within the FEIR.
- Modifications would not require new conditions for approval, without which the modifications would result in a new significant impact or substantially increase the severity of a previously identified significant impact.

MPR #10 is granted by the CPUC for the proposed activities based on the factors described below.

SDG&E MPR #10 Request. Excerpts from the SDG&E MPR #10 Request, received November 29, 2017, are presented below (indented):

This refinement proposes an underground alternative to cross I-15. Under this refinement a TBM (a remotely controlled laser-guided steerable trenchless machine) would be used to install a reinforced concrete pipe (RCP) that would house the transmission line underneath I-15. The underground tunnel would be approximately 1,000 feet long and would extend from the western temporary work area located just south of the I-15 southbound exit ramp to Miramar Road to the eastern temporary work area located just south of the I-15 northbound on-ramp off of Pomerado Road.

The western temporary work area would be located at the eastern end of the Kearny Mesa Road cul-de-sac (extending slightly into the ornamental/developed area) located west of the I-15 southbound exit ramp to Miramar Road, and would extend to the intersection of Kearny Mesa Road and Miramar Road. The western temporary work area would be approximately 0.68 acre. Within the western temporary work area, a bore (sending) pit would be excavated at approximately station 403+50 and would measure approximately 12 feet wide by 40 feet long and have a maximum depth of 31 feet. The western temporary work area would also include a new proposed vault location (relocated from Miramar Road west of Kearny Mesa Road) at station 402+00 on Kearny Mesa Road. In addition, the western temporary work area would include a 3-foot-wide trench that would be approximately 640 feet long and would extend from the eastern side of the bore (sending) pit to the new proposed vault at station 402+00 and continue to then connect to the approved underground portion of the existing Project at station 335+00 on Miramar Road. The western temporary work area would include space for the TBM, the bore (sending) pit, and trucks to transport spoils. The bore (sending) pit would be protected by steel shoring. The western temporary work area would be accessed from Miramar Road, which mirrors access for the overhead crossing options identified in the FEIR.

The eastern temporary work area is approximately 0.76 acre and would be located within the ornamental/developed area located west of the I-15 northbound on-ramp off Pomerado Road and east of the I-15 northbound lanes. Within the temporary work area, a graded pad would be constructed and would measure approximately 50 feet wide by 300 feet long, and would be approximately 0.33 acre. Within the graded pad, a receiving pit would be excavated at station 412+50, which would measure approximately 12 feet wide by 25 feet long and have a maximum depth of 42 feet. The receiving pit would be protected by steel shoring. The eastern temporary work area would also include a 3-foot-wide trench that would be approximately 322 feet long and would extend from the western side of the receiving pit and intercept the existing trench alignment at station 415+50 on Pomerado Road and continue to the vault located at station 421+50. Access to the eastern temporary work area would be obtained via the I-15 northbound on-ramp from Pomerado Road (Attachment 1). All construction equipment would utilize the on-ramp to access the work area. All temporary work areas, including the graded pad, will be restored to pre-project conditions.

Construction activities associated with the proposed refinement would include trenching, excavation and exportation of spoils, grading, shoring, and bore operation. The boring operation would begin at the western bore (sending) pit where the TBM would be remotely guided southeast under I-15 and connect to the receiving pit east of I-15. The total length of the underground tunnel would be approximately 1,000 feet. At its maximum depth below ground

level, the underground tunnel would reach a depth of approximately 42 feet, with the minimum depth being approximately 15 feet.

Spoils would be conveyed out of the tunnel where a loading machine would be used to bring the excavated spoils out of the pit and into a dump truck and will be hauled away to an appropriate disposal facility. The total volume of material estimated to be removed from the site is approximately 4,670 cubic yards. Material and equipment staging for the western temporary work area would utilize the existing staging yards; however, the proposed temporary workspace at the end of the Kearny Mesa Road cul-de-sac may be used for staging construction materials and spoil stockpiling during TBM operations.

Work associated with this proposed refinement would take approximately 2 to 3 months, with the TBM running 12 hours a day for 7 days a week for approximately 4 to 6 weeks.

CPUC Evaluation of MPR #10 Request

In accordance with the MMRCP, the MPR #10 request was reviewed by CPUC to confirm that no new impacts or increase in impact severity would result from the requested MPR activities. The following discussion summarizes this analysis for air quality, biological resources, cultural and paleontological resources, transportation and traffic, and other issue areas. A list of bulleted conditions is presented to define additional information and clarifications regarding mitigation measure requirements.

Air Quality

Consistent with the methodology used in the FEIR, emissions associated with the proposed refinement were estimated using a 2016 fleet mix of 70 percent Tier 2 equipment and 30 percent Tier 3 equipment. However, the project is currently using at least Tier 3 equipment. Therefore, actual emissions are likely lower than those estimates included in the FEIR.

The proposed refinement would generate an additional 5 pounds of VOC, 48 pounds of CO, 1 pound of NO_x, 0.1 pound of SO_x, 5 pounds of PM₁₀, and 1 pound of PM_{2.5} per day, assuming TBM operations at 12 hour a day. As shown in Table 1 below, emissions of VOC, CO, SO_x, PM₁₀, and PM_{2.5} from the proposed MPR #10 refinement would not substantially increase over the estimates in the FEIR and would continue to be consistent with the findings of the FEIR. The CPUC has also analyzed an optional scenario whereby TBM operations would occur on a 24-hour basis. This optional scenario would also be consistent with the findings of the FEIR as presented in Table 1.

Table 1. Alternative 5 Estimated Peak Daily Construction Air Pollution Emissions with MPR #10

	VOC	CO	NO _x	SO _x	PM10	PM2.5
FEIR Controlled Project Emissions 2016 ^a						
Total	61.60	383.55	474.36	1.10	72.66	31.69
FEIR Controlled Project Emissions with MPR #10 Bore Operations (12-hour)						
Total	59.24	361.78	474.57	1.05	74.35	31.86
FEIR Controlled Project Emissions with MPR #10 Bore Operations (24-hour)						
Total	63.12	383.30	507.10	1.06	79.16	34.11
Emissions Threshold	75	550	250	250	100	55

^a taken from FEIR Table 4.13-21: Alternative 5 Estimated Peak Daily Construction Air Pollutant Emissions

In both scenarios, NO_x emissions would continue to exceed the thresholds of significance consistent with the prior findings of the FEIR. These exceedances would not be substantially greater with implementation of MPR#10. Activities associated with construction and utilization of the proposed refinement area (such as the type of equipment used and run time of equipment) would be consistent with those discussed in the FEIR. Impacts on air quality would remain significant and unavoidable with the implementation of APM Air-2, and Mitigation Measures Air-3, and Air-4. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on air quality.

Biological Resources

The proposed refinement area is within disturbed developed/ornamental areas. No biological resources exist onsite. The proposed refinement area will be established outside of the nesting season. There will be no new impacts on sensitive habitat, avian species, or sensitive or special-status species utilizing the habitat in the proposed refinement areas, and no increase in the severity of a previously identified impact on biological resources as identified in the FEIR.

Cultural and Paleontological Resources

A cultural resource records search, covering the proposed refinement receiving and bore (sending) pits, was conducted for the FEIR in 2016 and updated in January 2017 by SDG&E. No cultural or paleontological resources have been recorded within the proposed refinement area. However, since the FEIR identified the MPR #10 work areas as having a high or moderate potential for buried cultural deposits, cultural monitoring would occur until the Qualified Archaeologist determines no resources are present or likely to be impacted. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on cultural or paleontological resources.

Greenhouse Gas Emissions

The construction activity associated with the proposed refinement would result in an increase of approximately 5 metric tons of carbon dioxide equivalents (MT CO₂e) per year. GHG emissions would continue to be far below the threshold of significance (10,000 MT CO₂e) and consistent with the FEIR. The proposed refinement would not result in a new impact or substantially increase the severity of a previously analyzed impact for greenhouse gases as identified in the FEIR.

Noise

Activities associated with construction and utilization of the proposed refinement area (such as use of heavy equipment) are consistent with those discussed in the FEIR. The proposed refinement area is not located in proximity to sensitive receptors (e.g., residents or schools). The closest residents are approximately 1,000 feet from the refinement area. In addition, the refinement area is in an area of high existing noise levels, due to the proximity of the I-15 freeway. The TBM would be operated 12 hours a day for 7 days a week for a period of approximately 4 to 6 weeks. TBM operation could be extended to 24 hours a day. A construction noise permit would be obtained from the City of San Diego to allow for work outside of the daytime hours specified by the City's Noise Ordinance. The noise anticipated with construction of this option would be similar to that of the other proposed options with the exception of the TBM operation. The potential ground-borne noise generated by the TBM equipment would not be expected to be noticeable at the closest residential areas, which are located almost 1,000 feet away. The process of extracting spoil material from the tunnel opening, which would include the use of conveyor systems, loaders, heavy trucks, etc., could also generate noise during the tunnel construction process. However, with residents approximately 1,000 feet from the tunnel opening and high existing noise levels generated from traffic on I-15 and Miramar and Pomerado Roads, it is not expected that the noise from

tunnel construction activity would be noticeable at the closest residential areas. Noise generated from construction would not be greater than that associated with the other I-15 crossing options considered in the FEIR. Temporary impacts associated with construction noise would remain significant and unavoidable even with the implementation of MM Noise-1 and MM Noise-2. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on noise as identified in the FEIR.

Transportation and Traffic Resources

The western temporary work area would be located at the eastern end of the Kearny Mesa Road cul-de-sac located west of the I-15 southbound exit ramp to Miramar Road, and would extend to the intersection of Kearny Mesa Road and Miramar Road. The eastern temporary work area would be located within the ornamental/developed area located west of the I-15 northbound on-ramp off Pomerado Road and east of the I-15 northbound lanes. The proposed refinement would result in a decrease in impacts to traffic compared to the impacts to traffic associated with the installation of the transmission line within the Pomerado Road/Miramar Road Bridge. Lane closures would be reduced or eliminated in the area of the I-15 Bridge. The proposed refinement would not require changes to the Construction Transportation Management Plan. Construction traffic (i.e., vehicle trips) for the proposed refinement would be consistent with those analyzed in the FEIR, and the construction traffic would utilize the same roadways and access routes identified in the FEIR. A slight increase in dump truck trips is anticipated due to the additional spoil material that would need to be exported from the refinement area; however, the amount of vehicle trips and roadways affected by the proposed refinement would be consistent with the analysis of Alternative 5 in the FEIR. The proposed refinement would not result in a change to level of service (LOS) from what is disclosed in the FEIR. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on transportation and traffic as identified in the FEIR.

Other Issue Areas

The proposed refinement areas would not result in a new impact, or increase the severity of a previously analyzed impact on aesthetics, agriculture and forestry, fire and fuels management, geology and soils, hazards and hazardous materials, hydrology and water quality, land use, public services, recreation, or utilities and service systems.

MPR #10 Conditions of Approval

MPR #10 is approved by the CPUC with conditions. The conditions presented below shall be met by SDG&E and its contractors:

1. All applicable Project MMs, APMs, compliance plans, and permit conditions shall be implemented. Some measures have on-going/time-sensitive requirements and shall be implemented prior to and during construction, where applicable. Prior to construction, SDG&E must submit all applicable permits to the CPUC.
2. Copies of all relevant permits, compliance plans, and this MPR, shall be available on site for the duration of construction activities.
3. Wildlife found to be trapped shall be removed by a qualified biological monitor.
4. SDG&E shall implement appropriate dust controls at the MPR #10 work areas in accordance with the approved Dust Control Management Plan, and SWPPP. SDG&E shall use non-potable water for dust control, as required by MM Utilities-1.
5. SDG&E shall implement all appropriate erosion and sediment control BMPs for the MPR #10 work areas as defined in the SWPPP, and as specified by the Qualified SWPPP Practitioner. Sediment and

erosion control BMPs shall be properly maintained throughout the duration of construction activities.

6. All ground-disturbing activities (e.g., grading, trenching, etc.) shall be monitored by a CPUC-approved archaeological monitor and a Native American monitor in accordance with MM Cultural Resources-1, where appropriate. In the event of an archaeological discovery, all construction activity associated with MPR #10 shall be halted.
7. All ground-disturbing activities at the MPR #10 work areas shall be monitored by a CPUC-approved paleontological monitor. In the event of a paleontological discovery, all earthwork must cease within 50 feet of the discovery, and procedures defined in MM Paleontology-3 shall be implemented.
8. SDG&E shall properly store all hazardous materials and contain and dispose of contaminated soils and materials as described in the CPUC-approved Hazardous Substance Control and Emergency Response Plan.
9. All complaints received by SDG&E shall be logged and reported immediately to the CPUC. This includes complaints relevant to traffic, as well as lighting, noise and dust, etc. Where feasible, complaints shall be resolved, depending on the nature of the complaint, through construction site or activity modifications.
10. All workers shall receive Safety and Environmental Awareness Program (SEAP) training prior to work at the MPR #10 work areas. A log shall be maintained on site with the names of all crew personnel who have received training. All training participants shall wear their SEAP hard-hat sticker for ease of compliance verification.
11. No additional tree removal or tree pruning in or adjacent to MPR #10 work areas shall occur unless the SDG&E construction safety advisor determines that an imminent threat to worker and/or public safety exists. The CPUC shall be advised of any tree removals or tree pruning efforts within 24 hours of their occurrence.
12. SDG&E shall obtain discharge permits for dewatering activities.
13. Approval is subject to verification of private property landowner encroachment approval.

Please contact me if you have any questions or concerns regarding this MPR approval.

Sincerely,



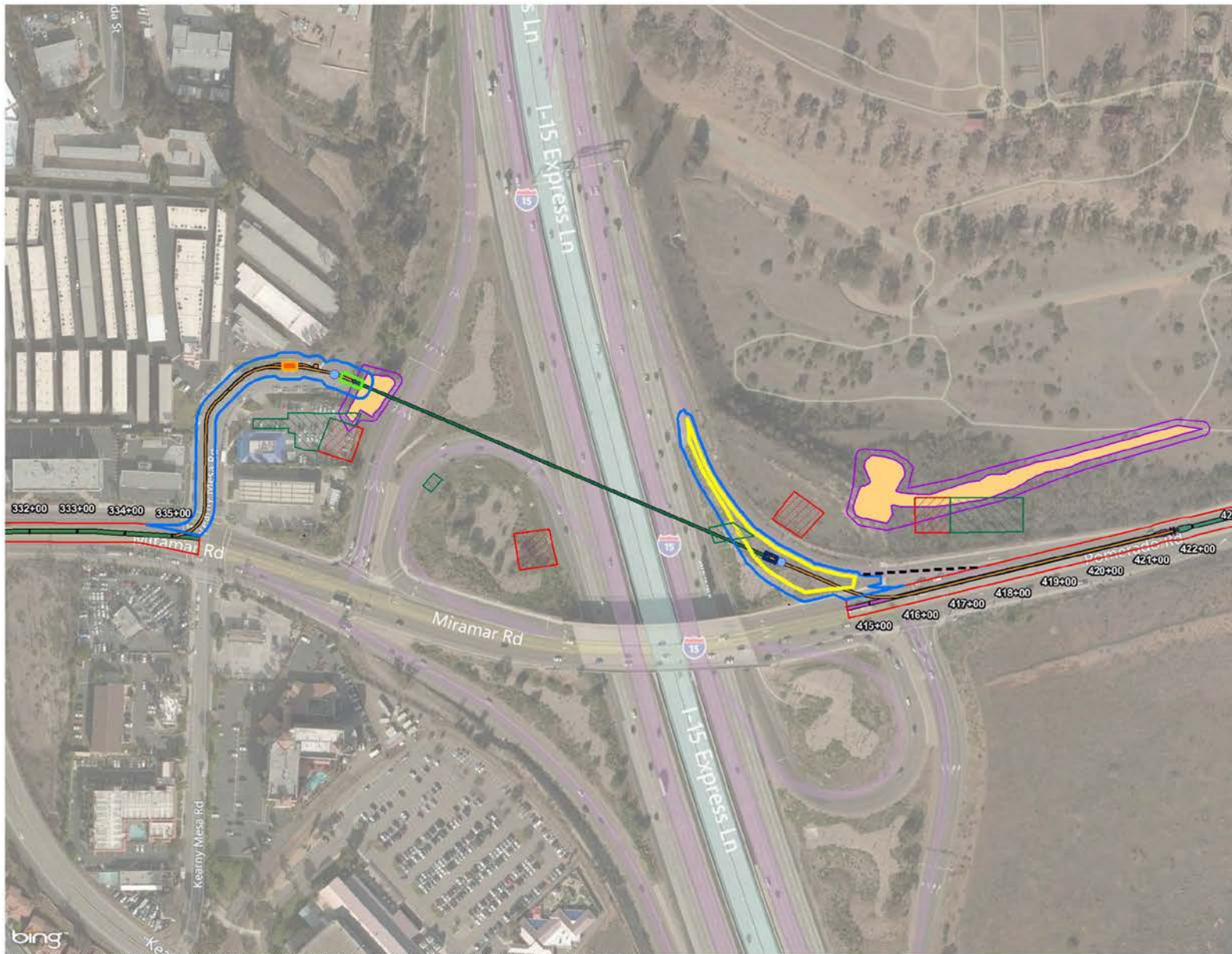
Billie Blanchard
Project Manager
Energy Division, CEQA Unit

cc: Molly Sterkel, CPUC Program Manager
Lonn Maier, CPUC Supervisor
Marcelo Poirier, CPUC Attorney
Susanne Heim, Panorama Environmental
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Edith Moreno, SDG&E
Ron Walker, AECOM

Exhibit 1: MPR #10 Map

Attachment A: CPUC Evaluation of Minor Project Refinement #10

Exhibit 1: MPR #10 Maps



Legend

Proposed MPR 10 Features

- Temporary Work Space
- Receiving Pit
- Bore (sending) Pit
- Tunnel Bore Machinery
- Vault
- Graded Pad
- Aboveground Trench
- Underground Tunnel
- Access Road

Approved Project Features

- Underground Vault
- Temporary Work Space

Approved Overhead Option 1

- Permanent Impact
- Temporary Work Space

Approved Overhead Option 2

- Permanent Impact
- Temporary Work Space

Alignment B

- Segment 3, Section 1
- Segment 3, Section 2
- Segment 5, Section 20

200 100 0 200 Feet
1:2,400 1 inch = 200 feet

**SXPQ - Sycamore to Peñasquitos
230kV Transmission Line Project
MPR 10 Map 2: Proposed Refinement &
Approved Overhead Options 1 and 2**

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Attachment A: CPUC Evaluation of Minor Project Refinement #10

Would the Proposed Project refinements result in a new impact, or increase the severity of a previously analyzed impact on:	No	Yes
Aesthetics (e.g., damage scenic resources or vistas, degrade the existing visual character of the site and its surroundings, or create sources of light or glare)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>FEIR Significance: Significant and Unavoidable</i>		

Summary of Proposed Project Refinement Impacts on Aesthetics:

The proposed refinement would occur in the same location as the proposed I-15 overhead crossing Options 1 and 2, which were identified in the FEIR. This proposed refinement would eliminate the need for installing cable poles to transition the line to an overhead position, which would reduce aesthetic impacts associated with Options 1 and 2. The proposed refinement would result in a decrease in impact of a previously analyzed impact on aesthetics as identified in the FEIR.

Agriculture and Forestry Resources (e.g., convert Farmland to nonagricultural use, or create a conflict with existing agricultural zoning or a Williamson Act)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>FEIR Significance: Less than Significant</i>		

Summary of Proposed Project Refinement Impacts on Agriculture and Forestry Resources:

The proposed refinement would not convert agricultural land to non-agricultural use, or result in the loss of agricultural land. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on agriculture or forestry resources.

Air Quality (e.g., produce criteria air pollutant emissions, or expose sensitive receptors to additional pollutants)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>FEIR Significance: Significant and Unavoidable</i>		

Summary of Proposed Project Refinement Impacts on Air Quality:

The proposed refinement would result in minor changes to equipment assumptions and an increase in dump haul trucks associated with spoil removal from those assumed in the FEIR, although the increase in haul trips would be partially offset by the reduced boring and excavation activities previously contemplated in the I-15 Bridge.

It is anticipated that SDG&E’s activity for the proposed refinement would begin in January 2018. As previously noted, the construction schedule proposes operation of a TBM and TBM auger for 12 hours a day for 7 days a week for up to 6 weeks. The CPUC also considered an optional scenario (See discussion above) in which TBM operations would occur on a 24-hour basis. The proposed refinement would also require additional haul truck trips associated with approximately 4,670 cubic yards of spoil removal. As such, 800 cubic yards of spoil removal would no longer be removed as anticipated during trenching for ducts through the bridge. Therefore, this proposed refinement would result in a net increase of 3,870 cubic yards of spoil removal, or an increase of approximately 18 haul truck trips per day. Ancillary equipment, such as generators and pick-up trucks, were assumed to remain the same as the equipment assumptions made in the FEIR.

Consistent with the methodology used in the FEIR, emissions associated with the proposed refinement were estimated using a 2016 fleet mix of 70 percent Tier 2 equipment and 30 percent Tier 3 equipment. However, the project is currently using at least Tier 3 equipment. Therefore, actual emissions are likely lower than those estimates included in the FEIR.

The additional work associated with the proposed refinement would only slightly increase emissions estimates. The proposed refinement would generate an additional 5 pounds of VOC, 48 pounds of CO, 1 pound of NO_x, 0.1 pound of SO_x, 5 pounds of PM₁₀, and 1 pound of PM_{2.5} per day. Emissions of VOC, CO, SO_x, PM₁₀, and PM_{2.5} from the proposed refinement would not substantially increase over the estimates in the FEIR and would continue to be below the thresholds of significance consistent with the FEIR findings. NO_x emissions would continue to exceed the thresholds of significance and would not substantially increase with implementation of the proposed refinement, consistent with the FEIR findings.

Activities associated with construction and utilization of the proposed refinement area (such as the type of equipment used and run time of equipment) would be consistent with those discussed in the FEIR.

Impacts on air quality would remain significant and unavoidable with the implementation of APM Air-2,

Attachment A: CPUC Evaluation of Minor Project Refinement #10 (Cont.)

Would the Proposed Project refinements result in a new impact, or increase the severity of a previously analyzed impact on:

No Yes

and Mitigation Measures Air-3, and Air-4. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on air quality.

Biological Resources (e.g., have an adverse effect on sensitive or special-status species; impact riparian, wetland, or any other sensitive habitat; or conflict with local policies or ordinances protecting biological resources)?

FEIR Significance: Less than Significant with Mitigation

Summary of Proposed Project Refinement Impacts on Biological Resources:

There are no biological resources in the proposed refinement area. No special-status species or sensitive habitats are known to occur within the proposed refinement area. The landscaped area would be returned to pre-project conditions upon completion of the Project. The proposed refinement area would be established outside of the nesting season. Impacts on biological resources would remain less than significant. The refinement would not result in a new impact or increase the severity of a previously analyzed impact on biological resources.

Cultural and Paleontological Resources (e.g., cause an adverse change to a significant historical, archeological, or paleontological resource)?

FEIR Significance: Less than Significant with Mitigation

Summary of Proposed Project Refinement Impacts on Cultural and Paleontological Resources:

The proposed refinement area would be located in a disturbed area. A cultural resource records search, covering the proposed refinement receiving and bore (sending) pits, was conducted for the FEIR in 2016 and updated in January 2017 by SDG&E. No cultural or paleontological resources have been recorded within the proposed refinement area. The proposed refinement work areas were mapped during the FEIR process as having a high potential for cultural resources. Although resources in this area have likely been destroyed, cultural monitoring would occur until the Qualified Archaeologist determines no resources are present or likely to be impacted. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on cultural or paleontological resources.

Fire and Fuels Management (e.g., cause of expose people or structures to fire hazards, or create a conflict with a Fire Management Plan?)

FEIR Significance: Less than Significant with Mitigation

Summary of Proposed Project Refinement Impacts on Fire and Fuels Management:

Activities associated with construction and utilization of the proposed refinement area would be consistent with those discussed in the FEIR. The proposed refinement is located within the same fire hazard area as the FEIR design, and the potential for fire ignition would remain less than significant with implementation of the revised Construction Fire Prevention Plan. The refinement would not result in a new impact or increase the severity of a previously analyzed impact on fire or fuels management.

Attachment A: CPUC Evaluation of Minor Project Refinement #10 (Cont.)

Geology and Soils (e.g., cause or expose people or structures to geologic or soil hazards, including erosion or loss of topsoil)?

FEIR Significance: Less than Significant with Mitigation

Summary of Proposed Project Refinement Impacts on Geology and Soils:

The proposed refinement is located in an area previously surveyed for geological hazards, and as analyzed in the FEIR. A supplemental geotechnical investigation for the proposed refinement determined there is no potential or low potential for liquefaction or landslide-related impacts. The results of the geotechnical investigation identified the potential for localized sloughing; however, areas where soil types have a potential for sloughing, and which would have side slopes greater than 4 feet high, would be protected by shoring to prevent local instabilities. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on geologic resources as identified in the FEIR.

Greenhouse Gas Emissions (e.g., produce criteria greenhouse gas pollutants, or expose sensitive receptors to additional pollutants)?

FEIR Significance: Less than Significant with Mitigation

Summary of Proposed Project Refinement Impacts on Greenhouse Gas Emissions:

The additional work associated with the proposed refinement would generate an additional 5 pounds of VOC, 48 pounds of CO, 1 pound of NO_x, 0.1 pound of SO_x, 5 pounds of PM₁₀, and 1 pound of PM_{2.5} per day.

The construction activity associated with the proposed refinement would result in an increase of approximately 5 metric tons of carbon dioxide equivalents (CO₂e) per year. However, it is important to note that the GHG estimates in the analysis do not account for the reduction in GHG emissions associated with the Alternative 5 crossing of I-15 Option 3 construction phases (e.g., trenching) that would no longer occur as part of this proposed refinement. Thus, the GHG emission estimates in this analysis are conservative. GHG emissions would continue to be far below the threshold of significance and consistent with the FEIR.

The FEIR estimated total construction-related GHG emissions of 6,611 metric tons carbon dioxide equivalents (MT CO₂e), resulting in amortized construction emissions of approximately 220 MT CO₂e per year.

The level of equipment use and run time of equipment required for the proposed refinement would be consistent with the equipment use and run time estimates included in the FEIR. The implementation of APM AIR-5 and Mitigation Measure GHG-1 would reduce the impacts on greenhouse gas emissions to less than significant. The proposed refinement would not result in a new impact, or increase the severity of a previously analyzed impact on greenhouse gas emissions.

Hazards and Hazardous Materials (e.g., create or increase the exposure of people or structures to hazardous materials, involve the use of additional hazardous materials or equipment, or interfere with an adopted emergency plan)?

FEIR Significance: Less than Significant with Mitigation

Summary of Proposed Project Refinement Impacts on Hazards and Hazardous Materials:

With the exception of the TBM, the proposed refinement would require use of the same types of equipment and hazardous materials that were analyzed in the FEIR. The TBM would not introduce new hazards not analyzed in the FEIR, and the refinement would not interfere with the adopted emergency plan as analyzed in the FEIR and described in the Hazard Substance Control and Emergency Response Plan. The proposed refinement area does not contain known hazardous materials sites. The implementation of APMs HAZ-1, HAZ-2, and HAZ-3, and Mitigation Measures Hazards-2, and Hazards-3 would reduce the impacts on hazards and hazardous materials to less than significant. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on hazards and hazardous materials.

Attachment A: CPUC Evaluation of Minor Project Refinement #10 (Cont.)

Hydrology and Water Quality (e.g., degrade water quality, discharge waste or sediment, deplete groundwater, alter the existing drainage pattern, create additional runoff water or polluted runoff, place structures in a 100-year flood hazard area, or expose people or structures to a significant risk involving flooding)?

FEIR Significance: Less than Significant with Mitigation

Summary of Proposed Project Refinement Impacts on Hydrology and Water Quality:

The proposed refinement would be within the area previously surveyed for hydrological resources and would remain consistent with the impacts on hydrological resources and water quality analyzed in the FEIR. The proposed refinement would be within a previously disturbed area that is located within the Peñasquitos Watershed. Applicable discharge permits would be obtained for any dewatering activities. The proposed refinement area does not contain jurisdictional waters and is not within a flood hazard. The implementation of Mitigation Measures Hydrology-1 and Hydrology-2 would reduce impacts on hydrology and water quality to less than significant. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on hydrology and water quality.

Land Use and Planning (e.g., conflict with a land use plan, policy, or regulation of an agency with jurisdiction over the project, or conflict with a habitat conservation plan)?

FEIR Significance: No Impact

Summary of Proposed Project Refinement Impacts on Land Use and Planning:

The proposed refinement would be located within the same area as the Project analyzed in the FEIR. The proposed refinement would have no impact on land use and planning.

Noise (e.g., expose sensitive receptors to additional noise or vibration)?

FEIR Significance: Significant and Unavoidable

Summary of Proposed Project Refinement Impacts on Noise:

Activities associated with construction and utilization of the proposed refinement area (such as use of heavy equipment) would be consistent with those discussed in the FEIR.

The proposed refinement area is not located in proximity to sensitive receptors (e.g. residents/schools). The closest residents are approximately 1,000 feet from the refinement area. In addition, the refinement area is in an area of high existing noise levels, due to the proximity of the I-15 freeway. The TBM would be operated 12 hours a day for 7 days a week for a period of approximately 4 to 6 weeks. TBM operation could be extended to 24 hours a day. In accordance with MM Noise-2, a construction noise permit would be obtained from the City of San Diego to allow for work outside of the daytime hours specified by the City's Noise Ordinance.

The noise anticipated with construction of this option would be similar to that of the other proposed options considered in the FEIR. The one primary difference in noise generation between this proposed option and the others is the TBM operation. However, TBM operations occur underground, and the use of this piece of equipment is not expected to result in a substantial increase in noise levels as compared to other options. TBMs can sometimes create ground-borne noise that can create annoyance for occupants of structures in proximity to the tunnel alignment. However, the closest residents to the tunnel alignment are approximately 1,000 feet away, and no perceptible ground-borne noise is anticipated to reach nearby residents at this distance.

The process of extracting spoil material from the tunnel opening, which would include the use of conveyor systems, loaders, heavy trucks, etc., could also generate noise during the tunnel construction process. However, with residents approximately 1,000 feet from the tunnel opening and high existing noise levels generated from traffic on I-15 and Miramar and Pomerado Roads, it is not expected that the noise from tunnel construction activity would be noticeable at the closest residential areas, or that any noise generated from construction would be greater than that associated with the other I-15 crossing options.

Attachment A: CPUC Evaluation of Minor Project Refinement #10 (Cont.)

The implementation of Mitigation Measures Noise-1, Noise-2, and Noise 3 would still result in noise impacts that are significant and unavoidable. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on noise.

Public Services (e.g., result in adverse impacts on government facilities that provide a public service)?

FEIR Significance: Less than Significant

Summary of Proposed Project Refinement Impacts on Public Services:

The proposed refinement would not result in additional lane closures on public roads or delays affecting a different roadway than analyzed in the FEIR. SDG&E would continue to coordinate with local fire and police services throughout construction. The proposed refinement would not be located near a school or within a park. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on public services.

Recreation (e.g., increase the use of, or cause adverse effects on, parks or other recreational facilities)?

FEIR Significance: Less than Significant with Mitigation

Summary of Proposed Project Refinement Impact on Recreation:

The proposed refinement would not be located within a park, preserve, or trail. The refinement area would not impact parks or recreational facilities. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on recreation.

Transportation and Traffic (e.g., increase traffic congestion or degrade performance of the circulation system, taking into account all modes of transportation, or increase hazards due to a design feature)?

FEIR Significance: Less than Significant with Mitigation

Summary of Proposed Project Refinement Impacts on Transportation and Traffic:

The proposed refinement would result in a decrease in impacts to traffic compared to the impacts to traffic associated with the installation of the transmission line within the Pomerado Road/Miramar Road Bridge. Lane closures would be reduced or eliminated in the area of the I-15 bridge. The proposed refinement would not require changes to the Construction Transportation Management Plan (CTMP).

Construction traffic (i.e., vehicle trips) for the proposed refinement would be consistent with those analyzed in the FEIR, and the construction traffic would utilize the same roadways and access routes identified in the FEIR. A slight increase in dump truck trips is anticipated due to the additional spoil material that would need to be exported from the refinement area; however, the amount of vehicle trips and roadways affected by the proposed refinement would be consistent with Alternative 5 as analyzed in the FEIR. The proposed refinement would not result in a change to level of service different to what is disclosed in the FEIR.

The proposed refinement would not result in a substantial increase in vehicle traffic, lane closure, or result in the loss of parking, consistent with the analysis in the FEIR. Helicopters would not be used as part of the proposed refinement. The proposed refinement would not result in a new impact, or increase the severity of a previously analyzed impact on transportation and traffic.

Utilities and Service Systems (e.g., result in the construction of new or expansion of existing water or stormwater drainage facilities, require additional water entitlements, create new solid waste disposal needs)?

FEIR Significance: Less than Significant with Mitigation

Summary of Proposed Project Refinement Impacts on Utilities and Service Systems:

The proposed refinement would not involve the construction of new, or expansion of existing water facilities, stormwater drainage facilities, and/or require water entitlements, or creation of new solid waste disposal needs. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on utilities.

Attachment A: CPUC Evaluation of Minor Project Refinement #10 (Cont.)