

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 12, 2019

Richard Quasarano, AICP CEP
Environmental Project Manager
San Diego Gas & Electric Company
8315 Century Park Court
San Diego, CA, 92123

RE: Ocean Ranch Substation Project: Minor Project Change #1

Dear Mr. Quasarano,

On September 5, 2019, San Diego Gas & Electric (SDG&E) submitted Minor Project Change (MPC) Request #1 to the California Public Utilities Commission (CPUC) for the installation of a wrought iron fence and gates at the entrance to the substation off of Rocky Point Drive and transitioning the existing temporary 6-foot tall perimeter chain-link fence from temporary to permanent.

SDG&E's Ocean Ranch Substation Project was evaluated in accordance with the California Environmental Quality Act (CEQA). The mitigation measures described in the Final Mitigated Negative Declaration (MND) were adopted by the CPUC as conditions of project approvals. On October 2, 2017, the CPUC granted SDG&E a Permit to Construct for the Project (Decision 17-09-029). The CPUC also adopted a Mitigation Monitoring, Compliance and Reporting Program (MMCRP) to ensure compliance with all mitigation measures imposed on the Ocean Ranch Substation Project during implementation.

MPCs are reviewed for consistency with CEQA requirements and are located within the geographic boundary of the project study area. MPCs do not create new or substantially more severe significant impacts, or conflict with any mitigation measure or applicable law or policy. Also, they do not trigger other permit requirements unless the appropriate agency has approved the change, and clearly and strictly comply with the intent of the mitigation measure or applicable law or policy.

This letter documents the CPUC's thorough evaluation of all activities covered in this MPC, including the mitigation measure requirements. The evaluation process ensures that all mitigation measures applicable to the location and activities covered in the MPC are implemented, as required in the CPUC's Decision.

MPC #1 for the for the installation of a wrought iron fence and gates at the entrance to the substation off of Rocky Point Drive and transitioning the existing temporary 6-foot tall perimeter chain-link fence from temporary to permanent is granted by CPUC based on the factors described below.

SDG&E Minor Project Change Request. Excerpts from the SDG&E Minor Project Change request, received September 5, 2019, are presented below (indented):

This proposed minor project change (MPC) involves installing an approximately 6-foot-tall wrought iron fence with two gates at the entrance to Ocean Ranch Substation off of Rocky Point Drive and transitioning the temporary 6-foot-tall chain-link fence to a permanent chain-link fence of the same height on the northern and western boundaries of the site. As part of the transitioning process from temporary to permanent, concrete will be added to some of the fence posts and the visual screening fabric will be removed from the chain-link fence. The temporary chain-link fence on the eastern boundary of the site will

be removed as there is an existing fence along the eastern boundary of the property line that will be tied-into with the permanent fence.

Per the Landscape Improvement Plans, ornamental plants are in the process of being planted surrounding the substation site. Due to instances of vandalism during construction and the potential for pedestrians to access the substation site, a permanent fence, as described above, is proposed to provide protection to the substation and associated landscape.

No potential changes to permitted impacts are anticipated to result from the installation of the permanent fence. While no potential changes to permitted impacts are anticipated, a brief discussion of impacts previously considered in the Final Mitigated Negative Declaration and Supporting Initial Study Checklist (IS/MND) is provided in the following.

Although the fence will add another visual element to the substation, it will be shorter than the 10-foot-tall concrete masonry unit (CMU) wall that encloses the substation and will be no more impactful on aesthetics than the chain-link fence gates described in the IS/MND for the entrances off of Rocky Point Drive. In addition, the fence and gates will still allow views of the landscaping and will reduce the potential for vandalism and unwanted pedestrian traffic impacting the landscaped areas. Therefore, installation of the fence will not result in a new significant visual impact or a substantial increase of previously identified visual impacts.

SDG&E has coordinated with City of Oceanside Inspector, Mike Gonzalez, who agreed that the chain link fence can be transitioned to a permanent fence in addition to the installation of wrought iron fence with gates as described above.

CPUC Evaluation of Minor Project Change Request

In accordance with the MMCRP, the request for MPC #1 was reviewed by CPUC to confirm that no new impacts or increase in impact severity would result from the requested MPC activities. Impacts associated with the installation of a wrought iron fence and gates at the entrance to the substation off of Rocky Point Drive and transitioning the existing temporary 6-foot tall perimeter chain-link fence from temporary to permanent are equal to or less than those previously identified. As proposed, all applicable avoidance/minimization measures identified in the FEIR Appendix 6 Mitigation Monitoring Plan will be followed.

Aesthetics: Although the fence will add another visual element to the substation, it will be shorter than the 10-foot-tall concrete masonry unit (CMU) wall that encloses the substation and will be no more impactful on aesthetics than the chain-link fence gates described in the IS/MND for the entrances off of Rocky Point Drive. In addition, the fence and gates will still allow views of the landscaping and will reduce the potential for vandalism and unwanted pedestrian traffic impacting the landscaped areas. Therefore, installation of the fence will not result in a new significant visual impact or a substantial increase of previously identified visual impacts.

Biological Resources. Installation of posts required for the gates and fencing would occur in areas of previous disturbance and/or fill. Further, no sensitive biological resources were identified during construction. No impacts to biological resources are anticipated.

Cultural Resources. Installation of posts required for the gates and fencing would occur in areas of previous disturbance and/or fill. Further, no sensitive cultural resources were identified during construction. No impacts to cultural resources are anticipated.

Paleontological Resources. There are known sensitive paleontological resources within and surrounding the Project area, and the Project site overlies the Santiago Formation, which is identified as highly sensitive for paleontological resources. However, installation of posts required for the gates and fencing would occur in areas of previous disturbance and/or fill; therefore, no impacts to paleontological resources are anticipated.

Conditions of NTP Approval

The conditions noted below shall be met by SDG&E and its contractors during work associated with MPC #1:

- All applicable project mitigation measures, 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.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Eric Chiang', is positioned above the typed name.

Eric Chiang
CPUC Environmental Project Manager

cc: V. Strong, Aspen