

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



September 9, 2016

Chris Terzich  
Environmental Project Manager  
San Diego Gas & Electric Company  
8315 Century Park Court MS CP32D  
San Diego, CA 92123

RE: Vine 69/12 Kilovolt (kV) Substation Project: Minor Project Change Request #1 – Extend the Date of Use for Staging Areas

Dear Mr. Terzich,

On August 31, 2016, San Diego Gas and Electric (SDG&E) submitted a Minor Project Change (MPC) request to the California Public Utilities Commission (CPUC) for the Vine 69/12 Kilovolt (kV) Substation Project (Project). As requested under this MPC request, SDG&E is seeking CPUC authorization to extend the duration of use of two previously approved staging yards, the Kettner Parking Lot Staging Yard (2727 Kettner Boulevard) and the Witherby Substation Staging Yard (2201 Hancock Street). Both yards are located in the City of San Diego, San Diego County, and were approved for temporary use (up to 60 days) under Temporary Extra Work Space (TEWS) requests.

In accordance with the California Environmental Quality Act, a Final Mitigated Negative Declaration (MND) was prepared by the CPUC for the Vine 69/12 kV Substation Project. On May 12, 2016, the CPUC granted SDG&E a Permit to Construct the Project (Decision 16-05-008). The decision conditionally authorizes construction of the Project with the implementation of the applicant-proposed measures (APMs) and mitigation measures identified in the Final MND. A Notice of Determination was submitted to the State Clearinghouse on May 31, 2016, indicating the CPUC's approval of the Project.

The CPUC also adopted a Mitigation, Monitoring, Compliance and Reporting Program (MMCRP) to ensure compliance with all mitigation measures imposed on the Vine 69/12 Kilovolt (kV) Substation Project during implementation. The MMCRP also acknowledges that temporary changes to the project, such as the need for additional workspace, are anticipated and common practice for construction efforts of this scale and that a Minor Project Change request would be required for these activities. This letter documents the CPUC's thorough evaluation of all activities covered in this Minor Project Change, and that no new impacts or increase in impact severity would result from the requested Minor Project Change activities.

Minor Project Changes are reviewed for consistency with CEQA requirements and are located within the geographic boundary of the project study area. Minor Project Changes 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.

Minor Project Change #1 for extended use of the Kettner Parking Lot Staging Yard and the Witherby Substation Staging Yard 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 August 31, 2016, are presented below (indented):

Page B.1-16 and Table B.1-4 in Section B.1 Project Description of the Final Mitigated Negative Declaration and Supporting Initial Study Checklist (IS/MND) identify approved, existing SDG&E staging facilities that can be used for the Project. The information in this Minor Project Change (MPC) request proposes to extend the use of two staging facilities that were not included in the Project Description, but approved for use through the Temporary Extra Work Space (TEWS) process, as defined in the Project's Mitigation Monitoring, Compliance, and Reporting Plan (MMCRP).

The storage facilities will store construction materials and equipment associated with the 12 kV distribution relocation, Vine Substation development, 69 kV loop-in, and telecommunications upgrades. This MPC is being requested to allow for staging of equipment and materials during site development and construction activities, at the Vine Substation. During construction, there will not be enough space available within the Vine Substation limits to accommodate construction activities and staging simultaneously. Other existing SDG&E staging facilities that are located farther from the Project area have been considered; however, due to distance, use of those facilities would result in more logistical challenges than the proposed staging facilities described in this MPC request. Both locations are within close proximity to the Project. The Witherby Substation staging yard is located immediately adjacent to SDG&E's existing Witherby Substation. The Kettner Parking Lot staging yard is located adjacent to Kettner Boulevard and an I-5 South on-ramp.

Both staging facilities have been approved for use through the TEWS process. Through this MPC request, SDG&E is requesting to extend the use of both staging yards beyond the TEWS limit of 60 days through September 30, 2017. The Witherby Substation TEWS (TEWS #1) was approved by the California Public Utilities Commission (CPUC) Environmental Monitor on July 20, 2016 and is approved for use through September 17, 2016. The Kettner Parking Lot TEWS (TEWS #3) was approved by the CPUC Environmental Monitor on August 15, 2016 and is approved for use through October 10, 2016.

No ground-disturbing activities or improvements are required at either site. Because the sites are located within previously disturbed or paved areas, no change in the temporary or permanent impacts identified previously in the Project's Final IS/MND will result from the proposed modification.

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

MPC #1 for the Vine 69/12 kV Substation Project is granted by the CPUC based on the factors described below.

#### **CPUC Evaluation of Minor Project Change Request**

In accordance with the MMCRP, Minor Project Change Request #1 was reviewed by CPUC to confirm that no new impacts or increase in impact severity would result from the requested Minor Project Change activities. The following discussion summarizes this analysis for biological resources, cultural and paleontological resources, hazards and hazardous materials, air quality, and land use.

Both staging facilities have been approved for use through the TEWS process. The Witherby Substation Staging Yard was used by the distribution contractor for materials storage. The first phase of the distribution work is expected to be completed in September 2016, but will then resume in January 2017. The Kettner Parking Lot Storage Yard is expected to be used by the distribution contractor in 2017.

**Biological Resources:** The Witherby Substation Staging Yard consists of gravel, asphalt, and compacted bare ground. No native vegetation is present. The parcel is a fenced-in vacant lot adjacent to and associated with SDG&E's Witherby Substation. It is currently being used as a temporary staging facility for the Project under an approved TEWS. Adjacent land uses include an industrial complex and parking garage to the immediate

west; a San Diego Metropolitan Transit System right-of-way to the south; the Witherby Substation to the east; and Hancock Street with an adjacent parking lot to the north. On July 12, 2016, SDG&E Biologist conducted a biological reconnaissance survey of the proposed Witherby Substation staging. Groundcover observed included a mixture of sand, gravel, asphalt, and compacted bare ground. No sensitive biological resources were observed, and no native vegetation was present. A pre-construction biological resources survey will be conducted prior to resuming use of the yard.

The Kettner Parking Lot Staging Yard is a paved parking lot with no native vegetation present. Chain-link fence and retaining walls surround the site. Adjacent land uses include an empty commercial building to the immediate north; an Interstate (I-) 5 South on-ramp to the immediate east; a paved parking lot and West Maple Street to the south; and Kettner Boulevard and an airport parking structure to the west. On August 9, 2016, an SDG&E Biologist conducted a biological reconnaissance survey of the proposed Kettner Parking Lot staging yard. The site is completely paved and is surrounded by sidewalk, fencing, and a retaining wall. There are a few ornamental palm trees along the sidewalk and non-native vegetation in the disturbed median adjacent to the I-5 South on-ramp. No sensitive biological resources were observed. A pre-construction biological resources survey will be conducted prior to use of the yard.

**Cultural and Paleontological Resources:** To confirm that the Witherby Substation staging yard qualified for a TEWS, SDG&E conducted a records search of the site using data provided by the South Coastal Information Center (SCIC). The SCIC records search identified no previously recorded archaeological resources within the Witherby Substation area. To prevent the unintentional disturbance of any unknown resources, an intensive pedestrian survey was conducted by ASM Affiliates, Inc. on July 13, 2016. No cultural resources were observed, and no further cultural resources work was recommended.

Due to the existing conditions and proposed use of the Kettner Parking Lot staging area, cultural resource reconnaissance surveys were not conducted.

**Hazards and Hazardous Materials:** No fuel or hazardous materials will be stored within the staging yards, and Storm Water Pollution Prevention Plan (SWPPP) best management practices will be implemented for the duration of use of the yards.

**Air Quality:** A Dust Control Plan has been prepared and approved by the CPUC. The Plan will be implemented during construction, as well as at the subject yards. No ground-disturbing activities or improvements are required at either site.

**Land Use:** The Witherby Substation Staging Yard consists of gravel, asphalt, and compacted bare ground. No native vegetation is present. The parcel is a fenced-in vacant lot adjacent to and associated with SDG&E's Witherby Substation. It is currently being used as a temporary staging facility for the Project under an approved TEWS. Adjacent land uses include an industrial complex and parking garage to the immediate west; a San Diego Metropolitan Transit System right-of-way to the south; the Witherby Substation to the east; and Hancock Street with an adjacent parking lot to the north. No existing sensitive resources are located in close proximity to the proposed yard. No complaints have been filed to date regarding use of the yard.

The Kettner Parking Lot Staging Yard is a paved parking lot with no native vegetation present. Chain-link fence and retaining walls surround the site. Use of the yard will start in 2017. Adjacent land uses include an empty commercial building to the immediate north; an Interstate (I-) 5 South on-ramp to the immediate east; a paved parking lot and West Maple Street to the south; and Kettner Boulevard and an airport parking structure to the west. No existing sensitive resources are located in close proximity to the proposed yard.

### **Conditions of MPC Approval**

The conditions noted below shall be met by SDG&E and its contractors:

- 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.
- Copies of all relevant permits, compliance plans, and this MPC #1 shall be made available on site for the duration of construction activities.
- SDG&E has indicated that Operational Protocols would be utilized that require pre-construction surveys and monitoring of bird nests to avoid and minimize impacts to nesting birds and that the implementation of SDG&E's Natural Community Conservation Plan and compliance with the legal requirements of MBTA and CFGC would reduce impacts to nesting birds to a less-than-significant level. SDG&E shall provide documentation of pre-construction survey results to the CPUC EM prior to use of either yard in 2017.

Sincerely,



Eric Chiang  
CPUC Environmental Project Manager

cc: V. Strong, Aspen