

PUBLIC UTILITIES COMMISSION505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

May 12, 2017

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 #2 – Pole Replacement

Dear Mr. Terzich,

On April 24, 2017, 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 replace an existing 80-foot tall wood 69 kV pole with an approximately 80-foot tall tubular steel pole (TSP) and to remove the associated stub pole and guy wire. The existing wood pole to be replaced was included with the Project's Final IS/MND as part of the 69 kV Loop-In; however, the pole was identified for conductor installation and removal, and not for replacement. Minor Project Change #2 for the replacement of an existing wood 69 kV pole and the removal of the associated stub pole and guy wire is granted by CPUC based on the factors described below.

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. 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. 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.

SDG&E Minor Project Change Request. Excerpts from the SDG&E Minor Project Change request, received April 24, 2017, are presented below (indented):

SDG&E is requesting to replace an existing 80-foot-tall wood 69 kV pole (Pole 166780) with an approximately 80-foot-tall tubular steel pole (TSP), and to remove the associated stub pole and guy wire. The existing wood pole to be replaced was included with the Project's Final IS/MND as part of the 69 kV Loop-In; however, the pole was identified for conductor installation and removal, and not for replacement. The location of the requested pole replacement is shown in Figure B.1-3a Detailed Project Components of the Final IS/MND and included with this request as Attachment A: MPC #2 Pole Replacement Location Map. A temporary work area associated with this pole was included with the Final IS/MND, as shown in Figure B.1-3a: Detailed Project Components of the Final IS/MND. No additional temporary work area is required to facilitate the replacement of the pole; however, lane closures on the northbound lanes of Pacific Highway will be required during pole replacement activities. The temporary lane closures will be included with the City of San Diego Traffic Control Permit (TCP) and traffic controls will be implemented per the Traffic Control Plan. To accommodate removal of the guy wire stub pole, an additional approximately 20-foot by 10-foot temporary work area located around the guy wire stub pole will be required. The temporary work area will be located on asphalt. Removal of the existing wood pole and removal of the stub pole and guy wire will be consistent with the methodology provided on Page B.1-32 of the Final IS/MND.

The new TSP will have similar specifications to the three approved TSPs, as described on Page B.1-13 and Page B.1-32 of the Final IS/MND, and depicted in Figure B.1-17: Typical Proposed 69 kV Tubular Steel Pole. However, the specifications will differ slightly from Figure B.1-17: Typical Proposed 69 kV Tubular Steel Pole and the installation methodology provided on Page B.1-32 because the pole will be direct buried instead of installed with a foundation. A typical drawing of a direct buried 69 kV steel pole is provided in Attachment B: General Arrangement 69 kV Steel Pole. The impact area of the direct buried pole will be smaller than that required for a foundation installation.

This MPC is being requested to due to safety concerns associated with the loads and code minimums of the new 69 kV line. Due to the deterioration rate of the existing pole and revised load calculations for the alignment, the pole will fail code minimums if it remains a wood pole.

CPUC Evaluation of Minor Project Change Request

In accordance with the MMCRP, Minor Project Change Request #2 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, traffic, water resources, hazardous materials, air quality, and land use...

Biological Resources: Pole 166780 and the associated stub pole were included in the survey area of the Vine 69/12 kV Substation Project Reconnaissance-Level Survey conducted in January 2014 by SDG&E. According to the survey, the biologist was unable to directly access the 69 kV loop-in transmission pole sites, but the entire site was observed visually and little to no vegetation was observed directly beneath the transmission line and between the fence and the railroad ROW. No sensitive biological resources were observed. On April 11, 2017, a biological reconnaissance survey of the existing pole site and associated stub pole was conducted. No native vegetation or avian activity was observed in the vicinity of Pole 166780, and the stub pole was observed to be entirely surrounded by asphalt. Mexican fan palms are located approximately 10 feet south of the pole; however, trimming or removal of the palm trees will not be required to facilitate the pole replacement.

Cultural and Paleontological Resources: Pole 166780 and the associated stub pole were included in the original cultural resource study conducted for the Project, and the results are documented in *Cultural Resource*

Review for the SDG&E proposed Vine 69/12 kV Substation Project, San Diego County, California (SDG&E ETS# 25059, ASM Project #21430 [Castells, 2015]). As part of the study, a records search was conducted with a one-mile radius of the Project at the South Coastal Information Center on December 04, 2013. Only one resource was located within the Project area, and it is located over a half mile southeast of Pole 166780. Due to the location of the Project within a previously developed area, a cultural resource field survey was not conducted. No cultural resources are known to be present near Pole 166780 or the stub pole.

The Project area is underlain by the Middle to Late Pleistocene Bay Point Formation, which has a moderate to high potential for buried paleontological resources. Installation of the new TSP will require excavation that will likely impact deposits of the Bay Point Formation. In accordance with Applicant-Proposed Measure (APM) CUL-02, MM CUL-1, and MM CUL-3, a paleontological monitor will be on site to observe excavation activities that occur at depths greater than 3.5 feet and that have the potential to impact sensitive areas, such as the Bay Point Formation.

Traffic: Temporary lane closures along northbound Pacific Highway and a temporary sidewalk closure will be required during the pole replacement; however, construction activities and lane/sidewalk closures will be conducted in accordance with the Mitigation Measure (MM) T-1, as well as the Project's approved Traffic Control Plan, the City of San Diego TCP, and the Metropolitan Transit System (MTS) Right-of-Entry Permit.

Water Resources: The Storm Water Pollution Prevention Plan (SWPPP) will be amended to include the new ground disturbance associated with the pole replacement and guy wire stub pole, and will also include the new temporary work area associated with the guy wire stub pole. SDG&E will submit a Change of Information to the State Water Resources Control Board through the Storm Water Multiple Application Reporting System (SMARTS) to reflect an increase in ground disturbance covered by the SWPPP for the Project. Sediment controls will be installed prior to ground disturbance and as recommended by the Qualified SWPPP Developer or Qualified SWPPP Practitioner.

Hazards and Hazardous Materials: No fuel or hazardous materials will be stored at the pole replacement location. Construction activities associated with the pole replacement work will be subject to the Hazardous Materials and Waste Management Plan prepared for the Vine Substation Project.

Air Quality: A Fugitive Dust Control Plan has been prepared for the Project and approved by the CPUC. The Plan will be implemented during construction.

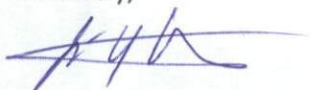
Land Use: The existing wood pole to be replaced is located on Pacific Highway was included with the Project's Final IS/MND as part of the 69 kV Loop-In; however, the pole was identified for conductor installation and removal, and not for replacement. The location of the requested pole replacement and temporary work area are shown on Figure B.1-3a, Detailed Project Components of the Final IS/MND.

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 #2 shall be made available on site for the duration of construction activities.

Sincerely,

A handwritten signature in blue ink, appearing to be 'Eric Chiang', with a long horizontal flourish extending to the right.

Eric Chiang
CPUC Environmental Project Manager

cc: V. Strong, Aspen