

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



November 8, 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 #3 – Extend the Date of Use for West Redwood Staging Area.

Dear Mr. Terzich,

On November 6, 2017, San Diego Gas and Electric (SDG&E) submitted Minor Project Change (MPC) request #3 to the California Public Utilities Commission (CPUC) for the Vine 69/12 Kilovolt (kV) Substation Project (Project). As requested under this MPC #3, SDG&E is seeking CPUC authorization to extend the duration of use of the previously approved West Redwood staging area. The staging area is located in the City of San Diego, San Diego County, and was approved for temporary use by a Temporary Extra Work Space (TEWS) request approved on August 28, 2017. The TEWS approval for use of the staging area expired on October 26, 2017 therefore SDG&E is seeking CPUC authorization for extended use of this staging area.

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 #3 for extended use of the West Redwood Staging Area is granted by CPUC based on the factors described below.

**SDG&E Minor Project Change #3 Request.** Excerpts from the SDG&E Minor Project Change request, received November 6, 2017, 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 a staging area that was 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).

SDG&E is requesting the use of a staging area that was not previously identified in the Project's Final IS/MND as a potential staging facility. The staging area will store construction materials and equipment associated with the 12 kV distribution relocation. The Vine Substation site in its current development phase does not provide adequate space 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. The staging area is located within close proximity to Kettner Boulevard and the Project work area, as shown in Attachment A: West Redwood Street Staging Area Site Map.

The staging area has been approved for use through the TEWS process. Through this MPC request, SDG&E is requesting to extend the use of the staging area beyond the TEWS limit of 60 days through February 28, 2018. The West Redwood Street Staging Area TEWS (TEWS #5) was approved by the California Public Utilities Commission (CPUC) Environmental Monitor on August 29, 2017 and was approved for use through October 26, 2017. A copy of approved TEWS #5 is provided in Attachment D: Approved West Redwood Staging Area TEWS.

No ground-disturbing activities or improvements are required at the site. Because the site is located within a paved area, no change in the temporary or permanent impacts identified previously in the Project's Final IS/MND will result from the proposed modification. Furthermore, no fuel or hazardous materials will be stored within the staging area, and Storm Water Pollution Prevention Plan (SWPPP) best management practices will be implemented for the duration of use of the area.

This letter documents the CPUC's thorough evaluation of all activities covered in this Minor Project Change 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.

Minor Project Change #3 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 #3 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.

The West Redwood Staging area was approved for use through the TEWS process for use by the underground contractor for materials and equipment storage through October 26, 2017. The City of San Diego also issued approval for use of the staging area through November 28, 2017 and SDG&E will obtain extensions for use from the City of San Diego as necessary.

**Biological Resources:** The West Redwood Staging Area is located at the dead end of a paved public street. No vegetation is present within the staging area. On November 1, 2017, Jesse Byrd (Insignia Environmental) conducted a biological reconnaissance survey of the site and surrounding area. No sensitive biological resources were observed. The site is currently being used as a temporary staging facility for the Project under an approved TEWS.

**Cultural and Paleontological Resources:** The West Redwood Staging Area was evaluated for cultural and paleontological resources as part of the Project's IS/MND, and no resources were noted. No ground disturbance will be required for the use of the staging area; therefore, further paleontological and archaeological surveys are not required.

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

**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 staging area. No ground-disturbing activities or improvements are required at the staging area.

**Land Use:** The West Redwood Staging Area is located at the dead end of West Redwood Street. Adjacent land uses include the Metropolitan Transit System (MTS) and North County Transit District (NCTD) right-of-way to the immediate west, and business use to the immediate north and south. Equipment, construction materials, and metal containers will be stored adjacent to the MTS and NCTD right-of-way. Use of the subject site will not obstruct access to business entrances to the north and south, and no public parking will be eliminated. No existing sensitive resources are located in close proximity to the staging area and no complaints have been filed to date regarding use of the staging area.

### **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.
- Use of the subject site has been approved through November 28, 2017 by the City of San Diego. If required by the City, SDG&E shall obtain extensions for use of the site and submit to CPUC.
- Copies of all relevant permits, compliance plans, and this MPC #3 shall be made available on site for the duration of construction activities.

Sincerely,



Eric Chiang  
CPUC Environmental Project Manager

cc: V. Strong, Aspen