

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



February 7, 2013

Mr. Don Houston  
Project Manager II, Environmental Services  
San Diego Gas and Electric  
1010 Tavern Road  
Alpine CA, 91901

**Subject: Minor Project Refinement Request (MPRR) #1 – Temporary Retention Basin – East County Substation Project (Application No. 09.08.008)**

Dear Mr. Houston:

On January 25, 2013, San Diego Gas and Electric (SDG&E) submitted a Minor Project Refinement Request (MPRR) to the California Public Utilities Commission (CPUC) to construct a temporary, polyvinyl chloride (PVC)-lined retention basin within a portion of the 500 kilovolt (kV) yard for water storage during construction.

The CPUC voted on June 21, 2012 to approve the East County (ECO) Substation Project (Decision 12-06-039) and a Notice of Determination was submitted to the State Clearinghouse (SCH#2009121079).

The Commission decision approving the permit to construct authorizes Energy Division staff to approve requests by SDG&E for minor project refinements. The decision states that minor project refinements may be approved so long as such minor project refinements are located within the geographic boundary of the study area of the Environmental Impact Report/Environmental Impact Statement and do not, without mitigation, result in a new significant impact or a substantial increase in the severity of a previously identified significant impact based on the criteria used in the environmental document; conflict with any mitigation measure or applicable law or policy; or trigger an additional permit requirement.

The CPUC prepared a Mitigation Monitoring, Compliance and Reporting Program (MMCRP) to ensure compliance with all mitigation measures imposed on the ECO Substation Project during construction. The MMCRP also acknowledges that MPRR's are required to be submitted by SDG&E for CPUC review. This letter documents the CPUC's thorough evaluation of all activities covered in MPRR #1 and that the change requested in MPRR #1 is allowed pursuant to the Commission decision issuing the Permit to Construct.

Don Houston  
February 7, 2013

MPRR #1 to construct a temporary PVC-lined retention basin within a portion of the 500 kV yard to be used for water storage during construction is granted by CPUC based on the factors described below.

**SDG&E MPRR.** Excerpts from the SDG&E MPRR, received January 25, 2013, are presented below (indented) with CPUC additions in **bold**:

**SDG&E submitted MPRR #1 to the CPUC for the addition of a temporary, PVC-lined retention basin within the 500 kV yard to be used for water storage during construction.** The temporary retention basin will measure approximately 250 feet by 150 feet and will be approximately 10 feet deep. The basin will be fenced and located entirely within the approved boundaries of the ECO substation permanent footprint. The basin will have a capacity of approximately two million gallons. Following the completion of mass grading, the temporary retention basin will be removed and the materials disposed of in accordance with the Project's Hazardous Materials and Waste Management Plan. The temporary retention basin is anticipated to take approximately 14 days to construct and will be utilized during mass grading of the ECO Substation site, which is anticipated to last approximately four months.

The requested addition of a temporary retention basin at the approved ECO Substation site is needed to allow SDG&E to store construction water on site for immediate access during initial mass-grading activities until the permanent detention basin is constructed. Due to the volume of water required for dust control and other purposes, including compaction, it would be time-consuming and infeasible for water trucks to constantly travel to off-site water sources during site development each time the need for water arose. Water trucks will be used to initially fill the retention basin prior to the commencement of mass grading and will be used to maintain water levels during site development, as required. Once the retention basin is initially filled, water trucks will be able to refill on site during mass-grading activities and the need for travel to off-site water sources during site development will be minimized.

**CPUC Evaluation of MPRR #1.** In accordance with the MMCRP, the MPRR was reviewed by CPUC to confirm that no new impacts or increase in impact severity would result from the requested activities. The following discussion summarizes this analysis for aesthetics, agriculture and forestry resources, air quality and greenhouse gas emissions, biological resources, cultural resources, geology, soils, and seismicity, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation and traffic, and utilities and service systems, . A list of conditions is also provided to define additional information and clarifications regarding mitigation requirements.

**Aesthetics.** The temporary retention basin and associated activities will be within the boundaries of the approved ECO Substation 500 kV yard and will be consistent with the impacts analyzed for construction in the Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS). The area proposed for the temporary retention basin will measure approximately 37,500 square feet (0.86 acre) and will be fenced with an approximately six-foot-tall, gray, galvanized steel chain-link fence, similar to the fence to be constructed along the perimeter of the ECO Substation site. No new impacts or increase in impact severity for aesthetics is anticipated.

**Agriculture and Forestry Resources.** The temporary retention basin will be located entirely within the boundaries of the approved ECO Substation site. Construction and utilization of the temporary retention basin will not encroach onto agricultural land, nor will it restrict any agricultural activities that occur on the land. No new impacts or increase in impact severity for agriculture and forestry resources is anticipated.

**Air Quality and Greenhouse Gas Emissions.** As described on Page D.11-22 of the Final EIR/EIS, water for dust control and other purposes during construction will be transported by water trucks from off-site locations within San Diego County and the City of San Diego. The addition of a temporary retention basin will not increase the number of water trucks utilized or the number of trips required beyond what was analyzed in the Final EIR/EIS. With the addition of the retention basin, the majority of the water truck trips will occur prior to site development rather than throughout the site-development phase. No additional ground disturbance will be required for construction of the temporary retention basin beyond what was analyzed in the Final EIR/EIS for construction. No new impacts or increase in impact severity for air quality and greenhouse gas emissions is anticipated.

**Biological Resources.** The requested work space for the proposed temporary retention basin was fully analyzed in the Final EIR/EIS as the location is within the ECO substation 500 kV yard. Wildlife escape ramps will be constructed within the retention basin in accordance with Applicant-Proposed Measure (APM) ECO-BIO-20 to allow potential entrapped wildlife to escape. No new impacts or increase in impact severity for air quality and greenhouse gas emissions is anticipated.

**Cultural Resources.** The proposed temporary retention basin is located within the limits of the area surveyed as part of the Final EIR/EIS. One cultural site has been identified within the requested refinement area, which was assessed in the August 2011 Eligibility Report prepared by ASM Affiliates, and is eligible for inclusion on the National Register of Historic Places and/or California Register of Historic Properties. The cultural site is located within the boundaries of the approved ECO Substation site, and impacts to the cultural site during construction of the ECO Substation are analyzed within the Research Design for Archaeological Data Recovery at CA-SDI-7074 (HPTP). In the event that potential cultural resources are encountered during construction or grading activities, all work will be halted and an archaeological monitor will assess the discovery in accordance with the Monitoring, Post-Review Discovery, and Unanticipated Effects Plan. No new impacts or increase in impact severity for cultural resources is anticipated.

**Geology, Soils, and Seismicity.** No additional ground disturbance will be required for the temporary retention basin and no permanent structures are proposed by SDG&E as part of MPRR #1. Use of the retention basin will be short term and temporary during mass grading of the ECO Substation site, and will be conducted in accordance with the best management practices (BMPs) provided in the ECO Substation Storm Water Pollution Prevention Plan (SWPPP) to minimize the potential for erosion. No new impacts or increase in impact severity for geology, soils and seismicity is anticipated.

**Hydrology and Water Quality.** The temporary retention basin will be lined with a PVC liner to prevent the stored water from entering the groundwater table. In addition, BMPs provided in the ECO Substation SWPPP will be implemented to minimize the potential for impacts to hydrology and water quality. No new impacts or increase in impact severity for hydrology and water quality is anticipated.

**Land Use and Planning.** The proposed temporary retention basin will be within the limits of the ECO Substation site analyzed in the Final EIR/EIS, and will be removed following the completion of grading activities. No new impacts or increase in impact severity for land use and planning is anticipated.

**Mineral Resources.** The proposed temporary retention basin is located within the limits of the area analyzed for mineral resources as part of the Final EIR/EIS. No new impacts or increase in impact severity for mineral resources is anticipated.

**Noise.** The construction of the temporary retention basin would be within the limits of the ECO substation site and consist of using similar noise generating equipment as analyzed in the Final EIR/EIS. The use of heavy equipment for preparation of the temporary retention basin will be completed in accordance with APM ECO-NOI-1. No new impacts or increase in impact severity for noise is anticipated.

**Population and Housing.** The temporary retention basin will be used temporarily during mass grading of the substation site, and will not induce population growth or displace people or existing housing. No new impacts or increase in impact severity for population and housing is anticipated.

**Public Services.** The refinement will not disrupt existing utility systems, nor will it increase the need for public services/facilities or impact the wastewater treatment provider or solid waste disposal site's capacity. Water required during construction for dust control and grading activities will be in accordance with MM-HYD-3, which requires identification of adequate water supplies. No new impacts or increase in impact severity for public services is anticipated.

**Recreation.** MPRR #1 will not increase local population or housing and will not increase demand for recreational facilities in the ECO Substation area. No new impacts or increase in impact severity for recreational resources is anticipated.

**Transportation and Traffic.** The only vehicles or heavy equipment that will be utilized for the addition of the temporary retention basin are those that are required for vegetation clearing and the grading/soil compaction activities necessary to prepare the ECO Substation site for use as identified in the Final EIR/EIS. No new impacts or increase in impact severity for transportation and traffic is anticipated.

**Utilities and Service Systems.** The activities conducted during construction of the requested refinement area will be temporary and short term in nature, and no additional utilities or service systems will be required. No new impacts or increase in impact severity for utilities and service systems is anticipated.

### **Conditions of MPRR #1 Approval.**

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

Don Houston  
February 7, 2013

1. All applicable project mitigation measures, compliance plans, permit conditions and conditions of NTP #2 shall be implemented.
2. Copies of all relevant permits, compliance plans (i.e., MMCRP, etc.), and this MPRR approval letter shall be available on-site for the duration of construction activities. Copies of permits shall be provided to the CPUC upon request.

Sincerely,

/s/ Amy Baker

Amy Baker  
CPUC Environmental Project Manager