PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

July 15, 2016

Richard Quasarano
Compliance Manager
San Diego Gas & Electric Company
8330 Century Park Court, CP31F
San Diego, CA 92123

Subject: Salt Creek Substation—Review of Minor Project Refinement Request #1

Dear Mr. Quasarano,

The California Public Utilities Commission (CPUC) has reviewed San Diego Gas and Electric Company's (SDG&E's) proposed Minor Project Refinement (MPR) Request #1 for the approved Salt Creek Substation Project (project), provided by email on July 12, 2016. The CPUC adopted the Final Environmental Impact Report (FEIR) and approved the Environmentally Superior Alternative, Alternative 2 – Salt Creek Substation on May 12, 2016. SDG&E's request for a MPR has been reviewed consistent with the requirements specified in the Mitigation Monitoring Reporting Program and Mitigation Monitoring Compliance and Reporting Program for the project.

SDG&E's Proposed Minor Project Refinement #1
On July 12, 2016, SDG&E submitted a request for MPR #1 to the CPUC. MRP#1 would modify the approved project by increasing the limits of disturbance by 0.55 acres in the northwest corner of SDG&E's property, adjacent to Hunte Parkway. SDG&E proposed MPR #1 to allow for easier mobility within the northwest corner for installation of the temporary construction fence, as well as allow for the permanent underground connection of the recycled water service lateral and the fire water service lateral. The change in LOD would also allow for construction of the temporary recycled water high line.

CPUC Review of Minor Project Refinement #1
The proposed actions were reviewed for consistency with the impact analysis contained in the adopted Final Environmental Impact Report (FEIR) prepared for the project. A review form and SDG&E's request are attached to this letter. Table 1 below provides CPUC's evaluation of whether the proposed refinement would result in a new impact, or increase the severity of any impact that was previously analyzed in the FEIR.

Table 1 CPUC Evaluation of Minor Project Refinement #1

Would the Proposed Project refinements result in a new impact, or increase the severity of a previously analyzed impact to:	No	Yes
Aesthetics (e.g., damage scenic resources or vistas, degrade the existing visual character of the site and its surroundings, or create sources of light or glare)? *Final EIR Significance: Significant and Unavoidable*	☒	☐

Summary of Proposed Project Refinement Impacts on Aesthetics:

The proposed refinement would not increase the impact to the visual quality of the area. The disturbance associated with connecting to the recycled water line, potable water fire line, temporary recycled water high line and temporary power connection would be temporary. The area of disturbance is also directly adjacent to the project area of disturbance and the visual impact of construction on the viewshed would not increase as a result of the refinement.
The proposed refinements would not result in a new impact or increase the severity of a previously analyzed impact on aesthetics.

Agriculture and Forestry Resources (e.g., convert Farmland to nonagricultural use, or create a conflict with existing agricultural zoning or a Williamson Act)? *Final EIR Significance: Less than Significant*	☒	☒

Summary of Proposed Project Refinement Impacts on Agriculture and Forestry Resources:

The proposed refinements would not convert agricultural land to non-agricultural use or result in the loss of agricultural land. The refinement is located in the area that was purchased by SDG&E for construction of the substation and this area is not subject to agricultural use. The proposed refinements would not result in a new impact or increase the severity of a previously analyzed impact on agriculture or forestry resources.

Air Quality (e.g., produce criteria air pollutant emissions, or expose sensitive receptors to additional pollutants)? *Final EIR Significance: Less than Significant with Mitigation*	☒	☐

Summary of Proposed Project Refinement Impacts on Air Quality:

The proposed refinements would increase the area of disturbance by 0.55 acres and involve trenching in an area adjacent to the previously analyzed area of disturbance. Trenching for installation of the distribution lines and recycled water lines was previously considered in the EIR. APM Air-1 and Mitigation Measure Air-1 would reduce the impact on air quality to a less than significant level. The proposed refinements would not result in a new impact or increase the severity of a previously analyzed impact on air quality.

Biological Resources (e.g., have an adverse effect on sensitive or special-status species; impact riparian, wetland, or any other sensitive habitat; or conflict with local policies or ordinances protecting biological resources)? *Final EIR Significance: Less than Significant with Mitigation*	☒	☒

Summary of Proposed Project Refinement Impacts on Biological Resources:

The proposed refinements would involve temporary disturbance in an area containing landscaped vegetation. The refinement area contains landscaped vegetation (i.e., ice plant) and the biological resources in the proposed refinement area are consistent with the biological resources in the areas of disturbance considered in the previous EIR. The refinements would not result in a new impact or increase the severity of a previously analyzed impact on biological resources.

Would the Proposed Project refinements result in a new impact, or increase the severity of a previously analyzed impact to:	No	Yes
Cultural and Paleontological Resources (e.g., cause an adverse change to a significant historical, archeological, or paleontological resource)? *Final EIR Significance: Less than Significant with Mitigation*	☒	☒

Summary of Proposed Project Refinement Impacts on Cultural and Paleontological Resources:

No cultural or paleontological resources have been recorded within the proposed refinement areas. The proposed refinements would involve temporary ground disturbance in a new area of 0.55 acres. Cultural or paleontological resources could be encountered in these areas; however, APM CUL-2, CUL-5, and CUL-7, and Mitigation Measure Cultural-1 would reduce the impact on cultural resources to less than significant. The proposed refinements would not result in a new impact or increase the severity of a previously analyzed impact on cultural or paleontological resources.

Geology and Soils (e.g., cause or expose people or structures to geologic or soil hazards, including erosion or loss of topsoil)? *Final EIR Significance: Less than Significant with Mitigation*	☒	☒

Summary of Proposed Project Refinement Impacts on Geology and Soils:

The proposed refinements would increase ground disturbance by 0.55 acres. Impacts from erosion were considered in the Final EIR and implementation of the CPUC approved Stormwater Pollution Prevention Plan (SWPPP) would reduce impacts from the proposed refinement to a less than significant level. The proposed refinements would occur in areas containing the same underlying geologic and soil units as the remaining substation parcel. Impacts on these geologic resources were analyzed in the Final EIR. The proposed refinements would not result in a new impact or increase the severity of a previously analyzed impact on geology and soils.

Greenhouse Gas Emissions (e.g., produce criteria greenhouse gas pollutants, or expose sensitive receptors to additional pollutants)?	☒	☒

Summary of Proposed Project Refinement Impacts on Greenhouse Gas Emissions:

The level of equipment use and number of vehicle trips required for the proposed refinements would be consistent with the equipment use and vehicle trip estimates included in the Final EIR. The Proposed Project refinements would not result in a new impact or increase the severity of a previously analyzed impact on greenhouse gas emissions.

Hazards and Hazardous Materials (e.g., create or increase the exposure of people or structures to hazardous materials, involve the use of additional hazardous materials or equipment, or interfere with an adopted emergency plan)? *Final EIR Significance: Less than Significant with Mitigation*	☒	☐

Summary of Proposed Project Refinement Impacts on Hazards and Hazardous Materials:

The proposed refinement would require use of the same types of equipment and hazardous materials that were analyzed in the Final EIR. The refinement area does not contain known hazardous materials sites. The proposed refinements would not result in a new impact or increase the severity of a previously analyzed impact on hazards and hazardous materials.

Would the Proposed Project refinements result in a new impact, or increase the severity of a previously analyzed impact to:	No	Yes
Hydrology and Water Quality (e.g., degrade water quality, discharge waste or sediment, deplete groundwater, alter the existing drainage pattern, create additional runoff water or polluted runoff, place structures in a 100-year flood hazard area, or expose people or structures to a significant risk involving flooding)? *Final EIR Significance: Less than Significant with Mitigation*	☒	☒

Summary of Proposed Project Refinement Impacts on Hydrology and Water Quality:

The proposed refinements would increase ground disturbance by 0.55 acres. The proposed refinements would occur adjacent to the substation site and would drain to the same water bodies as the substation. Impacts to these water bodies were analyzed in the Final EIR. Implementation of the measures contained in the CPUC approved SWPPP would reduce impacts to a less than significant level. The proposed refinements would not result in a new impact or increase the severity of a previously analyzed impact on hydrology and water quality.

Land Use and Planning (e.g., conflict with a land use plan, policy, or regulation of an agency with jurisdiction over the project, or conflict with a habitat conservation plan)? *Final EIR Significance: No Impact*	☒	☐

Summary of Proposed Project Refinement Impacts on Land Use and Planning:

The proposed refinements would occur within the substation parcel, which is owned by SDG&E. The proposed refinements would have no impact on land use and planning.

Noise (e.g., expose sensitive receptors to additional noise or vibration)? *Final EIR Significance: Significant and Unavoidable*	☒	☐

Summary of Proposed Project Refinement Impacts on Noise:

The proposed refinements would slightly adjust the project work areas; however, the refinements would not affect the distance between construction activities and the nearest sensitive receptors or change the equipment that would be used during construction. The calculated construction noise levels presented in the Final EIR are not affected by the proposed refinements. The proposed refinements would not result in a new impact or increase the severity of a previously analyzed impact on noise.

Public Services (e.g., result in adverse impacts on government facilities that provide a public service)? *Final EIR Significance: Less than Significant*	☒	☐

Summary of Proposed Project Refinement Impacts on Public Services:

The proposed refinements would not require any public services. The proposed refinements would not result in a new impact or increase the severity of a previously analyzed impact on public services.

Recreation (e.g., increase the use of, or cause adverse effects on, parks or other recreational facilities)? *Final EIR Significance: Significant and Unavoidable*	☒	☒

Summary of Proposed Project Refinement Impact on Recreation:

There are no recreational resources within the area of the proposed refinement. The proposed refinements would not affect the duration of construction in vicinity of a recreational resource. The proposed refinements would not result in a new impact or increase the severity of a previously analyzed impact on recreation.

Would the Proposed Project refinements result in a new impact, or increase the severity of a previously analyzed impact to:	No	Yes
Transportation and Traffic (e.g., increase traffic congestion or degrade performance of the circulation system, taking into account all modes of transportation, or increase hazards due to a design feature)? *Final EIR Significance: Less than Significant with Mitigation*	☒	☒

Summary of Proposed Project Refinement Impacts on Transportation and Traffic:

The proposed refinements would not change the roadways used to access project work areas or the number of vehicles required to construct or maintain the project. The proposed refinements would not result in a new impact or increase the severity of a previously analyzed impact on transportation and traffic.

Utilities and result in the construction of new or expansion of existing water or stormwater drainage facilities, require additional water entitlements, create new solid waste disposal needs, or *Final EIR Significance: Less than Significant with Mitigation*	☒	☐

Summary of Proposed Project Refinement Impacts on Utilities and Service Systems:

There are no known utilities within the area of the proposed refinements. Potential conflicts with underlying or neighboring utilities would be the same as the potential conflicts with underground utilities considered in the Final EIR. The proposed refinements would not result in a new impact or increase the severity of a previously analyzed impact on utilities and public services.

Conclusion

This letter provides documentation that the actions proposed in MPR #1 are consistent with the FEIR. MPR#1 would not result in a new impact or increase the severity of a previously analyzed impact; therefore, no supplemental or subsequent CEQA review is required to address MPR #1. The actions proposed in MPR #1 are consistent with the CPUC approved FEIR.

Please contact me at connie.chen@cpuc.ca.gov if you have any questions regarding this review of MPR#1.

Sincerely,

Connie Chen
Project Manager
Energy Division, CEQA Unit

cc: Susanne Heim, Panorama Environmental
Sheila Hoyer, Panorama Environmental

Attachment A: Minor Project Refinement #1 Review Form
Attachment B: SDG&E Minor Project Refinement Request for Change in Limits of Disturbance (MPR Request #1)

ATTACHMENT A

Minor Project Refinement Review Form

PUBLIC UTILITIES COMMISSION

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SAN FRANCISCO, CA 94102-3298

Proposed Minor Project Change Type:	Request #:
Minor Project Refinement	1.

Part A: Proposed Minor Project Change Summary			
Date Submitted:	**Requested Approval Date:**	**Start Date:**	**Expected End Date:**
7/12/2016	7/15/2016	7/1/2016	8/1/2016
Submitted by:	**Organization and Title:**	**Duration and Work Hours:**	
Keri Cuppage	Senior Environmental Compliance Specialist	Within approved work hours	

Location(s): Describe applicable location(s), address, and/or dimensions and area of any additional work areas and land disturbance associated with the proposed refinements.

Addition of 0.55 Acres of LOD in northwest corner of SDG&E's property

Proposed Action(s): List and describe each proposed action.

Change of LOD in northwest portion of the project area to align with the property line.

Purpose(s): *Explain why the proposed action(s) are necessary.*

Easier mobility for installation of temporary construction fence, allow for permanent underground connection of recycled water line, potable water fire line, temporary recycled water high line and temporary power connection.

Comparison Documentation: *Submit supporting photos, maps, and other documentation illustrating the difference between the existing conditions in the area, the approved project, and the proposed refinements in Part D.*

Part B: Existing Conditions					
Current and Adjacent Land Use(s):					
Currently vacant. Adjacent to single family residential and public school.					
Has landowner approval been granted? (Describe below)			**Landowner:**	**Date of Approval:**	**Approval Verified by:**
☐ Yes	☐ No	☒ N/A	SDG&E	Click here to enter a date.	Click here to enter text.
SDG&E owns the proposed area of disturbance.					

Surveys: *List any new survey reports under Part D, attach a copy, and describe relevant survey details under the applicable resource category listed in Part E.*

Biological Resources. Were all sites associated with the proposed action(s) surveyed for biological resources with the potential to occur in the area? If so, were survey results positive or negative? Were surveys completed during the appropriate timing and season to detect resources? If not, describe under the applicable resource category in Part E.	☒ Previously Surveyed ☐ Survey Attached	☐ Positive ☒ Negative
	☒ N/A – Surveys were included in the EIR.	
Cultural Resources. Were all sites associated with the proposed action(s) surveyed for cultural resources (records search and pedestrian survey)? If so, were survey results positive or negative?	☒ Previously Surveyed ☐ Survey Attached	☐ Positive ☒ Negative
	☒ N/A – Surveys were provided for the EIR.	
Hydrology. Were all sites associated with the proposed action(s) surveyed for hydrologic resources? If so, were survey results positive or negative?	☒ Previously Surveyed ☐ Survey Attached	☐ Positive ☐ Negative
	☒ N/A – Surveys were included in the EIR.	
Summarize water features and stormwater considerations including any changes to jurisdictional features and the use of erosion and sediment control best management practices.		
Refinement does not cause changes to hydrologic features. No jurisdictional features are located in the area. BMPs will be implemented in accordance with the approved SWPPP.		

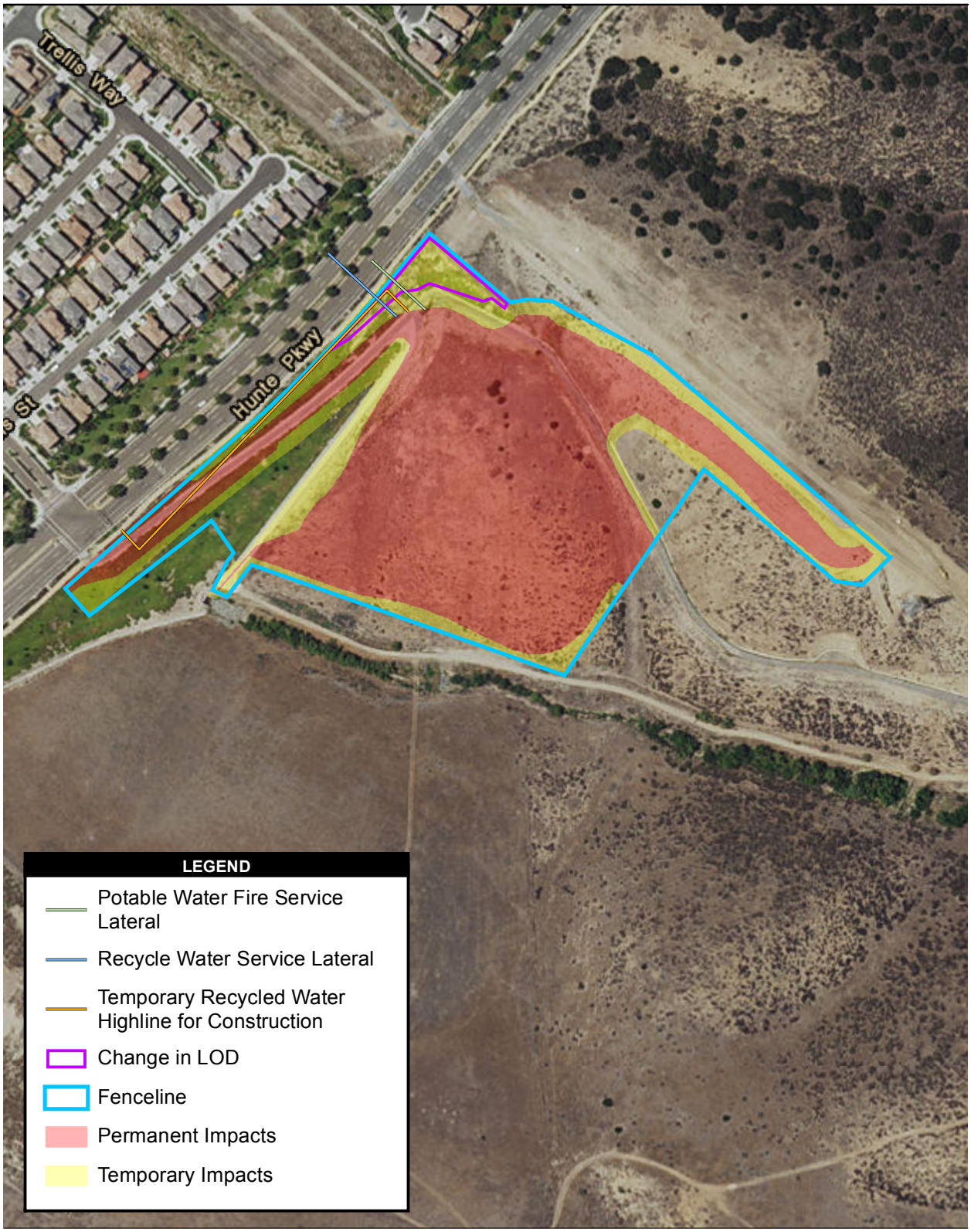
Part C: Permits, Agency Approvals, and Environmental Protection Measures (EPMs) (List any new permits or agency approvals under Part D, attach a copy, and describe relevant details under the applicable resource category listed in Part E)		
Have all required permits, permit amendments/authorizations, or agency approvals been issued by resource agencies with applicable jurisdiction?	☒ Previously Provided	
	☐ Authorization Attached	
	☐ N/A	
Would the proposed action(s) conflict with permit conditions or agency approvals?	☐ Yes	☒ No
Would the proposed action(s) conflict with project applicant proposed measures (APMs), avoidance and minimization measures, or mitigation measures (MMs) listed in the Final Environmental Impact Report (FEIR)?	☐ Yes	☒ No

Part D: Attached Materials (e.g., surveys, maps, photos, memos, agency authorizations, etc.)
Attachment 1 – Change in LOD Figure

Part E: FEIR Consistency
List applicable project requirements (e.g., APMs, MMs, project parameters, or other project stipulations) for which the refinements are being requested.
MM Aesthetics-1, APM Air-1, MM Air-1, APM BIO-1, APM BIO-2, APM BIO-3, APM BIO-4, MM Biology-3, MM Biology-9, APM CUL-2, APM CUL-5, APM CUL-7, MM Cultural-1, MM Cultural-4, MM Geology-1, APM HAZ-3, MM Hazards-2, APM HYDRO-1, MM Noise-2, APM UTIL-1, MM Utilities-1

ATTACHMENT 1

SDG&E Minor Project Refinement Request for Change in Limits of Disturbance Figure



Source: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

300 150 0 300 Feet

Scale: 1:3,600; 1 inch = 300 feet

Salt Creek Impacts with Fenceline

Salt Creek

Path: C:\Users\sorensenj\Desktop\GIS\SaltCreekImpacts_Fenceline.mxd, 7/7/2016, sorensenj

ATTACHMENT B

SDG&E Minor Project Refinement Request for Change in Limits of Disturbance (MRP Request #1)

Memorandum

Date: July 12, 2016

To: Connie Chen
Project Manager
California Public Utilities Commission

From: Richard Quasarano
Compliance Manager
San Diego Gas & Electric Company

Subject: Minor Project Refinement Request for Change in Limits of Disturbance (MPR Request #1)

SDG&E's design team is requesting a change to the previously identified Limits of Disturbance (LOD). Specifically, this Request #1 is for a change of the LOD in the northwest portion of the project area to align with the property line with a requested approval date of July 15th, 2016. The change in LOD would increase the substation work area by approximately 0.55 acres. The new total impact area would be 13.11 acres. This additional area would allow for easier mobility within the northwest corner for installation of the temporary construction fence, as well as allow for the permanent underground connection of the recycled water service lateral and the fire water service lateral. The change in LOD would also allow for the temporary recycled water high line for construction. Impacts within the change of LOD would be temporary.

The total length of the recycled water service lateral would be 220 feet (ft.). Approximately 85 ft. would be trenched outside of the property (75 ft. would be trenched in asphalt on Hunte Parkway and 10 ft. would be trenched in the landscaped parkway adjacent to Hunte Parkway) and 135 ft. would be trenched on the slope inside the property. The trench width would be 2.5 ft. for a total trenched area of approximately 550 square feet (sq. ft.). The approximate construction duration for the recycled water service lateral would be 8 days.

The total length of the fire water service lateral would be 130 ft. Approximately 30 ft. of the fire water service lateral would be trenched outside of the property (20 ft. would be trenched in asphalt on Hunte Parkway and 10 ft. would be trenched in the landscaped parkway adjacent to Hunte Parkway) and 100 ft. would be trenched inside the property (90 ft. would be trenched in the landscaped slope and 10 ft. would be trenched in concrete). The trench width would be 2.5 ft. for a total trenched area of approximately 325 sq. ft. The approximate construction duration for the fire water service lateral would be 6 days.

The temporary recycled water highline would provide a temporary connection from the existing recycled water meter for construction purposes and would be approximately 1,175 ft. in length (total). The majority of this alignment occurs within previously identified LOD. However a small portion (approximately 300 ft.) of the highline would extend into the additional LOD area being requested herein. The recycled water highline would lay on the ground's surface. No trenching would occur for this above-ground line, and it would be removed prior to construction completion.

This area is within the geographic boundary of the study area utilized within the EIR. The habitat within the change of LOD area is consistent with the previously mapped habitat of the area, and is composed primarily of disturbed/ornamental habitat dominated by iceplant (*Carpobrotus edulis*) African daisy (*Gazania* sp.), sweet clover (*Melilotus indicus*), and Russian thistle (*Salsola tragus*). Changes to the LOD would not represent a new significant impact to biological resources and/or increase the severity of any other significant impacts. Additionally, the change in LOD would not trigger additional

permit requirements and would not conflict with any Applicant Proposed Measure (APMs), Mitigation Measure (MMs), or other applicable regulations. All APMs and MMs that will be implemented for the existing LOD would also be implemented for the additional LOD. All cultural and paleontological monitoring would be extended into this area, as monitoring efforts are covering ground disturbing activities throughout the substation project area. Likewise, all erosion and sediment control storm water BMPs would also be extended into this area. The change in LOD would not require a change in construction start and end dates.

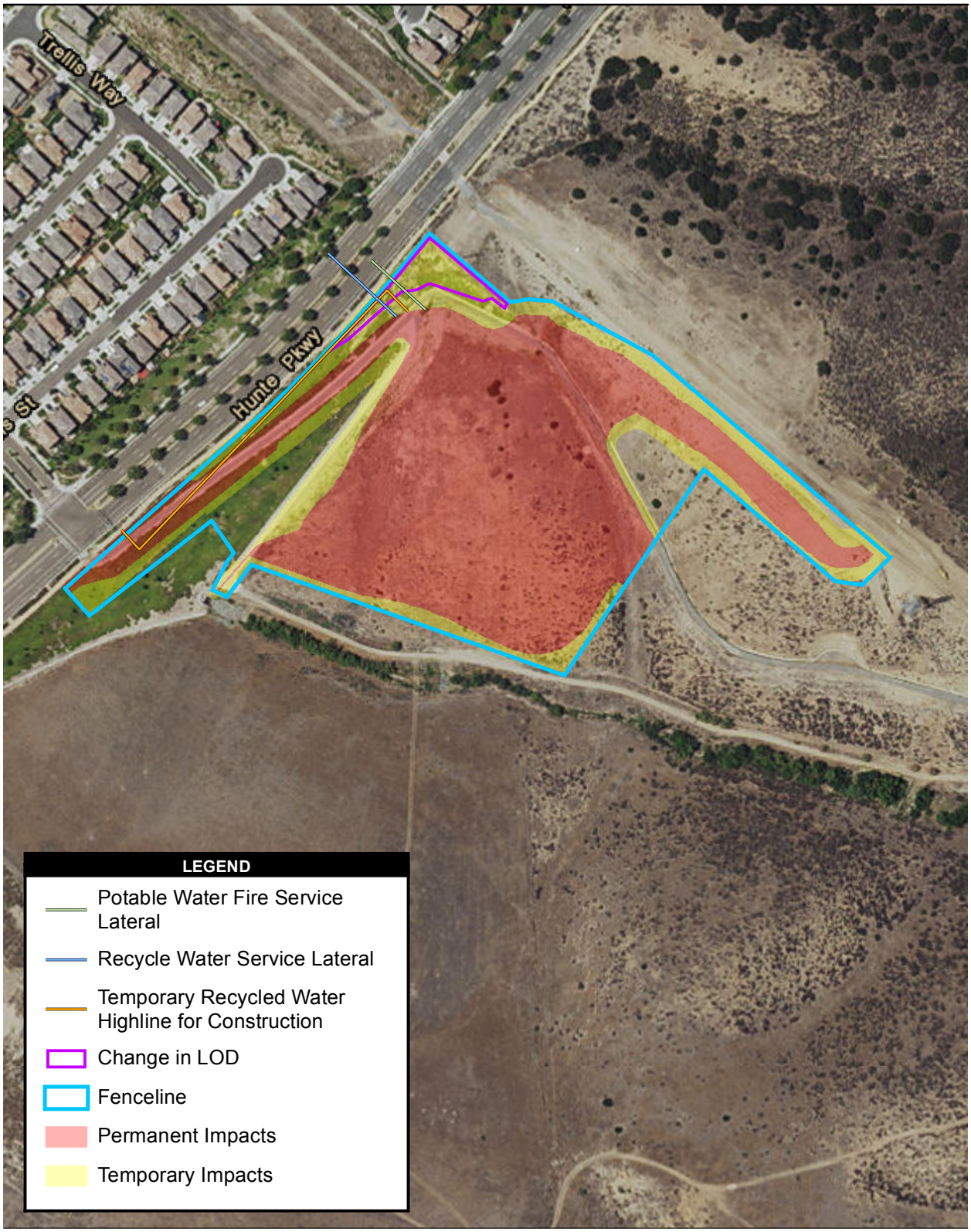
The attached image shows the new temporary disturbance area, as well as the locations of the potable water fire service lateral, the recycled water service lateral, and the temporary recycled water highline for construction. The purple line in the upper northwest corner surrounding an area of yellow notes the approximate change in LOD.

Your consideration of the proposed change in LOD is appreciated. Please let us know if you have any questions or concerns with this adjustment.

Thank you,

Rich Quasarano

ATTACHMENT 1 – Change in LOD Figure



Source: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

300 150 0 300 Feet

Scale: 1:3,600; 1 inch = 300 feet

Salt Creek Impacts with Fenceline

Salt Creek

Path: C:\Users\sorensenj\Desktop\GIS\SaltCreekImpacts_Fenceline.mxd, 7/7/2016, sorensenj