

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



September 6, 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 #2

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 #2 for the approved Salt Creek Substation Project (project), provided by email on August 19, 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 an 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 #2**

On August 19, 2016, SDG&E submitted a request for MPR #2 to the CPUC. MRP#2 would modify the approved project by increasing the limits of disturbance by 0.13 acres in the east portion of SDG&E's property within SDG&E's transmission corridor. SDG&E proposed MPR #2 to allow for additional parking closer to the substation perimeter gate, once the Hunte Parkway parking is inaccessible during the construction of the access road to Hunte Parkway.

**CPUC Review of Minor Project Refinement #2**

The proposed actions were reviewed for consistency with the impact analysis contained in the adopted 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 #2**

Would the Proposed Project refinement result in a new impact, or increase the severity of a previously analyzed impact to:	No	Yes
<b>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)?</b> <i>FEIR Significance: Significant and Unavoidable</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Summary of Proposed Project Refinement Impacts on Aesthetics:**

The proposed refinement would not increase the impact to the visual quality of the area. The additional impact area has previously been graded and is associated with SDG&E transmission access roads. The use of the area for parking is temporary and would appear similar to the vehicles using adjacent construction areas. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on aesthetics.

<b>Agriculture and Forestry Resources (e.g., convert Farmland to nonagricultural use, or create a conflict with existing agricultural zoning or a Williamson Act)?</b> <i>FEIR Significance: Less than Significant</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**Summary of Proposed Project Refinement Impacts on Agriculture and Forestry Resources:**

The proposed refinement 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 refinement would not result in a new impact or increase the severity of a previously analyzed impact on agriculture or forestry resources.

<b>Air Quality (e.g., produce criteria air pollutant emissions, or expose sensitive receptors to additional pollutants)?</b> <i>FEIR Significance: Less than Significant with Mitigation</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**Summary of Proposed Project Refinement Impacts on Air Quality:**

The proposed refinement does not include an increase in construction or earth-moving activities. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on air quality.

<b>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)?</b> <i>FEIR Significance: Less than Significant with Mitigation</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**Summary of Proposed Project Refinement Impacts on Biological Resources:**

The proposed refinement would involve temporary disturbance to 0.13 acres of previously disturbed habitat. The only vegetation present includes small dried patches of common star thistle (*Centaurea melitensis*). This additional impact area has previously been graded and is associated with existing SDG&E transmission access roads currently in use. No vegetation would be impacted by the increase in LOD, as it is located within the greater disturbed area that is graded and cleared as part of SDG&E's annual road maintenance. The biological resources in the proposed refinement area are consistent with the biological resources in the areas of disturbance considered in the FEIR. The refinement would not result in a new impact or increase the severity of a previously analyzed impact on biological resources.

Would the Proposed Project refinement 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)?**

*FEIR 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 area. The proposed refinement would not involve ground disturbance. The proposed refinement 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)?**

*FEIR Significance: Less than Significant with Mitigation*

**Summary of Proposed Project Refinement Impacts on Geology and Soils:**

The proposed refinement would not increase ground disturbance. The proposed refinement 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)?**

*FEIR Significance: Less than Significant with Mitigation*

**Summary of Proposed Project Refinement Impacts on Greenhouse Gas Emissions:**

The proposed refinement would allow for additional parking closer to the substation perimeter gate. The equipment use and vehicle trip estimates included in the FEIR would not be affected. The project refinement 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)?**

*FEIR Significance: Less than Significant with Mitigation*

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

The proposed refinement area does not contain known hazardous materials sites. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on hazards and hazardous materials.

**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)?**

*FEIR Significance: Less than Significant with Mitigation*

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

The proposed refinement does not include ground disturbance. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on hydrology and water quality.

Would the Proposed Project refinement result in a new impact, or increase the severity of a previously analyzed impact to:	No	Yes
<b>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)?</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>FEIR Significance: No Impact</i>		

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

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

<b>Noise (e.g., expose sensitive receptors to additional noise or vibration)?</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>FEIR Significance: Significant and Unavoidable</i>		

**Summary of Proposed Project Refinement Impacts on Noise:**

The proposed refinement would slightly adjust the project work area; however, the refinement would only be used for additional parking. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on noise.

<b>Public Services (e.g., result in adverse impacts on government facilities that provide a public service)?</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>FEIR Significance: Less than Significant</i>		

**Summary of Proposed Project Refinement Impacts on Public Services:**

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

<b>Recreation (e.g., increase the use of, or cause adverse effects on, parks or other recreational facilities)?</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>FEIR Significance: Significant and Unavoidable</i>		

**Summary of Proposed Project Refinement Impact on Recreation:**

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

<b>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)?</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>FEIR Significance: Less than Significant with Mitigation</i>		

**Summary of Proposed Project Refinement Impacts on Transportation and Traffic:**

The proposed refinement 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 refinement would not result in a new impact or increase the severity of a previously analyzed impact on transportation and traffic.

Would the Proposed Project refinement result in a new impact, or increase the severity of a previously analyzed impact to:	No	Yes
<b>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</b> <i>FEIR Significance: Less than Significant with Mitigation</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

There are no known utilities within the area of the proposed refinement and the proposed parking will not require subsurface excavation; therefore, there would be no conflict with buried utilities. The proposed refinement 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 #2 are consistent with the FEIR. MPR#2 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 #2. The actions proposed in MPR #2 are consistent with the CPUC-approved FEIR.

Please contact me at [connie.chen@cpuc.ca.gov](mailto:connie.chen@cpuc.ca.gov) if you have any questions regarding this review of MPR#2.

Sincerely,



Connie Chen  
 Project Manager  
 Energy Division, CEQA Unit

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

- Attachment A: Minor Project Refinement #2 Review Form**
- Attachment B: SDG&E Minor Project Refinement Request for Change in Limits of Disturbance (MPR Request #2)**

# ATTACHMENT A

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## Minor Project Refinement Review Form

Proposed Minor Project Change Type:	Request #:
Minor Project Refinement	2

**Part A: Proposed Minor Project Change Summary**

Date Submitted:	Requested Approval Date:	Start Date:	Expected End Date:
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9/2/2016	9/3/2016	9/3/2016	12/10/2016
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Submitted by:	Organization and Title:	Duration and Work Hours:
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Keri Cuppage	Senior Environmental Compliance Specialist	Within approved work hours
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**Location(s):** Describe applicable location(s), address, and/or dimensions and area of any additional work areas and land disturbance associated with the proposed refinement.

Addition of 0.13 acres of LOD in east portion of SDG&E's property

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

Change of LOD in east portion of the project area.

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

To allow for additional parking closer to the substation perimeter gate once the Hunte Parkway parking is inaccessible during the construction of access road to Hunte Parkway.

**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 refinement 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:
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<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	SDG&E	8/22/2016	
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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.

<input checked="" type="checkbox"/> Previously Surveyed	<input type="checkbox"/> Positive
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<b>Biological Resources.</b> 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.	<input type="checkbox"/> Survey Attached	<input checked="" type="checkbox"/> Negative
	<input checked="" type="checkbox"/> N/A – Surveys were included in the EIR.	
<b>Cultural Resources.</b> 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?	<input checked="" type="checkbox"/> Previously Surveyed	<input type="checkbox"/> Positive
	<input type="checkbox"/> Survey Attached	<input checked="" type="checkbox"/> Negative
<input checked="" type="checkbox"/> N/A – Surveys were provided for the EIR.		
<b>Hydrology.</b> Were all sites associated with the proposed action(s) surveyed for hydrologic resources? If so, were survey results positive or negative?	<input checked="" type="checkbox"/> Previously Surveyed	<input type="checkbox"/> Positive
	<input type="checkbox"/> Survey Attached	<input checked="" type="checkbox"/> Negative
<input checked="" type="checkbox"/> 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?	<input checked="" type="checkbox"/> Previously Provided	
	<input type="checkbox"/> Authorization Attached	
	<input type="checkbox"/> N/A	
Would the proposed action(s) conflict with permit conditions or agency approvals?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> 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)?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> 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 refinement is being requested.

, APM Air-1, APM BIO-4, MM Biology-3, MM Biology-9, MM Geology-1, APM HAZ-3, MM Hazards-2, APM HYDRO-1, MM Noise-2

## **ATTACHMENT B**

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### **SDG&E Minor Project Refinement Request for Change in Limits of Disturbance (MRP Request #2)**

## Memorandum

Date: September 2, 2016

To: Connie Chen  
Project Manager  
California Public Utilities Commission

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

Subject: Revised Minor Project Refinement Request for Change in Limits of Disturbance (MPR Request #2)

SDG&E's design team is requesting a change to the previously identified Limits of Disturbance (LOD). Specifically, this MPR Request #2 is for a change of the LOD in the east portion of the project area to allow for additional parking. The requested approval date of this MPR Request #2 is September 3, 2016. The change in LOD would increase the substation work area by approximately 0.13 acres. The new total impact area would be 13.24 acres. This increase in LOD would allow for additional parking closer to the substation perimeter gate, once the Hunte Parkway parking is inaccessible during the construction of the access road to Hunte Parkway. The anticipated start date of using this increase in LOD would be is September 3, 2016.

No preserve areas are located within this additional disturbance area. As a result no impacts to preserve areas would occur as a result of this increase in LOD. A CPUC Approved Biologist surveyed the additional LOD area and confirmed that the area is disturbed habitat and does not contain non-native grassland or any other sensitive plant species. Only small dried patches of common star thistle (*Centaurea melitensis*) exist within the area. As seen in Attachment 2 – Photos, this additional impact area has previously been graded and is associated with existing SDG&E Transmission access roads currently in use. No vegetation would be impacted by this increase in LOD, as it is located within the greater disturbed area that is graded and cleared as part of SDG&E's annual road maintenance. The increase in LOD area is located within the outer limits of the 50-foot buffer area of a cultural resource Environmentally Sensitive Area; however disturbance associated with parking would not be greater than the current disturbance associated with SDG&E's annual road maintenance activities. The boundary of the increased LOD area would be flagged to prevent parking or any other activity outside of the newly approved limits. No additional construction or other ground disturbance would occur as a result of this increase in LOD.

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 figure (Attachment 1) and images (Attachment 2) show the new temporary disturbance area. The purple line in the southeast 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,

Richard Quasarano

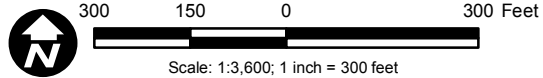
## **ATTACHMENT 1 – Change in LOD Figure**



**LEGEND**

- Change in LOD
- Fenceline
- Permanent Impacts
- Temporary Impacts

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



### Salt Creek Impacts with Fenceline

#### Salt Creek

Path: \\ussdglfp001.na.aecomnet.com\data\projects\6048\60485246\_Salt\_Creek\900-CAD-GIS\920 GIS\922\_Maps\SaltCreekImpacts\_Fenceline.mxd, 9/1/2016, janssensn

## **ATTACHMENT 2– Photographs**



**Photograph 1:**  
**View 1 of**  
**additional**  
**disturbance**  
**area.**



**Photograph 2:**  
**View 2 of**  
**additional**  
**disturbance**  
**area.**



**Photograph 3:  
View 3 of  
additional  
disturbance  
area.**