

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



August 25, 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 #3

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 #3 for the approved Salt Creek Substation Project (project), provided by email on August 23, 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 #3**

On August 23, 2016, SDG&E submitted a request for MPR #3 to the CPUC. MRP #3 would modify the approved project by increasing the limits of disturbance by 0.01 acre in the east portion of SDG&E's property and within the SDG&E transmission corridor. SDG&E proposed MPR #3 to allow trucks that are dropping off imported soil to turn from the SDG&E's existing access road within the transmission corridor onto the SDCWA access road within the substation property. Due to the high frequency of trucks arriving from the SDG&E access road (twelve trucks per hour), it is necessary that there is a safe location for the trucks to turn onto the SDCWA access road.

**CPUC Review of Minor Project Refinement #3**

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 #3**

Would the proposed Minor Project Refinement result in a new impact, or increase the severity of a previously analyzed impact to:	No	Yes
<p><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></p> <p><i>FEIR Significance: Significant and Unavoidable</i></p> <p><b>Summary of Proposed Minor Project Refinement Impacts on Aesthetics:</b></p> <p>The proposed refinement would not increase the impact to the visual quality of the area. The use of the additional impact area would be temporary. The area of disturbance is also directly adjacent to the project disturbance area and the visual impact of truck traffic in this area would be equivalent to the visual impact of truck traffic on the adjacent access roads. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on aesthetics.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><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></p> <p><i>FEIR Significance: Less than Significant</i></p> <p><b>Summary of Proposed Minor Project Refinement Impacts on Agriculture and Forestry Resources:</b></p> <p>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&amp;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.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>Air Quality (e.g., produce criteria air pollutant emissions, or expose sensitive receptors to additional pollutants)?</b></p> <p><i>FEIR Significance: Less than Significant with Mitigation</i></p> <p><b>Summary of Proposed Minor Project Refinement Impacts on Air Quality:</b></p> <p>The proposed refinement would include an increase in the area that would be bladed and graded by 0.01 acre. APM Air-1 and Mitigation Measure Air-1 would reduce the impact on air quality to a less-than-significant level. The proposed refinement would not result in a new significant impact or increase the severity of a previously analyzed impact on air quality.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><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></p> <p><i>FEIR Significance: Less than Significant with Mitigation</i></p> <p><b>Summary of Proposed Minor Project Refinement Impacts on Biological Resources:</b></p> <p>This area is within the biological study area analyzed in the Biological Technical Report and was mapped as non-native grassland. Temporary impacts to 0.01 acre would occur as a result of this increase in LOD. This area was surveyed by a biologist and was determined to be dominated by San Diego sunflower. Approximately 97 individuals of San Diego sunflower would be impacted and would therefore be added into the Special Status Plants Mitigation and Monitoring Plan. The 0.01 acre of temporarily impacted non-native grassland habitat that would occur as a result of this increase in LOD would be hydroseeded in accordance with the requirements of the Salt Creek Substation Project Restoration and Enhancement Plan for Temporary Impacts. APM BIO-6 and Mitigation Measure Biology-2 would reduce the impact on biological resources to less than significant. The refinement would not result in a new impact or increase the severity of a previously analyzed impact on biological resources.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Would the proposed Minor 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 Minor Project Refinement Impacts on Cultural and Paleontological Resources:**

The proposed refinement would involve blading and grading of 0.01 acre. No cultural or paleontological resources have been recorded within the proposed refinement area. Cultural or paleontological resources could be encountered in this area during earthwork; 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 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 Minor Project Refinement Impacts on Geology and Soils:**

The proposed refinement would increase ground disturbance by 0.01 acre. 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 refinement would occur in areas containing the same underlying geologic and soil units as the remaining substation parcel and transmission corridor access roads. Impacts on these geologic resources were analyzed in the Final EIR. 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 Minor Project Refinement Impacts on Greenhouse Gas Emissions:**

The level of equipment use and number of vehicle trips required for the proposed refinement would be consistent with the equipment use and vehicle trip estimates included in the Final EIR. The proposed 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 Minor 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 refinement would not result in a new impact or increase the severity of a previously analyzed impact on hazards and hazardous materials.

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

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

The proposed refinement would increase ground disturbance by 0.01 acre. The proposed refinement 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 refinement would not result in a new impact or increase the severity of a previously analyzed impact on hydrology and water quality.

<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"/>
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*FEIR Significance: No Impact*

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

The proposed refinement would occur within SDG&E's existing transmission corridor. 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"/>
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*FEIR Significance: Significant and Unavoidable*

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

The proposed refinements would slightly adjust the project work areas; however, the refinement 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 would not be affected by the proposed refinements. 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"/>
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*FEIR Significance: Less than Significant*

**Summary of Proposed Minor 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"/>
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*FEIR Significance: Significant and Unavoidable*

**Summary of Proposed Minor 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.

Would the proposed Minor Project Refinement result in a new impact, or increase the severity of a previously analyzed impact to:	No	Yes
<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 Minor 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 modification is proposed to increase safety and reduce potential traffic hazards during periods of high frequency truck travel to the site. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on transportation and traffic.

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

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

There are no known utilities within the area of the proposed refinement. Potential conflicts with underlying or neighboring utilities would be the same as the potential conflicts with underground utilities considered in the FEIR. 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 #3 are consistent with the FEIR. MPR #3 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 #3. The actions proposed in MPR #3 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 #3.

Sincerely,



Connie Chen  
Project Manager  
Energy Division, CEQA Unit

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

**Attachment A: Minor Project Refinement #3 Review Form**

**Attachment B: SDG&E Minor Project Refinement Request for Change in Limits of Disturbance (MPR Request #3)**

## **ATTACHMENT A**

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### **Minor Project Refinement Review Form**

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
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**Proposed Minor Project Change Type:****Request #:**

Minor Project Refinement

3

**Part A: Proposed Minor Project Change Summary****Date Submitted:****Requested Approval Date:****Start Date:****Expected End Date:**

8/23/2016

8/22/2016

8/22/2016

11/30/2016

**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 refinement.

Addition of 0.01 acres of LOD in east portion of SDG&E's property; within the transmission corridor

**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 trucks that are dropping off imported soil to turn from the SDG&E access road onto the SDCWA access road. Due to the high frequency of trucks arriving from the SDG&E access road (twelve trucks per hour) it is necessary that there is a safe location for the trucks to turn onto the SDCWA access road.

**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:** Yes No N/A

SDG&amp;E

8/22/2016

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.

<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 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.	
<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, MM Air-1, APM BIO-2, 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

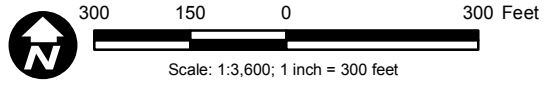
## **ATTACHMENT 1**

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**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



### Salt Creek Impacts with Fenceline

#### Salt Creek

Path: P:\\_6048\60485246\_Salt\_Creek\900-CAD-GIS\920 GIS\923\_Incoming\Source\20160818\_FromJustin\SaltCreekGIS\SaltCreekImpacts\_Fenceline.mxd, 8/22/2016, jansenn

## **ATTACHMENT B**

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**SDG&E Minor Project Refinement Request for Change in Limits of Disturbance (MRP Request #3)**



## Memorandum

Date: August 23, 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 #3)

SDG&E's design team is requesting a change to the previously identified Limits of Disturbance (LOD). Specifically, this MPR Request #3 is for a change of the LOD in the east portion of the project area to allow for transportation between the SDG&E access road and the San Diego County Water Authority access road (SDCWA) during the import of soil. The requested approval date of this MPR Request #3 is August 22, 2016. The change in LOD would increase the substation work area approximately 450 square feet (sq. ft.) (0.01 acre). The new total impact area would be 13.29 acres. This increase in LOD would be bladed and graded to allow trucks that are dropping off imported soil to turn from the SDG&E access road onto the SDCWA access road. Due to the high frequency of trucks arriving from the SDG&E access road (twelve trucks per hour) it is necessary that there is a safe location for the trucks to turn onto the SDCWA access road.

This additional area would be temporarily impacted until the hauling of imported soil is completed. The anticipated start date of using this increase in LOD would be August 22, 2016 and is expected to end by November 30, 2016.

This area is within the biological study area analyzed in the Biological Technical Report and was mapped as non-native grassland and lies just south of the NCCP area. Temporary impacts to 450 sq. ft. would occur as a result of this increase in LOD. This area was surveyed by a biologist and was determined to be dominated by San Diego sunflower. Approximately 97 individuals of San Diego sunflower would be impacted and would therefore be added into the Special Status Plants Mitigation and Monitoring Plan. The 450 sq. ft. of temporarily impacted non-native grassland habitat that would occur as a result of this increase in LOD would be hydroseeded in accordance with the requirements of the Salt Creek Substation Project Restoration and Enhancement Plan for Temporary Impacts.

Changes to the LOD would not represent impacts to other 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) shows the new temporary disturbance area. The purple line in the northeast 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.

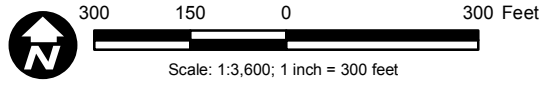
Thank you,

Richard Quasarano

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



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: P:\\_6048\60485246\_Salt\_Creek\900-CAD-GIS\920 GIS\923\_Incoming\Source\20160818\_FromJustin\SaltCreekGIS\SaltCreekImpacts\_Fenceline.mxd, 8/22/2016, jansenn





## **ATTACHMENT 2– Photographs**





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



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



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

