PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

January 11, 2017

Ms. Jennifer Kaminsky
San Diego Gas and Electric Company
1010 Tavern Road
Alpine, CA 91901

RE: Sycamore- Peñasquitos 230-kV Transmission Line Project—Review of Minor Project Refinement #1 Request

Dear Ms. Kaminsky,

On January 6, 2017, SDG&E submitted Minor Project Refinement (MPR) #1 Request to the California Public Utilities Commission (CPUC) to modify the approved project by transitioning the new 230-kV line and existing 138-kV line to an underground position for the Sycamore-Peñasquitos 230-kV Transmission Line Project (Project). SDG&E's request for MPR #1 is enclosed in Attachment 1.

The Project was evaluated in accordance with the California Environmental Quality Act (CEQA), and a Final Environmental Impact Report (FEIR) was prepared by the CPUC. The CPUC voted to approve the environmentally superior alternative, Alternative 5, on October 13, 2016 (Decisions 16-10-005), and a Notice of Determination was filed with the State Clearinghouse (SCH# 2014081031). The mitigation measures and Applicant Proposed Measures (APMs) described in the FEIR were adopted by the CPUC as conditions of Project approval. The CPUC also adopted a Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) to ensure compliance with all APMs and mitigation measures during Project implementation.

This letter documents the CPUC's thorough evaluation of all activities covered in this MPR request, including the CPUC evaluation table provided with the MPR analysis. The evaluation process ensures that all mitigation measures applicable to the location and activities covered in the MPR are implemented as required in the CPUC's decision. The evaluation process further ensures that the following criteria are met:

- Modifications would not be outside the geographic boundary of the study area utilized in the Final EIR.
- A new significant impact or substantial increase in the severity of a previously identified significant impact would not be created, based on the thresholds used in the Final EIR.
- Additional permit requirements would not be triggered that are not defined in the Final EIR or MMCRP.
- There would not be a conflict with any APM or MM, and the modifications would not result in a new conflict with any applicable guideline, ordinance, code, rule, regulation, order, decision, statute, or policy not already identified within the Final EIR.
- Modifications would not require new conditions for approval, without which the modifications would result in a new significant impact or substantially increase the severity of a previously identified significant impact.

MPR #1 is granted by the CPUC for the proposed activities based on the factors described below.

SDG&E MPR #1 Request. Excerpts from the SDG&E MPR #1 Request, received January 6, 2017, are presented below (indented):

> Under this proposed Minor Project Refinement (MPR), instead of the new 230 kilovolt (kV) transmission line remaining overhead into the Sycamore Canyon Substation, the new 230-kV line would transition to an underground position via a new single-circuit 230-kV steel cable pole (Structure P03B) and would then travel approximately 1,250 feet within a new 230-kV duct bank into the Sycamore Canyon Substation until connecting with an open bay position in the 230-kV yard near the existing control shelter (refer to Exhibit 1). New Structure P03B would be approximately 160 feet tall. The existing 138-kV power line would transition to an underground position via a new single-circuit 138-kV steel cable pole (Structure P03A) (refer to Exhibit 1). New Structure P03A would be approximately 90 feet tall. Both of the new cable poles (P03A and P03B) would be located within the work area provided for cable pole P03 described in the Project's FEIR. The final design for the 138-kV transmission line (TL13820) getaway deviates from the FEIR design only at the P03A cable pole location and at the entrance into the Sycamore Substation. Each underground trench package (138-kV and 230-kV) would require one splice vault.
>
> Installing the 230-kV getaway in an underground position would eliminate the need to relocate the existing 230-kV line entering the Sycamore Substation from the east. Specifically, existing structures E1, E1A, E2, and E3 would not need to be utilized as part of the Project and new structures P01 and P02 would no longer need to be constructed. Exhibit 1 depicts the FEIR design compared to the proposed design described in this MPR and highlights new and eliminated project elements. Additionally, because structure P02 is no longer needed, the retaining wall and new spur road proposed at that location would not be necessary. Exhibit 2 illustrates the proposed MPR design described. With implementation of this refinement, overall impact areas would be reduced by 0.56 acres as detailed in the table below:

Impact areas associated with MPR 1 [a]	**FEIR Design** [b]	**MPR Design**	**Delta**
Total Temporary Impacts	2.89	2.68	- 0.21
Total Permanent Impacts	0.67	0.32	- 0.35
Totals	3.56	3.0	- 0.56

Notes:
[a] MPR # 1 affects the following features: Structures P01, P02, P03, E1A, E1, E2, E3, and the underground alignments between structure site P03 and the Substation.
[b] Note that FEIR design includes SDG&E design changes submitted as part of the SDG&E comment package on the DEIR dated November 16, 2015.

> Under the FEIR Design, the new 230-kV line would connect from Structure P03 to existing Structure E3 in an overhead position. This approximately 500-foot overhead span crosses over four existing 69-kV power lines that connect to the 69-kV yard within the Sycamore Canyon Substation. In order to

string the new 230-kV conductor from Structure P03 to Structure E3, a simultaneous outage[1] would need to be taken on these four 69-kV power lines. During final design of the Project, it was determined that the required simultaneous outage of these four 69-kV power lines would not be approved by SDG&E Grid Operations or the California Independent System Operator (CAISO). Accordingly, SDG&E Transmission Engineering needed to revise the 230-kV getaway to avoid the need to take the simultaneous outage of these four lines. By placing the new 230-kV line in an underground position from Structure P03 to the Sycamore Canyon Substation, the simultaneous outage is no longer required[2].

CPUC Evaluation of MPR #1 Request

In accordance with the MMCRP, the MPR request was reviewed by CPUC to confirm that no new impacts or increase in impact severity would result from the requested MPR activities. The following discussion summarizes this analysis for biological resources, cultural and paleontological resources, fire and fuels management, and other issue areas. A list of bulleted conditions is presented to define additional information and clarifications regarding mitigation measure requirements.

Biological Resources
This area was mapped as southern mixed chaparral and revegetated coastal sage scrub in the FEIR. The refinement will result in a decrease of approximately 0.15 acre of temporary impacts and 0.34 acre of permanent impacts to sensitive habitat. The implementation of APMs BIO-1, BIO-2, and BIO-3 and Mitigation Measures Biology-1a, Biology-1b, Biology-Biology-1c, Biology-1d, Biology-1e, Biology-1g, Biology-3, Biology-5, Biology-6, Biology-7, Biology-8, Biology-9, Biology-10, and Biology-11 will reduce the impacts on biological resources to less than significant. The refinement will not result in a new impact or increase the severity of a previously analyzed impact on biological resources.

Cultural and Paleontological Resources
No cultural or paleontological resources have been recorded within the proposed refinement area. The proposed refinement will result in a net decrease of approximately 0.56 acre of ground-disturbing activities. Cultural or paleontological resources could be encountered in these areas; however, APMs CUL-1, CUL-2 and CUL-6, and Mitigation Measures Cultural Resources-1, Cultural Resources-2, Cultural Resources-3, and Cultural Resources-4 will reduce the impacts on cultural resources to less than significant. The proposed refinement will not result in a new impact or increase the severity of a previously analyzed impact on cultural or paleontological resources.

Fire and Fuels Management
Activities associated with construction and utilization of the refinement area are consistent with those discussed in the FEIR. The implementation of APM PS-6, and Mitigation Measures Fire-1, Fire-2, Fire-3, and Fire-4 will reduce the impacts on fire and fuels management to less than significant. The refinement

[1] An "outage" refers to the temporary de-energization of an energized line. Outages must be approved by SDG&E Grid Operations as well as by the CAISO. As a safety requirement during stringing operations above energized lines, the lower lines must be de-energized while the lines above are being string into position.
[2] Work to install the 230-kV line in an underground position *below* the existing 69-kV power lines would not require the power lines to be de-energized.

will not result in a new impact or increase the severity of a previously analyzed impact on fire or fuels management.

Other Issue Areas
The proposed refinement will not result in a new impact or increase the severity of a previously analyzed impact on aesthetics, air quality, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, or utilities. The proposed refinement will reduce corona noise, and is located on MCAS Miramar so will not impact transportation, public services or recreation.

MPR #1 Conditions of Approval

MPR #1 is approved by the CPUC with conditions. The conditions presented below shall be met by SDG&E and its contractors:

1. 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. Prior to construction, SDG&E must submit all applicable permits to the CPUC.
2. Copies of all relevant permits, compliance plans, and this MPR, shall be available on site for the duration of construction activities.
3. Verification of noticing, including address lists, and postings, as required under Mitigation Measure Noise-1, shall be submitted to the CPUC prior to construction.
4. No clearing or disturbance to vegetation shall occur outside of approved work areas.
5. For construction activities conducted during the avian nesting season (January 15 through August 31), an approved biologist shall conduct surveys for nesting birds in accordance with Mitigation Measure Biology-7 and the approved Burrowing Owl Monitoring and Mitigation Plan. The results of the surveys (habitat and audio) shall be submitted to the CPUC, USFWS, and CDFW prior to initiating any construction activities. If active nests or burrows are found, a biological monitor shall establish an appropriate buffer around the nest and monitor the nest as required by Mitigation Measure Biology-7, and the Burrowing Owl Monitoring and Mitigation Plan.
6. Wildlife found to be trapped will be removed by a qualified biological monitor.
7. SDG&E shall implement appropriate dust controls at each work area in accordance with the approved Dust Control Management Plan, and SWPPP. SDG&E shall use non-potable water for dust control, as required by Mitigation Measure Utilities-1.
8. SDG&E shall implement all appropriate erosion and sediment control BMPs for each work area as defined in the SWPPP, and as specified by the Qualified SWPPP Practitioner. Sediment and erosion control BMPs shall be properly maintained throughout the duration of construction activities.
9. All ground-disturbing activities (e.g., grading, trenching, etc.) shall be monitored by a CPUC-approved archaeological monitor and a Native American monitor in accordance with Mitigation Measure Cultural Resources-1, where appropriate. In the event of an archaeological discovery, all construction activity within 50 feet of the find shall be redirected or halted.
10. All ground-disturbing activities with moderate to high paleontological sensitivity shall be monitored by a CPUC-approved paleontological monitor. In the event of a paleontological discovery, all earthwork must cease within 50 feet of the discovery, and procedures defined in Mitigation Measure Paleontology-3 shall be implemented.

11. SDG&E shall properly store all hazardous materials and contain and dispose of contaminated soils as described in the CPUC-approved Hazardous Substance Control and Emergency Response Plan.
12. SDG&E shall implement all appropriate fire prevention measures contained in the CPUC-approved Fire Prevention Plan.
13. All complaints received by SDG&E shall be logged and reported immediately to the CPUC. This includes complaints relevant to lighting as well as noise and dust, etc. If complaints cannot be resolved, lighting at the site may need to be modified and/or sound attenuation devices may need to be installed etc., depending on the nature of the complaint.
14. All workers shall receive Safety and Environmental Awareness Program (SEAP) training prior to work at the construction site. A log shall be maintained on site with the names of all crew personnel who have received training. All training participants shall wear their SEAP hard-hat sticker for ease of compliance verification.

Please contact me if you have any questions or concerns regarding this MPR approval.

Sincerely,

Billie Blanchard
Project Manager
Energy Division, CEQA Unit

cc: Molly Sterkel, CPUC Program Manager
Mary Jo Borak, CPUC Supervisor
Marcelo Poirier, CPUC Attorney
Jeff Thomas, Panorama Environmental
Susanne Heim, Panorama Environmental
Sheila Hoyer, Panorama Environmental
Edith Moreno, SDG&E
Ron Walker, AECOM

Appendix A: CPUC Evaluation of Minor Project Refinement #1

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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)? *FEIR 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 refinement would reduce the level of visual intrusion and contrast with the surrounding suburban landscape associated with the Project by reducing the number of new transmission line structures (by 1), reducing the number of structures requiring lighting (by 3), spans requiring marker balls (by 1) and retaining walls (by 1). The implementation of APMs AES-1 and AES-2 and Mitigation Measure Aesthetics-3 would reduce the impacts on aesthetics to less than significant. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on aesthetics as identified in the FEIR.

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

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 proposed refinement 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)? *FEIR Significance: Significant and Unavoidable*	☒	☐

Summary of Proposed Project Refinement Impacts on Air Quality:

Activities associated with construction and utilization of the refinement areas (such as the type of equipment used and run time of equipment) are consistent with those discussed in the FEIR. The refinement area is substantially the same as described in the FEIR. Impacts on air quality will remain significant and unavoidable with the implementation of APM Air-2, and Mitigation Measures Air-3, and Air-4. The proposed refinement 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)? *FEIR Significance: Less than Significant with Mitigation*	☒	☐

Summary of Proposed Project Refinement Impacts on Biological Resources:

The biological resources in the proposed refinement area are consistent with the biological resources in the areas of disturbance considered in the FEIR. This area was mapped as southern mixed chaparral and revegetated coastal sage scrub in the FEIR. The refinement would result in a decrease of approximately 0.15 acre of temporary impacts and 0.34 acre of permanent impacts to sensitive habitat. The implementation of APMs BIO-1, BIO-2, and BIO-3 and Mitigation Measures Biology-1a, Biology-1b, Biology-Biology-1c, Biology-1d, Biology-1e, Biology-1g, Biology-3, Biology-5, Biology-6, Biology-7, Biology-8, Biology-9, Biology-10, and Biology-11 would reduce the impacts 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.

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)? *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 result in a net decrease of approximately 0.56 acre of ground-disturbing activities. Cultural or paleontological resources could be encountered in these areas; however, APMs CUL-1, CUL-2 and CUL-6, and Mitigation Measures Cultural Resources-1, Cultural Resources-2, Cultural Resources-3, and Cultural Resources-4 would reduce the impacts 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.

Fire and Fuels Management (e.g., cause of expose people or structures to fire hazards, or create a conflict with a Fire Management Plan?) *FEIR Significance: Less than Significant with Mitigation*	☒	☐

Summary of Proposed Project Refinement Impacts on Fire and Fuels Management:

Activities associated with construction and utilization of the refinement area are consistent with those discussed in the FEIR. The implementation of APM PS-6, and Mitigation Measures Fire-1, Fire-2, Fire-3, and Fire-4 would reduce the impacts on fire and fuels management to less than significant. The refinement would not result in a new impact or increase the severity of a previously analyzed impact on fire or fuels management.

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 decrease the area of ground disturbing activities by approximately 0.56 acre, and construction of one above ground structure and a retaining wall subject to potential impacts from soil hazards would be eliminated. The proposed refinement would occur in areas containing the same underlying geologic and soil units as those discussed in the FEIR. Impacts on these geologic resources were analyzed in the FEIR. Implementation of APMs GEO-1 and GEO-3, and Mitigation Measures Geology-1, Geology-2, and Geology-3 would reduce the impacts on geology and soils to less than significant. 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 level of equipment use and run time of equipment required for the proposed refinement would be consistent with the equipment use and run time estimates included in the FEIR. The implementation of APM AIR-3 and Mitigation Measure GHG-1 would reduce the impacts on greenhouse gas emissions to less than significant. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on greenhouse gas emissions.

Would the Proposed Project refinements result in a new impact, or increase the severity of a previously analyzed impact to:	No	Yes
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 would require use of the same types of equipment and hazardous materials that were analyzed in the FEIR. The refinement area does not contain known hazardous materials sites. The implementation of APMs HAZ-1, HAZ-2, HAZ-3 and HAZ-4, and Mitigation Measures Hazards-1, Hazards-1, Hazards-2, Hazards-3, Hazards-4, Hazards-6, and Hazards-7 would reduce the impacts on hazards and hazardous materials to less than significant. The proposed refinements 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 is within the area previously surveyed for hydrological resources and would remain consistent with the impacts to hydrological resources and water quality analyzed in the FEIR. The refinement would reduce the amount of ground-disturbing activity by approximately 0.56 acre. The implementation of APM HYDRO-3, and Mitigation Measures Hydrology-1, Hydrology-2, Hydrology-4, and Hydrology-5 would reduce impacts on hydrology and water quality to less than significant. 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)? *FEIR Significance: No Impact*	☒	☐

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

The proposed refinement is located within the same alignment as the Project analyzed in the FEIR. The proposed refinement would have no impact on land use and planning.

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

Summary of Proposed Project Refinement Impacts on Noise:

Activities associated with construction and utilization of the refinement areas (such as use of heavy equipment, helicopter use, construction duration etc.) are consistent with those discussed in the FEIR. The proposed refinement would result in approximately 1,800 feet less of overhead 230-kV transmission line being constructed, reducing permanent noise impacts related to corona noise during the Operation and Maintenance phase of the Project. The implementation of Mitigation Measures Noise-1, Noise-2, Noise-3, Noise-4, and Noise-5 would still result in impacts on noise that are significant and unavoidable. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on noise.

Would the Proposed Project refinements result in a new impact, or increase the severity of a previously analyzed impact to:	No	Yes
Public Services (e.g., result in adverse impacts on government facilities that provide a public service)? *FEIR Significance: Less than Significant*	☒	☐

Summary of Proposed Project Refinement Impacts on Public Services:

The proposed refinement area is completely located within MCAS property, and is not accessible to the public. The proposed refinement would not result in lane closures on public roads or otherwise affect public services. The proposed refinement 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)? *FEIR Significance: Significant and Unavoidable*	☒	☐

Summary of Proposed Project Refinement Impact on Recreation:

There are no recreational resources within the area of the proposed refinement, which is completely located within MCAS property. The proposed refinement would not affect the duration of construction in 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.

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)? *FEIR Significance: Less than Significant with Mitigation*	☒	☐

Summary of Proposed Project Refinement Impacts on Transportation and Traffic:

The proposed refinement is completely located within MCAS property, and is not accessible to the public. The refinement would not result in an increase in vehicle traffic, lane closure, or helicopter use, nor would it result in the loss of parking. The proposed refinement 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 *FEIR Significance: Less than Significant with Mitigation*	☒	☐

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

Potential conflicts with underlying or neighboring utilities would be the same as the potential conflicts with underground utilities considered in the FEIR. Implementation of Mitigation Measures Utilities-1, Utilities-2, and Utilities-3 would reduce the impacts on utilities and public service systems to less than significant. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on utilities and public services.