

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 4, 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 #6 Request

Dear Ms. Kaminsky,

On August 3, 2017, SDG&E submitted Minor Project Refinement (MPR) #6 for approval by the California Public Utilities Commission (CPUC) for the Sycamore-Peñasquitos 230-kV Transmission Line Project (Project). MPR #6 establishes staging yards along the southern and northern perimeters of Pomerado Road, which are shown in Exhibit 1 (attached).

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 (MMs) 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 MMs 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 (See Attachment A). The evaluation process ensures that all MMs 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 FEIR.
- 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 FEIR.
- Additional permit requirements would not be triggered that are not defined in the FEIR 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 FEIR.
- 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 #6 is granted by the CPUC for the proposed activities based on the factors described below.

SDG&E MPR #6 Request. Excerpts from the SDG&E MPR #6 Request, received August 3, 2017, are presented below (indented):

Under this proposed Minor Project Refinement (proposed refinement), SDG&E seeks to add additional temporary work space (as identified above and in Attachment 1), totaling approximately 0.72 acres, along the northern and southern perimeters of Pomerado Road. The use of these areas would not result in any new impacts or increase the severity of a previously analyzed impact as identified in the Project's FEIR and as authorized by Notice to Proceed (NTP) #2 issued by the CPUC on February 7, 2017. No ground disturbing activities are proposed; however, minor vegetation clearing and trimming is proposed (brush, weed, and non-native grasses) as needed to minimize potential fire risk.

The proposed refinement areas along Pomerado Road (Locations 5-17) would be used to stage excavators, backhoes, steel plates, traffic control materials, vaults, pickups and any additional construction related materials and equipment. The proposed refinement areas along Pomerado Road are needed due to space limitations within the approved temporary work space and are necessary to fully clear the roadway for traffic after construction operations cease for the day.

CPUC Evaluation of MPR #6 Request

In accordance with the MMCRP, the MPR #6 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 air quality, biological resources, cultural and paleontological resources, hydrology and water quality, and other issue areas. A list of bulleted conditions is presented to define additional information and clarifications regarding mitigation measure requirements.

Air Quality

The proposed refinement areas are increased in size from the approved project by 0.72 acre. 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 implementation of APM AIR-2 and MMs Air-3 and Air-4 would reduce impacts; however, impacts would remain significant and unavoidable. The refinement would not result in a new impact or increase the severity of a previously analyzed impact on air quality.

Biological Resources

The proposed refinement areas consist of bare ground, ornamental plantings, ruderal habitat with non-native grasses and sporadic native vegetation, and developed areas. Impacts are consistent with the impacts to biological resources identified in the FEIR, and will remain less than significant with mitigation.

Areas with native vegetation will be flagged prior to use of the staging areas. All staging areas will be clearly delineated with lathe staking and flagging to ensure construction personnel stay within approved project limits.

Consistent with MM Biology-7, a nesting bird survey of the proposed refinement area will be conducted within 5 days prior to establishment of the staging area if vegetation removal or ground-disturbing activities are necessary.

There will be no new impacts to sensitive habitat, avian species, or sensitive or special-status species utilizing the habitat in the proposed refinement areas, and no increase in the severity of a previously identified impact on biological resources as identified in the FEIR.

Cultural and Paleontological Resources

A pedestrian survey of the proposed refinement areas conducted on July 18, 2017 did not identify any cultural resources. However, since the FEIR identified the MPR #6 work areas as having a high or moderate potential for buried cultural deposits, monitoring during ground disturbing activities is recommended. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on cultural or paleontological resources.

Hydrology and Water Quality

The proposed refinement areas are located within the Peñasquitos Watershed, and are located in an area previously surveyed for hydrological resources in the FEIR. The proposed refinement areas do not contain jurisdictional waters and would remain consistent with the impacts to hydrological resources and water quality analyzed in the FEIR. Therefore, impacts associated with the proposed refinement areas would remain less than significant with the implementation of MMs Hydrology-1 and Hydrology-2, and would not result in a new impact or increase the severity of a previously analyzed impact on hydrology and water quality as identified in the FEIR.

Other Issue Areas

The proposed refinement areas would not result in a new impact or increase the severity of a previously analyzed impact on aesthetics, agriculture and forestry, fire and fuels management, geology and soils, greenhouse gas emissions, hazards and hazardous materials, land use, noise, public services, recreation, transportation and traffic, or utilities and service systems.

MPR #6 Conditions of Approval

MPR #6 is approved by the CPUC with conditions. The conditions presented below shall be met by SDG&E and its contractors:

1. All applicable Project MMs, 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. Wildlife found to be trapped shall be removed by a qualified biological monitor.
4. SDG&E shall implement appropriate dust controls at the MPR #6 work areas in accordance with the approved Dust Control Management Plan, and SWPPP. SDG&E shall use non-potable water for dust control, as required by MM Utilities-1.
5. SDG&E shall implement all appropriate erosion and sediment control BMPs for the MPR #6 work areas 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.
6. 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 MM Cultural Resources-1, where appropriate. In the event of an archaeological discovery, all construction activity associated with MPR #6 shall be halted.

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7. All ground-disturbing activities at the MPR #6 work areas 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 MM Paleontology-3 shall be implemented.
8. SDG&E shall properly store all hazardous materials and contain and dispose of contaminated soils and materials as described in the CPUC-approved Hazardous Substance Control and Emergency Response Plan.
9. All complaints received by SDG&E shall be logged and reported immediately to the CPUC. This includes complaints relevant to traffic, as well as lighting, noise and dust, etc. Where feasible, complaints shall be resolved, depending on the nature of the complaint, through construction site or activity modifications.
10. All workers shall receive Safety and Environmental Awareness Program (SEAP) training prior to work at the staging yard. 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.
11. A nesting bird survey will be conducted within 5 days prior to the establishment of individual staging areas if vegetation removal or ground-disturbing activities are necessary.
12. All staging areas will be clearly delineated with lathe and flagging to ensure construction personnel stay within approved project limits. Portions of staging areas and workspace that support native vegetation will be flagged for avoidance prior to use of the staging areas.
13. No tree removal or tree pruning in or adjacent to staging areas shall occur unless the SDG&E construction safety advisor determines that an imminent threat to worker and/or public safety exists. In such instances, nesting bird surveys shall precede tree work per Condition #11 above. The CPUC shall be advised of any tree removals or tree pruning efforts within 24 hours of their occurrence.

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
Lonn Maier, 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

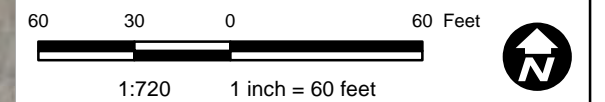
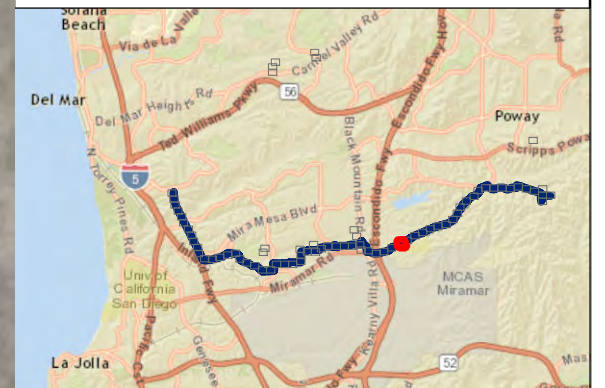
Exhibit 1: MPR #6 Maps
Attachment A: CPUC Evaluation of Minor Project Refinement #6

Exhibit 1: MPR #6 Maps



Legend

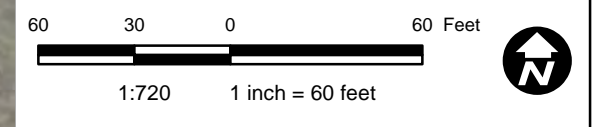
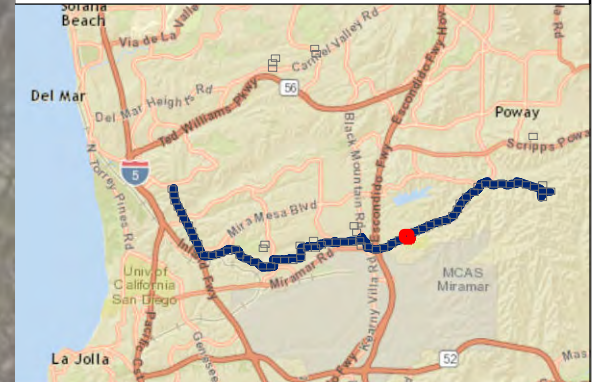
- Proposed MPR 6 Workspace
- Stations
- Segment B**
- Segment 3, Section 3
- Segment 3, Section 4
- Underground Vault
- Temporary Work Space
- Parcels
- Municipal Boundary



**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 6**



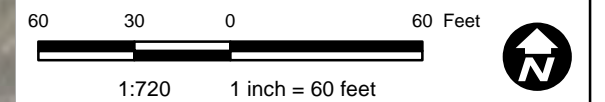
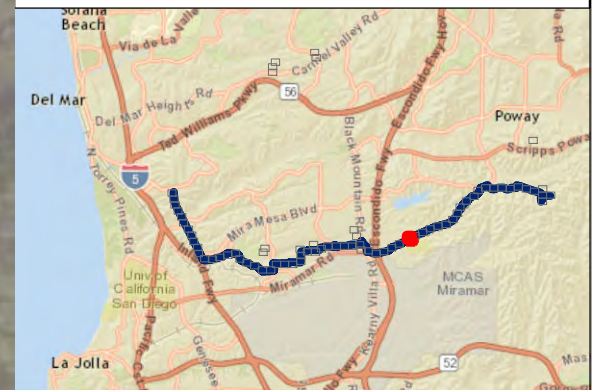
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- Proposed MPR 6 Workspace
 - Stations
- Segment B**
- Segment 3, Section 4
 - Temporary Work Space
 - Parcels
 - Municipal Boundary



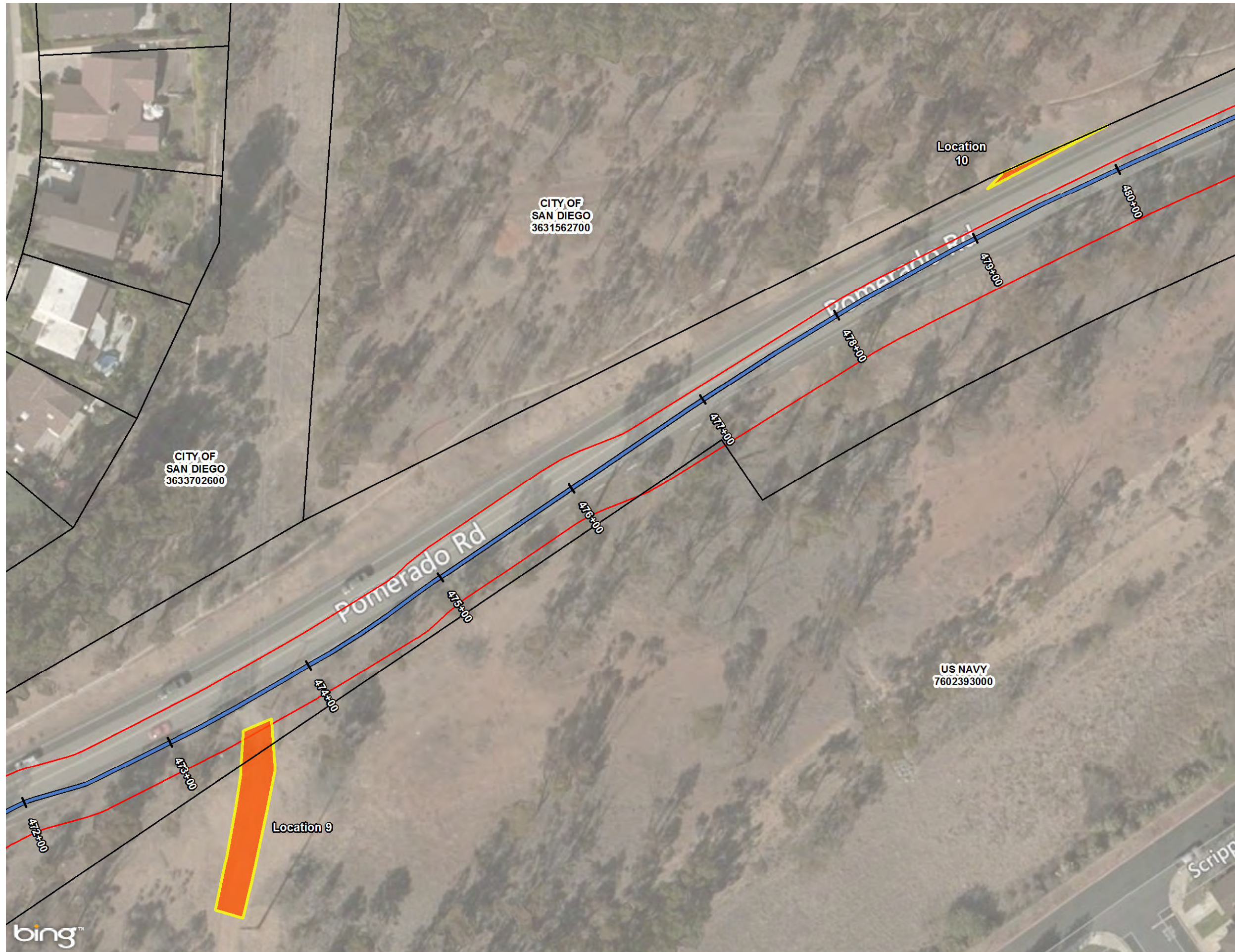
**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 6**



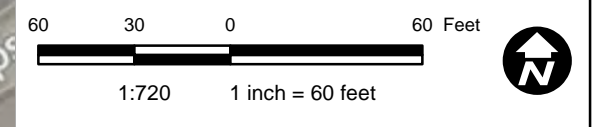
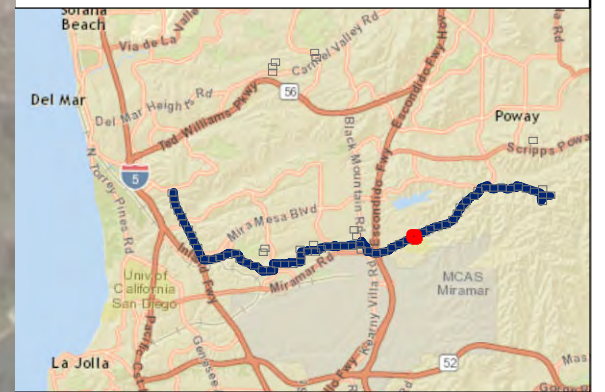
- Legend**
- Proposed MPR 6 Workspace
 - Stations
 - Segment B**
 - Segment 3, Section 4
 - Segment 3, Section 5
 - Underground Vault
 - Temporary Work Space
 - Parcels
 - Municipal Boundary



**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 6**



- Legend**
- Proposed MPR 6 Workspace
 - Stations
- Segment B**
- Segment 3, Section 5
 - Temporary Work Space
 - Parcels
 - Municipal Boundary

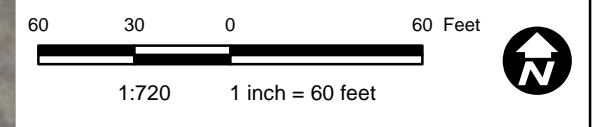
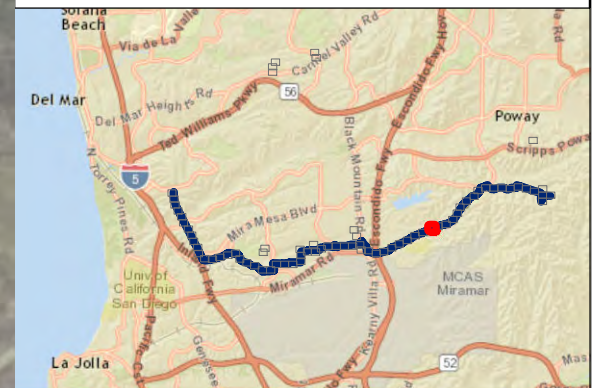


**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 6**

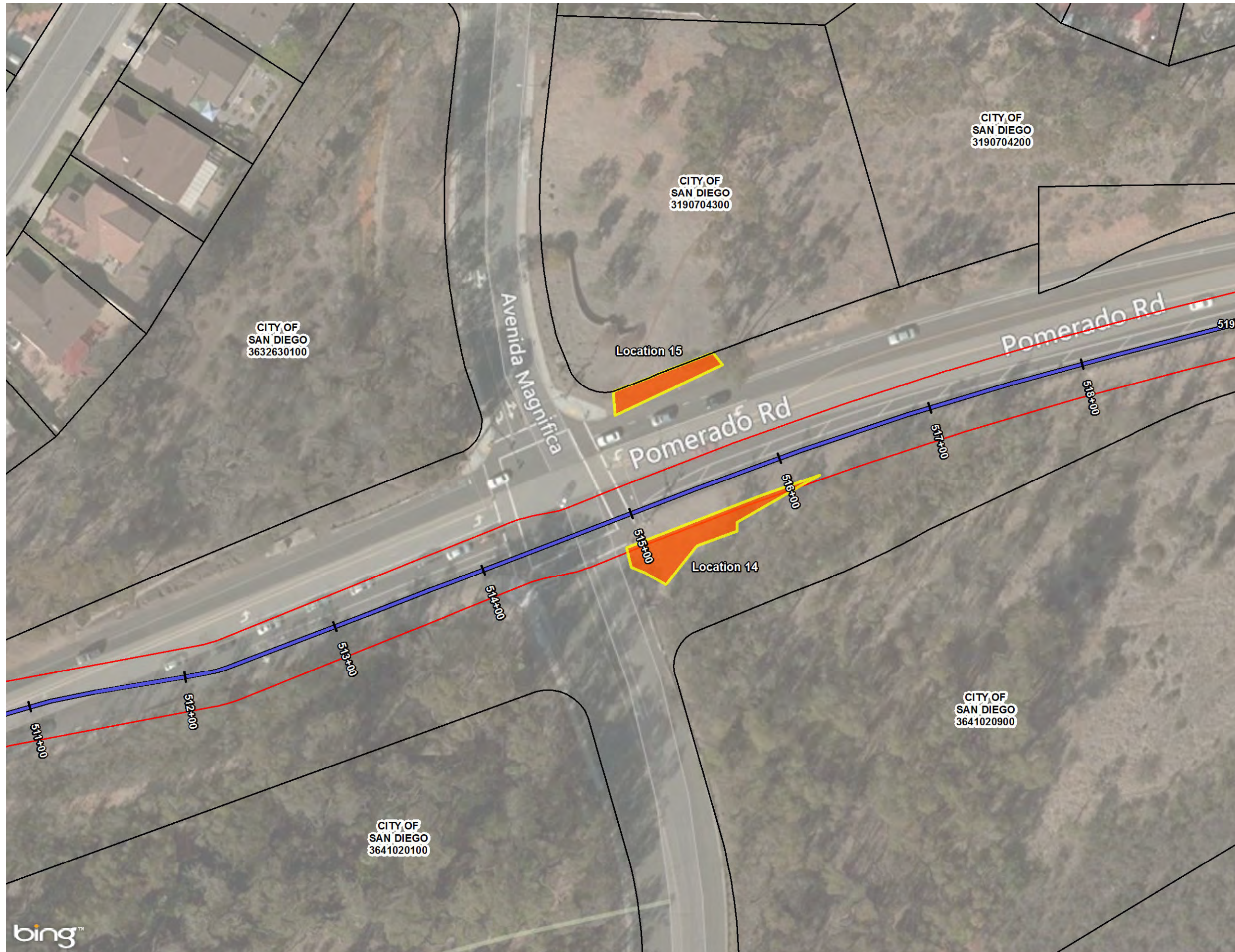


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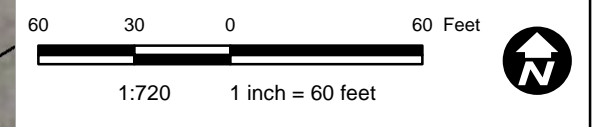
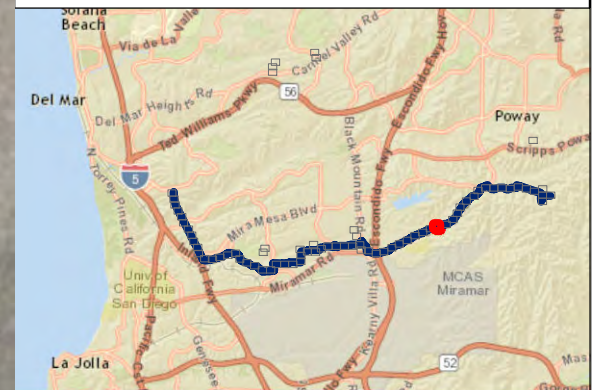
- Proposed MPR 6 Workspace
- Stations
- Segment B**
- Segment 3, Section 6
- Segment 3, Section 7
- Underground Vault
- Temporary Work Space
- Parcels
- Municipal Boundary



**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 6**



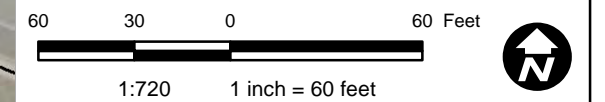
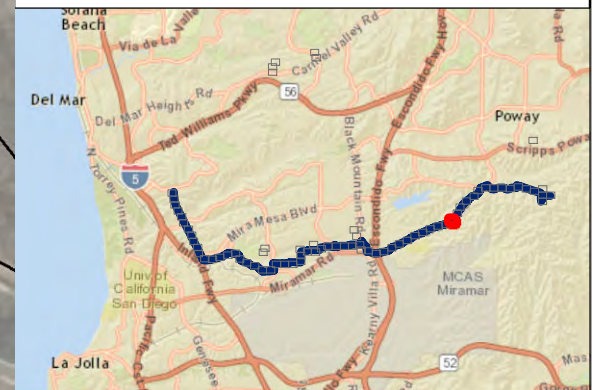
- Legend**
- Proposed MPR 6 Workspace
 - Stations
- Segment B**
- Segment 3, Section 7
 - Temporary Work Space
 - Parcels
 - Municipal Boundary



**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 6**



- Legend**
- Proposed MPR 6 Workspace
 - Stations
 - Segment B**
 - Segment 3, Section 8
 - Segment 3, Section 9
 - Underground Vault
 - Temporary Work Space
 - Parcels
 - Municipal Boundary

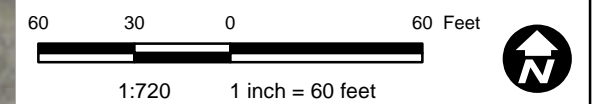
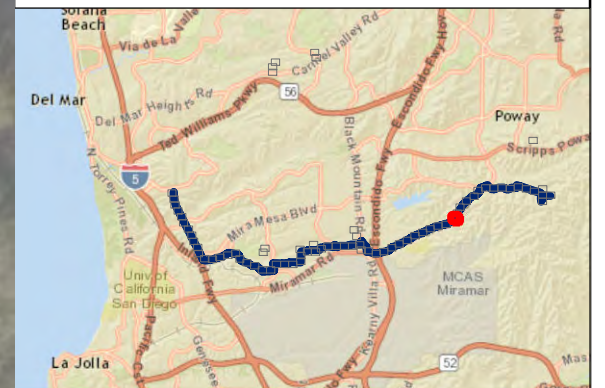


**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 6**



Legend

- Proposed MPR 6 Workspace
- Stations
- Segment B**
- Segment 3, Section 8
- Segment 3, Section 9
- Underground Vault
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**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 6**

Attachment A: CPUC Evaluation of Minor Project Refinement #6

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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>FEIR Significance: Significant and Unavoidable</i>		

Summary of Proposed Project Refinement Impacts on Aesthetics:

The proposed refinement would not increase the impact to the visual quality of the area. The proposed refinement is temporary, and in the same location as the FEIR. 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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>FEIR Significance: Less than Significant</i>		

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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>FEIR Significance: Significant and Unavoidable</i>		

Summary of Proposed Project Refinement Impacts on Air Quality:

Activities associated with construction and utilization of the proposed refinement areas (such as the type of equipment used and run time of equipment) are consistent with those discussed in the FEIR. Impacts on air quality would 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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>FEIR Significance: Less than Significant with Mitigation</i>		

Summary of Proposed Project Refinement Impacts on Biological Resources:

The biological resources in the proposed refinement areas are consistent with the biological resources in the areas of disturbance considered in the FEIR. They would not involve temporary or permanent impacts to vegetation, sensitive habitat, or protected species. Impacts to biological resources would remain less than significant. Consistent with Mitigation Measure Biology-7, a nesting bird survey would be conducted within 5 days prior to the establishment of a staging area if vegetation removal or ground-disturbing activities are necessary. All staging areas will be clearly delineated with lathe and flagging to ensure construction personnel stay within approved project limits. Areas with native vegetation will be flagged prior to use of the staging areas. The refinement would not result in a new impact or increase the severity of a previously analyzed impact on biological resources.

Attachment A: CPUC Evaluation of Minor Project Refinement #6 (Cont.)

Would the Proposed Project refinements result in a new impact, or increase the severity of a previously analyzed impact to:	No	Yes
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Cultural and Paleontological Resources (e.g., cause an adverse change to a significant historical, archeological, or paleontological resource)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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FEIR Significance: Less than Significant with Mitigation

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

The proposed refinement areas are located in primarily bare or disturbed areas. A pedestrian survey and records search for locations 5-17 did not result in the discovery of historical, archaeological, or paleontological resources within the refinement areas, with the exception of one single isolate, an aqua color glass insulator. 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?)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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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 proposed refinement areas are consistent with those discussed in the FEIR. Work in the refinement areas would be conducted in accordance with the revised Construction Fire Prevention Plan approved by the CPUC on July 19, 2017. 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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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FEIR Significance: Less than Significant with Mitigation

Summary of Proposed Project Refinement Impacts on Geology and Soils:

The proposed refinement is located in primarily bare or disturbed areas, and the proposed use of the areas (staging for materials and equipment, and/or vehicle parking) would be similar to the FEIR analysis. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on geologic resources as identified in the FEIR.

Greenhouse Gas Emissions (e.g., produce criteria greenhouse gas pollutants, or expose sensitive receptors to additional pollutants)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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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-5 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.

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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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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 proposed refinement area does not contain known hazardous materials sites. The implementation of APMs HAZ-1, HAZ-2, and HAZ-3, and Mitigation Measures Hazards-2, and Hazards-3 would reduce the impacts on hazards and hazardous materials to less than significant. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on hazards and hazardous materials.

Attachment A: CPUC Evaluation of Minor Project Refinement #6 (Cont.)

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

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 proposed refinement is within previously disturbed areas that are located within the Peñasquitos Watershed. The proposed refinement area does not contain jurisdictional waters. The implementation of Mitigation Measures Hydrology-1 and Hydrology-2 would reduce impacts on hydrology and water quality to less than significant. The proposed refinement 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)?	<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 is located within the same area 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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>FEIR Significance: Significant and Unavoidable</i>		

Summary of Proposed Project Refinement Impacts on Noise:

Activities associated with construction and utilization of the proposed refinement areas (such as use of heavy equipment) are consistent with those discussed in the FEIR. The implementation of Mitigation Measures Noise-1, Noise-2, and Noise 3 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.

Public Services (e.g., result in adverse impacts on government facilities that provide a public service)?	<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 does not have the potential to result in lane closures or delays. The proposed refinement is not located on government facilities that provide 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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>FEIR Significance: Less than Significant with Mitigation</i>		

Summary of Proposed Project Refinement Impact on Recreation:

The proposed refinement is not located within a park, preserve, or trail. The refinement areas would not impact parks or recreational facilities. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on recreation.

Attachment A: CPUC Evaluation of Minor Project Refinement #6 (Cont.)

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)?	<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 result in an increase in vehicle traffic, lane closure, or helicopter use, nor would it result in the loss of parking, consistent with the analysis in the FEIR. 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 Service Systems (e.g., 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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>FEIR Significance: Less than Significant with Mitigation</i>		

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

The proposed refinement would not involve the construction of new, or expansion of existing, water facilities, stormwater drainage facilities, and/or require water entitlements, or creation of new solid waste disposal needs. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on utilities.