

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



January 24, 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 #2 Request

Dear Ms. Kaminsky,

On January 17, 2017, SDG&E submitted Minor Project Refinement (MPR) #2 for approval by the California Public Utilities Commission (CPUC) for the Sycamore-Peñasquitos 230-kV Transmission Line Project (Project). The refinement modifies the approved project by rerouting the new 230-kV underground line to avoid two parallel storm drains running diagonally across the intersection of Kearny Villa Road and Black Mountain Road. Instead, MPR #2 requests that the transmission line would continue along Miramar Road (past Kearny Villa Road), before turning north on Black Mountain Road, then west on Activity Road (see Exhibit 1). The length of the proposed 230-kV line alignment refinement between Miramar Road and Activity Road would be approximately 2,300 linear feet, a reduction of 300 feet from the originally approved Project alignment.

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 (See Attachment A). 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 #2 is granted by the CPUC for the proposed activities based on the factors described below.

SDG&E MPR #2 Request. Excerpts from the SDG&E MPR #2 Request, received January 17, 2017, are presented below (indented):

The Final Environmental Impact Report (FEIR) design called for the new 230-kV transmission line to be installed in an underground position following Miramar Road west (across the I-15 Freeway), turning north on Kearny Villa Road, then briefly south on Black Mountain Road, before moving west again on Activity Road (refer to Exhibit 1). The Segment between Miramar Road and Activity Road is approximately 2,600 linear feet.

Under the proposed refinement, the new 230-kV transmission line would continue along Miramar Road (past Kearny Villa Road), before turning north on Black Mountain Road, then ultimately west on Activity Road, consistent with the FEIR route. The 230-kV line with the proposed refinement between Miramar Road and Activity Road would be approximately 2,300 linear feet.

During final design of Alternative 5 (FEIR route or design) and in compliance with Mitigation Measure Utilities-3, SDG&E reviewed the number and location of existing buried utilities along the underground alignment. During that review, SDG&E identified two parallel 192-inch storm drains running diagonally across the intersection of Kearny Villa Road and Black Mountain Road. Exhibit 2 attached shows these two storm drains, which are identified on the drawing as 192" ACCMP SD. The FEIR route at this intersection would require a 110-degree sweep (turn) from Kearny Villa Road to Black Mountain Road. Meanwhile, the cabling system requires a 60-foot minimum radius to maintain allowable cable pulling tensions. This minimum turning radius limits the potential path of the sweep and results in the FEIR route having to cross under the storm drains as it makes the turn. Neither conventional trenching nor tunneling under the storm drains would be possible under this condition. In addition, under the FEIR route, the underground alignment would need to cross these storm drains twice (see Exhibit 2). With implementation of this refinement, the Project would avoid potential conflicts with these two storm drains and the constructability concern described would be eliminated. The refinement also reduces the number of horizontal bends in this section and reduces the linear feet of trench by approximately 300 feet. Less horizontal bends will reduce pulling tensions, which reduces the potential risk of damage to the cable when pulling. The reduced length could also result in an approximately 3-5 day reduction in the overall construction schedule of the underground portion of the Project.

CPUC Evaluation of MPR #2 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 air quality, cultural and paleontological resources, noise, transportation and traffic, 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 would reduce the length of trenching by 300 feet. Construction and utilization of the refinement area (such as the type of equipment used and run time of equipment) are consistent with those discussed in the FEIR. The refinement may decrease the construction schedule by 3 to 5 days, thereby slightly reducing overall project emissions. The implementation of APM AIR-2 and Mitigation Measures 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.

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 300 feet of trenching activities. Cultural or paleontological resources could be encountered in these areas; however, APMs CUL-1, and CUL-6, and Mitigation Measures Cultural Resources-1, Cultural Resources-2, Cultural Resources-4, Paleontology-1, Paleontology-2, and Paleontology-3 would reduce the impacts on cultural and paleontological 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.

Noise

Activities associated with construction and utilization of the refinement area (such as the type of equipment used and run time of equipment) are consistent with those discussed in the FEIR. The proposed refinement is located within the same land use setting (preliminary commercial/industrial) as the FEIR route alignment. The refinement may decrease the construction schedule by 3 to 5 days, thereby reducing the extent of construction-related noise on nearby sensitive receptors. The implementation of Mitigation Measures Noise-1, and Noise-2 would reduce the impacts on noise; however, noise impacts would remain significant and unavoidable during construction of the proposed refinement. The refinement would not result in a new impact or increase the severity of a previously analyzed impact on noise.

Transportation and Traffic

The proposed refinement is located within Black Mountain Road and Miramar Road, and has the potential to require temporary lane closures and would affect bus routes and bus stops on these roadways during project construction. The proposed refinement would avoid the existing bike lane on Kearny Villa Road, and would not result in the loss of parking. Because the amount of vehicle trips and roadways affected for the proposed refinement would be consistent with the Project analyzed in the FEIR, the proposed refinement would not result in a change to level-of-service (LOS) compared to what is disclosed in the FEIR. The refinement may decrease the construction schedule by 3 to 5 days, thereby slightly reducing the extent of construction-related traffic impacts. The implementation of APM TR-4 and Mitigation Measures Traffic-1, Traffic-3, Traffic-6, Traffic-7, Traffic-8, Traffic-11 and Traffic-12 would reduce impacts on traffic and transportation to less than significant. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on traffic and transportation.

Other Issue Areas

The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on aesthetics, agriculture and forestry, biological resources, fire and fuels management, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use, public services, recreation, or utilities.

MPR #2 Conditions of Approval

MPR #2 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. Wildlife found to be trapped shall be removed by a qualified biological monitor.
5. 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.
6. 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.
7. 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.
8. 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.
9. 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.
10. 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.
11. 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.

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

Sincerely,

A handwritten signature in black ink that reads "Billie Blanchard". The signature is written in a cursive, flowing style.

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

Exhibit 1: Black Mountain Road Re-Route Map
Attachment A: CPUC Evaluation of Minor Project Refinement #2

Exhibit 1: Black Mountain Road Re-Route



Appendix A: CPUC Evaluation of Minor Project Refinement #2

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 refinement is entirely underground. 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 refinement area (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. The refinement may decrease the construction schedule by 3 to 5 days, thereby slightly reducing overall project emissions. 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 area are consistent with the biological resources in the areas of disturbance considered in the FEIR. The refinement is entirely underground, and is located within existing paved roadways. It would not involve temporary or permanent impacts to vegetation, sensitive habitat, or protected species. Impacts to biological resources would remain 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
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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"/>
<i>FEIR Significance: Less than Significant with Mitigation</i>		

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 300 feet of trenching activities. Cultural or paleontological resources could be encountered in these areas; however, APMs CUL-1, and CUL-6, and Mitigation Measures Cultural Resources-1, Cultural Resources-2, Cultural Resources-4, Paleontology-1, Paleontology-2, and Paleontology-3 would reduce the impacts on cultural or paleontological 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?)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>FEIR Significance: Less than Significant with Mitigation</i>		

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 refinement is located entirely within existing paved roadways. 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"/>
<i>FEIR Significance: Less than Significant with Mitigation</i>		

Summary of Proposed Project Refinement Impacts on Geology and Soils:

The proposed refinement would decrease the area of ground disturbing activities by approximately 300 feet. 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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>FEIR Significance: Less than Significant with Mitigation</i>		

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 refinement may decrease the construction schedule by 3 to 5 days, thereby slightly reducing overall project emissions. 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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>FEIR Significance: Less than Significant with Mitigation</i>		

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, and HAZ-3, and Mitigation Measures Hazards-2, Hazards-3, and Hazards-4, 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)?	<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 refinement would reduce the amount of ground-disturbing activity by approximately 300 feet. The implementation of APM HYDRO-3, and Mitigation Measures Hydrology-1, Hydrology-2, and Hydrology-4 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)?	<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 franchise position in City of San Diego roadways, consistent with 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 refinement areas (such as use of heavy equipment, construction duration etc.) are consistent with those discussed in the FEIR. The refinement may decrease the construction schedule by 3 to 5 days, thereby reducing the extent of construction-related noise on nearby sensitive receptors. The implementation of Mitigation Measures Noise-1, and Noise-2 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
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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 has the potential to result in lane closures or delays affecting different roadways than analyzed in the FEIR; however, the potential impacts on these roadways are consistent with the analysis in the FEIR. The proposed refinement is not located near a school or within a park. The refinement may decrease the construction schedule by 3 to 5 days. The implementation of APMs PS-1, PS-2, PS-3, and PS-4 would reduce impacts to less than significant. 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 located within a largely commercial area and 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.

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 is located within Miramar Road and Black Mountain Road, and has the potential to require temporary lane closures on these roadways during project construction, consistent with the potential impacts identified for the FEIR. The refinement may decrease the construction schedule by 3 to 5 days, thereby slightly reducing the extent of construction-related traffic impacts. The implementation of APMs TR-2 and TR-4, and Mitigation Measures Traffic-1, Traffic-3, Traffic-6, Traffic-7, Traffic-8, Traffic-11 and Traffic-12 would reduce impact to less than significant. The refinement would not result in an increase in vehicle traffic, or lane closure, 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 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 install underground transmission line within Black Mountain and Miramar Roads instead of Kearny Villa Road, and a separate segment of Black Mountain Road to minimize/reduce potential conflicts with existing underground utilities. Implementation of Mitigation Measures Utilities-1, Utilities-2, and Utilities-3 would reduce the impacts on utilities 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.