

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 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 #9 Request

Dear Ms. Kaminsky,

On October 6, 2017, SDG&E submitted Minor Project Refinement (MPR) #9 for approval by the California Public Utilities Commission (CPUC) for the Sycamore-Peñasquitos 230-kV Transmission Line Project (Project). MPR #9 adds a paved, developed area off Crestmar Point for use as a staging area for vehicles and construction equipment, as 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 (Decision 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 #9 is granted by the CPUC for the proposed activities based on the factors described below.

SDG&E MPR #9 Request. Excerpts from the SDG&E MPR #9 Request, received October 6, 2017, are presented below (indented):

Under this proposed MPR (proposed refinement), SDG&E seeks to add a paved, developed area to use as a staging area for vehicles and construction equipment that will be used on the Sycamore to Peñasquitos Transmission Line Project (Project). The staging area would be accessed from Crestmar Point. To facilitate entry into the proposed staging area, approximately 20 feet of the existing curb on the east side of Crestmar Point would be cut and a small landscaped area would be graded in order to install a temporary driveway. The graded area will measure approximately 20 feet wide and 30 feet long and will be approximately 0.01 acres. The graded area would be laid with gravel, and shaker plates would be installed at the entrance/exit points. The graded area (0.01 acre) and the proposed staging area (1.12 acres) total approximately 1.13 acres. In addition, a temporary fence would be installed along the perimeter of the proposed refinement area in order to secure vehicles and construction equipment.

Upon completion of the Project, the curb and landscaping will be restored to its original condition.

CPUC Evaluation of MPR #9 Request

In accordance with the MMCRP, the MPR #9 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, transportation and traffic, and other issue areas. A list of bulleted conditions is presented to define additional information and clarifications regarding mitigation measure requirements.

Biological Resources

The proposed refinement area consists of a paved parking lot and a small landscaped area. Impacts are consistent with the impacts to biological resources identified in the FEIR, and will remain less than significant with mitigation.

The small landscaped area (0.01 acres) will be graded to provide access for construction vehicles into the staging area. No biological resources exist onsite. The proposed refinement area will be established outside of the nesting season.

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 area conducted on October 4, 2017, did not identify any cultural resources. However, since the FEIR identified the MPR #9 work areas as having a high or moderate potential for buried cultural deposits, monitoring in the form of a spot check 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.

Transportation and Traffic Resources

The proposed refinement is located near the intersection of Carroll Road and Crestmar Point. The proposed staging area is located west of Crestmar Point, which is a two-way road divided by a landscaped median. The northern terminus of the road consists of a cul-de-sac. Primary access to the staging yard would be provided through the temporary driveway (proposed curb cut location) on the east side of Crestmar Point. Vehicles entering the staging yard would travel north on Crestmar Point and turn right into the temporary driveway. Vehicles exiting the proposed refinement would make a right turn off the temporary driveway onto the Crestmar Point northbound lane. Vehicles would then travel north on Crestmar Point, turn around in the cul-de-sac, and would then drive in the Crestmar Point southbound lane to access Carroll Road. An additional secondary access road to the staging area may be utilized along Ware Court. Aside from light traffic at the beginning and end of each work day (approximately 10 personal vehicles and pickup trucks), large truck traffic will typically be limited to hauling of two or three reels of underground cables a day during the cable-pulling phase of the Project. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on transportation and traffic 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, air quality, fire and fuels management, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use, noise, public services, recreation, or utilities and service systems.

MPR #9 Conditions of Approval

MPR #9 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 #9 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 MM Utilities-1.
5. SDG&E shall implement all appropriate erosion and sediment control BMPs for the MPR #9 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.
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 #9 shall be halted.
7. All ground-disturbing activities at the MPR #9 work area 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.

Ms. Jennifer Kaminsky

October 11, 2017

Page 4

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 MPR #9 work area. 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. No additional tree removal or tree pruning in or adjacent to MPR #9 work areas shall occur unless the SDG&E construction safety advisor determines that an imminent threat to worker and/or public safety exists. 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
Sheila Hoyer, Panorama Environmental
Edith Moreno, SDG&E
Ron Walker, AECOM

Exhibit 1: MPR #9 Map
Attachment A: CPUC Evaluation of Minor Project Refinement #9

Exhibit 1: MPR #9 Map



Legend

- Proposed Refinement Area
- Proposed Area for Grading
- Access Road
- Ingress/Egress Access Road
- Underground Vault
- Temporary Work Space

Alignment B

- Segment 5, Section 8
- Segment 5, Section 9



125 62.5 0 125 Feet
1:1,500 1 inch = 125 feet

**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area -
MPR 9**

Attachment A: CPUC Evaluation of Minor Project Refinement #9

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"/>
---	-------------------------------------	--------------------------

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 proposed refinement would be temporary in nature and 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"/>
--	-------------------------------------	--------------------------

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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
--	-------------------------------------	--------------------------

FEIR Significance: Significant and Unavoidable

Summary of Proposed Project Refinement Impacts on Air Quality:

Activities associated with construction and utilization of the proposed refinement area (such as the type of equipment used and run time of equipment) would be 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"/>
---	-------------------------------------	--------------------------

FEIR Significance: Less than Significant with Mitigation

Summary of Proposed Project Refinement Impacts on Biological Resources:

There are no biological resources in the proposed refinement area. Approximately 0.01 acre of landscaping consisting of pear tree, acacia, sea fig, and ice plant would be graded. No special-status species or sensitive habitats are known to occur within the proposed refinement area. The landscaped area would be returned to pre-project conditions upon completion of the Project. The proposed refinement area would be established outside of the nesting season. 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.

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"/>
--	-------------------------------------	--------------------------

FEIR Significance: Less than Significant with Mitigation

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

The proposed refinement area would be located in a disturbed area. A pedestrian survey and records search of the proposed refinement area did not result in the discovery of historical, archaeological, or paleontological resources within the refinement area. Ground disturbance would be minimal and would likely impact the road bed or fill material. Archaeological and paleontological monitoring would be conducted during ground-disturbing activities. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on cultural or paleontological resources.

Attachment A: CPUC Evaluation of Minor Project Refinement #5 (Cont.)

Would the Proposed Project refinements result in a new impact, or increase the severity of a previously analyzed impact to:	No	Yes
---	----	-----

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"/>
--	-------------------------------------	--------------------------

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 area would be consistent with those discussed in the FEIR. 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"/>
--	-------------------------------------	--------------------------

FEIR Significance: Less than Significant with Mitigation

Summary of Proposed Project Refinement Impacts on Geology and Soils:

The proposed refinement would be located in a developed (paved) and landscaped area, and the proposed use of the area (staging for materials and equipment) 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"/>
---	-------------------------------------	--------------------------

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"/>
---	-------------------------------------	--------------------------

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 #5 (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 would be 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 would be within a previously developed and paved area that is located within the Peñasquitos Watershed. The proposed refinement area does not contain jurisdictional waters and is not within a flood hazard. 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 would be 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 area (such as use of heavy equipment) would be 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 would not be located near a school or within a park. 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 would not be located within a park, preserve, or trail. The refinement area 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 #5 (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.