



## Valley South Subtransmission Line Project PROJECT MEMORANDUM

**To:** Eric Chiang, CPUC Project Manager  
**From:** Sandra Alarcón-Lopez, CEQA Project Manager  
Aspen Environmental Group  
**Re:** SCE's PEA (December 2014)  
**Date:** January 8, 2015

---

Aspen has reviewed SCE's Proponent's Environmental Assessment (PEA) dated December 2014 for the Valley South 115 kV Subtransmission Project and has considered SCE responses to previous data requests (#1 and #2) on draft versions of the PEA. In addition, Aspen considered the CPUC's Working Draft PEA Checklist for Transmission Lines and Substations (November 2008), and the CPUC's Information and Criteria List in preparing this evaluation.

Attachment A provides our comments on the December 2014 PEA. The attached comments include requests for clarification on responses to previous Aspen data requests and new comments identified in our review of background studies provided as part of the official PEA submittal to the CPUC.

Please let me know if you have questions or comments regarding this submittal.

Thank you.

# Valley South Subtransmission Line Project

## Review of PEA (December 2014): Data Request Set #3

---

### General. GIS Data

- 3-1** Based on a general review of the GIS data provided, it appears the majority of the information requested is included; however, (1) the 23 new wood guy stub poles do not appear to be identified or (2) the properties to be acquired. New wood poles are identified, but it is unclear if these are the wood guy stub poles. When comparing the ownership listing to the new right-of-way, the GIS data shows 50 APNs/parcels, whereas the Project Description states that either 36 or 25 parcels (not sure which is correct – See #3-3 below) are to be acquired. If this information is provided in the GIS data, please explain under which data category. If not included, please provide this additional information.

### Chapter 3. Project Description

- 3-2** Section 3.6 states that 36 private properties would require new or upgraded land rights, and that “SCE will utilize approximately...5.2 miles of proposed new or upgraded easements sufficient to contain the proposed facilities and provide safety and access, which is estimated to be 25 to 30 feet wide.” It is understood that the properties to be acquired are identified in the GIS. It is unclear whether the length of the properties to be acquired would coincide with the estimated 5.2 miles of new/upgraded easements. Please provide a table (by milepost) detailing the length of the alignment in existing ROW, new ROW, existing ROW widths (estimated/variable ranges OK), and new ROW widths. Indicate where the alignment is with SCE fee-owned property, existing easements, franchise ROW, or new/upgraded easements. Please also provide a map indicating essentially the same information, especially where along the proposed and alternative alignments new/upgraded easements would be required to accommodate the project and where the 36 properties are located that would require new or upgraded land rights.
- 3-3** Data Gap Response #1-19 states there are 25 private properties that would require new or updated land rights and that the PEA will be updated to reflect this number. As noted in #3-1 above, the PEA is still stating there are 36 properties. What is the correct number? Please provide the supporting GIS data (see #3-1 above).
- 3-4** Data Gap Response #1-31 appears to be out of date. It is referring to a table from the old PEA (Table 3.2-D), an Appendix E-5 Soils Map, and Attachment 3\_Permits that were not part of the official PEA (December 2014) and data gap submittal. Please provide a revised response and supporting information. Attachment 3\_Permits is also needed to respond to Data Gap #1-51.

### Section 4.1. Aesthetics

- 3-5** CPUC Data Gap #2-5 requested a "reasonable number" of visual simulations for Alternative 2 in order to assess the alternative's Aesthetics impacts on adjacent and nearby sensitive receptors. In declining to provide this information, SCE stated that visual impacts would be similar to the

Proposed Project, but that because the Alternative is longer, impacts would be greater than for the Proposed Project. Therefore, (a) CEQA would allow an impact discussion of lesser detail, (b) visual simulations would not offer anything substantive for comparison purposes, and (c) visual simulations are not necessary to evaluate the impact potential for Alternative 2. Assuming that Alternative 2 becomes an alternative (if an EIR is prepared) and in order to provide full disclosure, at least some visual simulations are appropriate for the Alternative 2 impact analysis. If SCE is unable to do so in a timely fashion, please advise the CPUC and the Aspen Team will prepare on the CPUC's behalf.

- 3-6** Of the three viewpoint locations that were recommended by the Aspen Team for the Benton Road to Nicolas Road Re-conductoring segment, one (Benton Road) was provided. SCE declined to provide viewpoint analyses for either the Murrieta Hot Springs Road viewpoint or the Suzi Lane viewpoint. Both of these viewpoints are appropriate viewpoints for analysis of the re-conductoring segment. Please provide the requested visual simulations. If SCE is unable to do so in a timely fashion, please advise the CPUC and the Aspen Team will prepare on the CPUC's behalf.

### **Section 4.3. Air Quality**

- 3-7** Data Gap Response #2-9 does not relate to the comment. The comment is specific to the presentation on Table 4.3-5, which shows SRA 26 values and not SRA 24 values in places where it should either show SRA 24 values as the most conservative value or both values to show which elements are within each SRA. That table should be corrected to show SRA 24 LST values for all appropriate elements of the project that occur within SRA 24, when the SRA 24 values are more conservative than the SRA 26 values.

### **Section 4.5. Cultural Resources (also applies to the Cultural Resources Report [Confidential], reviewed by Applied EarthWorks, Inc.)**

- 3-8** The records search information in the PEA is inconsistent with the records search information in the cultural resources survey report for the project. In addition, the records search information in the cultural resources survey report for the project (Wilson et. al, 2014) lists studies performed outside of the project area (i.e., Coachella Valley). We recommend a QA/QC review of the records search information.
- 3-9** The records searches were conducted in 2011, 2012, and 2013; however, much work has been done in the area since then. It is not clear if the entire project (Segment 1 and Segment 2) was updated in 2013, or if only portions of the project were updated. We recommend updating the entire project (Segment 1 and Segment 2) records search with a half-mile radius.
- 3-10** The pedestrian surveys of the project (Segment 1 and Segment 2) failed to identify one known prehistoric resource. This resource consists of a large bedrock outcrop containing many bedrock milling features. This resource type is very common to the study area and the cultural resources survey report notes that previously documented prehistoric resources “overwhelmingly consist of bedrock milling features” (pg. 54 of VSSP cultural resources report). Therefore, we recommend that culturally sensitive areas within the project be resurveyed by qualified archaeologists who are familiar with the site types commonly found in the area.

**Reference:** Wilson, Stacie, Jill Gibson, and Theodore G. Cooley  
2014 *Cultural Resources Survey Report for the Proposed Southern California Edison Valley South 115 kV Subtransmission Project, Riverside County, California.* AECOM, San Diego, California. Submitted to Southern California Edison.

## Section 4.6. Geology/Soils

**3-11** In reviewing the GIS data provided on December 15, 2014 and the Data Gap responses, the GIS files of geology were not provided. Data Gap responses 2-24 and 2-25 say that GIS files titled “landslides, Perris Quad Geology and Riverside County Geology” are attached; however, no such files were provided. Please provide the GIS files noted in the Data Gap responses.

## Section 4.12. Noise

**3-12** Please state the expected hours of construction and days during the week. It is understood that construction is expected to occur during “normal” daytime hours. Is this 8:00 a.m. to 5:00 p.m., Monday through Friday? Please clarify. The response to Data Gap Response 1-47 did not answer this question; it simply refers to the GIS data for pulling, tensioning, and splicing work locations.

**3-13** SCE states in Data Gap Response 2-41 and 2-42 that the FTA’s 2006 Transit Noise and Vibration Impact Assessment for linear construction projects threshold of 90 dBA Leq (1-hour) at 50-feet was utilized to assess impacts. The PEA states “While construction noise would be noticeable, the noise levels identified in this analysis are typically considered acceptable for construction activities during daytime hours and do not exceed the daytime hourly Leq of 90 dBA noise level identified by the FTA as the construction noise level where adverse community reaction can occur.” Please provide the exact reference (page) for this threshold. A 90 dBA one-hour average seems excessively high and would likely result in complaints from sensitive receptors, as this would be equivalent to a rail transit horn, jack hammer, or rock drill operating essentially non-stop for an hour per FTA, 2006 Figure 2-11 (p. 2-16).

## Appendix E. Air Quality

**3-14** It appears that there is an error in the use and translation of emissions factors from the OFFROAD model to supplant emissions factor data in the SCAQMD OFFROAD table. We agree on the basic approach as the SCAQMD table values are old and do not provide important corrections that have been made to the OFFROAD model. However, the emissions factor values developed, particularly for NOx, appear to be too low for both uncontrolled emissions and for the controlled emissions with the APM assumption of Tier 3 or better engines (i.e. they seem to strictly represent Tier 4 engine values). Also, it is unclear how the uncontrolled emissions factors were developed, as the values in the emissions factor sheet do not match the SCAQMD CEQA website values and are not linked to other calculations. The following should be done to correct the off-road equipment emissions factors:

- For the uncontrolled OFFROAD engine emissions no model year should be selected in the OFFROAD model, the average aggregate emission factors should be developed and used for the 2018 construction year. Alternatively, emission factor values from the SCAQMD CEQA website spreadsheet for the construction year can be used with a 0.667 correction factor to address the load factor revisions in the OFFROAD model.
  - For the controlled OFFROAD engine emissions, to develop Tier 3 or better emissions the model year corresponding to the Tier 3 standard model year compliance date and all later years up through 2017 or 2018 should be selected as permitted by the model for the 2018 scenario year. This means that at least two runs are necessary to cover the engine sizes... a 2007 and up model year run for HP between 100 and 174, and a 2006 and up model year run for HP between 175 and 599. Alternatively, Tier 3 emissions standard values can be used.
- 3-15** It is unclear if the use of AP-42 Section 13.2.2 equation “1b” is appropriate over the use of equation “1a”, given that the emissions estimate is not strictly been done for light vehicles, in fact the vehicles that are primarily accessing the unpaved roads are not light vehicles since all worker commuting appears to be assumed to occur only on paved roads.
- 3-16** What is the purpose of separating the unpaved public road from the unpaved private road estimates?
- 3-17** There are dated or mixed reference citations used in the emissions estimates that don’t appear to provide the best estimates, or may be noted in error. Some of these include:
- Citing the 2006 version of AP-42 Sections 13.2.2, which was updated in 2011; the reference should be updated.
  - Use of WRAP Handbook for unpaved silt loading rather than using values from AP-42 Section 13.2.2 or SCAQMD CEQA guidance document values. Additionally, the selection within the noted WRAP Handbook table is itself questionable, as the dirt road value from that table is 11 percent, while the noted gravel/crushed limestone road value of 6 percent was used. The silt loading should be corrected to 11 percent using this reference source, or corrected using AP-42 or SCAQMD references.
  - Citation of the “ARB Emission Inventory Methodology 7.9, Entrained Paved Road Dust (1997)” for the paved road silt loading assumption rather than using assumptions from AP-42 Section 13.2.1, which was used as the emission factor calculation method source, or from SCAQMD CEQA guidance document values. The value used is lower than would likely be considered proper for the average ADT road category in AP-42 Section 13.2.1 Table 13.2.1-2, which based on the mix of paved road types used would likely be a value somewhere between 0.06 and 0.2 and not as low as 0.035.
- 3-18** The GHG emissions calculation methodology is dated. The current California recommended guidance source for GHG emissions estimation is from The Climate Registry using the methods outlined in the General Reporting Protocol and other resources noted below:

General Reporting Protocol

[http://www.theclimateregistry.org/downloads/2013/03/TCR\\_GRP\\_Version\\_2.0.pdf](http://www.theclimateregistry.org/downloads/2013/03/TCR_GRP_Version_2.0.pdf)

Updates and clarification document

([http://www.theclimateregistry.org/downloads/2014/06/2014.06.30\\_GRP\\_2.0\\_Updates\\_and\\_Clarifications.pdf](http://www.theclimateregistry.org/downloads/2014/06/2014.06.30_GRP_2.0_Updates_and_Clarifications.pdf))

Updated emissions factors

(<http://www.theclimateregistry.org/downloads/2014/04/2014-Climate-Registry-Default-Emissions-Factors.pdf>), including N<sub>2</sub>O emissions factors not included in this estimate.

Additionally, the latest U.S. EPA accepted (AR4) global warming potential values for CH<sub>4</sub>, N<sub>2</sub>O, and SF<sub>6</sub> should be used (25, 298, and 22,800, respectively) in the future. However, we are only noting this U.S. EPA update to the AR4 GWPs for future SCE project estimating purposes; we are not asking for the updated GHG emissions estimate for this project to include these updated GWPs, given their minimal impact for this project, as long as the older IPCC Third Assessment Report (TAR) GWPs are used consistently.

- 3-19** Please provide the updated emissions spreadsheets in Excel format, which include revisions based on the requests above.

## Appendix F. Biological Resources Assessment

- 3-20** It appears that all the required surveys have been completed for each segment and the alternative; however, all survey work to date has been completed during years of less than average rainfall. With the expected above average rainfall through early next year (2015), it would be prudent for additional survey work to be conducted in the spring of 2015 (unless similar rainfall totals to the previous survey years are observed). This is especially true for the botanical surveys, but a good rainy season will benefit most of the plants/animals surveyed as part of the project. Please complete spring surveys (2015) to support the VSSP.