

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 30, 2019

Lori Charpentier
Project Manager
Major Environmental Projects
Southern California Edison
2244 Walnut Grove Avenue
Rosemead, CA, 91770

RE: Valley South Subtransmission Project: Minor Project Change #3

Dear Ms. Charpentier,

On August 14, 2019, Southern California Edison (SCE) submitted Minor Project Change (MPC) Request #3 to the California Public Utilities Commission (CPUC) for additional access routes and work areas in Segments 1 and 2. SCE is proposing to add the additional access and work areas not previously identified in the NTP request. The area includes SCE right-of-way, franchise access, and existing roads. The proposed areas are in Segments 1 and 2. A review of the requested sites was conducted by the CPUC Environmental Monitor on August 16, 2019. Requests for additional information was provided to SCE on August 19 and 20. SCE provided responses on August 23.

SCE's Valley South Subtransmission Project was evaluated in accordance with the California Environmental Quality Act (CEQA). The mitigation measures described in the Final Environmental Impact Report (FEIR) were adopted by the CPUC as conditions of project approvals. The CPUC voted on December 1, 2016 to approve SCE's Valley South Subtransmission Project (Decision 16-12-001) and a Notice of Determination was submitted to the State Clearinghouse (SCH# 2015051012). The CPUC is working with SCE to develop a Mitigation Monitoring, Compliance and Reporting Program (MMCRP) to ensure compliance with all mitigation measures imposed on the Valley South Subtransmission Project during implementation.

MPCs are reviewed for consistency with CEQA requirements and are located within the geographic boundary of the project study area. MPCs do not create new or substantially more severe significant impacts, or conflict with any mitigation measure or applicable law or policy. Also, they do not trigger other permit requirements unless the appropriate agency has approved the change, and clearly and strictly comply with the intent of the mitigation measure or applicable law or policy.

This letter documents the CPUC's thorough evaluation of all activities covered in this MPC, including the mitigation measure requirements. The evaluation process ensures that all mitigation measures applicable to the location and activities covered in the MPC are implemented, as required in the CPUC's Decision.

MPC #3 for the use of the additional access and work areas in Segments 1 and 2 is granted by CPUC based on the factors described below.

SCE Minor Project Change Request. Excerpts from the SCE MPC #3 request, received August 14, 2019, (additional information was provided by SCE on August 23, 2019) are presented below (indented):

SCE is requesting use of additional overland travel access and work areas (see Attachment A).

Original Condition: Additional access roads will be overland travel within SCE easement, or use of other existing access roads not previously identified in NTP request, additional work areas added in previously disturbed or agriculture areas with no sensitive resources.

Justification for Change: Additional work areas as needed for construction and newly identified access to existing work areas that were not previously identified.

Impacts associated with the additional work areas and access roads are equal to or less than those already associated with the Segment 1 and Segment 2 work areas and access roads. All applicable avoidance/minimization measures identified in FEIR Appendix 6 Mitigation Monitoring Plan will be followed.

SCE is in the process of finalizing a permit with the railroad, which includes use of one of the requested access roads. Permit conditions require Wilson to coordinate use of the road with the onsite railroad flagger provided by the railroad during construction.

After further discussion with the contractor, there may be a need to mow in certain areas. Crews will have water trucks on site for fire safety and will coordinate with all land owners to ensure access is appropriate and safe and may walk in as needed.

CPUC Evaluation of Minor Project Change Request

In accordance with the draft MMCRP, the request for MPC #3 was reviewed by CPUC to confirm that no new impacts or increase in impact severity would result from the requested MPC activities. Impacts associated with the use of the additional access routes and work areas are equal to or less than those previously identified. All applicable avoidance/minimization measures identified in the FEIR Appendix 6 Mitigation Monitoring Plan will be followed. The following discussion summarizes the supplemental analysis for biological and cultural resources, and fire hazards conducted for the MPC request. The proposed MPC request would not result in any changes to impacts or required mitigation for other issue areas, including aesthetics, air quality, noise, traffic/transportation, and water resources.

Biological Resources: Biological resources assessments were conducted and were included in the Notice to Proceed Request 2 dated December 21, 2018. The newly identified areas were included in the assessment areas. MSHCP riparian riverine resources, SKR burrow, San Diegan Tiger (Coastal) whiptail, Long-spined spineflower, Plamer's grapplinghook, and Paniculate tarplant were recorded in the vicinity of some of the areas during historical surveys.

Cultural and Paleontological Resources: SCE provided a Resource Summary Table which indicated that cultural resources are present within 100-feet of two of the requested access roads. Monitoring and protection of these resources will be consistent with the Cultural Resources Management Plan (CRMP). High sensitivity paleontological formations are mapped in four of the proposed new work areas or access roads. Monitoring for paleontological resources will be consistent with the approved Paleontological Resources Mitigation and Monitoring Plan (PRMMP).

Fire Hazards: During a CPUC EM field review of this request on August 16, it was noted that some of the proposed overland travel access roads were heavily vegetated, posing a fire risk. According to the CAL FIRE's Fire Hazard Severity Zone in SRA and Local Responsibility Area (LRA) maps for western Riverside County, the proposed Project traverses across and adjacent to areas defined as Very High, High, and Moderate Fire Hazard Severity Zones (FEIR c.9.1.6). Construction activities and use of construction equipment in High to Very High Fire Hazard Severity Zones could trigger fires in the local dry vegetation (FEIR C.9.4.2 Impact Analysis for Impact HAZ-7). However, SCE has committed to implementation of SCE standard fire prevention protocols during construction and to requiring contractors to submit a fire prevention plan to SCE for review and approval. SCE indicates that their standard protocols will include protocols to be implemented when the National Weather Service issues a Red Flag Warning. Further, SCE indicates that the portions of the proposed Project area located within moderate to high fire hazard

areas would be grubbed of vegetation and graded (if necessary) prior to staging construction equipment on the site, further minimizing the potential for vehicles or equipment to start a fire.

Conditions of NTP Approval

The conditions noted below shall be met by SCE and its contractors prior to use of the laydown area:

- 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.
- Copies of all relevant permits, compliance plans, and this MPC #3 shall be made available on site for the duration of construction activities.
- SCE shall provide a copy of the railroad permit allowing use of the access road to Pole 197 prior to construction.
- Vegetated areas approved under this MPC request shall be mowed prior to equipment mobilization and maintained such that the potential for vehicles and equipment starting a fire is minimized or these routes shall be used for walking traffic only. Additionally, crews will have water trucks on site for fire safety and will coordinate with all land owners to ensure that access is appropriate and safe.

Sincerely,

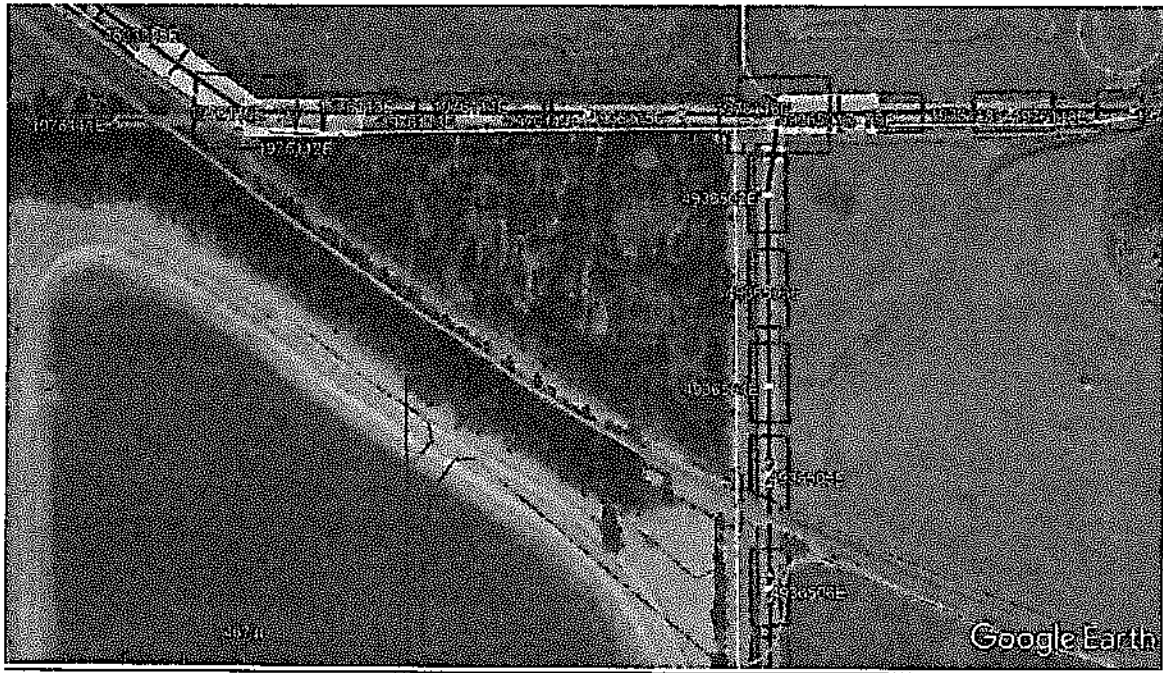


Eric Chiang
CPUC Environmental Project Manager

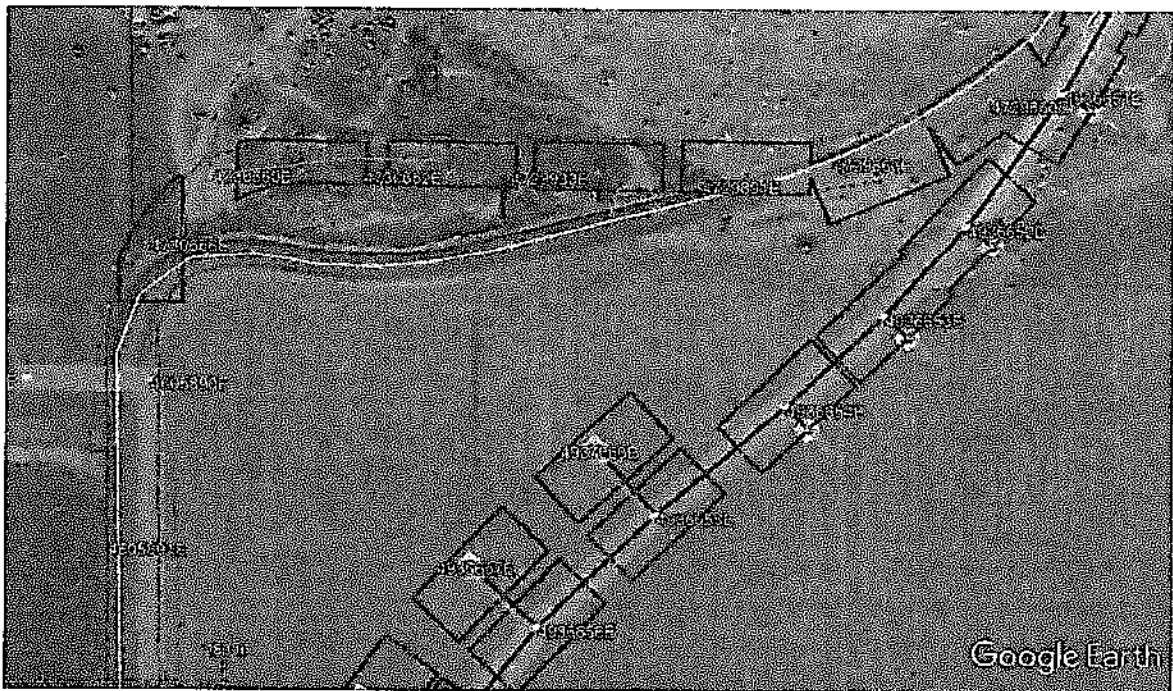
cc: V. Strong, Aspen

Attachment A: Location of Proposed Additional Access and Work Areas

VSSP MPR 3 - Additional access roads and work areas



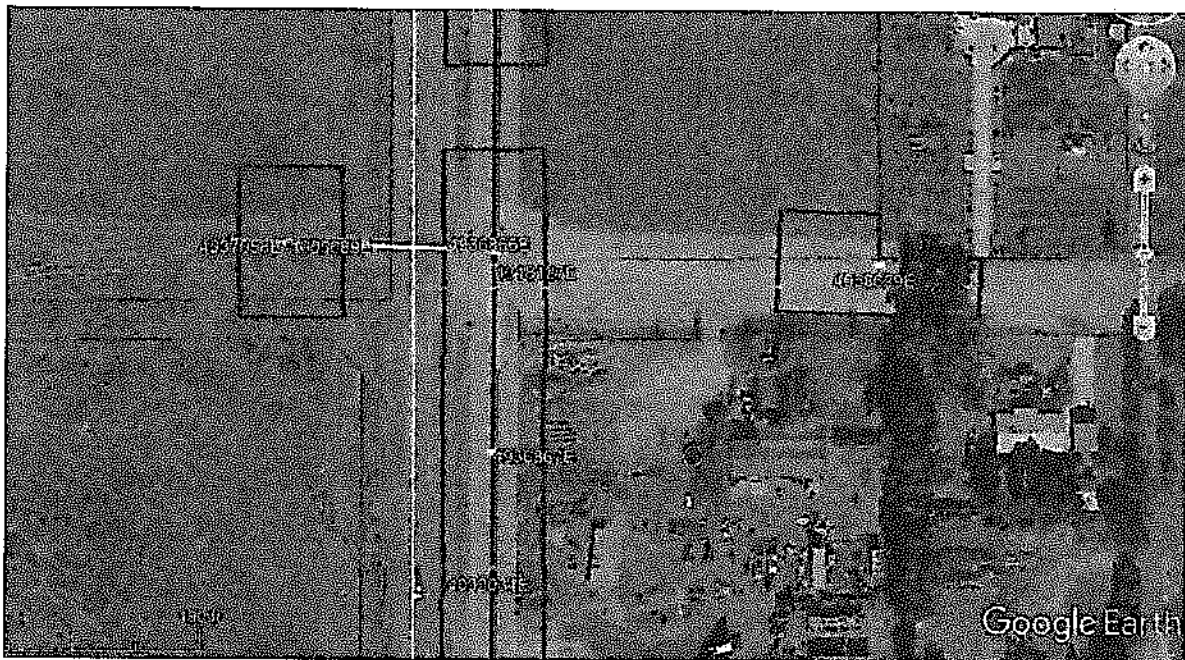
Add access road to 1976111E



Add access roads for 4730660E – 4729933E



Add access road to 2091014E



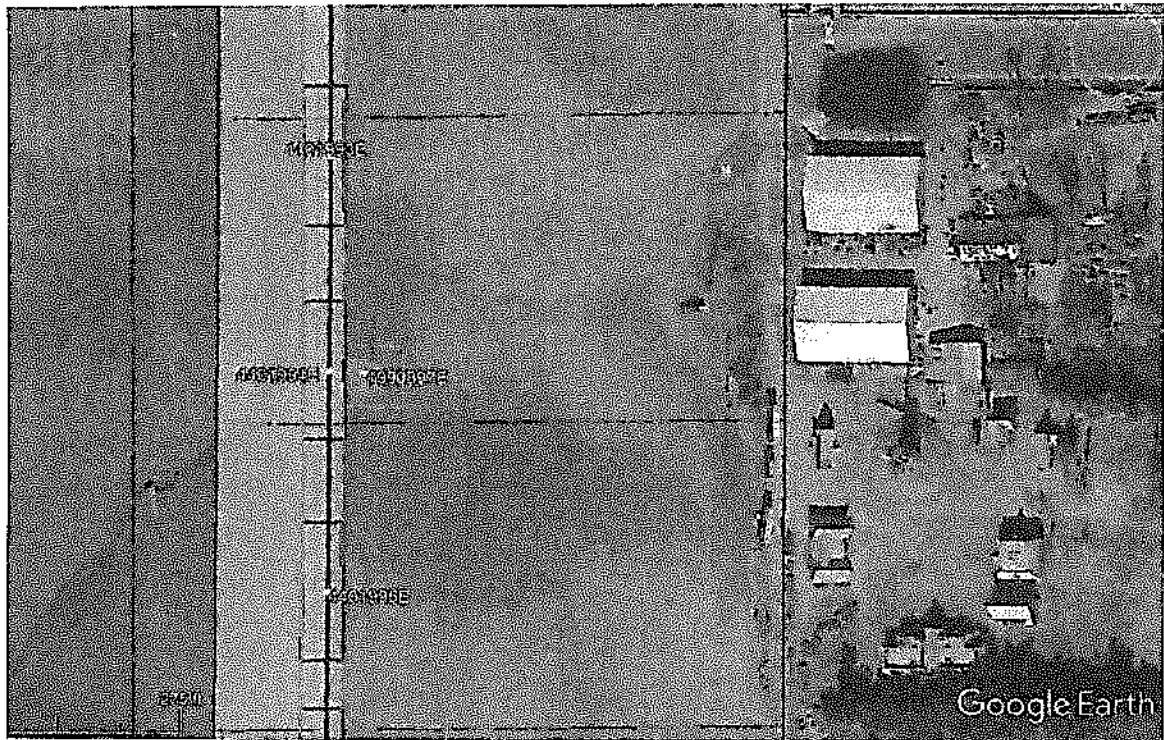
Add access road to 4937058E



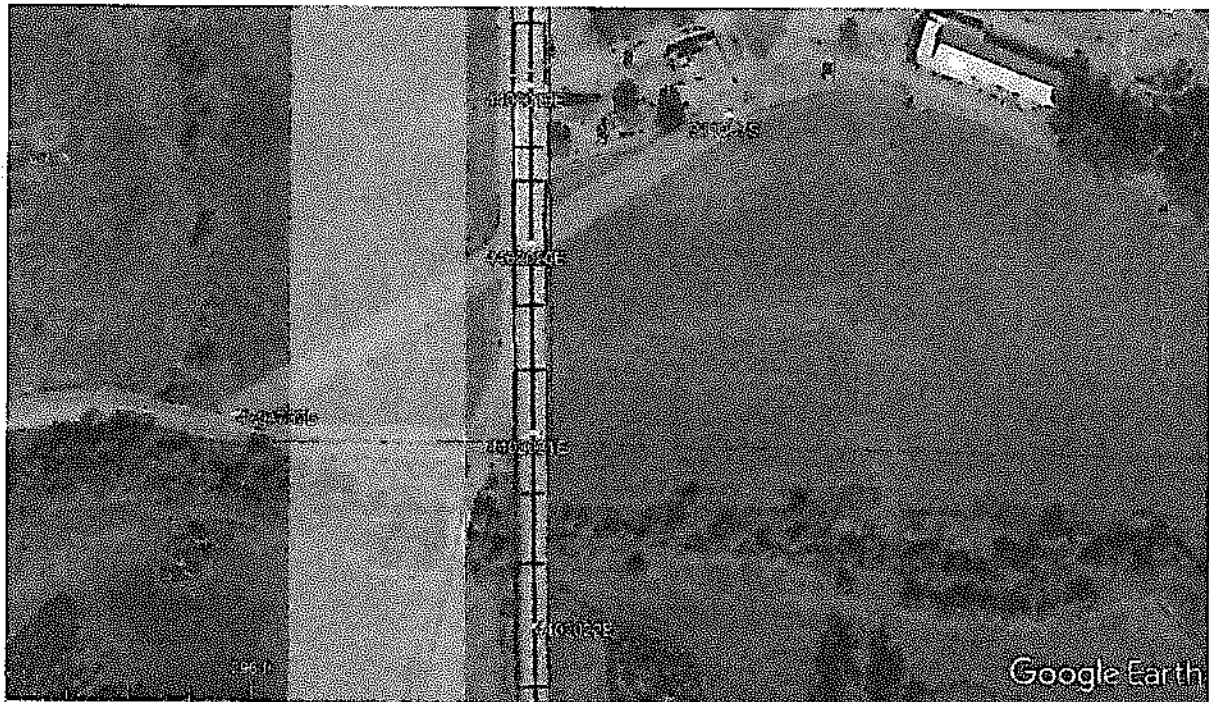
Add access road to 4439130E.



Add access road for 1623623E



Add work area for 1990897E



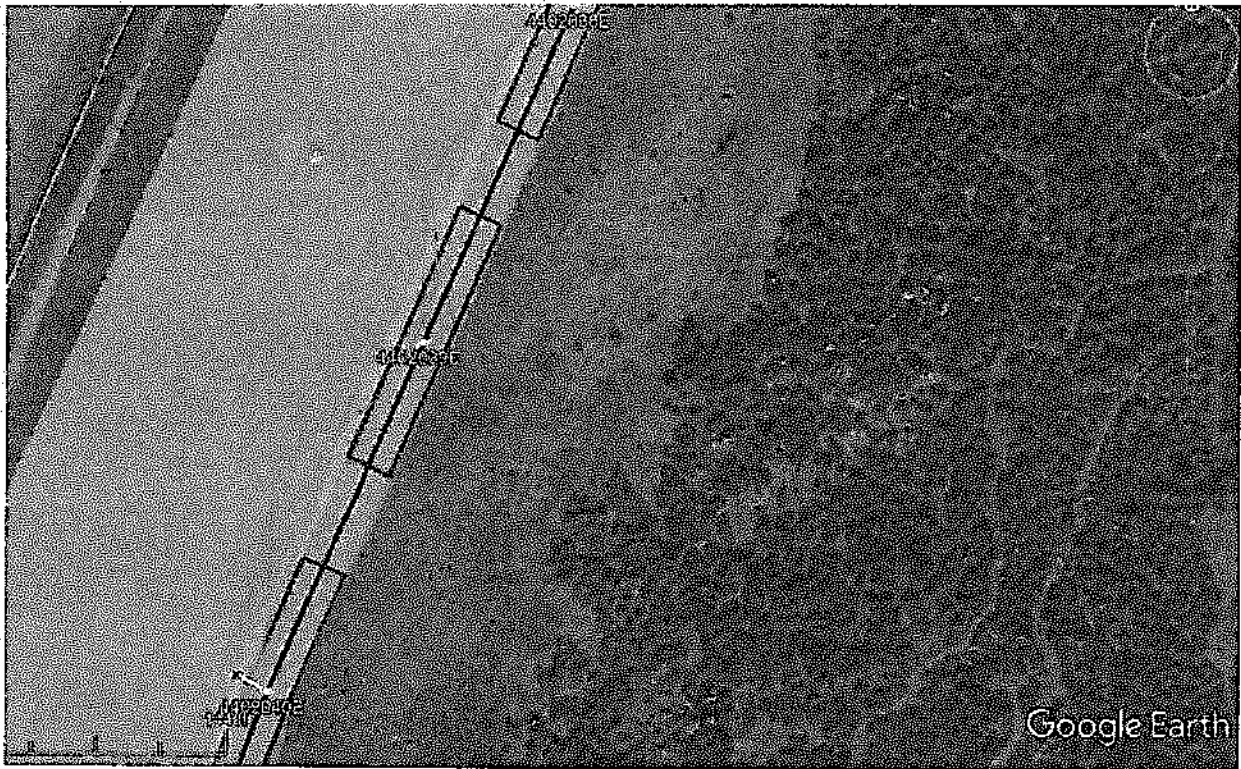
Add work area for 211257S



Add access road for 4402022E



Add access road to 4402022E



Add access road for 4402039E



Extend work areas for 4402048E – 4402052E to road



Add work area for 2014201E and access road to Nicolas Road.