Comment Set D1 – Southern California Edison

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September 13, 2019

Email Only
Ms. Billie Blanchard
California Public Utilities Commission
c/o Aspen Environmental Group
235 Montgomery Street, Suite 640
San Francisco, CA 94104-2920

Re: Southern California Edison's Comments to the Draft Mitigation Negative Declaration on the Eldorado-Lugo-Mohave Series Capacitor Project (A.18-05-007)

Dear Ms. Blanchard,

Thank you for the opportunity to comment on the above referenced Draft MND. The accompanying document contains the comments of Southern California Edison Co. ("SCE") on the Draft Mitigated Negative Declaration ("MND") for the Eldorado-Lugo-Mohave Series Capacitor Project ("Proposed Project").

On behalf of SCE, the proponent of the Proposed Project, SCE appreciates the time and effort of the CPUC and its consultant Aspen Environmental Group in analyzing the Proposed Project and developing the Draft MND.

SCE comments may include proposed revisions to the MND which are shown with underlined text or deletions which are shown with stricken text.

SCE looks forward to the CPUC's preparation of the Final MND and consideration of approval of the Proposed Project. Should you have any questions concerning these comments, please contact me at (626) 302-1164.

Sincerely

Thomas E. Diaz
Regulatory Affairs Senior Advisor
Southern California Edison

cc: (w/enclosure)
Fritts Golden (Aspen)
Selya Arce (SCE)
Rey Gonzales (SCE)
Tammy Jones (SCE)

P.O. Box 800
Rosemead, CA 91770

Comment Set D1 – Southern California Edison (cont.)

#	MND Section	Page No.	Current MND Description	Proposed Revision	Rationale	
1.	1.1	1-1	Maintain system reliability within the Los Angeles Basin as well as the entire California Independent System Operator (CAISO) grid, which is defined as the Electrical Needs Area (ENA).	No change is proposed to this text. Instead, SCE suggests providing a footnote to define "Los Angeles Basin": The Los Angeles Basin, in the context of transmission facilities, consists of SCE-owned 500 kV and 220 kV facilities that serve major metropolitan areas in Orange, Riverside, San Bernardino, Los Angeles, Ventura, and Santa Barbara Counties.	Someone reading "Los Angeles Basin" for the first time may mistakenly assume Los Angeles County or the City of Los Angeles was being referred to. The added definition more fully defines "Los Angeles Basin." This definition is taken from SCE's previously filed Proponents Environmental Assessment (PEA), Chapter 1, Section 1.2 at page 1-3.	D1-1
2.	1.1	1-2	N/A; added additional bullets.	SCE recommends that the following project objectives be added to this section. – Ensure compliance with all applicable reliability planning criteria required by the North American Electric Reliability Corporation, Western Electricity Coordinating Council, and California Independent System Operator (CAISO). – Integrate planned generation resources in order for those facilities to become fully deliverable. – Meet the requirements of existing Interconnection Agreements that require the Proposed Project to achieve FCDS for generation facilities. – Meet Proposed Project needs while minimizing environmental impacts. – Design and construct the Proposed Project in conformance with SCE's approved engineering, design, and construction standards for substation, transmission, subtransmission, and distribution system projects.	These inserted project objectives were missing from the full list of project objectives in Section 1.1 but are fully listed in Chapter 4 at page 4-7. These missing project objectives are also found in SCE's PTC application at page 5 filed in May 2018.	D1-2

Comment Set D1 – Southern California Edison (cont.)

#	MND Section	Page No.	Current MND Description	Proposed Revision	Rationale	
3.	1.3	1-3	Install approximately 2 miles of overhead and 500 feet of underground telecommunications facilities as one path to connect the proposed series capacitors to SCE's existing communication system.	Install approximately 2 miles of overhead and ~~500~~ 700 feet of underground telecommunications facilities as one path to connect the proposed series capacitors to SCE's existing communication system.	Proposed SCE telecommunication design for underground facilities calls for approximately 700 feet.	D1-3
4.	1.3	1-3	Relocating, replacing, or modifying existing transmission, subtransmission, and distribution facilities at approximately 12 locations along the Eldorado-Lugo, Eldorado-Mohave, and Lugo-Mohave 500 kV Transmission Lines to address 14 of the overhead clearance discrepancies. Tower modifications would include raising 9 towers approximately 18.5 feet by inserting new lattice-steel sections in tower bodies.	Relocating, replacing, or modifying existing transmission, subtransmission, and distribution facilities at approximately 12 locations along the Eldorado-Lugo, Eldorado-Mohave, and Lugo-Mohave 500 kV Transmission Lines to address 14 of the overhead clearance discrepancies. Tower modifications would include raising 9 towers up to approximately 18.5 feet by inserting new lattice-steel sections in tower bodies.	Suggested edits were made to indicate there may be varying tower height modifications.	D1-4
5.	1.3	1-3	Install approximately 235 miles of optical ground wire (OPGW) (approximately 59 miles on the Eldorado- Mohave Transmission Line and approximately 173 miles on the Lugo-Mohave Transmission Line, including approximately 3 miles of underground telecommunications facilities in the vicinity of the Mohave Substation).	Install approximately ~~235~~ 232 miles of optical ground wire (OPGW) (approximately 59 miles on the Eldorado- Mohave Transmission Line and approximately 173 miles on the Lugo-Mohave Transmission Line, and ~~including~~ approximately 3 miles of underground telecommunications facilities in the vicinity of the Mohave Substation).	The 3 miles of underground telecommunication facilities are not OPGW and will be installed in an underground duct bank system.	D1-5
6.	3.1	3-1	Transmission Lines to address 14 of the overhead clearance discrepancies. Tower modifications would include raising 9 towers approximately 18.5 feet by inserting new lattice-steel sections in tower bodies	Transmission Lines to address 14 of the overhead clearance discrepancies. Tower modifications would include raising 9 towers up to approximately 18.5 feet by inserting new lattice-steel sections in tower bodies	Suggested edits were made to indicate there may be varying tower height modifications.	D1-6

Comment Set D1 – Southern California Edison (cont.)

#	MND Section	Page No.	Current MND Description	Proposed Revision	Rationale	
7.	4.1.8	4-2	Relocating, replacing, or modifying existing transmission, subtransmission, and distribution facilities at approximately 12 locations along the Eldorado-Lugo, Eldorado-Mohave, and Lugo-Mohave 500 kV Transmission Lines to address 14 of the overhead clearance discrepancies. Tower modifications would include raising 9 towers approximately 18.5 feet by inserting new lattice-steel sections in tower bodies.	Relocating, replacing, or modifying existing transmission, subtransmission, and distribution facilities at approximately 12 locations along the Eldorado-Lugo, Eldorado-Mohave, and Lugo-Mohave 500 kV Transmission Lines to address 14 of the overhead clearance discrepancies. Tower modifications would include raising 9 towers <u>up to</u> approximately 18.5 feet by inserting new lattice-steel sections in tower bodies.	Suggested edits were made to indicate there may be varying tower height modifications.	D1-7
8.	4.5.1.4	4-15	Install 3 fiber optic repeater facilities in the existing Lugo-Mohave 500 kV Transmission Line ROW. Two of these facilities would be within chain-link-fenced areas measuring approximately 70 feet by 35 feet, and one facility would be within a fenced area measuring approximately 101 feet by 57 feet. Access to Kelbaker and Lanfair repeater sites would be by way of approximately 80 -foot long new access road. (Figure 4-2, Sheets 2, 5, and 7; and Figures 4-6, 4-7, and 4-8) The repeater facilities would consist of: – Pre-fabricated building – Communication manhole – Distribution manhole – Emergency generator – Aboveground propane fuel tank surrounded by a block wall – Underground telecommunications facilities – Access road from existing transmission line access road to repeater site (at Kelbaker and Lanfair only)	Install 3 fiber optic repeater facilities in the existing Lugo-Mohave 500 kV Transmission Line ROW. Two of these facilities would be within chain-link-fenced areas measuring approximately 70 feet by 35 feet, and one facility would be within a fenced area measuring approximately 101 feet by 57 feet. Access to Kelbaker and Lanfair repeater sites would be by way of approximately 80 -foot long new access road. (Figure 4-2, Sheets 2, 5, and 7; and Figures 4-6, 4-7, and 4-8) The repeater facilities would consist of: – Pre-fabricated building – Communication manhole – Distribution manhole – Emergency generator – Aboveground propane fuel tank surrounded by a block wall – Underground telecommunications facilities – Access road from existing transmission line access road to repeater site ~~(at Kelbaker and Lanfair only)~~	There is a slight extension of access road at the Barstow repeater site as well. Suggested edits would not limit the access road description to just the Kelbaker and Lanfair repeater sites.	D1-8

Comment Set D1 – Southern California Edison (cont.)

#	MND Section	Page No.	Current MND Description	Proposed Revision	Rationale	
9.	4.7.7	4-47	Land disturbance includes all areas affected by construction of the Proposed Project. Approximately 378.1 acres of land would be disturbed. Total permanent land disturbance for the Proposed Project would be approximately 7.0 acres. The balance of the land disturbed by project activities (371.1 acres) includes 125.5 acres of previously disturbed land and 245.6 acres of undisturbed land that would be restored after construction. The estimated amount of land disturbance for each Proposed Project component is summarized in Table 4-15, Proposed Project Estimated Land Disturbance.	Land disturbance includes all areas affected by construction of the Proposed Project. Approximately ~~378.1~~ 380.4 acres of land would be disturbed. Total permanent land disturbance for the Proposed Project would be approximately 7.0 acres. The balance of the land disturbed by project activities (~~371.1~~ 373.5 acres) includes ~~125.5~~ 126.2 acres of previously disturbed land and ~~245.6~~ 247.3 acres of undisturbed land that would be restored after construction. The estimated amount of land disturbance for each Proposed Project component is summarized in Table 4-15, Proposed Project Estimated Land Disturbance.	Revised disturbance amounts reflect design changes to address tribal concerns expressed during recent on-site visits with Native American tribes, CPUC and BLM.	D1-9
10.	4.7.7 Table 4-15	4-49	See Table 4-15, Proposed Project Estimated Land Disturbance.	For a detailed summary of the land disturbance acreage totals revised in #9 directly above, please see Attachment 1: Table 4-15, Proposed Project Estimated Land Disturbance.	Revised disturbance amounts reflect design changes to address tribal concerns expressed during recent on-site visits with Native American tribes, CPUC and BLM.	D1-10
11.	5.3 MM AQ-1	5-59	Prepare and implement a Dust Control Plan. SCE shall avoid visible fugitive dust emissions by implementing the following dust control measures derived from MDAQMD Rule 403.2. Prior to commencing earth-moving activity, SCE shall prepare and submit to the MDAQMD, Clark County DAQ, CPUC, BLM and NPS a Dust Control Plan that describes all dust control measures that will be implemented for the project, including, but not limited to:	Prepare and implement a Dust Control Plan. SCE shall ~~avoid~~ minimize visible fugitive dust emissions by implementing the following dust control measures derived from MDAQMD Rule 403.2. Prior to commencing earth-moving activity, SCE shall prepare and submit to the MDAQMD, Clark County DAQ, CPUC, BLM and NPS a Dust Control Plan that describes all dust control measures that will be implemented for the project, including, but not limited to:	Suggested edit is consistent with purpose of mitigation measure to reduce impacts to less than significant as it would be impossible to avoid all visible emissions.	D1-11
12.	5.4.1	5-67	An additional nine special-status wildlife species were not observed in surveys but are likely to occur within or immediately adjacent to the Proposed Project footprint. Summary descriptions	An additional ~~nine~~ eleven special-status wildlife species were not observed in surveys but are likely to occur within or immediately adjacent to the Proposed Project footprint. Summary	Revised to match the number and description of species.	D1-12

Comment Set D1 – Southern California Edison (cont.)

#	MND Section	Page No.	Current MND Description	Proposed Revision	Rationale	
			of each of the following species are presented in MND Appendix D: - Banded Gila monster - Desert rosy boa - Mojave fringe-toed lizard - Loggerhead shrike - Bendire's thrasher - Golden eagle - Western burrowing owl - Pallid bat - American badger - Desert kit fox	descriptions of each of the following species are presented in MND Appendix D: - Banded Gila monster - Desert rosy boa - Mojave fringe-toed lizard - Loggerhead shrike - Bendire's thrasher - Golden eagle - Western burrowing owl - Pallid bat - American badger - Ringtail - Desert kit fox		D1-12 cont.
13.	5.7	5-159	b. Result in substantial soil erosion or the loss of topsoil?	Uncheck the Less Than Significant Impact box.	Only the Less than Significant with Mitigation box should be checked. See highlighted area in table below.	D1-13
14.	5.7	5-159	e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water?	Uncheck the Less Than Significant Impact box and check the No Impact box.	The No Impact box should be checked. See highlighted areas in table below.	D1-14

Comment Set D1 – Southern California Edison (cont.)

D1-15

#	MND Section	Page No.	Current MND Description	Proposed Revision	Rationale
			5.7 Geology and Soils		
15.	5.7	5-188	LESS THAN SIGNIFICANT. Proposed Project operation and maintenance activities would be incorporated into the existing Operation and Maintenance schedule for the existing transmission lines, substations, and associated facilities. Operation and Maintenance of the Proposed Project would not involve the use of a septic tank or alternative wastewater disposal system, as Operation and Maintenance of the	NO IMPACT. ~~LESS THAN SIGNIFICANT.~~ Proposed Project operation and maintenance activities would be incorporated into the existing Operation and Maintenance schedule for the existing transmission lines, substations, and associated facilities. Operation and Maintenance of the Proposed Project would not involve the use of a septic tank or alternative wastewater disposal system, as Operation and Maintenance of the	Summary heading revised to match conclusions in this paragraph.

GEOLOGY AND SOILS Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b. Result in substantial soil erosion or the loss of topsoil?	☐	☒	☒	☐
c. Be located on geologic units or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in the 2016 California Building Code (CBC),[1] creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☒	☐
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

Comment Set D1 – Southern California Edison (cont.)

#	MND Section	Page No.	Current MND Description	Proposed Revision	Rationale	
			Proposed Project is not anticipated to generate wastewater (SCE, 2018). As a result, no impact would occur.	Proposed Project is not anticipated to generate wastewater (SCE, 2018). As a result, no impact would occur.		D1-15 cont.

Comment Set D1 – Southern California Edison (cont.)

Table 4-15. Proposed Project Estimated Land Disturbance

Proposed Project Feature	Quantity	Total Approximate Area Disturbed during Construction (acres)	Approximate Area Previously Disturbed (acres)	Approximate Area to be Restored (acres)	Approximate Area Permanently Disturbed (acres)
Mid-Line Series Capacitors					
Newberry Springs Series Capacitor	1	3.8	0.0	0.6	3.2
Ludlow Series Capacitor	1	4.0	0.0	1.5	2.5
Total Estimate for Mid-Line Series Capacitors		7.7	0.0	2.1	5.6
Transmission					
Guard Structures	92	7.4	0.0	7.4	0.0
Pull and Tension Sites	198	~~58.3~~ 58.1	0.0	~~58.1~~ 57.9	0.2
Discrepancy Work Areas	14	3.6	3.5	0.1	0.0
OPGW/Tower Work	92	20.8	20.6	0.2	0.0
Total Estimated for Transmission		~~90.2~~ 89.9	24.1	~~65.9~~ 65.6	0.2
Subtransmission					
Discrepancy Work Area	1	1.7	0.0	1.7	0.0
Total Estimated for Subtransmission		1.7	0.0	1.7	0.0
Distribution					
Mid-Line Series Capacitor Work Areas (includes Joint Distribution/ Telecommunications Route between Capacitors)	4	~~21.2~~ 20.8	0.0	~~21.2~~ 20.8	0.0
Fiber Optic Repeater Work Areas	3	2.7	0.0	2.7	0.0
Infraction Work Area	1	0.1	0.0	0.1	0.0
Total Estimated for Distribution		~~23.9~~ 23.6	0.0	~~23.9~~ 23.6	0.0
Telecommunications					
Fiber Optic Repeaters	3	0.2	0.0	0.0	0.2
Telecommunications Work Areas (Mohave Substation, Mid-Line Series Capacitors, Fiber Optic Repeaters, and Pull and Tension Sites)	38	32.0	0.9	31.1	0.0
Total Estimated for Telecommunications		32.2	0.9	31.1	0.2
Substations					
Lugo Substation	1	~~22.9~~ 23.0	~~22.9~~ 23.0	0.0	0.0
Mohave Substation	1	21.5	21.5	0.0	0.0
Eldorado Substation	1	11.0	11.0	0.0	0.0
McCullough Substation	5	0.4	0.4	0.0	0.0
Total Estimated for Substations[1]		~~55.8~~ 55.9	~~55.8~~ 55.9	0.0	0.0

D1-16

Comment Set D1 – Southern California Edison (cont.)

Table 4-15. Proposed Project Estimated Land Disturbance

Staging Areas					
Staging Areas	17	~~98.3~~ 99.5	34.4	~~63.9~~ 65.1	0.0
Landing Zones	201	~~50.0~~ 51.4	~~0.1~~ 0.7	~~49.9~~ 50.7	0.0
Parking Areas	4	15.5	9.8	5.7	0.0
Total Estimated for Staging Areas		~~163.8~~ 166.4	~~44.3~~ 45.0	~~119.4~~ 121.4	0.0
Access Roads and/or Spur Roads					
Access Roads and/or Spur Roads	11	1.4	0.3	0.2	0.9
Footpaths	40	1.6	0.0	1.6	0.0
Total Area Estimated for Access Roads and/or Spur Roads and Footpaths		3.0	0.3	1.8	0.9
Total Estimated for Proposed Project		~~378.1~~ 380.4	~~125.5~~ 126.2	~~245.6~~ 247.3	7.0

D1-16 cont.