

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 1, 2020

Michael Bass
Environmental Project Manager
Southern California Edison
2244 Walnut Grove Avenue
Rosemead, CA 91770

RE: Valley-Ivyglen 115kV Subtransmission Project (VIG) – Minor Project Refinement No. 6 Request: Notice to Proceed- (NTP-) 1 Supplemental Work Areas at multiple locations throughout Segments VIG1 and VIG2

Dear Mr. Bass,

On October 28, 2020, Southern California Edison (SCE) submitted Minor Project Refinement (MPR) No. 6 Request to the California Public Utilities Commission (CPUC) for review. The proposed MPR would involve additional work areas and land disturbances that were not included in NTPR-1 but are necessary to construct the Project work described in Section 2.3.1.1 of the Final Environmental Impact Report (FEIR). The proposed work areas are within the general disturbance area of the VIG Project, except as noted in Table 2-5 of the FEIR as being necessary to construct the Project components. The primary activities to be conducted at the proposed work areas would include installation of wood poles, guy anchors, conductor, fiber optic, and the transfer of distribution conductor from existing poles to the new 115-kV structures. Furthermore, site preparation activities would include vegetation clearing, improvement/ construction of access roads and work areas, and installation of Stormwater Pollution Prevention Plan (SWPPP) best management practices (BMPs).

Additional Work Areas within General Disturbance Areas:

The proposed additional work areas would encompass 0.51 acres in Segments VIG1 and VIG2. The locations, dimensions, and activities to occur at each site are provided in Table 1 and are virtually shown in the biological resources maps (see Attachment A).

Table 1: VIG1 and VIG2 Additionally Requested Work Areas

Segment	Pole / Feature Name	Nearest Structure	Latitude	Longitude	Description	Activity
VIG1	Anchor Site	087E	33.73666	-117.22043	406 square feet of temporary work area for installation of a guy anchor for 087E.	Installation of guy anchor for stability of 087E.
VIG1	Access Road	118E	N/A	N/A	124-foot Level 5 access road directly south of 118E. 2,735 square feet of permanent	Improvement of road for future SCE maintenance.

					disturbance and 1,520 square feet of temporary disturbance.	
VIG1	Access Road	129E	N/A	N/A	60 square feet of permanent disturbance and 818 square feet of temporary disturbance for the expansion of the Level 5 access road outside the northwest side of the work area for 129E.	Improvement of road for future SCE maintenance.
VIG1	Access Road	131E	N/A	N/A	466 square feet of permanent disturbance and 1,025 square feet of temporary disturbance for the expansion of the Level 5 access road outside the north side of the work area for 131E.	Improvement of road for future SCE maintenance.
VIG1	Access Road	147E - 148E	N/A	N/A	254 feet of Level 5 access road from the western edge of the 147E work area to the west and south of 148E. 3,750 square feet of permanent disturbance and 1,301 square feet of temporary disturbance.	Improvement of road for future SCE maintenance.
VIG1	Access Road	151E	N/A	N/A	77-foot Level 5 access road directly south of 151E. 2,060 square feet of permanent disturbance and 527 square feet of temporary disturbance.	Improvement of road for future SCE maintenance.
VIG2	Work Area	188E	N/A	N/A	380 square feet of additional work area on the north side of 188E to accommodate a guy anchor.	Work area for the installation of a guy anchor to provide structural support for 188E.
VIG2	Anchor Site	188E	33.73188	-117.29038	Located outside of the general disturbance area. 290 feet west of 188E. 335 square feet of temporary work area for installation of a guy anchor south of 4060748E.	Installation of guy anchor for stability of 188E.
VIG2	211672S	214E	33.71981	-117.29713	Located outside of the general disturbance area. 227 feet west of 214E. 1,512 square feet of temporary work area for an existing wood pole and guy anchor.	Modification of an existing wood pole.
VIG2	4765608E	224E	33.71661	-117.29936	120 feet southeast of 224E. 3.14 square feet of permanent disturbance and 2,753 square feet of temporary work area for installation of a wood pole, guy wire, and anchor.	Installation of a guy stub pole and anchor to support 224E.
VIG2	Anchor Site	226E	33.71634	-117.30087	344 square feet of temporary work area for installation of a guy anchor for 226E.	Installation of guy anchor for stability of 226E.
VIG2	Access Road	236E	N/A	N/A	The Level 2/5 access road west of 236E approved in NTP-2 would be replaced with a 150-foot long Level 5 road originating within the work area of 235E and extending to the west of 236E. The proposed change would result in a net increase of 1,627 square feet of permanent disturbance and a net decrease of 4,941 square feet of temporary disturbance.	Improvement of road for future SCE maintenance.
VIG2	264428S	236E	33.71478	-117.30565	100 feet northwest of 236E. 1,420 square feet of temporary disturbance for an existing wood pole and guy anchor.	Modification of an existing wood pole.
VIG2	Access Road	236E	N/A	N/A	74 feet of Level 0 access from the work area of 236E to the work area for 264428S.	Access to the work area of 264428S.

VIG2	Anchor Site	236E	33.71444	-117.30573	95 feet southwest of 236E. 508 square feet of temporary work area for installation of a guy anchor for 4920595E.	Installation of guy anchor for stability of 4920595E.
VIG2	Access Road	236E	N/A	N/A	156 feet of Level 1 access road from the driveway located west of 236E to the western edge of the work area for 236E.	Access to 4920596E.
VIG2	4648631E	241E	33.71308	-117.30922	Located outside of the general disturbance area. 280 feet west of 241E. 3,315 square feet of additional temporary work area for 4648631E. Work area would increase from 35'X35', as approved in MPR No. 02, to 100'X50'.	Distribution conductor from this pole to 241E would be replaced to match the diameter of the conductor at 241E. The conductor size increase necessitates an increase in pole size for 4648631E. The larger work area is necessary for the pole change.
VIG2	Access Road	245E	N/A	N/A	500 feet of Level 1 access road for overland travel from Hwy 74 (near 245E) to the west side of the work area for 4648631E.	Access to 4648631E.

The Valley-Ivyglen Subtransmission Line Project was evaluated in accordance with the California Environmental Quality Act (CEQA), and an Environmental Impact Report (EIR) was prepared by the CPUC. The CPUC issued a Permit to Construct the Project on April 2, 2013 (Decision 10-08-009). The mitigation measures (MMs) and project commitments (PCs) described in the EIR were adopted by the CPUC as conditions of Project approval. In May 2020 the CPUC adopted the Mitigation Monitoring, Compliance, and Reporting Plan (MMCRP) to ensure compliance with all PCs and MMs during project implementation.

This letter documents the CPUC's evaluation of all activities covered in the MPR No. 6 Request. The CPUC has carefully reviewed this MPR request and has verified that the proposed activities adhere to all applicable PCs and MM requirements. The evaluation process ensures that all PCs and MMs applicable to the location, and all 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:

- The proposed change does not trigger additional discretionary permit requirements that are not defined in the EIR or MMCRP.
- The proposed change does not increase the severity of an impact or create a new impact, based on the thresholds used in the EIR.
- The proposed change is within the geographic scope of the study area utilized in the EIR.
- The proposed change does not conflict with any PC or MM, and the refinements 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 EIR.

The CPUC has determined that MPR No. 6 meets the above criteria. MPR No. 6 is approved by the CPUC for the proposed activities based on the factors described below.

CPUC Evaluation of MPR No. 6 Request

The CPUC evaluated SCE's MPR Request No. 6 to verify that they fulfill the requirements of the MMCRP. In accordance with the MMCRP, the CPUC reviewed the request to confirm that

no new impacts on sensitive resources, or increases in impact severity, would result from the requested MPR activities. The following discussion summarizes this analysis for biological, cultural, paleontological, aesthetics and visual resources, as well as other environmental resources.

Location of Ground Disturbance Areas

MPR No. 6 activities would occur at several locations, work areas, or portions of work areas, throughout Segments VIG1 and VIG2. The temporary and permanent disturbance areas associated with MPR No. 6 are shown in Table 2. The quantity and dimensions of MPR No. 6 disturbance areas are consistent with what is described in Table 2-5 of the FEIR. Section 2.4.2.1 of the FEIR, which states that construction of VIG would disturb approximately 633.7 acres of land, including approximately 141.5 acres of permanent disturbance. Total impacts for all VIG NTPRs/MPRs are anticipated to be below the quantities given in the FEIR. If quantities in future NTPRs/MPRs exceed the FEIR, an explanation of significance will be provided.

Table 2: Disturbances Associated with MPR No. 6

Feature	Number of Miles	Temporary Impact Total	Permanent Impact Total
Level 0 Road Improvement	0.01	--	--
Level 1 Road Improvement	0.12	--	--
Level 5 Road Improvement	0.10	0.006 ac (250 sq ft)	0.25 ac (10,698 sq ft)
Temporary Work Areas	--	0.25 ac (10,973 sq ft)	--
Light-Weight Steel (LWS) Pole / Wood Pole, New	--	--	0.00007 (3.14 sq ft)
Total	0.23 miles	0.26 ac (11,223 sq ft)	0.25 ac (10,701 sq ft)

Aesthetics/Visual Impacts

The proposed additional work areas and the work to be conducted are consistent with the descriptions of structures to be installed and disturbances to occur during construction provided in Sections 2.3.1.1, 2.3.1.3, and Table 2-5 of the FEIR.

Aesthetic impacts associated with work under MPR No. 6 would not create a new significant impact or a substantial increase in the severity of a previously identified impact identified in Section 4.1.4.2 of the FEIR. Additionally, all applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

Biological, Cultural, Paleontological Resources, and other Environmental Resources

The proposed work areas were included in previous biological surveys for the FEIR, as described in the biological report (Attachment A). Furthermore, the work areas do not overlap with wetlands or waterways; no amendments to the water permits would be needed.

Several proposed work areas are within Riversidean sage scrub (RSS)/disturbed Riversidean sage scrub, including the access roads at 129E, 131E, 151E, and work areas at 188E, and 224E. In accordance with MM BR-5, removal of Riversidean sage scrub habitat would not occur during the coastal California gnatcatcher breeding season.

Following the completion of all construction, the temporary work areas would be restored/reclaimed in accordance with the Project SWPPPs, Project Commitment D¹, and the

¹ The applicant shall develop a Habitat Restoration and Revegetation Plan to address ground disturbance in all project areas. Per MM BR-7, the Habitat Restoration and Revegetation Plan shall detail topsoil segregation and conservation methodology; restoration of special status plant species habitat; vegetation removal and revegetation methods, including seed mixes, rates, and transplants, criteria to monitor and evaluate

VIG Habitat Restoration and Revegetation Plan (HRRP).

The activities described in MPR No. 6 would not create a new significant impact or a substantial increase in the severity of an identified impact listed in Section 4.4.4.2 of the FEIR. Indirect impacts that may occur to sensitive species in the vicinity of the proposed work areas would be mitigated in accordance with the Project Commitments and Mitigation Measures.

The proposed features were not included in the application for the WR-MSHCP Phase 1 certificate of inclusion (COI), except for the Level 1 access road southwest of 236E. However, based on the guidance provided by the RCA, the use of these work areas does not require notification to the RCA because the disturbances would not pose a significant impact to sensitive vegetation of concern (Table 3). All temporary impacts to vegetation will be restored in accordance with the HRRP.

Table 3. Permanent Impacts to MSHCP Baseline Grasslands in Segments VIG1 and VIG2

MSHCP PSE Application	0.0012 Acres
Currently Proposed Impacts	0.0000 Acres
Proposed Grassland Impacts	0.0000 Acres

MPR No. 6 proposed work areas are covered under the Stephens' kangaroo rat (SKR) Habitat Conservation Plan. Although 0.49 Acres of the proposed refinements are outside of the SKR buffer depicted in the Certificate of Inclusion, the Riverside County Habitat Conservation Agency has agreed that SCE may reconcile impacted acreage once the Project has reached final design. SCE will be responsible for identifying acreage not previously included in the COI (such as the acreage proposed here) as well as removing acreage that was included in the COI but not disturbed by construction activities.

Furthermore, all applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

The proposed work areas were surveyed and analyzed in the cultural and paleontological resources addendum reports (Attachments B and C respectively). The survey results indicate that there are no new sensitive archaeological or paleontological resources located at the proposed work areas. Cultural and tribal monitoring would be conducted in accordance with the Cultural Resources Monitoring and Treatment Plan (CRMTP). Paleontological monitoring, spot checking, and fossil recovery would be implemented for excavations at the proposed work areas in accordance with the Project's Paleontological Resource Monitoring Plan (PRMP). If a resource is found at the site, SCE would comply with the procedures for unanticipated discoveries provided in MMs CR-1b, CR-4, CR-5, CR-7, the CRMTP, and the PRMP. Impacts to cultural resources associated with this refinement would not create a new significant impact or a substantial increase in the severity of a previously identified impact identified in the FEIR (Attachment B, Cultural Resources Report and Attachment C, Paleontological Resources Report). All applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

revegetation success, and alternative restoration and revegetation methods in the event that the revegetation success criteria are not initially reached.

MPR No. 6 work activities occurring at the proposed locations and the types of equipment used are consistent with the activities described in Sections 2.3.1.1 and 2.3.1.3 of the FEIR. Implementation of the Project Noise Control Plan would ensure noise reduction measures are performed as required. Blasting activities are not anticipated during access road construction, site preparations, excavation work as described in the VIG FEIR Section 2.4.5.4. If blasting or fracturing is needed, a blasting plan would be submitted for CPUC review and approval in accordance with MMs WQ-1 and NV-2. Blasting would only be used in areas where subsurface obstructions reasonably preclude excavation using conventional construction equipment. Therefore, impacts to noise and vibration associated with work under MPR No. 6 would not create a new significant impact or a substantial increase in the severity of a previously identified impact identified in Section 4.11.4.2 of the FEIR. Additionally, all applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

Work activities occurring at the proposed locations and the types of equipment used are consistent with the activities described in Sections 2.3.1.1 and 2.3.1.3 of the FEIR. The type and quantity of construction equipment would be the same as identified in NTP-1; the areas requested would not require the use of additional equipment. In compliance with MM AQ-1, nitrogen oxide (NOx) and particulate matter (PM) emissions from off-road diesel-powered construction equipment would be minimized to the extent feasible by using Tier 4 interim or Tier 4 Standards for equipment with engines greater than 150 horsepower. Per MM AQ-2, daily emissions of equipment would be tracked to ensure NOx emissions stay within the NOx Regional Clean Air Incentive Market Trading Credits (RTCs) purchased for the Project.

Impacts to greenhouse gas emissions associated with MPR No. 6 would not create a new significant impact or a substantial increase in the severity of a previously identified impact identified in Section 4.7.4.2 FEIR. All applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

All proposed locations under MPR No. 6 are within the 1,000-foot corridor evaluated for solid waste disposal sites, Cease and Desist Orders, or Cleanup and Abatement orders per Section 4.8.1.1 of the FEIR. Planned ground-disturbing activities includes excavating, including drilling of holes for light-weight steel (LWS) pole installation. In the event of an inadvertent discovery, SCE would follow the procedures in Project's Contaminated Soil and Groundwater Contingency Plan. Proposed work areas in MPR No. 6 are located within a Very High Fire Hazard Zone. Fire danger mitigation would be implemented in accordance with the Project Emergency Action Plan and Fire Control and Emergency Response Plan. Impacts to hazards and hazardous materials associated with this refinement would not create a new significant impact or a substantial increase in the severity of a previously identified impact identified in Section 4.8.4.2 of the FEIR.

Furthermore, the quantity of construction equipment and personnel would be the same as identified in NTP-1. Adherence to the Project Traffic Management and Control Plan would ensure compliance with traffic-related Project mitigation measures, TT-1, TT-2, and TT-7. There would be no change to the access routes identified in the Traffic Management and Control Plan. Impacts to transportation and traffic associated with this refinement would not create a new significant impact or a substantial increase in the severity of a previously identified impact identified in Section 4.15.4.2 of the FEIR. In addition, all applicable avoidance/minimization

measures identified in FEIR Chapter 9 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

Permits

No additional permits or approvals are required for MPR No. 6 activities.

MPR No. 6 Conditions of Approval

MPR No. 6 is approved by the CPUC with conditions. The conditions presented below shall be met by SCE and its contractors:

1. All applicable Project MMs, PCs, 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.
2. Copies of all relevant permits, compliance plans, and this MPR, shall be available on site for the duration of construction activities.
3. SCE shall implement all appropriate erosion and sediment control best management practices (BMPs) for the MPR No. 6 additional disturbance areas, in compliance with 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.
4. All activities (e.g., stabilizing construction entrance/ ground surface, fence installation, etc.) shall be monitored by CPUC-approved monitors in accordance with the MMCRP, where appropriate.
5. In the event that MPR No. 6 activities require additional road improvement/ design, or vegetation clearing/ grubbing, SCE shall meet and confer with appropriate agencies and/or local jurisdictions as needed and notify the CPUC for concurrence and approval.
6. SCE shall ensure that construction equipment at the proposed locations will have adequate and properly placed secondary containment to avoid and minimize potential spills.
7. The work associated with MPR No. 6 shall occur within approved project workdays and hours. In the event that MPR No. 6 scheduling necessitates work outside of the hours permitted under local noise ordinances, SCE shall meet and confer with the local jurisdictions as needed and notify the CPUC for concurrence.
8. SCE and its contractors shall adhere to the WR-MSHCP terms and conditions, including but not limited to adherence to the Project Habitat Restoration and Revegetation Plan, adherence to the SWPPP, performance of preconstruction surveys for burrowing owls, and the use of biological monitors to record compliance with work area boundaries and compliance with the avoidance of environmentally sensitive areas (ESAs).
9. All complaints related to MPR No. 6 activities received by SCE shall be logged and reported immediately to the CPUC. This includes complaints relevant to traffic, as well as lighting, noise, vibration, dust, etc. Where feasible, complaints shall be resolved, depending on the nature of the complaint, through construction site or activity modifications. Complaints or disputes that cannot be modified through construction site or activity modifications shall be resolved through the dispute resolution communications processes described in the MMCRP.
10. SCE shall notify CPUC after completing MPR No. 6 work activities including use of access roads and temporary work areas, and provide photos of the restored additional work

disturbance areas. In addition, in the event that new disturbance is foreseen, for maintenance or other activities, SCE shall notify CPUC for evaluation and approval.

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

Sincerely,

A handwritten signature in blue ink that reads "Patricia A. Kelly". The signature is written in a cursive style with a large initial "P".

Patricia Kelly
CPUC Project Manager

cc:

Chuck Cleaves, E & E Compliance Manager
Fernando Guzman, E & E Deputy Compliance Manager
Marcus Obregon, SCE Environmental Project Manager

**Attachment A:
MPR No. 6 Biological Resources Report**

Attachment B:
MPR No. 6 Cultural Resources Report

Attachment C:
MPR No. 6 Paleontological Resources Report