STATE OF CALIFORNIA
GAVIN NEWSOM, *Governor*

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3298

June 15, 2021

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. 14 Request: Notice to Proceed- (NTP-) 2 Underground Shift and Supplemental Work Areas at multiple locations throughout Segment VIG8

Dear Mr. Bass,

On May 20, 2021, Southern California Edison (SCE) submitted Minor Project Refinement (MPR) No. 14 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-2 but are necessary to construct the Project work described in Sections 2.3.1.1, 2.3.1.2 and 2.3.1.3 of the FEIR. Due to the congestion of existing underground utilities, the previously approved alignment would be relocated to avoid conflicts when installing the 115-kV duct bank. The proposed work areas are within the general disturbance area of the Valley-Ivyglen 115-kV Project, except as noted in Table 1, and are of the sizes described in Table 2-5 of the FEIR as being necessary to construct Project components. The primary activities to be conducted at the proposed work areas would include installation of conduit duct bank, followed by installation of 115-kV underground subtransmission cable and telecom cable. Construction of these components would be accomplished in a manner consistent with the descriptions contained in the following VIG FEIR Sections: 2.4.5.4, 115-kV Structure Construction; 2.4.7, Telecommunication Installation.

The 115-kV and telecom duct bank, east of vault 6001584 would be installed via boring (Cased Bore) for approximately 346 feet. The boring entrance and exit points would be within the previously approved subtransmission trenching work area. The boring machine would bore an underground path and install a 30 – 32-inch casing into which conduit would be placed. The conduit would connect to vault 6001584 to the west and to conduit in open trench to the east. Site preparation activities would include vegetation clearing, improvement/construction of work areas, and installation of Stormwater Pollution Prevention Plan (SWPPP) best management practices (BMPs).

Additional Work Areas within General Disturbance Areas:

The proposed refinements would result in a net increase of 0.07 acres of temporary disturbance and an increase of 0.0 acres of permanent impacts in Segments VIG8. The locations, dimensions, and activities for each proposed refinement are provided in Table 1 and are visually shown in the

biological resource maps (Attachment A).

Table 1: VIG8 Additionally Requested Work Areas

Segment	Pole / Feature Name	Nearest Structure	Latitude	Longitude	Description	Activity
VIG8	Trenching work area	580E	N/A	N/A	Southeast of 580E. The telecom route between pullbox 5702896 and existing manhole M9300920 would be shifted from a path mostly in the eastbound lane of Temescal Canyon Road to a route that crosses Temescal Canyon Road perpendicularly at M9300920 and parallels the 115 kV conductor to pullbox M9300920. All work would occur within previously approved work areas.	Installation of underground telecom conduit.
VIG8	Boring work area	6001584	N/A	N/A	Located outside of the general disturbance area and extending 346 feet northeast of vault 6001584, 2,275 square feet of temporary work area is requested for underground boring and installation of casing and duct bank. Within the portion of the boring work area that does not overlap the trenching work area, no ground disturbance or activity other than foot traffic would occur. 445 square feet of additional temporary work area is requested at the east end of the boring path to accommodate equipment and materials.	Installation of underground duct bank.
VIG8	Trenching work area	6001586	N/A	N/A	520 linear feet of trenching work area located west of vault 6001586 would be shifted north of the asphalt roadway of Temescal Canyon Road. 5,245 square feet of area is outside of the general disturbance area. 380 square feet of additional temporary work area is requested.	Installation of underground duct bank.

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 activities covered in the MPR No. 14 Request. The CPUC has reviewed this MPR request and has verified that the proposed activities adhere to applicable PCs and MM requirements. The evaluation process ensures that PCs and 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:

- 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. 14 meets the above criteria. MPR No. 14 is approved by the CPUC for the proposed activities based on the factors described below.

CPUC Evaluation of MPR No. 14 Request

The CPUC evaluated SCE's MPR Request No. 14 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. 14 activities would occur at several locations, work areas, or portions of work areas, throughout Segment VIG8. The temporary and permanent disturbance areas associated with MPR No. 14 are shown in Table 2. The quantity and dimensions of MPR No. 14 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: Requested Disturbances Associated with MPR No. 14

Feature	Number of Miles	Temporary Impact Total	Permanent Impact Total
Temporary Work Areas	--	0.07 ac (3,100 sq ft)	--
Total	**0.00 Miles**	**0.07 ac (3,100 sq ft)**	**0.00 ac (0.00 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, 2.3.1.2, 2.3.1.3, and Table 2-5 of the FEIR. The newly proposed refinements are underground and would not be visible after installation. Aesthetic impacts associated with work under MPR No. 14 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, 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).

The boring east of vault 6001584 will occur at a depth of approximately 12 feet and will pass underneath two ephemeral streambeds, but the work would not impact jurisdictional elements of the streambeds. No amendments to the waters permits would be needed. There would be no ground disturbance, vehicle staging, or equipment/material storage within the streambeds and

riparian vegetation along the boring work area. Only foot traffic that is necessary for guiding the boring path would occur in this area and the foot traffic would not impact riparian vegetation or result in dredge or fill. Pressurized drilling fluids would not be used, thereby avoiding a release of drilling fluids into the streambed via "frac-out" or spillage.

The boring path would travel underneath land mapped as Riversidean alluvial fan sage scrub, disturbed Riveridean sage scrub, and coast live oak riparian forest. The bore would also pass underneath a mature live oak tree (*Quercus agrifolia*). The root systems of mature coast live oak trees consist of a deep central taproot that is usually nonfunctional and several deep roots that may tap groundwater if present within 36 feet of the soil surface (Steinberg, Peter D. 2002. Quercus agrifolia. In: Fire Effects Information System, [Online]. U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station. Fire Science Laboratory (Producer). Available: https://www.fs.fed.us /database/feis/plants/tree/queagr/all.html [2021, May 20]).

Approximately 85% of all roots of Quercus spp. are fine roots in the upper three feet of soil (Breda, N. Granier, A, Bartaud, F, and Moyne, C. 1995. Soil Water Dynamics in an Oak Stand. Plant and Soil 172:17–27). The bore would travel underneath the oak tree but would be off-center to miss the central taproot. The approximate 12.5-foot depth of the bore would avoid most roots. MM BR-6 requires that pruned roots two inches or greater in diameter be cut at a 90-degree angle with sharp hand tools and wrapped in moist burlap until the soil is replaced. The boring method would not allow for treatment of cut roots as described in MM BR-6; however, nearby Project trenching alongside a coast live oak found that roots two inches in diameter were not present deeper than five feet from the soil surface. The top of the bore would have a depth of approximately 11 feet, which would likely be well below roots two inches in diameter or greater. The trenching work area west of vault 6001586 overlaps with disturbed Riveridean sage scrub. 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 D, and the VIG Habitat Restoration and Revegetation Plan.

Portions of the proposed work areas in VIG8 are outside of the Western Riverside- Multiple Species Habitat Conservation Plan (WR-MSHCP) Phase 2 certificate of inclusion (COI) coverage area. Based on the guidance provided by the RCA, construction of these features would not require notification and approval by the Regional Conservation Authority (RCA) prior to construction because the overall permanent disturbance to baseline vegetation of RCA concern does not exceed the acreage proposed in the MSHCP Participating Special Entity (PSE) application. There are no proposed permanent impacts under MPR No. 14 work activities. All temporary impacts to vegetation will be restored in accordance with the Habitat Restoration and Revegetation Plan (HRRP).

Table 3. Permanent Impacts to MSHCP Baseline Vegetation in Segment VIG8

MSHCP PSE Application	0.00 Acres
Currently Proposed Impacts (MPR No. 14)	0.00 Acres

Change in Vegetation Impacts	**0.00 Acres**

MPR No. 14 proposed work areas are covered under the Stephens' kangaroo rat (SKR) Habitat Conservation Plan. Although 0.09 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.

The activities described in MPR No. 14 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. 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); no supplemental surveys were necessary. The survey results indicate that there are no new sensitive archaeological or paleontological resources located at the proposed work areas. The boring path occurs in the vicinity of a known cultural resource area. 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). The proposed refinements occur in soil with low potential for paleontological resources. 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 Section 4.5.4.2 of the FEIR. All applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

Erosion would be controlled at locations of earth disturbance through the implementation and adherence to the Project linear SWPPP. Spoils associated with the boring operation would be controlled with BMPs at the entrance and exit points to prevent discharge. Following approval of MPR No.14, the SWPPP would be updated to show the proposed work areas. At the completion of all construction, sites would be restored/reclaimed in accordance with the Project SWPPPs, Project Commitment D, and the VIG HRRP.

Impacts to geology, soils, and seismicity associated with this refinement would not create a new significant impact or substantial increase in the severity of a previously identified impact in Section 4.6.4.2 of the FEIR. All applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation, Monitoring, Compliance, and Reporting Plan would be followed.

Trenching and boring activities proposed in MPR No. 14 would result in similar noise and vibration impacts as those described in the Final EIR. The boring would occur within 300 feet of residences. The temporary noise levels associated with boring and casing may be higher than open trenching, but impacts would be reduced to less than significant by implementing Project

Commitment H, Mitigation Measure NV-1, and the Project Noise Control Plan. Blasting would not occur at any of the proposed work areas.

Impacts to noise and vibration associated with work under MPR No. 14 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.

The boring operation is not expected to significantly change impacts to air quality. All other 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 NTPR-2; 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. A boring machine with a Tier 4 engine would be used during the boring operation. 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. 14 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 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 include trenching and boring. 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. 14 are located within elevated fire threat areas. 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. All applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

The proposed refinements are located within the Santa Ana Watershed and the Elsinore Groundwater Basin. The proposed work areas are not located within a flood zone.

The boring operation east of vault 6001584 would cross underneath two ephemeral streambeds. No ground disturbance, vehicle staging, or equipment/material storage would occur within the streambeds and riparian vegetation along the boring work area; only foot traffic that is necessary for guiding the boring path would occur in this area. Pressurized drilling fluids would not be used, thereby avoiding a release of drilling fluids into the streambeds via "frac-out" or spillage.

Erosion that could affect water quality would be controlled at locations of earth disturbance through the implementation and adherence to the Project linear SWPPP. If stained or odorous

soil is found during excavating, SCE would follow the procedures in Project's Contaminated Soil and Groundwater Contingency Plan. Dewatering, if necessary, would be performed in accordance with the Project linear SWPPP. Impacts to hydrology and water quality 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 4.9.4.2 of the FEIR.

Furthermore, the quantity of construction equipment and personnel would be the same as identified in NTPR-2. 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, 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. 14 activities.

MPR No. 14 Conditions of Approval

MPR No. 14 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 appropriate erosion and sediment control best management practices (BMPs) for the MPR No. 14 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 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
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. 14 shall occur within approved project workdays and hours. In the event that MPR No. 14 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. 14 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. Once the Project has reached final design, SCE shall be responsible for identifying acreage not previously included in the COI (such as the acreage proposed in MPR No. 14) as well as removing acreage that was included in the COI but not disturbed by construction activities.
11. SCE shall notify CPUC after completing MPR No. 14 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,

Patricia Kelly

Patricia Kelly
CPUC Project Manager

cc:
Chuck Cleeves, WSP Compliance Manager
Fernando Guzman, WSP Deputy Compliance Manager
Marcus Obregon, SCE Environmental Project Manager

Attachment A:
MPR No. 14 Biological Resources Report

Attachment B:
MPR No. 14 Cultural Resources Report

Attachment C:
MPR No. 14 Paleontological Resources Report