

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



June 30, 2020

Tom Diaz  
Regulatory Affairs  
Southern California Edison  
2244 Walnut Grove Ave  
GO4, 2<sup>nd</sup> Floor  
Rosemead, CA 91770

**RE: Valley-Ivyglen 115 kV Subtransmission Line Project – Notice to Proceed (NTP)-1 for construction of Segments VIG1, VIG2, and VIG3 in Riverside County: Excluding sites requiring jurisdictional water permits**

Dear Mr. Diaz:

Southern California Edison (SCE) is requesting authorization from the California Public Utilities Commission (CPUC) to commence construction on select activities for the Valley-Ivyglen 115kV Subtransmission Line Project (Project, or VIG) on Segments VIG1, VIG2, and VIG3. NTP-1 would include; installation of overhead 115-kV subtransmission line and fiber optic line on new structures and in underground trenches, transfer of existing distribution circuits along the transmission line to new 115-kV structures or underground positions, and installations of new 115-kV switching and protective equipment at Valley Substation. NTP-1 excludes work at sites requiring jurisdictional water permits. Construction for this NTP will be confined to the following activities:

**Subtransmission, Telecommunication, and Distribution Components**

NTP-1 would include work within the general disturbance area in Segments VIG1 to VIG3 as described in the VIG Final Environmental Impact Report, with the exclusion of locations that require jurisdictional water permits as described here:

- Gabion basket and access road work within the wetland between Structures 097E and 098E (VIG1);
- Road plate work within the riparian area and ephemeral streambed between Structure 106E and 107E (VIG1);
- Gabion basket work within the ephemeral streambed at Structure 111E (VIG1);
- Structure and access road work within the ephemeral streambed at Structure 116E (VIG1);
- Structure and tree trimming work within the wetland/riparian area near the San Jacinto River between Structures 119E and 120E (VIG1);
- Structure and access road work near the San Jacinto River at Structure 120E (VIG1);
- Structure and access road work near the San Jacinto River at Structure 121E (VIG1);
- Gabion basket work within the ephemeral streambed between Structures 126E and 127E (VIG1);
- Tree trimming within the wetland/riparian area between Structures 135E and 137E (VIG1);

- Access road and rip rap installation within the ephemeral streambed between Structures 145E and 146E (VIG1); and
- Structure work within the riparian component at Structure 215E (VIG2).

The excluded sites requiring jurisdictional waters permits are adjacent to sites requested in NTPR-1. To ensure that construction activities do not inadvertently occur within the excluded work areas, protective measures shall be implemented. Per MM BR-1, areas requiring waters permits will be flagged and marked with signs as Environmentally Sensitive Areas (ESAs). If the ESAs are immediately adjacent to active work areas, fencing may be installed at the ESA boundary to ensure that encroachment does not occur. Construction monitors will regularly inspect ESA flagging, signage, and fencing and perform repairs, as necessary. Furthermore, Project personnel will have access to the Collector for ArcGIS application via their smart phones. Collector will provide project maps showing their current location relative to ESA avoidance areas.

### **Segment VIG1**

The following work in Segment VIG1 would be completed under NTP-1, except for work at locations requiring jurisdictional water permits as described above:

- Install 7.49 miles of new 115-kV conductor (280 feet of new underground conduit).
- Install 139 light weight steel (LWS) poles, 25 tubular steel poles (TSPs)/ riser poles.<sup>1</sup>
- Install 280 feet of underground duct banks, and one underground vault.
- Relocate existing distribution line to new structures.
- Install 1,425 feet of fiber optic line near Valley Substation.
- To facilitate installation and relocation of conductor in VIG1, helicopter landing may occur within work areas within the VIG1 general disturbance area, guard sites would be established at 25 locations, and 48 pulling/tensioning sites would be established.

### **Segment VIG2**

Work within the riparian component at Structure 215 is excluded from NTP-1. Per mitigation measure (MM) AES-2, the 115-kv structures of VIG2 would be placed on wood poles, except for an approximately 1.5-mile section to be placed underground. In accordance with MM AES-2, NTP-1 would include the installation of mostly wood poles, with two TSP riser poles to make the transition from overhead to underground. The most northern structure of VIG2, at the VIG1/VIG2 interface, would also be a TSP. The following work in Segment VIG2 would be completed under NTP-1:

- Install 2.59 miles of new overhead 115-kV conductor (1.62 miles of new underground conduit).

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<sup>1</sup> LWS poles 65 to 115 feet tall, TSPs 45 to 115 feet tall (two at 135 feet tall)

- Install 68 wood poles, three TSP poles, and 11 guy poles.<sup>1</sup>
- Install 1.62 miles of underground duct bank, seven underground vaults, and two TSP riser poles.<sup>2</sup>
- Relocate existing distribution line to new structures, remove 25 distribution poles.
- Install 2.52 miles of telecommunications fiber optic line overhead and 1.7 miles of telecommunications fiber optic line underground.
- To facilitate installation and relocation of conductor in VIG2, no helicopter landing zones would be established, guard sites would be established at 30 locations, and 20 pulling/tensioning sites would be established.

### **Segment VIG3**

Work within the general disturbance area of Segment VIG3 (302E to 313E and 328E to 336E) would be completed under NTP-1, as follows:

- Install 0.45 miles of new 115-kV conductor.
- Install 11 LWS and six TSPs.<sup>2</sup>
- Install telecommunications fiber optic line on new 115-kV structures, approximately 338 feet of underground conduit, and install one underground structure.
- Relocate existing distribution line to new structures and remove 15 distribution poles.  
To facilitate installation and relocation of conductor in VIG3, no helicopter landing zones would be established, guard sites would be established at seven locations, and nine pulling/tensioning sites would be established.

### **Substation Components**

The following subtransmission and telecommunications-related work would be completed at Valley Substation under NTP-1:

- Install two 115-kV circuit breakers and four 115-kV disconnect switches.
- Install approximately 2,530 feet of fiber optic line in an existing underground conduit.

### **Project Support Components**

Under NTP-1, SCE or its contractor would establish and use temporary staging yards (Valley Substation Yard, Valley Yard South, and 74 Central Yard) in Riverside County. These staging yards would be used as reporting locations for workers, vehicle and equipment parking, and material storage. These areas may also have trailers for supervisory and clerical personnel and

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<sup>1</sup> Wood poles 80 to 105 feet tall, TSPs, and TSP riser poles 80 to 115 feet tall, guy poles 40 to 60 feet tall.

<sup>1</sup> LWS poles 65 to 115 feet tall, TSPs 45 to 115 feet tall (two at 135 feet tall)

may be lit for staging and security purposes. In addition, normal maintenance and refueling of construction equipment would be conducted at staging areas in accordance with the Storm Water Pollution and Prevention Plan (SWPPP).

- The Valley Substation Yard would be used for contractor show-up staging of equipment and materials. The yard is surrounded by security fence; fencing repairs would occur as necessary. No screening would be installed for reasons associated with substation safety; however, the yard is not visible from street or nearby sensitive receptors. Fuel storage tanks with secondary containment would be installed, as needed. Electrical power and communication services would be provided to the onsite office trailer from a nearby distribution source.
- The Valley Yard South staging area is an established fence yard currently used by SCE for the storage of materials. This yard may be used to store materials for work associated under NTP-1. No residences are in close proximity to the Valley Substation Yard, therefore, automatic external lighting will not be shielded from dusk until dawn in order to provide maximum security presence. No improvements would occur.
- The 74 Central Yard-Alternative staging area is a previously disturbed plot of land located southwest of the intersection of Central Avenue and El Toro Cut Off Road in the city of Lake Elsinore. This area may be used for the staging of material and equipment. Improvements at this staging yard would include the installation of a perimeter fence with screening.

Materials commonly stored at staging areas would include, but would not be limited to, the following: construction trailers, construction equipment, temporary sanitation facilities, steel bundles, steel/wood poles, conductor reels, fiber optic cable reels, hardware, insulators, cross arms, signage, consumables (such as fuel and filler compound), tools, waste material for salvaging, recycling, or disposal. In addition, materials used for best management practices (straw wattles, gravel, fiber rolls, silt fences).

Temporary lighting (mobile light standards) may be installed at any of the staging areas. To mitigate the escape of artificial light from mobile standards, the light would be shielded and directed inward to illuminate the staging areas. The lights would be manually controlled and used only when necessary. Construction trailers may also be equipped with external lights over stairways and external doors for safety.

Hazardous materials (fuels, lubricants, compressed gases) may be used at any of the staging yards. Hazardous materials would be stored, handled, and used in accordance with all applicable regulations. In addition, safety data sheets would be made available at the construction sites for all crew workers.

Temporary sanitation facilities and bins for construction-related waste may be placed at any of the staging areas. Waste that cannot be reused or recycled (e.g., wood, soil, vegetation, etc.) would be disposed of at approved facilities.

## **Project Understanding**

### **NTP-1 is granted by the CPUC for the proposed construction activities based on the following understanding:**

- SCE will comply with all Project Commitments and Mitigation Measures included in the Mitigation, Monitoring, Compliance, and Reporting Program (MMCRP) for VIG. All project compliance plans and permit conditions will be implemented during construction activities. Some measures are ongoing/time-sensitive requirements and will be implemented prior to and during construction where applicable.
- Copies of all relevant permits, compliance plans (i.e., MMCRP, SWPPP, etc.), and this NTP will be available onsite for the duration of construction activities. Copies of permits will be provided to the CPUC upon request.
- Preconstruction clearance surveys for biological, cultural, and paleontological resources will be conducted as appropriate prior to construction activities by CPUC-approved monitors.
- All crew personnel will be appropriately trained on environmental issues, including requirements of the MMCRP, prior to starting work. A log will be maintained onsite with the names of all crew personnel trained and will be made available to the CPUC upon request.
- No movement or staging of construction vehicles or equipment will be allowed outside of the approved workspace areas. If additional temporary workspace areas or access routes, and/or changes to construction techniques, are required, the CPUC must review and approve them.
- If construction debris or spills enter into environmentally sensitive areas, the jurisdictional agencies and the CPUC will be notified immediately.

### **The Conditions noted below will be met by SCE and its contractors:**

- Copies of all relevant permits (i.e., General Permits, National Pollution Discharge Elimination System permit, Certified Unified Program Agency Permit, etc.) compliance plans (i.e., MMCRP, SWPPP, etc.), and this NTP will be available onsite for the duration of construction activities. Copies of permits will be provided to the CPUC.
- SCE will submit resumes for biologists, cultural resources consultants, and paleontological monitors prior to the start of construction for approval by the CPUC.
- Prior to starting work, SCE will provide the CPUC sign-in sheets containing a list of all project personnel that completed Worker Environmental Awareness Plan training on environmental issues, including requirements of the MMCRP.
- SCE will apply for an Encroachment Permit from the California Department of Transportation (Caltrans) for I-15/I-215 crossings, south of Central Ave at 3<sup>rd</sup> Street, and will obtain all permits from Caltrans prior to conducting any work within the Caltrans right-of-way.
- A copy of the certified tier specification, best available control technology documentation, and/or California Air Resources Board or South Coast Air Quality Management District (SCAQMD) operating permit for each piece of construction equipment, as applicable, will be provided to the CPUC at the time the equipment is mobilized.

- Prior to construction, SCE will provide the CPUC with documentation of purchase of the required Reclaim Trading Credits to the SCAQMD.
- SCE will provide the CPUC results for preconstruction surveys for burrowing owl within 14 days of the start of construction.
- At least two weeks prior to the anticipated start of construction, SCE or its contractors will notify all property owners within 300 feet of construction that activities are about to commence so owners are aware there may be significant noise levels during construction. SCE will provide a copy of the notification to the CPUC.
- SCE will provide the CPUC with completed agreements between SCE and the City of Lake Elsinore for the proposed underground segments covered by this authorization.
- SCE will contact affected landowners regarding underground facilities prior to and during construction. SCE will notify the CPUC prior to or during construction if there are any affected landowners, and if any affected landowners are to be temporarily relocated.
- SCE will provide the CPUC with proof of authorization (legal right) prior to entering privately owned property at construction work areas under NTP-1 work activities.
- If blasting activities are deemed necessary at a later date, a blasting mitigation and monitoring plan will be submitted to the CPUC for review and approval at least 30 days prior to the start of blasting.
- SCE will provide the CPUC with a Helicopter Lift Plan prior to commencing helicopter operations, including any necessary coordination with the Federal Aviation Administration (FAA).
- SCE will provide the CPUC with FAA documentation prior to the use of equipment or installation of structures that require notification.
- SCE will provide documentation of roadway conditions with photographs prior to construction to the CPUC.
- SCE will provide a weekly status report of project activities scheduled/anticipated for the coming work week.

Sincerely,



Patricia Kelly  
CPUC Environmental Project Manager

cc:

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

Tom Diaz  
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**Attachment 1: Valley-Ivyglen 115 kV Subtransmission Line Project – Notice to Proceed (NTP)-1 for construction of Segments VIG1, VIG2, and VIG3 in Riverside County:  
Excluding sites requiring jurisdictional water permits**