

Southern California Edison
RTRP A.15-04-013

DATA REQUEST SET A.15-04-013 RTRP-CPUC Deficiency Report-SCE-004
Supplemental

To: ENERGY DIVISION
Prepared by: Thomas Diaz
Title: Regulatory Project Manager
Dated: 11/07/2016

Question 02:

Provide GIS data and detailed route maps showing the full extent of temporary and permanent access roads including:

- **Temporary downline, access, and spur roads (access routing to each structure locations from city streets or adjacent developed sites needs to be completely shown)**
- **Permanent access roads**

The GIS data provided in response to Deficiency Report #2 shows short segments of access roads. These access roads do not connect to paved roadways. The CPUC considers use of existing unpaved access roads in its calculations and assessment of temporary disturbance. SCE needs to define the full extent of existing unpaved access roads that could be used during construction.

Response to Question 02:

The requested GIS data and route maps are currently being developed. SCE anticipates completing this response on or before November 21, 2016.

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To: ENERGY DIVISION
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Title: Regulatory Project Manager
Dated: 11/07/2016

Question 03:

Refine the buffer area boundaries to more accurately reflect on-the-ground siting limitations, and also depict the locations of all proposed temporary and permanent work spaces within buffer areas including:

- Pole work areas (e.g., crane pads)
- Lattice steel tower work areas

The preliminary engineering plans/route maps provided on February 9, 2016, in response to Item #1 of Deficiency Report #2 depicted buffer areas of varying size around each proposed structure. The CPUC understands that SCE intends to site temporary and permanent work spaces within the buffer areas and that buffer areas have been depicted to provide siting flexibility as later stages of engineering design are completed. The intention of this approach is reasonable; however, the CPUC believes that the degree of flexibility resulting from the proposed buffer areas (particularly those of a 1,200-foot diameter size or over 1 million square feet) is excessive and will result in an overstatement of project impacts and new impacts not analyzed in the 2013 RTRP Final EIR. For example, in the 2013 Final EIR, it was described that impacts to wetlands and riparian areas would be avoided by the proposed project.

The current buffer areas include wetland and riparian areas and there would be significant impacts to these resources if the CPUC assumes work could be conducted anywhere within the buffer area.

The CPUC has prepared a mapbook (Attachment A) showing locations where the proposed buffer areas overlap with the following facilities and resources within the overhead alignment southeast of the Santa Ana River:

- Steep slopes
- Wetlands including the Santa Ana River floodplain and/or tributary drainages
- Metropolitan Water District's aqueduct infrastructure
- City streets, parking lots, loading/receiving docks, and perimeter landscaping of adjacent buildings
- Riverside Water Quality Control Plant facilities

- Hidden Valley Wilderness Area (federal land and water conservation fund area)

These resources should be avoided and carved out of the work area buffers, where feasible. The revised preliminary engineering plans and detailed route maps should also depict alignment revisions including the proposed underground alignment along Pats Ranch Road and 68th Street, and revised overhead alignment north of Limonite Avenue.

Please include GIS data files for all detailed route map refinements.

Response to Question 03:

The requested GIS data is currently being developed. SCE anticipates completing this response on or before November 21, 2016.

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Title: Regulatory Project Manager
Dated: 11/07/2016

Question 04:

Provide an updated version of Table 2.5-3a in the 2013 RTRP Final EIR that reflects all changes to calculated work space permanent and temporary disturbance areas based on preliminary engineering revisions (see Items #1 through #3 above).

Response to Question 04:

The updated table is currently being developed. SCE anticipates completing this response on or before November 21, 2016.

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To: ENERGY DIVISION
Prepared by: Hunly Chy
Title: Supervising Engineer
Dated: 11/07/2016

Question 05:

Provide details for construction of the underground duct bank including the following:

- Size and locations of duct banks
- Depth of duct banks
- Separation between duct banks
- Size of the riser poles
- Construction approach including approximately how much would be open/constructed per day of the underground line in roads and whether work would occur in multiple areas at once or just in a linear fashion down the line

Details previously provided by SCE in the RTRP 230-kV Alternatives Desktop Study may be applicable; however, many of the specific dimension provided (such as for vault structures) appear to be over sized for a 230-kV duct bank and need to be confirmed. See Attachment C for an example from another 230-kV underground project description.

Response to Question 05:

The requested information is currently being developed. SCE anticipates completing this response on or before October 31, 2016.

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To: ENERGY DIVISION
Prepared by: Gary Busteed
Title: Senior Environmental Project Manager
Dated: 11/07/2016

Question 07:

Clarify how SCE expects to obtain a permit for new poles located in the Hidden Valley Land and Water Conservation Fund (LWCF) area. How will NEPA be handled for new poles in this area? Where and how will SCE replace the impacted LWCF area?

The Land Use section in the 2013 RTRP Final EIR lacks analysis of the land use impacts resulting from conversion of LWCF areas. Mitigation Measure REC-02 in the recreation section does not define where or how SCE would replace the LWCF area or obtain the necessary permits from the National Park Service. Further information is needed to verify the feasibility of the proposed “land conversion” for the proposed transmission line structures within the LWCF area.

Response to Question 07:

a) **Clarify how SCE expects to obtain a permit for new poles located in the Hidden Valley Land and Water Conservation Fund (LWCF) area.**

The placement of overhead transmission line structures within the LWCF area is considered to be a “conversion” of land under the LWCF Act. Section 6(f) of the LWCF Act requires approval from the National Park Service (NPS) and requires replacement property for the loss or “conversion” of the recreation lands; this process is not a “permitted” activity. The purpose of the LWCF Act is to assist in preserving, developing, and ensuring accessibility to outdoor recreation resources and to strengthen the health and vitality of the citizens of the United States by providing funds, planning, acquisition, and development of recreation facilities. Recreation facilities awarded such funds are subject to the provisions of this Act. The LWCF’s most important tool for ensuring long-term stewardship is its “conversion protection” requirement.

Responsibility for compliance and enforcement of LWCF provisions rests with the State. Section 6(f)(3) of the LWCF Act requires that no property acquired or developed with LWCF assistance will be converted to another use other than public outdoor recreation uses without the approval of the Secretary of the Department of the Interior (NPS is part of the Department of the Interior), only if the Secretary finds it to be in accord with the Statewide Comprehensive Outdoor Recreation Plan (SCORP), and only upon such conditions as the Secretary deems necessary to ensure the substitution of other recreation properties of at least equal fair market value and of

reasonably equivalent usefulness and location (36 CFR § 59).

See response to question c) below for a description of the coordination and review process currently being undertaken for obtaining approval for the placement of the RTRP project facilities within the LWCF area.

b) **How will NEPA be handled for new poles in this area?**

The first step in the environmental review will be the completion of the Proposal Description (PD) and Environmental Screening Form (ESF) (see page 114 of the Federal Financial Assistance Manual, Volume 69, October 1, 2008 - <https://www.nps.gov/ncrc/programs/lwcf/manual/lwcf.pdf>). The PD portion of the form captures administrative and descriptive details enabling the NPS to understand the proposal. The ESF portion is designed for States and/or project sponsors to use while the LWCF proposal is under development. Upon completion, the ESF will indicate the resources that could be impacted by the proposal enabling States and/or project sponsors to more accurately follow an appropriate pathway for National Environmental Policy Act (NEPA) analysis: 1) a recommendation for a Categorical Exclusion (CE), 2) production of an Environmental Assessment (EA), or 3) production of an Environmental Impact Statement (EIS). The ESF will also be used to document any previously conducted yet still viable environmental analysis if used for this federal proposal. The completed PD/ESF must be submitted as part of the State's LWCF proposal to the NPS.

The Section 6(f)(3) conversion proposal, including the required NEPA environmental review documents (CE recommendation or an EA document), must focus on the loss of public outdoor recreation park land and recreational usefulness, and its replacement per 36 CFR 59, and not the activities precipitating the conversion or benefits thereof, such as the impacts of constructing a new school to relieve overcrowding or constructing a hotel/restaurant facility to stimulate the local economy. Rather, the environmental review must 1) focus on "resource impacts" as indicated on the ESF (Step 6), including the loss of public park land and recreation opportunities (ESF A-15), and 2) the impacts of creating new replacement park land and replacement recreation opportunities. A separate ESF must be generated for the converted park area and each replacement site.

c) **Where and how will SCE replace the impacted LWCF area?**

RPU and SCE are currently working closely with the California Department of Parks and Recreation, Office of Grants and Local Services (OGLS) and the NPS, in order to obtain approval for the replacement of lands acquired or developed with LWCF Act funds within the Hidden Valley Wildlife Area that would be crossed by the 230 kV transmission lines. Following the certification of the Project's Final EIR in February 2013 with the City of Riverside acting as Lead Agency, the City, in coordination with Riverside County Regional Park and Open Space District, sent a formal letter and map to OGLS on Dec. 12, 2014 to begin the review process of the proposed conversion. Since December 2014, several planning meetings have occurred and most recently several parcel options that would serve as replacement property have been identified by the City and SCE and relayed to NPS. Although NPS has not yet finalized the size (acreage) of the conversion area, these identified properties are currently under review by OGLS

and NPS. Once a preferred replacement property is identified, the environmental review of the conversion property and replacement property will commence, following the LWCF State Assistance Program Manual and 36 CFR § 59 (Land and Water Conservation Fund Program of Assistance to States; Post-Completion Compliance Responsibilities). The environmental review process is described above under response to question b).

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To: ENERGY DIVISION
Prepared by: Gary Busteed
Title: Manager-Project/Product 2
Dated: 11/07/2016

Question 08:

Focused surveys are required for the following special-status species within suitable habitat:

- **Least Bell's vireo**
- **Southwestern willow flycatcher**
- **Western yellow-billed cuckoo**
- **Delhi sands flower-loving fly**
- **San Diego ambrosia**
- **Brand's phacelia**
- **San Miguel savory**
- **Los Angeles pocket mouse**
- **Northwestern San Diego pocket mouse**
- **San Bernardino kangaroo rat**

Focused surveys for these species were performed between 2006 and 2009 (seven to ten years ago). These surveys are considered out-of-date and do not reflect current species distribution. The impact analysis and the mitigation measures in the 2013 RTRP Final EIR may therefore not adequately consider the level of impacts on these species. The focused surveys need to include the full limits of all work areas as defined in response to items 1 through 3 above.

Understanding that focused surveys for some species require multiple field visits over several weeks and during specific time periods, please provide a detailed schedule for any outstanding focused surveys that extend beyond the September 19th response deadline for this Deficiency Report.

Response to Question 08:

Rare Plants

A focused survey for San Diego Ambrosia was conducted within the proposed impact areas as this was the only rare plant species of the three target species (San Diego Ambrosia, Brand's phacelia, and San Miguel savory) identified by the Riverside County Integrated Project (RCIP) plan and CPUC that would be recognizable in May/June 2016. The report from this late season

survey is expected at the end of October 2016. SCE will share relevant GIS data with the CPUC at that time.

Focused surveys for rare plants were recommended in the spring of 2017.

Riparian Birds

Focused surveys were completed for Southwestern willow flycatcher (SWFL), Least Bell's vireo (LBVI), and Yellow-billed Cuckoo (YBCU). There were positive detections within the Santa Ana River for SWFL and LBVI. GIS data is currently being processed and a report is expected at the end of October.

Small Mammals

Surveys have been completed for small mammals. There were no positive detections for sensitive mammal species; Los Angeles pocket mouse, Northwestern San Diego pocket mouse, and San Bernardino kangaroo rat were not detected. The small mammal focused survey report will be available by mid-October.

Delhi Sands Flower Loving Fly (DSFLF)

The results of the focused survey were negative for 2016. This reinforced the results of the 2006 surveys in these areas. Another focused survey will be conducted in 2017 per the protocol. The year 1 report is expected by the end of October.

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To: ENERGY DIVISION
Prepared by: Thomas Diaz
Title: Regulatory Project Manager
Dated: 11/07/2016

Question 09:

Provide an updated construction schedule indicating the start date and duration for each project component.

Include detailed information regarding length of time that construction of an individual pole and underground segments would take.

Response to Question 09:

The requested construction schedule is currently being developed. SCE anticipates completing this response on or before Monday, October 31, 2016.

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To: ENERGY DIVISION
Prepared by: Thomas Diaz
Title: Regulatory Project Manager
Dated: 11/07/2016

Question 10:

Update Table 2.5-1 in the RTRP Final EIR to include equipment and personnel required for construction of the revised alignment including the underground transmission line segment. Provide type and number of equipment and employees needed per day and the production rate for construction of aboveground and underground segments.

Response to Question 10:

The requested Table 2.5-1 information is currently being developed. SCE anticipates completing this response by November 21, 2016.

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To: ENERGY DIVISION
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Title: Regulatory Project Manager
Dated: 11/07/2016

Question 11:

Provided quantities of cut, fill, and import material for each project component and a total quantity of import and export by material type.

Response to Question 11:

The requested information is currently being developed. SCE anticipates completing this response on or before November 21, 2016.

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To: ENERGY DIVISION
Prepared by: Thomas Diaz
Title: Regulatory Project Manager
Dated: 11/07/2016

Question 12:

Define utility separation requirements for the underground 230-kV transmission line from existing utilities in 68th Street and Pats Ranch Road.

If the telecommunication line would also be undergrounded with the 230-kV transmission line, provide the necessary utility separation requirements and the configuration of the telecommunication cable and transmission line within the duct bank. Provide a typical detail and cross-section for the underground duct banks.

Response to Question 12:

The response for the separation requirements is currently being developed. SCE anticipates completing this response on or before October 31, 2016.

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To: ENERGY DIVISION
Prepared by: Martin Barriga
Title: Transmission Engineer
Dated: 11/07/2016

Question 13:

Provide a profile graphic depicting the design of the riser poles. (See Attachment C for an example)

Response to Question 13:

Attached please find the profile of a typical, conceptual riser pole, designed based on existing industry practices. The riser pole depicted in the attached document is preliminarily deemed appropriate for the Riverside Transmission Reliability Project (RTRP) based on planning level assumptions, analyses performed to date, and known conditions. The precise design and location of any riser poles are subject to change following completion of final engineering, identification and/or verification of field conditions, availability of labor, material, and equipment, compliance with applicable environmental and permitting requirements, and other factors.

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To: ENERGY DIVISION
Prepared by: Hunly Chy
Title: Supervising Engineer
Dated: 11/07/2016

Question 14:

Provide a profile graphic depicting the design of the vaults. (See Attachment C for an example)

Response to Question 14:

Attached hereto please find a cross section of a typical underground vault as requested, as well as a cross section of a typical telecommunications manhole.

Please note that these images are typical underground vaults, preliminarily deemed appropriate for the Riverside Transmission Reliability Project (RTRP) based on planning level assumptions, analyses performed to date, and known conditions. The precise design and location of these vaults are subject to change following completion of final engineering, identification and/or verification of field conditions, availability of labor, material, and equipment, compliance with applicable environmental and permitting requirements, and other factors.

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To: ENERGY DIVISION

Prepared by: Gary Busteed

Title: Senior Environmental Project Manager

Dated: 11/07/2016

Question 15:

Provide an updated Noise Technical Report to reflect the different construction techniques that would be used during undergrounding of the 230-kV Transmission Line. Identify and analyze the impacts to the new sensitive receptors along Pats Ranch Road. Revise the corona noise analysis along Wineville Avenue. Provide new mitigation measures to reduce impacts.

Response to Question 15:

The noise analysis regarding the Hybrid Underground alternative is currently being conducted. We anticipate the results of the analysis by the end of October and anticipate completing this response on or before October 31, 2016.

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To: ENERGY DIVISION
Prepared by: Gary Busteed
Title: Senior Environmental Project Manager
Dated: 11/07/2016

Question 16:

Provide the peak and average estimated number of worker trips, haul truck, and delivery truck trips per day for construction of the overhead and underground 230-kV Transmission Line, Wildlife Substation, and all other project components (telecommunication facilities, relocation of distribution lines, etc.). Provide a detailed breakdown of these peak hour and daily trips by project component. Provide the likely travel routes for construction workers and/or truck trips traveling to/from the staging yards and construction areas for each project component and number of anticipated vehicles traveling down each road during peak hours and per day.

Response to Question 16:

An updated traffic report that includes the assumptions of the Hybrid Underground Alternative is being developed and is anticipated to be complete in late November, 2016. SCE anticipates making this updated traffic report available to the CPUC on or before November 30, 2016.

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To: ENERGY DIVISION
Prepared by: Thomas Diaz
Title: Regulatory Project Manager
Dated: 11/07/2016

Question 17:

Identify specific locations where lane and road closures would occur and for how long the lanes and roads would remain closed.

Response to Question 17:

The requested information is currently being developed. SCE anticipates completing this response on or before November 21, 2016.

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To: ENERGY DIVISION
Prepared by: Gary Busteed
Title: Environmental Project Manager
Dated: 11/07/2016

Question 18:

Provide updated air quality and greenhouse gas emissions modeling for all of the SCE project components; overhead and underground 230-kV transmission, Wildlife substation, telecommunication facilities, relocation of distribution facilities. Provide the calculations and outputs prior to mitigation and after mitigation. Provide updated localized air emissions for construction prior to mitigation and after mitigation. The location and chosen sensitive receptors for the localized air emissions analysis used in the AECOM Memorandum dated December 4, 2015 is adequate. Provide the model assumptions to support the model output.

The calculations must be limited to the project components proposed for analysis in the RTRP EIR. The calculations must use the same construction schedule as requested in Question 9, the same equipment types and numbers as requested in Question 10, and the same construction vehicle and truck trips as requested in Question 16. This information should be detailed in the model assumptions.

Response to Question 18:

The air and greenhouse gas emission models are currently being updated. SCE anticipates completing this response on or before November 21, 2016.

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To: ENERGY DIVISION
Prepared by: Thomas Diaz
Title: Regulatory Program Manager
Dated: 11/07/2016

Question 19:

Provide a revised Field Management Plan, which includes EMF modeling and analysis of potential “low cost” and “no cost” measures for the revised alignment including the underground transmission line segment.

Response to Question 19:

The revised Field Management Plan is currently being developed. SCE anticipates completing this response on or before October 31, 2016.