

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



February 25, 2013

Susan J. Nelson  
Southern California Edison  
Regulatory Affairs  
2244 Walnut Grove Avenue, Quad 3D, GO1  
Rosemead, California 91770

Re: Completeness Review, Banducci Substation Proponent's Environmental Assessment

Ms. Nelson,

I have reviewed Southern California Edison's (SCE) Banducci Substation Project Proponent's Environmental Assessment (PEA) and supplemental information, and I have determined that the PEA requires further supplementation, resubmission, and review prior to being considered complete.

Rather than resubmit the PEA in the approved format as requested on numerous occasions beginning formally on August 8, 2012, SCE formatted the most recent submittal as a simple "response to data requests". The PEA incompleteness determination of December 17, 2012 made clear that a complete resubmission and supplementation of the PEA was necessary. I anticipated that SCE would have re-filed a fully revised and supplemented PEA with the docket office, and I recommend that SCE do so in response to today's incompleteness determination. The electronic version of the re-filed PEA should be provided in smaller data file pieces (20 MB or less) rather than in a single 200 MB file as was provided previously.

In addition to reformatting the PEA in the requested format, please also provide the following supplemental information, which has been previously requested but not yet provided.

1. I previously requested an Excel spreadsheet with all parcels within 300 feet of the proposed project components. SCE provided an excel spreadsheet with the requested information for only those parcels within 300 feet of the substation footprint. The same information is required for parcels within 300 feet of all project components, including laydown areas, subtransmission lines, and telecom construction activities (constituting hundreds of parcels). Please provide this information with the PEA resubmittal.
2. I previously requested GIS data showing all project components, including pole locations, pulling/splicing locations, staging areas/yards, the substation footprint, and proposed ROWs. Features such as pole locations can be submitted as points, provided SCE indicates an estimated area of disturbance associated with each point so they can be buffered correctly and used for the analysis. Please provide this information with the PEA resubmittal.
3. I previously requested a description of the existing ROW location, ownership, and width, and a list of any properties likely to require acquisition. Please provide this information with the PEA resubmittal.
4. I previously requested GIS data showing soil types within the proposed project study area. Please provide this information with the PEA resubmittal.

5. I previously requested GIS data showing all project disturbance areas along the telecom routes. The CEQA team requires this information in order to evaluate the disturbance areas relative to potentially suitable habitat for Tehachapi slender salamander. This analysis will allow the team to determine whether focused surveys for this state-listed species are required prior to initiating the CEQA review process. SCE must immediately provide shape files for all temporary and permanent disturbance areas along the telecom routes. If the entire right-of-way will be temporarily disturbed by construction, SCE should immediately initiate focused surveys for Tehachapi slender salamander.
6. In comparing the supplemental information provided in SCE's "Response to Question 03.b" and the revised page from the Biological Resources Technical Report (page 16), there are remaining inconsistencies in the definition of the project study area. Please clarify whether the project study area is 100 feet wide total (along the telecomm and subtransmission routes) or 100 feet on either side of the alignment (200 feet wide total).
7. I previously requested further detail describing the protocol followed during burrowing owl surveys. Please provide weather conditions at the time of surveys, transect spacing, whether the surveyors walked transects or observed "potential habitat" from the road, total amount of habitat surveyed on each of the 4 survey days, and results (potential burrows, burrows with sign, etc.).
8. I previously requested clarification on whether potential staging areas have been surveyed and mapped for vegetation type. The disturbance areas are not shown in the dataset provided. The dataset includes just the alignment of the sub-transmission and telecomm routes. Please provide this information with the PEA resubmittal.
9. I previously requested survey and evaluation of cultural resources in the proposed staging areas. SCE indicated in "Response to Question 04" that supplemental information is forthcoming. Please provide this information to the CPUC's archaeologist coincident with the PEA resubmittal.

I look forward to reviewing SCE's resubmittal of the PEA for the Banducci Substation Project. Please contact me if you have any questions.

Sincerely,

Amy Baker

/s/

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cc:

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