PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



March 18, 2016

Ian Forrest, Senior Attorney Southern California Edison Company Post Office Box 800 Rosemead, CA 91770 Email: ian.forrest@sce.com

RE: Deficiency Report #4 - Certificate of Public Convenience and Necessity for the Riverside Transmission Reliability Project – Application No. A.15-04-013

Dear Mr. Forrest,

The California Public Utilities Commission's (CPUC) Energy Division CEQA Unit has completed its review of Southern California Edison's (SCE's) Application (A. 15-04-013) for a Certificate of Public Convenience and Necessity (CPCN) for the Riverside Transmission Reliability Project (RTRP) and responses to CPUC's Deficiency Reports #1, #2, and #3. The Energy Division found deficiencies in the information contained in SCE's responses to Deficiency Report #2 regarding preliminary engineering plans for the project. The attached report identifies outstanding deficiencies in SCE's response to Deficiency Report #2, Item #1. Included with this Deficiency Report are the following attachments for SCE's reference:

- 1. Attachment A Mapbook set illustrating conflicts with proposed work areas.
- 2. Attachment B Mapbook set illustrating the geographic extent of previous cultural resource surveys conducted between 2006 and 2011.

Information provided by SCE in response to the Energy Division's finding of deficiency should be filed as supplements to Application A. 15-04-013. One set of responses should be sent to the Energy Division and one to our consultant Panorama Environmental, in <u>both</u> hardcopy and electronic format. We request that SCE respond to this report no later than April 15, 2016.

We will review the information within 30 days and determine if it is adequate to accept the application as complete. We will be available to meet with you at your convenience to discuss these items.

The Energy Division reserves the right to request additional information at any point in the application proceeding and during subsequent construction of the project should SCE's CPCN be approved.

Please direct questions related to this application to me at (415) 703-5484 or <u>Jensen.Uchida@cpuc.ca.gov</u>.

Mr. Ian Forrest, Southern California Edison March 18, 2016 Page 2

Sincerely,

Jensen Uchida Project Manager

Energy Division, CEQA Unit

cc: Mary Jo Borak, Supervisor

Jack Mulligan, CPUC Attorney Tom Diaz, SCE Regulatory Affairs

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Christine Schneider, Panorama Environmental, Inc.

Jeff Thomas, Panorama Environmental, Inc.

DEFICIENCY REPORT #4 FOR THE RIVERSIDE TRANSMISSION RELIABILITY PROJECT APPLICATION (A. 15-04-013)

REPORT OVERVIEW

The California Public Utilities Commission (CPUC) has identified deficiencies in Southern California Edison's (SCE's) Application (A.15-04-013) for a Certificate of Public Convenience and Necessity for the Riverside Transmission Reliability Project (RTRP). Deficiencies were identified according to requirements of the CEQA (Public Resources Code Section 21000 *et seq.*), General Order 131-D, and the Commission's Rules of Practice and Procedure for a CPCN. Deficiencies are presented in Table 1.

Table 1: SCE Riverside Transmission Reliability Project Application 15-04-013 Deficiency Report #4		
Number	Deficiency	
1	Provide GIS data and detailed route maps showing the locations of the following: Conductor stringing pull and tension areas Guard structures 230-kV conductor field snub areas The GIS data and route maps provided in response to Deficiency Report #2 did not include locations of pull and tension areas, guard structures or field snub areas. This information is required to analyze environmental impacts of the proposed project.	
2	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.	
3	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	

Table 1: SCE Riverside Transmission Reliability Project Application 15-04-013 Deficiency Report #4			
Number	Deficiency		
	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:		
	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		
	Caltrans right of way along Highway 15		
	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 any planned alignment revisions or refinements following SCE's CPCN application such as the relocation of Pole JD22 (identified at the November 2015 site visit).		
	Please include GIS data files for all detailed route map refinements.		
4	Provide an updated version of Table 2.5-3a in the 2013 RTRP Final EIR that reflects all changes to calculated work space disturbance areas based on preliminary engineering revisions (see Items #1 through #3 above).		
5	Provide cultural resource survey reports and data for all unsurveyed portions of project disturbance areas as refined in response to Items 1 through 3 above (see also Attachment B).		
6	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.		
7	Focused surveys are required for the following special-status species within suitable habitat:		
	Burrowing owl		
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Table 1: SCE Riverside Transmission Reliability	Project Application 15-04-013
Deficiency Report #4	

Deficiency Report #4		
Number	Deficiency	
	 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.	

















































