

# Valley-Ivyglen 115-kV Subtransmission Line and Alberhill System Projects Final Environmental Impact Report Errata

## Introduction

The California Public Utilities Commission (CPUC) published the Final Environmental Impact Report (Final EIR) for the Valley-Ivyglen 115-kV Subtransmission Line and Alberhill System Projects in April 2017. During the Proceeding (A0701031; A0704028; A0909022), several parties submitted briefs alleging deficiencies in several comment responses. The CPUC has re-reviewed the comments in question and responses to those comments in the Final EIR, and has considered the commentary in the briefs and determined that several minor clarifications are warranted. Therefore, the CPUC makes the following changes to the body of the Final EIR and Appendix L of the Final EIR. Note that the edits below do not result in significant new information as described in Section 15088.5(a) of the California Environmental Quality Act (CEQA) Guidelines and do not require recirculation of the document.

## Changes to Appendix L of the Final EIR

Modifications to responses contained in Appendix L are shown below in underline and ~~strikeout~~.

**99-62:** Given that helicopter landing and takeoff activities would be short-term and occur on paved areas or on helicopter landing pads that, according to SCE data, are not located in close proximity to residences, and given the low number of reported cases of Valley Fever in ~~this the~~ the project area, ~~sensitive receptors residents~~ residents are unlikely to contract the disease from dust generated by helicopters. Construction workers have the greatest exposure to construction dust, and construction contractors and employers are required to comply with Cal/OSHA policies, including policies related to Valley Fever, as described under Impact AQ-2 (VIG) and Impact AQ-2 (ASP). Implementation of dust control measures during construction would reduce potential fugitive dust dispersion to a less than significant level (see DEIR Section 4.3.4.1 - Project Commitment J: Air Emissions Controls). In addition, MM AQ-3 would further reduce this already less than significant impact. Edits have been incorporated into Sections 4.3.1.3, 4.3.4.2 and 4.3.5.2 of the DEIR.

**248-2:** In cases where a visual impact was identified, mitigation was included to reduce the impact, which included either undergrounding or other measures. Regarding the methodology for assessing aesthetic impacts, as described in Section 4.1.3.1, Aesthetic Impact Assessment Methodology, “The FHWA has recently revised its guidelines for visual impact assessment to allow different levels of documentation and be more readily understood and practical in its application. However, the new FHWA guidelines now focus more on transportation projects and no longer emphasize several key concepts from the earlier guidelines that are applicable to various types of projects, such as transmission lines, substations, and similar industrial-type development projects, in rural, suburban, and urban landscapes. Although the new FHWA guidelines incorporate many elements from those issued in 1988, the earlier guidelines remain most applicable for assessing aesthetic impacts of proposed projects situated within diverse landscape types and on private lands. Due to the nature and setting of the proposed projects, the methodology for this aesthetic impact assessment relies primarily on the process, concepts, and terminology outlined in the FHWA’s 1988 guidelines, while incorporating some elements of the BLM’s and USFS’s established visual assessment methodologies as applicable.”

1 As implied by the commenter, the CPUC did not analyze every view in the area. Rather, the  
2 CPUC's analysis of Key Viewpoint 8 is considered representative of similar views within the  
3 area that do not currently contain aboveground transmission lines. As such, the CPUC need not  
4 evaluate the proposed project from additional viewpoints in order to reach an impact  
5 determination. As stated under Impact AES-3 (VIG), under Operations and Maintenance, "As  
6 shown in the visual simulation for Key Viewpoint 8 (Figure 4.1-4i), new LWS poles would be  
7 placed along this portion of roadway in a commercially developed area. The new poles would be  
8 taller than the existing vertical light poles and buildings, and the new poles would be visibly  
9 silhouetted against the sky. The addition of the new LWS poles would increase contrast in form,  
10 line, color, and texture due to their tall heights, vertical forms and lines, and dark gray color  
11 silhouetted against the light blue sky. The new poles would be dominant elements, but the form,  
12 line, color, and texture would be consistent with the existing visual character of the area. The  
13 project would therefore only reduce intactness and unity from moderately high to moderate and  
14 would only reduce vividness from moderately low to low for views from Key Viewpoint 8 and  
15 similar views in this area. Viewer groups in this commercial area consist largely of workers,  
16 commuters, and people engaged in personal business, and visual sensitivity is moderately low.  
17 Visual impacts would therefore be less than significant."

18  
19 Regarding viewer sensitivity, as stated in Section 4.1.1.2, Visual Sensitivity, "A lower viewer  
20 sensitivity does not in all cases imply that viewers do not have a concern for changes to the  
21 views, but rather that their activities and focus are concentrated elsewhere, and as such they may  
22 not have the same reaction to change as viewers who focus on the views surrounding them."

23  
24 See Section 4.1, Aesthetics, for more information. In addition, note that the CPUC considered  
25 undergrounding alternatives. See Chapter 5.0, Comparison of Alternatives, for an analysis of  
26 undergrounding alternatives.

27  
28 **248-7:** See response to comment 248-2. In addition, Section 4.1.2.3, Regional and Local, describes  
29 "General Order No. 131-D," which explains the CPUC's preemption of local regulating powers  
30 as follows:

31  
32 "The CPUC has sole and exclusive State jurisdiction over the siting and design of the proposed  
33 Project. Pursuant to General Order No. 131-D, Section XIV.B, 'Local jurisdictions acting  
34 pursuant to local authority are preempted from regulating electrical power line projects,  
35 distribution lines, substations, or electric facilities constructed by public utilities subject to the  
36 CPUC's jurisdiction. However, in locating such projects, the public utilities are directed to  
37 consider local regulations and consult with local agencies regarding these matters.'  
38 Consequently, public utilities are directed to consider local regulations and consult with local  
39 agencies, but the county and cities' regulations are not applicable as the county and cities do not  
40 have jurisdiction over the proposed Project. Accordingly, a discussion of local land use  
41 regulations is provided in the following subsections for informational purposes only."

42  
43 **376-7:** This alternative, should SCE determine that such an action was appropriate, would not require a  
44 permit and therefore is considered part of the "No Project" Alternative. The text related to the  
45 No Project Alternative has been updated in Chapter 3. Note that the No Project alternative would  
46 not meet the project objectives and would not relieve projected electrical demand that exceeds  
47 the operating limits of the existing facilities because it would not provide additional support to  
48 the existing operating limits of the existing facilities.

1 **Appendix L References**

2  
3 The following reference list is appended to the end of Appendix L in a new section titled “7.0,  
4 References.” The Table of Contents for Appendix L is similarly updated.

5  
6 **7.0 References**

7  
8 CAISO. 2016. The California ISO Controlled Grid Generation Queue – CISO Active. June 3.

9  
10 CPUC. 2002. Decision 02-12-066: Opinion on the Need for Additional Transmission Capacity to Serve  
11 the San Diego Gas & Electric Company Service Territory. December 19.

12  
13 CPUC. 2008. Decision 08-12-058: Decision Granting a Certificate of Public Convenience and Necessity  
14 for the Sunrise Powerlink Transmission Project. December 18.

15  
16 FERC. 2007. Final Environmental Impact Statement: Lake Elsinore Advanced Pumped Storage Project  
17 (FERC Project No. 11858). January.

18  
19 FERC. 2012. Order Issuing Preliminary Permit and Granting Priority to File License Application. (FERC  
20 Project No. 14227). October 24.

21  
22 FERC. 2014. Certification of Uncontested Settlements (Docket Nos. ER ER12-1302-000, ER12-1305-  
23 000 (Consolidated), ER12-1312-000)

24  
25 Nevada Hydro. 2016. Six-Month Progress Report for Lake Elsinore Advanced Pumped Storage Project.  
26 (FERC Project No. 14227). October 29.

27  
28 Riverside County Transportation Department. 2016. Transportation Improvement Program 2015/16 &  
29 2016/17 Biennial Report (TIP). December 13, 2016.

30  
31 **Changes to Section 1.1.1.4, Projected Valley South 115-kV System Demand**

32  
33 The third paragraph under Section 1.1.1.4 has been modified as follows:

34  
35 Based on the increase in electrical demand from 2008 through 2016 and data that indicate  
36 continued growth in the County of Riverside, the applicant determined that electrical demand will  
37 continue to increase through 2023. The applicant forecasts that peak electrical demand for a 1-in-  
38 5 year heat storm could increase to ~~4,144~~ 1,121 MVA by 2019, exceeding the operating limit of  
39 the two Valley South 500/115-kV transformers (Table 1-1). The applicant’s forecast for peak  
40 electrical demand indicates that there will be a need to reduce demand on the two transformers  
41 that serve the Valley South 115-kV System by summer 2019.

42  
43 **Changes to Section 3.4.5, ASP No Project Alternative, of the Final EIR**

44  
45 The following changes have been made to the description of the “No Project Alternative”:

- 46  
47 3. SCE ~~may would~~ modify their planning approach and operating procedures so that the C-  
48 Section transformer at the Valley Substation would provide additional power transfer  
49 capability and mitigate potential overload conditions on D-Section transformers.

1 Currently, SCE sets the circuit breaker at the Valley Substation between the C Section and D Section  
2 transformers at the “normal open” position. Under the No Project Alternative, the circuit breaker  
3 settings and operating procedures would be modified so that the circuit breaker between these  
4 transformers is closed when D Section transformers are overloaded. In the short term, the C Section  
5 transformer would provide additional power transfer capability and would mitigate potential overload  
6 conditions on D Section transformers. However, this alternative would not meet the forecasted  
7 electrical capacity needs of the proposed project in the long term.  
8

#### 9 **Changes to Section 4.1.4.2, Impact AES-3 (ASP)**

10  
11 The first paragraph of Impact AES-3 (ASP) has been modified as follows:  
12

13 The proposed Alberhill Project has the potential to affect visual resources at Key Viewpoints 13,  
14 14, and 15 and several other locations. Although an additional circuit would be added to poles  
15 coinciding with the Valley-Ivyglen segments represented in Key Viewpoint 6, 7, and 8 (ASP2,  
16 ASP3, and ASP4), these changes would be incremental and would not raise the level of  
17 significance beyond that disclosed under AES-3 (VIG). The visual simulation for Key Viewpoint  
18 13 (Figure 4.1-4n) provides an example of the incremental impact associated with adding an  
19 additional circuit to the proposed Valley-Ivyglen structures. Table 4.1-10 summarizes the changes  
20 to the aesthetic qualities of these representative Key Viewpoints due to project operation and  
21 maintenance activities, prior to implementation of any mitigation.  
22

#### 23 **Changes to Section 4.3.1.3, Ambient Air Quality in the Proposed Projects Area, of the Final EIR**

24  
25 The Valley Fever section on page 4.3-6 of Section 4.3.1.3 has been modified as follows:  
26

27 Valley Fever or coccidioidomycosis is primarily a disease of the lungs caused by inhalation of  
28 spores of the *Coccidioides immitis* fungus. The *Coccidioides* fungus resides in the soil in  
29 southwestern United States, northern Mexico, and parts of Central and South America. When  
30 weather and moisture conditions are favorable, the fungus “blooms” and forms many tiny spores  
31 that lie dormant in the soil. The spores are found in the top few inches of soil. The fungal spores  
32 become airborne when contaminated soil is disturbed by human activities, such as construction  
33 and agricultural activities, and natural phenomenon, and are subsequently inhaled into the lungs.  
34 Valley Fever disease Infection occurs when the spores of the fungus become airborne and are  
35 inhaled (Hector, 2005). ~~There is a low probability of the Valley Fever spores in the VIG and ASP~~  
36 ~~project areas (Riverside University Health System 2015).~~  
37

38 In 2014, the State of California had an incidence rate for confirmed cases of Valley Fever of 5.8  
39 per 100,000. In contrast, in 2015, Riverside County had a confirmed incidence rate of 2.9 per  
40 100,000. According to reported data, cases do not disproportionately occur within cities that  
41 comprise or are in immediate proximity to the project area (Riverside University Health System  
42 2015).  
43  
44

1 **Changes to Section 4.3.2.2, State, of the Final EIR**

2  
3 The following section has been added:

4  
5 **Cal/OSHA Regulations Applicable to Valley Fever**

6  
7 Although information is still emerging about Valley Fever in Riverside County, and it is unclear  
8 whether the soils in the project area contain significant amounts Coccidioides immitis compared  
9 to the Central Valley, developers and construction contractors are nonetheless required to comply  
10 with the following Cal/OSHA recommendations and regulations:

- 11  
12 • Employers have a legal responsibility to immediately report to Cal/OSHA any serious  
13 injury or illness, or death (including any due to Valley Fever) of an employee occurring  
14 in a place of employment or in connection with any employment. Employers also have  
15 responsibilities to control workers' exposure to hazardous materials.
  
- 16  
17 • Applicable regulations with regard to Valley Fever protection and exposure can be found  
18 in the California Code of Regulations, Title 8, sections
  - 19 ○ 342 (Reporting Work-Connected Fatalities and Serious Injuries),
  - 20 ○ 3203 (Injury and Illness Prevention),
  - 21 ○ 5141 (Control of Harmful Exposures),
  - 22 ○ 5144 (Respiratory Protection) and
  - 23 ○ 14300 (Employer Records-Log 300).

24  
25 **Changes to Impact AQ-2 (VIG):**

26  
27 The following changes have been made to the last paragraph under Impact AQ-2 (VIG) under  
28 “Construction”:

29  
30 In addition, given the low number of Valley Fever cases reported in this area, sensitive receptors  
31 are unlikely to contract the disease from the risk that dust generated by construction of the project  
32 would cause construction workers or nearby residents to contract the disease is low. However,  
33 construction workers have the greatest exposure to construction dust, and construction contractors  
34 and employers are required to comply with Cal/OSHA policies, including policies related to  
35 Valley Fever. Implementation of dust control measures (Project Commitment J) during  
36 construction would further reduce potential fugitive dust dispersion to a less than significant  
37 level. Implementation of MM AQ-3 would further reduce this already less than significant  
38 impact.

39  
40 **Changes to Impact AQ-2 (ASP):**

41  
42 The following paragraph has been added under Impact AQ-2 (ASP) under “Construction”:

43  
44 In addition, given the low number of Valley Fever cases reported in this area, the risk that dust  
45 generated by construction of the project would cause construction workers or nearby residents to  
46 contract the disease is low. However, construction workers have the greatest exposure to  
47 construction dust, and construction contractors and employers are required to comply with  
48 Cal/OSHA policies, including policies related to Valley Fever. Implementation of dust control  
49 measures (Project Commitment J) during construction would further reduce potential fugitive

1 dust dispersion to a less than significant level. Implementation of MM AQ-3 would further reduce  
2 this already less than significant impact.  
3

4 In addition, the following change has been made to the third paragraph under “Helicopter Construction”:  
5

6 Given that helicopter landing and takeoff activities would be short-term and occur on paved areas  
7 or on helicopter landing pads that, according to SCE data, are not located in proximity to  
8 residents, and given the low number of Valley Fever cases reported in this area, residents and  
9 construction workers ~~sensitive receptors~~ are unlikely to contract the disease from dust generated  
10 by helicopters. However, construction workers have the greatest exposure to construction dust,  
11 and construction contractors and employers are required to comply with Cal/OSHA policies,  
12 including policies related to Valley Fever. Implementation of dust control measures (Project  
13 Commitment J) during construction would reduce potential fugitive dust dispersion from  
14 helicopters or other methods of construction to a less than significant level. Implementation of  
15 MM AQ-3 would further reduce this already less than significant impact.