

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



July 30, 2015

Mr. Thomas Burhenn
Regulatory Affairs Department
Southern California Edison Company
2244 Walnut Grove Avenue
Rosemead, CA 91770

Re: Data Request C for the Valley-Ivyglen Subtransmission Line Project and Alberhill System Project EIR

Dear Mr. Burhenn:

The Energy Division of the California Public Utilities Commission is currently conducting environmental review of the Valley-Ivyglen Subtransmission Line Project and the Alberhill Project and has identified an additional data need. As a result, the Energy Division requests that Southern California Edison (SCE) review the Project Commitments in Attachment 1 and confirm their completeness, accuracy, and applicability to both proposed projects.

We request that the response to this request be provided to us by Thursday August 6, 2015. Upon receipt of the supplemental information, the Energy Division will use the information for the analyses in the Draft EIR.

The Energy Division reserves the right to request additional information at any point in the process. Questions relating to the Valley-Ivyglen or Alberhill Projects should be directed to me at (415) 703-5484 or Jensen.Uchida@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Jensen Uchida".

Jensen Uchida
Energy Division
Transmission and Environmental Permitting
California Public Utilities Commission

Attachment 1: Data Request C

Cc: Jennifer Wolf, SCE
Alisa Krizek, SCE
Kristi Black, Ecology & Environment Inc.

Draft Project Commitments for Alberhill System Project and Valley–Ivyglen Subtransmission Project

Project Commitment A: Landscaping and Irrigation Plan. For the Alberhill Project, prior to the start of construction, the applicant would develop a Landscaping and Irrigation Plan for Alberhill Substation that is consistent with surrounding community standards. The applicant would consult with Riverside County about the Plan and incorporate applicable County recommendations to the extent possible. Landscaping would be designed to filter views from the surrounding community and other potential sensitive receptors near the proposed substation and be consistent with the surrounding community. The landscape plan would include a plant species list and installation and construction requirements. The applicant would contract a landscape architect to complete the landscaping plan during final engineering for the Alberhill Project. Irrigation and landscaping installation would occur after construction of the substation perimeter wall and water service has been established. During operations, the applicant would maintain the substation site pursuant to the Landscaping and Irrigation Plan and be responsible for upkeep as long as the applicant owns the property.

Project Commitment B: Worker Environmental Awareness Plan. Prior to construction of the proposed projects, a Worker Environmental Awareness Plan would be developed based on final engineering designs, the results of preconstruction surveys, project commitments, and mitigation measures imposed by the California Public Utilities Commission. A presentation would be prepared by the applicant and shown to all site workers prior to their start of work. A record of all trained personnel would be kept with the construction foreman. In addition to the instruction for compliance with any site-specific biological or cultural resource protective measures and project mitigation measures, all construction personnel would also receive the following:

- A list of phone numbers of the applicant's personnel with the (archeologist, biologist, environmental compliance coordinator, and regional spill response coordinator);
- Instruction on the South Coast Air Quality Management District Rule 403 for control of dust;
- Instruction on what typical cultural resources look like, and if discovered during construction, to suspend work in the vicinity of any find and contact the site foreman and archeologist or environmental compliance coordinator;
- Instruction on individual responsibilities under the Clean Water Act, the Storm Water Pollution Prevention Plan for the projects, site-specific Best Management Practices, and the location of Material Safety Data Sheets for the projects;
- Instructions to notify the foreman and regional spill response coordinator in case of hazardous materials spills and leaks from equipment or upon the discovery of soil or groundwater contamination;
- A copy of the truck routes to be used for material delivery; and
- Instruction that noncompliance with any laws, rules, regulations, or mitigation measures could result in being barred from participating in any remaining construction activities associated with the projects.

Project Commitment C: Raptor Protection. The applicant would design all 115-kV subtransmission structures consistent with the Suggested Practices for Raptor Protection on Power Lines: The State of the Art in 2012 (APLIC 2012).

Project Commitment D: Habitat Restoration and Revegetation Plan. With input from the appropriate resource agencies, the applicant would develop and implement a Habitat Restoration and Revegetation Plan to restore areas where construction of the projects would be unable to avoid impacts on native vegetation and sensitive resources, such as wetlands, wetland buffer areas, riparian habitat, and other sensitive natural communities. The applicant

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would restore all areas disturbed during construction of the projects, including staging areas and pull, tension, and splicing sites, to as close to pre-construction conditions as possible, or to the conditions agreed upon between the applicant and landowner. Replanting and reseeding would be conducted under the direction the applicant or contract biologists. If revegetation would occur on private property, revegetation conditions would be part of the agreement between the applicant and the landowner.

Project Commitment E: Grading Plan. The Riverside County Flood Control and Water Conservation District shall be consulted regarding grading plans for construction and operation of the proposed projects. The County will review and approved final grading (and drainage) plans prior to start of construction. Storm water improvement sections of the plans shall be designed to maintain a discharge of storm water runoff consistent with the characteristics of storm water runoff presently discharged from project areas including the Alberhill Substation site. Measures included in the plans shall minimize adverse effects on existing or planned storm water drainage systems. Ground surface improvements installed at the site pursuant to the plans shall be designed to minimize discharge of materials that would contribute to a violation of water quality standards or waste discharge requirements. The final grading design shall include features that would minimize erosion and siltation both onsite and offsite. In addition, the final grading (and drainage) design shall be based on the results of the geotechnical study and soil evaluation for the substation site (Project Commitment F).

Project Commitment F: Geotechnical Study, Soil Testing, and Seismic Design Standards. Prior to the start of construction, the applicant shall conduct geotechnical and hydrologic studies and field investigations of the Alberhill Substation site, 500-kV transmission line routes, all 115-kV subtransmission line routes, and all telecommunications line routes. The studies shall include an evaluation of the depth to the water table, liquefaction potential, physical properties of subsurface soils, soil resistivity, and slope stability (landslide susceptibility). The studies shall include soil boring and laboratory testing to determine the engineering properties of soils, would characterize soils and underlying bedrock units, characterize groundwater conditions, and evaluate faulting and seismicity risk. Soil samples shall be collected and analyzed for common contaminants and the presence of hazardous materials. If chemicals are detected in the soil samples at concentrations above action levels, the applicant shall avoid the contaminated soil or work with the property owner to remove the contaminated soil. The results of this study shall be applied to final engineering designs for the projects. The information collected shall be used to determine final tubular steel pole foundation designs. In addition, the applicant shall design Alberhill Substation consistent with the Institute of Electrical and Electronic Engineers 693 Standard, *Recommended Practices for Seismic Design of Substations*.

Project Commitment G: Aircraft Flight Path Safety Provisions and Consultations. Prior to construction, the applicant shall consult with the Federal Aviation Administration and ensure the filing of forms and associated specifications per the requirements of Federal Aviation Regulations Part 77 (Objects Affecting Navigable Airspace). The applicant shall mark and light the components of the projects consistent with Federal Aviation Administration recommendations unless otherwise directed by the CPUC.

Project Commitment H: Implement Noise Control Measures. The applicant shall implement the following noise control measures for the proposed projects:

- All construction and general maintenance activities, except in an emergency, shall be limited to the hours of 7:00 a.m. to 7:00 p.m. and prohibited on Sundays and all legally proclaimed holidays. If the California Independent System Operator (CAISO) and/or Caltrans require that conductor stringing over freeways or highways occur after 7:00 p.m., or on a Sunday, SCE would obtain variances from all applicable jurisdictions.

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- Construction equipment shall use noise reduction features (e.g., mufflers and engine shrouds) that are no less effective than those originally installed by the manufacturer.
- Construction traffic shall be routed away from residences and schools where feasible.
- Unnecessary construction vehicle use and idling time shall be minimized to the extent feasible. The ability to limit construction vehicle idling time is dependent upon the sequence of construction activities and when and where vehicles are needed or staged. A “common sense” approach to vehicle use shall be applied; if a vehicle is not required for use immediately or continuously for construction activities, its engine should be shut off. Note: certain equipment, such as large diesel-powered vehicles require extended idling for warm-up and repetitive construction tasks.
- The applicant will notify all receptors within 500 feet of construction of the potential to experience significant noise levels during construction.
- During construction, the applicant will use sound walls, noise-reduction blankets, or other noise reduction measures prior to developing the project site in areas where sensitive receptors would be subjected to significant noise impacts.
- The applicant would shield small stationary equipment with portable barriers within 100 feet of residences.
- The applicant would minimize engine idling and turn off engines when not in use.
- Where blasting is required for the Alberhill system Project, the applicant would conduct additional pre-blast notification and coordination with residents, utilities, and others that may be affected by blasting operations.

Project Commitment I: Agricultural Uses. Existing agricultural and grazing uses within the existing and proposed ROW areas shall be allowed to continue during operation of the proposed projects. In addition, the applicant shall coordinate construction and maintenance activities with agricultural landowners to avoid interference with grazing and agricultural activities unless such coordination is not possible due to emergency circumstances.

Project Commitment J: Air Emissions Controls. The applicant would implement the following fugitive dust control measures for the Valley–Ivyglen Subtransmission Project:

- Water three times per day during excavation, bulldozing, scraping, and grading activities, per SCAQMD’s Table XI-A, Mitigation Measure Examples: Fugitive Dust from Construction and Demolition (Rev. 4/2007).
- Water storage piles by hand at a rate of 1.4 gallons/hour-yard, per SCAQMD’s Table XI-B, Mitigation Measure Examples: Fugitive Dust from Materials Handling (Rev. 4/2007).
- Limit vehicle speeds on unpaved roads to 15 miles per hour, per SCAQMD’s Table XI-A, Mitigation Measure Examples: Fugitive Dust from Construction and Demolition (Rev. 4/2007).

The applicant would implement the following fugitive dust control measures for the Alberhill System Project:

- Maintain 15 percent soil moisture conditions during excavation, bulldozing, scraping, and grading activities, per SCAQMD CEQA Air Quality Handbook (1993), Table 9-9-G-1.
- Water storage piles twice a day, resulting in a 50% fugitive dust control efficiency.
- Water unpaved roads twice per day, per SCAQMD’s Table XI-D Mitigation Measure Examples: Fugitive Dust from Unpaved Roads (Rev. 4/2007).