PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



February 8, 2021

Michael Bass Environmental Project Manager Southern California Edison 2244 Walnut Grove Avenue Rosemead, CA 91770

RE: Valley-Ivyglen 115kV Subtransmission Project (VIG) – Minor Project Refinement No. 10 Request: Minor Project Refinement No. 8 - Additional Work Areas

Dear Mr. Bass,

On February 1, 2021, Southern California Edison (SCE) submitted a request for Minor Project Refinement (MPR) No. 10 to the California Public Utilities Commission (CPUC) for review. The proposed MPR would involve additional work associated with the installation of the temporary 33 kV power circuit from a nearby pole into the Ivyglen Substation. The overall work area was originally approved under MPR No. 8 on January 20, 2021. The additional work areas are in two locations necessary for tree trimming equipment to remove tree branches of ornamental species on the north side of Temescal Canyon Road. The removal of the tree branches would allow for the 48 inches of clearance between electrical conductor and vegetation as required by Rule 35 of General Order 95.

The work described under MPR No. 10 is related to tree trimming only and would occur within the SCE/County of Riverside Franchise Agreement area which is adjacent to Temescal Canyon Road, a County road. The non-native trees to be trimmed include; London planetree, pine and eucalyptus. Equipment would be staged within the roadway and no soil disturbance is anticipated. However, at the conclusion of work, if there is a need, the sites would be restored/reclaimed in accordance with the Project SWPPPs, Project Commitment D, and the project Habitat Restoration and Revegetation Plan.

Additional Work Area within General Disturbance Areas:

The proposed refinements would result in a net increase of 0.16 acres of temporary disturbance in Segment VIG8. The locations, area, and activities for each proposed refinement are provided in Table 1 and depicted in Figure 1.

Segment	Pole / Feature Name	Latitude	Longitude	Description	Activity
VIG8	Work Area	N/A	N/A	4,200 square feet of temporary work area for trimming of trees between TC-02 and TC- 03.	Trimming of tree branches in path of conductor between TC- 02 and TC-03.
VIG 8	Work Area	N/A	N/A	2,975 square feet of temporary work area for trimming of trees between TC-04 and TC- 05.	Trimming of tree branches in path of conductor between TC- 04 and TC-05.

 Table 1: VIG8 Additionally Requested Work Areas

Figure 1. Proposed Work Areas Associated with MPR No. 10.



CPUC Evaluation of MPR No. 10 Request

The CPUC evaluated SCE's MPR Request No. 10 to verify that they fulfill the requirements of the MMCRP. In accordance with the MMCRP, the CPUC reviewed the request to confirm that no new impacts on sensitive resources, or impact in severity, would result from the requested MPR activities.

Summary of Proposed Land Disturbance:

Newly requested temporary disturbance areas associated with MPR No. 10 are shown in Table 2. The quantity and dimensions of disturbance areas are consistent with what is described in Table 2-5 of the FEIR. Section 2.4.2.1 of the FEIR states that construction of VIG would disturb approximately 633.7 acres of land, including approximately 141.5 acres of permanent disturbance. Total impacts for all VIG NTPRs/MPRs are anticipated to be below the quantities given in the FEIR. If quantities in future NTPRs/MPRs exceed the FEIR, an explanation of significance will be provided.

Feature	Number of Miles	Temporary Impact Total	Permanent Impact Total
Temporary Work Areas		0.16 ac (7,175 sq ft)	
Total	0.00 Miles	0.16 ac (7,175 sq ft)	0.0 ac (0 sq ft)

Aesthetics/Visual Impacts

The proposed additional work areas and the work to be conducted are consistent with the descriptions of the types of disturbances to occur during construction provided in Sections 2.3.1.1, 2.3.1.3, and Table 2-5 of the FEIR.

MPR No. 10 includes the trimming of trees within two temporary work areas (Figure 1). The area of the removed tree limbs would be visible to drivers traveling along Temescal Canyon Road and to some residents in homes on Wrangler Way, north of Temescal Canyon Road. The proposed location is not a scenic vista as described in Section 4.1.1.4 of the FEIR and is not included in the list of key viewpoints of sensitive locations in FEIR Section 4.1.3.3. The project design would minimize the visual distinctness of impacts by limiting the trimming tree branches to the 48 inches of clearance between electrical conductor and vegetation required by Rule 35 of General Order 95. The trimmed trees would include non-native ornamental tree along the northern road shoulder of Temescal Canyon Road, including London Planetree, pine, and eucalyptus trees (Figure 2). Oak trees would not be trimmed. The proposed refinements would not have a substantial adverse effect to a scenic vista, scenic resources, or to the visual character of the location.

Aesthetic impacts associated with these refinements do not create a new significant impact or a substantial increase in the severity of a previously identified impact identified in Section 4.1.4.2 of the FEIR. All applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

Biological, Cultural, Paleontological and other Environmental Resources

Aquatic resources that are both jurisdictional and MSHCP Riparian/Riverine resources are in the vicinity of the proposed work areas. However, the proposed work areas do not overlap with wetlands or waterways and no amendments to the waters permits would be needed.

The proposed work areas are not located within a Criteria Area Species Survey Area (CASSA), BUOW survey area, or small mammal survey area, and therefore additional focused surveys are not recommended or required by the MSHCP. The proposed work areas are outside of suitable habitat for CAGN; however, they are located within the vicinity of MSHCP Riparian and Riverine resources suitable for LBV. Construction in LBV areas is anticipated to occur outside LBV breeding season that occurs from March 1st through August 31st.

The proposed tree trimming would affect ornamental London Planetree, pine, and eucalyptus trees; oak trees would not be trimmed (Figure 2).

No ground disturbance is expected during construction; however, should disturbance occur, the work areas would be restored/reclaimed in accordance with the Project SWPPPs, Project

Commitment D, and the VIG Habitat Restoration and Revegetation Plan following the completion of all construction.

The proposed work areas are outside of the VIG WR-MSHCP Phase 2 certificate of inclusion (COI) coverage area. Based on the guidance provided by the RCA, the proposed refinements would not require notification and approval by the RCA prior to construction because the work would avoid sensitive resources and take. Additionally, the work does not include permanent impacts, and the overall disturbance to baseline vegetation of RCA concern would not exceed the acreage proposed in the MSHCP PSE application. The VIG MSHCP PSE application did not include any permanent impacts to MSHCP vegetation of concern and no additional impacts are proposed in MPR No. 10 (Table 3). All temporary impacts to vegetation would be restored in accordance with the HRRP.

MSHCP PSE Application	0.00 Acres
Currently Proposed Impacts (12/22/20)	0.00 Acres
Change in MSHCP Vegetation Impacts	0.00 Acres

MPR No. 10 proposed work areas are covered under the Stephens' kangaroo rat (SKR) Habitat Conservation Plan. Although 0.16 acres of the proposed refinements are outside of the SKR buffer depicted in the Certificate of Inclusion, the Riverside County Habitat Conservation Agency has agreed that SCE may reconcile impacted acreage once the Project has reached final design. SCE would be responsible for identifying acreage not previously included in the COI (such as the acreage proposed here) as well as removing acreage that was included in the COI but not disturbed by construction activities.

The activities described in MPR No. 10 do not create a new significant impact or a substantial increase in the severity of an identified impact listed in Section 4.4.4.2 of the FEIR. Indirect impacts that may occur to sensitive species in the vicinity of the proposed work areas would be mitigated in accordance with the Project Commitments and Mitigation Measures. All applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

There are no anticipated ground disturbance activities as part of MPR No. 10, however, cultural resource and paleontological surveys were completed of the area for MPR No. 8. Those surveys indicated that there are no sensitive resources in the proposed work area. Cultural and Native American monitoring would be conducted in accordance with the CRMTP. If a resource is found at the site, SCE would comply with the procedures for unanticipated discoveries provided in MM's CR-1b, CR-4, CR-5, CR-7, the CRMTP, and the PRMP.

All other CEQA subject areas were evaluated within MPR No. 8 and no potential impacts were identified. Additionally, all applicable avoidance/minimization measures identified in the FEIR Chapter 9 Mitigation, Monitoring, Compliance, and Reporting Plan would be followed.

Permits

No additional permits or approvals are required for MPR No. 10 activities.

MPR No. 10 Conditions of Approval

MPR No. 10 is approved by the CPUC with the following conditions which mirror the conditions of MPR No. 8. The conditions presented below, as with MPR No. 8, shall be met by SCE and it's contractors:

- 1. All applicable Project MMs, PCs, compliance plans, and permit conditions shall be implemented. Some measures have on-going/time-sensitive requirements and shall be implemented prior to and during construction, where applicable.
- 2. Copies of all relevant permits, compliance plans, and this MPR, shall be available on site for the duration of construction activities.
- 3. SCE shall have available spill response, and secondary containment, best management practices (BMPs) as outlined in the project SWPPP, and as specified by the Qualified SWPPP Practitioner.
- 4. All activities (e.g., stabilizing construction entrance/ ground surface, fence installation, etc.) shall be monitored by CPUC-approved monitors in accordance with the MMCRP, where appropriate.
- 5. In the event that MPR No. 10 activities require road improvement/ design, or vegetation clearing/ grubbing, SCE shall meet and confer with appropriate agencies and/or local jurisdictions as needed and notify the CPUC for concurrence and approval.
- 6. The work associated with MPR No. 10 shall occur within approved project workdays and hours. In the event that MPR No. 10 scheduling necessitates work outside of the hours permitted under local noise ordinances, SCE shall meet and confer with the local jurisdictions as needed and notify the CPUC for concurrence.
- 7. SCE and its contractors shall adhere to the WR-MSHCP terms and conditions, including but not limited to adherence to the Project Habitat Restoration and Revegetation Plan, adherence to the SWPPP, performance of preconstruction surveys for burrowing owls, and the use of biological monitors to record compliance with work area boundaries and compliance with the avoidance of environmentally sensitive areas (ESAs).
- 8. All complaints related to MPR No. 10 activities received by SCE shall be logged and reported immediately to the CPUC. This includes complaints relevant to traffic, as well as lighting, noise, vibration, dust, etc. Where feasible, complaints shall be resolved, depending on the nature of the complaint, through construction site or activity modifications. Complaints or disputes that cannot be modified through construction site or activity modifications processes described in the MMCRP.

Please contact me if you have any questions or concerns regarding this MPR approval.

Sincerely,

Catrue a Kelly

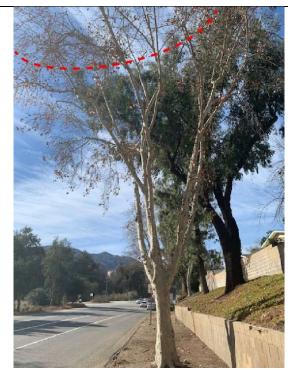
Patricia Kelly CPUC Project Manager

cc:

Chuck Cleeves, WSP (formerly E & E) Compliance Manager Fernando Guzman, WSP (formerly E & E) Deputy Compliance Manager Marcus Obregon, SCE Environmental Project Manager

Attachment A: MPR No. 10 Work Area Photographs

Trees Proposed for Trimming with Red Line Demarcating Approximate Cut Area.



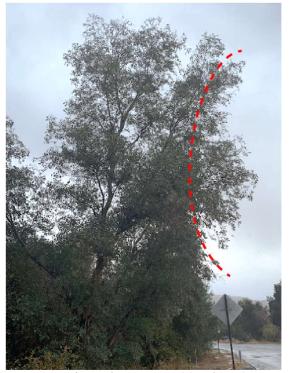
A. London Planetree between TC-02 and TC-03



B. Eucalyptus between TC-02 and TC-03



Pine between TC-02 and TC-03



D. Eucalyptus between TC-04 and TC-05