

PUBLIC UTILITIES COMMISSION

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December 21, 2020

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. 7 Request: Notice to Proceed- (NTP-) 2 Supplemental Work Areas at multiple locations throughout Segments VIG4, VIG5, VIG6, VIG7, and VIG8**

Dear Mr. Bass,

On December 1, 2020, Southern California Edison (SCE) submitted Minor Project Refinement (MPR) No. 7 Request to the California Public Utilities Commission (CPUC) for review. The proposed MPR would involve additional work areas and land disturbances that were not included in NTPR2 but are necessary to construct the Project work described in Section 2.3.1.1 of the Final Environmental Impact Report (FEIR). The proposed work areas are within the general disturbance area of the VIG Project, except as noted in Table 2-5 of the FEIR as being necessary to construct the Project components. The primary activities to be conducted at the proposed work areas would include installation of guy anchors, conductor, fiber optic, and telecommunication and subtransmission vaults. Furthermore, site preparation activities would include vegetation clearing, improvement/ construction of access roads and work areas, and installation of Stormwater Pollution Prevention Plan (SWPPP) best management practices (BMPs).

**Additional Work Areas within General Disturbance Areas:**

The proposed refinements would result in a net decrease of 0.07 acres of permanent and temporary disturbance in Segments VIG4 – VIG8. The locations, dimensions, and activities to occur at each site are provided in Table 1 and are virtually shown in the biological resources maps (see Attachment A).

**Table 1: VIG4 – VIG8 Additional Requested Work Areas**

Segment	Pole / Feature Name	Nearest Structure	Latitude	Longitude	Description	Activity
VIG4	Access Road	365E–366E	N/A	N/A	Elimination of the 7,822 square foot Level 5 access road from 365E to 375E approved in NTP No.2, and the addition of 5,456 square feet of Level 5 access road from 365E to 366E. The	Improvement of road for future SCE maintenance.

					shift would result in a net decrease of 2,366 square feet of permanent disturbance. The re-routed road avoids permanent impacts to smooth tarplant.	
VIG4	4106904E	405E	33.70407	-117.36304	327 feet northeast of 405E. The previously approved anchor site for 4106904E would be shifted to the northwest, placing 430 square feet outside of the general disturbance area and increasing the temporary disturbance area by 205 square feet.	Installation of guy anchor for the stability of 4106904E.
VIG4	4106907E	405E	33.703069	-117.36460	281 feet southwest of 405E. The previously approved anchor site for 4106907E would be shifted to the northwest, placing 297 square feet of previously approved temporary disturbance area outside of the general disturbance area.	Installation of guy anchor for the stability of 4106907E.
VIG5	Access Road	484E–485E	N/A	N/A	A 355 square foot increase of permanent disturbance and a 1,643 square foot decrease in temporary disturbance for a shift of the Level 5 access road between 484E and 485E.	Improvement of road for future SCE maintenance.
VIG8	V8-01	V8-01	33.76091	-117.4768	170 square feet of temporary work area added to the north side of the work area for V8-01.	Installation of vault V8-01 and underground duct bank.
VIG8	Subtrans Alignment / Telecom Alignment	V8-01–V8-02	N/A	N/A	Between V8-01 and V8-02. A northward shift of the underground alignment for the 115-kV line and telecom line duct bank. The shift would place 380 feet of 115-kV conduit, 415 feet of fiber optic conduit, and 12,570 square feet of previously approved temporary work area outside of the general disturbance area.	Installation of underground duct bank
VIG8	V8-02	V8-02	33.76197	-117.47310	A shift of the V8-02 work area to the west such that 5,035 square feet of previously approved temporary work area would be outside of the general disturbance area.	Installation of vault V8-02 and duct bank.
VIG8	Subtrans Alignment / Telecom Alignment	V8-03	N/A	N/A	108 feet west of V8-03. A northward shift of the underground alignment of the 115-kV line and telecom line duct bank. The shift would place 13 feet of telecom duct bank and 343 square feet of previously approved temporary work area outside of the general disturbance area.	Installation of underground duct bank.
VIG8	Subtrans Alignment / Telecom Alignment	V8-05–V8-06	N/A	N/A	Between V8-05 and V8-06. A northward shift of the underground alignment for the 115-kV line and telecom line duct bank. The shift would place 4,420 square feet of previously approved temporary work area outside of the general disturbance area.	Installation of underground duct bank.

The Valley-Ivyglen Subtransmission Line Project was evaluated in accordance with the California Environmental Quality Act (CEQA), and an Environmental Impact Report (EIR) was

prepared by the CPUC. The CPUC issued a Permit to Construct the Project on April 2, 2013 (Decision 10-08-009). The mitigation measures (MMs) and project commitments (PCs) described in the EIR were adopted by the CPUC as conditions of Project approval. In May 2020 the CPUC adopted the Mitigation Monitoring, Compliance, and Reporting Plan (MMCRP) to ensure compliance with all PCs and MMs during project implementation.

This letter documents the CPUC’s evaluation of all activities covered in the MPR No. 7 Request. The CPUC has carefully reviewed this MPR request and has verified that the proposed activities adhere to all applicable PCs and MM requirements. The evaluation process ensures that all PCs and MMs applicable to the location, and all activities covered in the MPR are implemented, as required in the CPUC’s decision. The evaluation process further ensures that the following criteria are met:

- The proposed change does not trigger additional discretionary permit requirements that are not defined in the EIR or MMCRP.
- The proposed change does not increase the severity of an impact or create a new impact, based on the thresholds used in the EIR.
- The proposed change is within the geographic scope of the study area utilized in the EIR.
- The proposed change does not conflict with any PC or MM, and the refinements would not result in a new conflict with any applicable guideline, ordinance, code, rule, regulation, order, decision, statute, or policy not already identified within the EIR.

The CPUC has determined that MPR No. 7 meets the above criteria. MPR No. 7 is approved by the CPUC for the proposed activities based on the factors described below.

**CPUC Evaluation of MPR No. 7 Request**

The CPUC evaluated SCE’s MPR Request No. 7 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 increases in impact severity, would result from the requested MPR activities. The following discussion summarizes this analysis for biological, cultural, paleontological, aesthetics and visual resources, as well as other environmental resources.

***Location of Ground Disturbance Areas***

MPR No. 7 activities would occur at several locations, work areas, or portions of work areas, throughout Segments VIG4, VIG5, VIG6, VIG7, and VIG8. The temporary and permanent disturbance areas associated with MPR No. 7 are shown in Table 2. The quantity and dimensions of MPR No. 7 disturbance areas are consistent with what is described in Table 2-5 of the FEIR. Section 2.4.2.1 of the FEIR, which 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.

**Table 2: Requested Disturbances Associated with MPR No. 7**

<b>Feature</b>	<b>Number of Miles</b>	<b>Temporary Impact Total</b>	<b>Permanent Impact Total</b>
Level 5 Road Improvement	-0.02	-0.04 ac (-1,643 sq ft)	-0.05 ac (-2,011 sq ft)
Temporary Work Areas	--	0.009 ac (375 sq ft)	--
<b>Total</b>	<b>-0.02 Miles</b>	<b>-0.03 ac (-1,268 sq ft)</b>	<b>-0.05 ac (-2,011 sq ft)</b>

### ***Aesthetics/Visual Impacts***

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

Aesthetic impacts associated with work under MPR No. 7 would 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. Additionally, all applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

### ***Biological, Cultural, Paleontological Resources, and other Environmental Resources***

The proposed work areas were included in previous biological surveys for the FEIR, as described in the biological report (Attachment A). Furthermore, the work areas do not overlap with wetlands or waterways; no amendments to the water permits would be needed.

The re-routing of the Level 5 access road in the vicinity of 365E–367E complies with a condition of the Phase 2 Multiple Species Habitat Conservation Plan (MSHCP) Certificate of Inclusion (COI) to avoid permanent impacts to a population of smooth tarplant. The proposed access route avoids the smooth tarplant population.

The proposed guy anchor work area for the existing subtransmission pole, 4106907E, southwest of 405E in VIG4, is located within a known population of San Diego Ambrosia. In compliance with Project Commitment L<sup>1</sup> and MSHCP Phase 2 Commitment ‘d’<sup>2</sup>, a biological monitor would be present during anchor installation to assist in minimizing impacts to plants. Plywood may be placed underneath equipment to protect San Diego Ambrosia from impact during guy anchor installation.

The northward shift of the subtransmission route in VIG8 would result in encroachment on Riversidean sage scrub (RSS) at V8-02 and V8-03. In accordance with MM BR-5, removal of Riversidean sage scrub habitat would not occur during the coastal California gnatcatcher breeding season.

The VIG8 subtransmission underground trench will pass within the protected zone of two mature coast live oak trees located on the northern shoulder of Temescal Canyon Road, between V8-01 and V8-02. In compliance with MM BR-6, an arborist would be present when crews work within the protected zone. Root-pruning would be limited to the minimum amount necessary and would

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<sup>1</sup> During construction, ground-disturbing activities including parking and staging of equipment and vehicles off-road within 50 feet of known populations of San Diego Ambrosia, the following will be implemented: Work should occur in the late summer/early fall (August to October) to avoid: 1) the San Diego ambrosia blooming season and 2) wet soil conditions during the rainy season when work could result in damage to the growing plant/rhizomes. If work, such as pole brushing, is required at other times, a biological monitor will be present to locate the San Diego ambrosia for avoidance. As a general rule, no work is allowed within 72 hours following a rain event, but dry site conditions will be verified by crews prior to initiation of work. If equipment and vehicles need to be situated over the plant population, metal grates or plywood sheets (depending on the size of equipment) will be placed over the plants temporarily. A biological monitor will be present during ground disturbing activities to ensure avoidance and minimization of impacts to San Diego Ambrosia.

<sup>2</sup> With input from the appropriate resource agencies, the applicant would develop and implement a Habitat Restoration and Revegetation Plan to restore temporarily impacted 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 would restore all temporarily impacted areas disturbed during construction of the projects, including staging areas and pull, tension, and splicing sites, to as close to preconstruction conditions as possible, or to the conditions agreed upon between the applicant and landowner. Replanting and reseeding would be conducted under the direction of 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.

be performed in conformance with MM BR-6.

Several of the proposed features are outside of the WR-MSHCP Phase 2 certificate of inclusion COI coverage area, including: portions of the Level 5 access roads at 366E and 484E, portions of the work areas for vaults V8-01 and V8-02, and the subtransmission and telecom work areas. Based on the guidance provided by the Western Riverside County Regional Conservation authority (RCA), construction of these features will not require notification and approval by the RCA prior to construction because the overall permanent disturbance to baseline vegetation of RCA concern does not exceed the acreage proposed in the MSHCP PSE application. The access road from 365E to 367E was proposed as a Level 5 road in the MSHCP Participating Special Entity (PSE) application. In response to the RCA's concern about impacts to smooth tarplant in that area, we are proposing to shorten the access road by 161 feet, which would have the additional benefit of reducing permanent disturbance to baseline grasslands of RCA concern by 0.05 acres (Table 3). No other MPR No. 7 proposed areas are in areas of baseline vegetation of RCA concern. All temporary impacts to vegetation will be restored in accordance with the Habitat Restoration and Revegetation Plan (HRRP).

**Table 3. Permanent Road Impacts to MSHCP Baseline Grasslands Between Poles 365E and 367E**

MSHCP PSE Application	0.18 Acres
Currently Proposed Impacts (11/20/20200	0.13 Acres
<b>Proposed In Grassland Impacts</b>	<b>0.05 Acres</b>

MPR No. 7 proposed work areas are covered under the Stephens' kangaroo rat (SKR) Habitat Conservation Plan. Although 1.23 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 will 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. 7 would 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.

The proposed work areas were surveyed and analyzed in the cultural and paleontological resources addendum reports (Attachments B and C respectively). The survey results indicate that there are no new sensitive archaeological or paleontological resources located at the proposed work areas. Cultural and tribal monitoring would be conducted in accordance with the Cultural Resources Monitoring and Treatment Plan (CRMTP). Paleontological monitoring, spot checking, and fossil recovery would be implemented for excavations at the proposed work areas in accordance with the Project's Paleontological Resource Monitoring Plan (PRMP). If a resource is found at the site, SCE would comply with the procedures for unanticipated discoveries provided in MMs CR-1b, CR-4, CR-5, CR-7, the CRMTP, and the PRMP. Impacts to cultural resources associated with this refinement would not create a new significant impact or a

substantial increase in the severity of a previously identified impact identified in the FEIR (Attachment B, Cultural Resources Report and Attachment C, Paleontological Resources Report). All applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

MPR No. 7 work activities occurring at the proposed locations and the types of equipment used are consistent with the activities described in Sections 2.3.1.1 and 2.3.1.3 of the FEIR. Implementation of the Project Noise Control Plan would ensure noise reduction measures are performed as required. Blasting activities are not anticipated during access road construction, site preparations, excavation work as described in the VIG FEIR Section 2.4.5.4. If blasting or fracturing is needed, a blasting plan would be submitted for CPUC review and approval in accordance with MMs WQ-1 and NV-2. Blasting would only be used in areas where subsurface obstructions reasonably preclude excavation using conventional construction equipment. Therefore, impacts to noise and vibration associated with work under MPR No. 7 would not create a new significant impact or a substantial increase in the severity of a previously identified impact identified in Section 4.11.4.2 of the FEIR. Additionally, all applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

Work activities occurring at the proposed locations and the types of equipment used are consistent with the activities described in Sections 2.3.1.1 and 2.3.1.3 of the FEIR. The type and quantity of construction equipment would be the same as identified in NTP-2; the areas requested would not require the use of additional equipment. In compliance with MM AQ-1, nitrogen oxide (NOx) and particulate matter (PM) emissions from off-road diesel-powered construction equipment would be minimized to the extent feasible by using Tier 4 interim or Tier 4 Standards for equipment with engines greater than 150 horsepower. Per MM AQ-2, daily emissions of equipment would be tracked to ensure NOx emissions stay within the NOx Regional Clean Air Incentive Market Trading Credits (RTCs) purchased for the Project.

Impacts to greenhouse gas emissions associated with MPR No. 7 would not create a new significant impact or a substantial increase in the severity of a previously identified impact identified in Section 4.7.4.2 FEIR. All applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

All proposed locations under MPR No. 7 are within the 1,000-foot corridor evaluated for solid waste disposal sites, Cease and Desist Orders, or Cleanup and Abatement orders per Section 4.8.1.1 of the FEIR. Planned ground-disturbing activities includes excavating, including drilling of holes for light-weight steel (LWS) pole installation. In the event of an inadvertent discovery, SCE would follow the procedures in Project's Contaminated Soil and Groundwater Contingency Plan. Proposed work areas in MPR No. 7 are located within a Very High Fire Hazard Zone. Fire danger mitigation would be implemented in accordance with the Project Emergency Action Plan and Fire Control and Emergency Response Plan. Impacts to hazards and hazardous materials associated with this refinement would not create a new significant impact or a substantial increase in the severity of a previously identified impact identified in Section 4.8.4.2 of the FEIR.

Furthermore, the quantity of construction equipment and personnel would be the same as identified in NTP-2. Adherence to the Project Traffic Management and Control Plan would

ensure compliance with traffic-related Project mitigation measures, TT-1, TT-2, and TT-7. There would be no change to the access routes identified in the Traffic Management and Control Plan. Impacts to transportation and traffic associated with this refinement would not create a new significant impact or a substantial increase in the severity of a previously identified impact identified in Section 4.15.4.2 of the FEIR. In addition, all applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

### ***Permits***

No additional permits or approvals are required for MPR No. 7 activities.

### **MPR No. 7 Conditions of Approval**

MPR No. 7 is approved by the CPUC with conditions. The conditions presented below shall be met by SCE and its 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 implement all appropriate erosion and sediment control best management practices (BMPs) for the MPR No. 7 additional disturbance areas, in compliance with the SWPPP and as specified by the Qualified SWPPP Practitioner. Sediment and erosion control BMPs shall be properly maintained throughout the duration of construction activities.
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. 7 activities require additional 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. SCE shall ensure that construction equipment at the proposed locations will have adequate and properly placed secondary containment to avoid and minimize potential spills.
7. The work associated with MPR No. 7 shall occur within approved project workdays and hours. In the event that MPR No. 7 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.
8. 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).
9. All complaints related to MPR No. 7 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 shall be

resolved through the dispute resolution communications processes described in the MMCRP.

10. SCE shall notify CPUC after completing MPR No. 7 work activities including use of access roads and temporary work areas, and provide photos of the restored additional work disturbance areas. In addition, in the event that new disturbance is foreseen, for maintenance or other activities, SCE shall notify CPUC for evaluation and approval.

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

Sincerely,



Patricia Kelly  
CPUC Project Manager

cc:

Chuck Cleeves, E & E Compliance Manager  
Fernando Guzman, E & E Deputy Compliance Manager  
Marcus Obregon, SCE Environmental Project Manager

**Attachment A:  
MPR No. 7 Biological Resources Report**

**Attachment B:**  
**MPR No. 7 Cultural Resources Report**

**Attachment C:**  
**MPR No. 7 Paleontological Resources Report**