

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



March 29, 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. 11 Request: Notice to Proceed- (NTP-) 2 Supplemental Work Areas at multiple locations throughout Segments VIG4, VIG5, and VIG6

Dear Mr. Bass,

On March 1, 2021, Southern California Edison (SCE) submitted Minor Project Refinement (MPR) No. 11 Request to the California Public Utilities Commission (CPUC) for review. The proposed MPR would involve additional land disturbances that were not included in NTPR-2 but are necessary to construct the Project work described in Section 2.3.1.1, 2.3.1.2 and 2.3.1.3 of the Final Environmental Impact Report (FEIR). The proposed work areas are within the general disturbance area of the Valley-Ivyglen 115-kV Project and are of the sizes described 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 poles, guy anchors, conductor, and fiber optic cable. Construction of these components would be accomplished in a manner consistent with the descriptions contained in the following VIG FEIR Sections: 2.4.5.4, 115-kV Structure Construction; 2.4.5.6, Wire Stringing; and 2.4.7.1, Fiber Optic Line Installation. 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 increase of 1.01 acres of permanent and 1.14 acres of temporary disturbance in Segments VIG4 – VIG6. 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 – VIG6 Additional Requested Work Areas

Segment	Pole / Feature Name	Nearest Structure	Latitude	Longitude	Description	Activity
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VIG4	Guy Anchor	366E	33.69259	-117.34886	23 feet northeast of 366E. A new guy anchor for a previously approved wood pole, 4765622E, within a previously approved work area.	Installation of guy anchor for the stability of 4765622E.
VIG4	Guy Anchor	367E	33.69211	-117.34942	A new guy anchor for a previously approved LWS pole, 367E, within a previously approved work area.	Installation of guy anchor for the stability of 367E.
VIG4	Guy Anchor	368E	33.69163	-117.34991	A new guy anchor for a previously approved LWS pole, 368E, within a previously approved work area.	Installation of guy anchor for the stability of 368E.
VIG4	Guy Anchor	369E	33.69150	-117.35010	A new guy anchor for a previously approved LWS pole, 369E, within a previously approved work area.	Installation of guy anchor for the stability of 369E.
VIG4	Guy Anchor	370E	33.69116	-117.35047	21 feet southwest of 370E. A new guy anchor for a previously approved wood pole, 4765623E, within a previously approved work area.	Installation of guy anchor for the stability of 4765623E.
VIG4	4106903E	405E	33.70433	-117.36247	521 feet northeast of 405E. An increase of the temporary work area of 7,933 square feet.	Modification of an existing 115 kV wood pole.
VIG4	4106904E	405E	33.70400	-117.3698	324 feet northeast of 405E. An increase of the temporary work area of 9,964 square feet.	Modification of an existing 115 kV wood pole.
VIG4	4765624E	405E	33.70370	-117.36337	162 feet northeast of 405E. Installation of a new wood pole. 6,028 square feet of temporary work area and 3.14 square feet of permanent disturbance.	Installation of a 115 kV wood pole.
VIG4	4765625E	405E	33.7032	-117.36415	138 feet southwest of 405E. Installation of a new wood pole. 7,485 square feet of temporary work area and 3.14 square feet of permanent disturbance.	Installation of a 115 kV wood pole.
VIG4	4106907E	405E	33.70300	-117.36453	272 feet southwest of 405E. An increase of the temporary work area of 8,735 square feet.	Modification of an existing 115 kV wood pole.
VIG4	4106908E	405E	33.70266	-117.36505	475 feet southwest of 405E. An increase of the temporary work area of 9,681 square feet.	Modification of an existing 115 kV wood pole.
VIG6	Access Road	528E	N/A	N/A	Located between 528E and Palomino Drive. 1,860 linear feet and 26,639 square feet of permanent disturbance for Level 5 road improvement that was misidentified as Level 2 in NTPR-2. The associated temporary disturbance was accurately accounted for in NTPR-2.	Improvement of road for future SCE maintenance.
VIG6	Access Road	531E	N/A	N/A	Located within the work area for 531E. 10 linear feet and 120 square feet of permanent disturbance for Level 5 road improvement that was misidentified as Level 2 in NTPR-2. The associated temporary disturbance was accurately accounted for in NTPR-2.	Improvement of road for future SCE maintenance.
VIG6	Access Road	532E / 533E	N/A	N/A	Located between Horse Thief Canyon Road and 532E/533E. 1,212 linear feet and 15,675 square feet of permanent disturbance for Level 5 road improvement that was misidentified as Level 2 in NTPR-2. The associated temporary disturbance was accurately accounted for in NTPR-2.	Improvement of road for future SCE maintenance.

VIG6	Access Road	534E	N/A	N/A	Located within and east of the work area for 534E. 138 linear feet and 1,656 square feet of permanent disturbance for Level 5 road improvement that was misidentified as Level 2 in NTPR-2. The associated temporary disturbance was accurately accounted for in NTPR-2.	Improvement of road for future SCE maintenance.
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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 activities covered in the MPR No. 11 Request. The CPUC has reviewed this MPR request and has verified that the proposed activities adhere to applicable PCs and MM requirements. The evaluation process ensures that PCs and MMs applicable to the location, and 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. 11 meets the above criteria. MPR No. 11 is approved by the CPUC for the proposed activities based on the factors described below.

CPUC Evaluation of MPR No. 11 Request

The CPUC evaluated SCE’s MPR Request No. 11 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. 11 activities would occur at several locations, work areas, or portions of work areas, throughout Segments VIG4, VIG5, and VIG6. The temporary and permanent disturbance areas associated with MPR No. 11 are shown in Table 2. The quantity and dimensions of MPR No. 11 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. 11

Feature	Number of Miles	Temporary Impact Total	Permanent Impact Total
Level 2 Road Improvement	-0.61	--	--
Level 5 Road Improvement	0.61	--	1.01 ac (44,090 sq ft)
Temporary Work Areas	--	1.14 ac (49,826 sq ft)	--
Wood Pole, New	--	--	0.0001 ac (6.28 sq ft)
Total	0.00 Miles	1.14 ac (49,826 sq ft)	1.01 ac (44,096 sq ft)

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. 11 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, 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).

The work area at 4106904E overlaps a riparian alkali meadow. Prior to construction the alkali meadow would be staked or fenced as an environmentally sensitive area (ESA) to prevent impacts. Temporary and permanent impacts necessary for construction of the Level 5 road between Horse Thief Canyon Road and 532E/533E through a riparian area are included in the current waters permits. Temporary impacts to a drainage associated with use of a guard site in VIG5 are included in the current waters permits. No amendments to the waters permits would be needed.

Increasing the size of the work areas at 4106904E and 4765624E increases the overlap of the work area with a population of Coulter’s goldfields by 1,813 square feet. In compliance with Multiple Species Habitat Conservation Plan (MSHCP) Phase 2 Commitment ‘k’, a biological monitor would be present during construction to assist in minimizing impacts to plants, including micro-siting vehicle staging and monitoring to avoid impacts.

Increasing the size of the work areas at 4765625E and 4106907E increases the overlap of the work area with a population of San Diego Ambrosia by 1,222 square feet. In compliance with Project Commitment L and MSHCP Phase 2 Commitment ‘d’¹, a biological monitor would be present to assist in minimizing impacts to plants. Plywood may be placed underneath equipment

¹ 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.

to protect San Diego Ambrosia from impact during construction activities.

Road building in VIG6 extends through Riversidean sage scrub and disturbed Riversidean sage scrub. In accordance with MM BR-5, Riversidean sage scrub habitat was removed from these areas outside of the coastal California gnatcatcher breeding season, with crews working within the temporary disturbance limits approved in NTPR-2

Following the completion of all construction, the temporary work areas would be restored/reclaimed in accordance with the Project SWPPPs, Project Commitment D, and the VIG Habitat Restoration and Revegetation Plan.

Several of the proposed features along the Valley-Elsinore-Fogarty circuit, in the vicinity of 405E, in Segment VIG4 are outside of the Western Riverside-MSHCP Phase 2 certificate of inclusion (COI) coverage area. Based on the guidance provided by the Regional Conservation Authority (RCA), construction of these features would 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 PSE application included 0.06 acres (2,592 square feet) of permanent impacts within grasslands of concern (Table 3) associated with the installation of one tubular steel pole (TSP) and two wood poles. MPR No. 11 would reduce impacts to just one wood pole, resulting in 0.007 acres (314 square feet) of impacts to grasslands of concern (Table 3). No other MPR No. 11 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 Impacts to MSHCP Baseline Grasslands along the Valley-Elsinore-Fogarty Circuit

MSHCP PSE Application	0.06 Acres
Currently Proposed Impacts (MPR No. 11)	0.007 Acres
Reduction in Grassland Impacts	0.053 Acres

MPR No. 11 proposed work areas are covered under the Stephens' kangaroo rat (SKR) Habitat Conservation Plan. Although 1.25 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.

The activities described in MPR No. 11 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); no supplemental surveys were necessary. 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 Section 4.5.4.2 of the FEIR. All applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

MPR No. 11 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 at any of the proposed work areas. Therefore, impacts to noise and vibration associated with work under MPR No. 11 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 NTPR-2; the areas requested would not require the use of additional equipment. In compliance with MM AQ-1, nitrogen oxide (NO_x) 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 NO_x emissions stay within the NO_x Regional Clean Air Incentive Market Trading Credits (RTCs) purchased for the Project.

Impacts to greenhouse gas emissions associated with MPR No. 11 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 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 include access road construction and pole and anchor 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. 11 are located within elevated fire threat areas. 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. All applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

The proposed refinements under MPR No. 11 are located within the Santa Ana River Watershed. Refinements in Segments VIG4 are in the Elsinore Groundwater Basin. Some of the proposed work areas are located within a flood zone, as shown in Figure 4.9-4 of the FEIR; however, the proposed work is consistent with the work described in sections 2.3.1.1, 2.3.1.2, and 2.3.1.3 of the FEIR and would not alter flood flows.

Most of the proposed work areas are located away from surface water bodies. Proposed VIG4 work areas along Riverside Drive are near the Temescal Channel. Several other proposed work areas are near unnamed streams or ephemeral drainages. Erosion that could affect water quality would be controlled at locations of earth disturbance through the implementation and adherence to the Project linear SWPPP. If stained or odorous soil is found during excavating, SCE would follow the procedures in Project's Contaminated Soil and Groundwater Contingency Plan. Dewatering, if necessary, would be performed in accordance with the Project linear SWPPP. Impacts to hydrology and water quality 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 4.9.4.2 of the FEIR.

Furthermore, the quantity of construction equipment and personnel would be the same as identified in NTPR-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, 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. 11 activities.

MPR No. 11 Conditions of Approval

MPR No. 11 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 appropriate erosion and sediment control best management practices (BMPs) for the MPR No. 11 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. 11 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. In the event that 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
7. SCE shall ensure that construction equipment at the proposed locations will have adequate and properly placed secondary containment to avoid and minimize potential spills.
8. The work associated with MPR No. 11 shall occur within approved project workdays and hours. In the event that MPR No. 11 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.
9. 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).
10. All complaints related to MPR No. 11 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.
11. Once the Project has reached final design, SCE shall be responsible for identifying acreage not previously included in the COI (such as the acreage proposed in MPR No. 11) as well as removing acreage that was included in the COI but not disturbed by construction activities.
12. SCE shall notify CPUC after completing MPR No. 11 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, WSP Compliance Manager
Fernando Guzman, WSP Deputy Compliance Manager
Marcus Obregon, SCE Environmental Project Manager

**Attachment A:
MPR No. 11 Biological Resources Report**

**Attachment B:
MPR No. 11 Cultural Resources Report**

Attachment C:
MPR No. 11 Paleontological Resources Report