

PUBLIC UTILITIES COMMISSION

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SAN FRANCISCO, CA 94102-3298



July 7, 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. 15 Request: Notice to Proceed (NTP-) 1 and 2 Lake Street Excavation and Supplemental Work Areas at multiple locations throughout Segments VIG1-VIG7

Dear Mr. Bass,

On June 15, 2021, Southern California Edison (SCE) submitted Minor Project Refinement (MPR) No. 15 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 NTPR-1 and NTPR-2 but are necessary to construct the Project work described in Sections 2.3.1.1 and 2.3.1.2 of the FEIR. The proposed work areas are within the general disturbance area of the Valley-Ivyglen 115-kV Project, except as noted in Table 1, 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, capacitor banks, and fiber optic. 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.

In coordination with the landowner and the City of Lake Elsinore, soil excavation is proposed between 454E and 460E to accommodate the future realignment of Lake Street. The planned Lake Street realignment will parallel the Valley-Ivyglen subtransmission line and will be constructed at an elevation similar to the existing Lake Street. The current ground elevation along the Valley-Ivyglen alignment is as much as 30 feet higher than the future elevation. In order to avoid future modifications to the Valley-Ivyglen line, the Project proposes to excavate soil at 455E, 456E, 458E, and 460E so the structures can be installed at the required future ground elevation. Additionally, where needed, the Project proposes to excavate 30-foot-wide swaths (Figure 1) underneath the path of the 115 kV conductor from 454E–460E to lower the ground elevation between structures and provide necessary ground clearance for the conductor and telecommunication wire. The depth of the excavations would vary as necessary to reach the future roadway elevation and would be as deep as 22 feet at 455E.

Figure 1. Proposed Areas of Excavation (white polygons) Between 454E and 460E.



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 0.68 acres of temporary disturbance and a net decrease of 0.0001 acres of permanent disturbance in Segments VIG 1-7. The locations, dimensions, and activities for each proposed refinement are provided in Table 1 and are visually shown in the biological resource maps (Attachment A.1, B.1).

Table 1: VIG1-VIG7 Additional Requested Work Areas

Segment	Pole / Feature Name	Nearest Structure	Latitude	Longitude	Description	Activity
VIG1	Tree Trimming	144E	N/A	N/A	Approximately 230 feet west of 144E. Access by foot along a 170-foot path to perform tree trimming of a eucalyptus located underneath the path of the 115 kV conductor. 1,020 square feet of temporary impacts.	Tree trimming to provide adequate clearance between the vegetation and conductor.
VIG3	2352600E	330E	33.69065	-117.33394	Located outside of the general disturbance area, 202 feet northwest of 330E. Replacement of an existing wood pole, that's 45 feet tall, with a new composite pole, that will be 50 feet tall, and installation of a distribution capacitor bank. 8,700 square feet of temporary work area.	Replace a 45-foot tall wood pole, with a 50-tall composite pole and installation of a capacitor bank at 2352600E.
VIG5	453E	453E	33.71526	-117.38515	88-foot southeast shift of 453E to accommodate the future realignment of Lake Street. 6,275 square feet of temporary work area.	Installation of a foundation and TSP, 453E.
VIG5	Soil Excavation	454E–460E	N/A	N/A	In order to install 115 kV structures at the ground elevation of the future Lake Street design and avoid conductor ground clearance infractions, soil would be excavated from 30-foot-wide areas, totaling approximately	Excavation of soil to install structures at the ground elevation of the future Lake Street and avoid ground clearance infractions.

					26,000 square feet, underneath the 115 kV conductor path as shown in Figure 1. The depth of the excavations would vary as necessary to reach the future roadway elevation and would be as deep as 22 feet at 455E.	
VIG5	454E	454E	33.71588	-117.38571	48-foot northeast shift of 454E to accommodate the future road design of Lake Street. 1,026 square feet of additional temporary work area.	Installation of LWSP, 454E.
VIG5	455E	455E	33.71645	-117.38622	25-foot northeast shift of 455E within the existing work area to accommodate the future road design of Lake Street.	Installation of LWSP, 455E.
VIG5	456E	456E	33.71684	-117.38656	7-foot northeast shift of 456E within the existing work area to accommodate the future road design of Lake Street.	Installation of a foundation and TSP, 456E
VIG5	General Disturbance Area	457E	N/A	N/A	Southwest of 457E, 7,100 square feet of temporary work area for the excavating of soil between 456E and 457E to avoid ground clearance infractions.	Excavation of soil to avoid ground clearance infractions from 456E–457E.
VIG5	459E	459E	N/A	N/A	Northward extension of the temporary work area for 459E to support excavating of soil between 459E and 460E to avoid ground clearance infractions. 825 square feet of additional temporary work area.	Excavation of soil to avoid ground clearance infractions from 459E–460E.
VIG5	4106973E	478E	33.72602	-117.39320	124 feet southwest of 478E. Removal of pole 4106973E. The distribution conductor would instead be installed on 478E. The change would remove 3.14 square feet of permanent disturbance.	Removal of pole 4106973E.
VIG5	4106974E	479E	33.72647	-117.39349	224 feet southwest of 479E. Removal of existing pole 4106974E. The distribution conductor would instead be installed on 479E. The change would remove 3.14 square feet of permanent disturbance.	Removal of pole 4106974E.
VIG5	Guy Anchors	479E	33.72687	-117.39382	263 feet west of 479E. Installation of two guy anchors southeast of 4106975E in a previously approved work area and disturbance area.	Installation of guy anchors for the stability of 4106975E.
VIG5	Guy Anchors	479E	33.72692	-117.39393	296 feet west of 479E. Installation of two guy anchors west of 4106975E within existing work areas.	Installation of guy anchors for the stability of 4106975E.
VIG7	4107079E	570E	33.74658	-117.44434	Located outside of the general disturbance area and 655 feet southeast of 570E. Installation of a distribution capacitor bank on an existing wood pole. 4,800 square feet of temporary work area.	Installation of a capacitor bank on existing wood pole, 4107079E.

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. 15 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. 15 meets the above criteria. MPR No. 15 is approved by the CPUC for the proposed activities based on the factors described below.

CPUC Evaluation of MPR No. 15 Request

The CPUC evaluated SCE’s MPR Request No. 15 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. 15 activities would occur at several locations, work areas, or portions of work areas, throughout Segments VIG1-VIG7. The temporary and permanent disturbance areas associated with MPR No. 15 are shown in Table 2. The quantity and dimensions of MPR No. 15 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. 15

Feature	Number of Miles	Temporary Impact Total	Permanent Impact Total
Temporary Foot Path	0.03	0.02 ac (1,020 sq ft)	--
Temporary Work Areas	--	0.66 ac (28,726 sq ft)	--
Wood Pole	--	--	-0.0001 ac (-6.28 sq ft)
Total	0.03	0.68 ac (29,746 sq ft)	-0.0001 ac (-6.28 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, 2.3.1.2, 2.3.1.3, and Table 2-5 of the FEIR.

Portions of the proposed excavation from 454E–460E would be visible to drivers on Lake Street. Northbound drivers would see the deepest area of excavation at 455E, as well as the shallower excavations between 457E and 460E. Southbound drivers would see the excavations at 457E–460E, as well as a portion of the deeper excavation between 456E and 457E. The visual impact of the excavated areas would be mitigated through revegetation. The banks of the excavated areas would be sloped to facilitate restoration, and all excavated area would be revegetated in accordance with the Project SWPPPs, Project Commitment D and the VIG Habitat Restoration and Revegetation Plan. The realignment of Lake Street is expected to occur within the next two years, at which time the areas around the VIG line will be graded and landscaped by the developer.

Aesthetic impacts associated with these refinements 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. 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 A1, B.1).

The work areas do not overlap with wetlands or waterways; no amendments to the waters permits would be needed. Additionally, the proposed work areas do not overlap with sensitive vegetation or known populations of protected plant species. In accordance with Mitigation Measure BR-3 biological monitoring during construction would ensure protection of unanticipated special status plant species.

The proposed refinement in VIG3 (6,670 square feet of temporary disturbance) is outside of the VIG Western Riverside- Multiple Species Habitat Conservation Plan (WR-MSHCP) Phase 1 certificate of inclusion (COI) coverage area. In VIG5 and VIG7, 11,614 square feet of proposed temporary disturbances are outside of the VIG WR-MSHCP Phase 2 COI coverage. Based on the guidance provided by the 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 applications. No permanent impacts to baseline vegetation of RCA concern are proposed for Phase 1 or Phase 2 (see Table 3). All temporary impacts to vegetation will be restored in accordance with Project Commitment D and the VIG Habitat Restoration and Revegetation Plan.

Table 3. Proposed Permanent Impacts to MSHCP Baseline Vegetation of RCA Concern

Proposed Impacts to Phase 1 Baseline Vegetation of Concern	0.00 acres
Proposed Impacts to Phase 2 Baseline Vegetation of Concern	0.00 acres
Total Proposed Impacts	0.00 acres

MPR No. 15 proposed work areas are covered under the Stephens' kangaroo rat (SKR) Habitat

Conservation Plan. Although 0.46 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.

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. For excavations between 454E–460E, restoration would include grading final slope of no steeper than 3:1 and installing straw wattles along the slopes as required by the SWPPP.

The activities described in MPR No. 15 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.

The proposed work areas were surveyed and analyzed in the cultural and paleontological resources addendum reports (Attachments A.2, B.2, A.3, B.3); 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. Trimming of a eucalyptus tree to mitigate fire danger is proposed within a cultural resource area west of 144E. The proposed access would be for foot traffic only to allow workers to walk to the tree and perform trimming with hand tools. No excavation, ground disturbance, or vegetation removal will occur to support the foot path. Vehicles and equipment would not use the proposed access route. 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). All the MPR No.15 proposed refinements occur in soil with low potential for paleontological resources. 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.

Erosion would be controlled at locations of earth disturbance through the implementation and adherence to the Project linear SWPPP. The VIG LUP SWPPP would be amended to reflect the excavation activities and subsequent stabilization of soils from 454E to 460E. At the completion of construction, sites would be restored/reclaimed in accordance with the Project SWPPPs, Project Commitment D, and the VIG Habitat Restoration and Revegetation Plan. Restoration for excavated areas from 454E to 460E would include grading to a final slope of no steeper than 3:1 and installing straw wattles along the slopes at 6-foot spacing.

Impacts to geology, soils, and seismicity associated with this refinement would not create a new significant impact or substantial increase in the severity of a previously identified impact in Section 4.6.4.2 of the FEIR. All applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation, Monitoring, Compliance, and Reporting Plan would be followed.

Activities occurring at the proposed MPR No. 15 work locations and the types of equipment used are consistent with the activities described in Sections 2.3.1.1, 2.3.1.2, 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 would not occur at any of the proposed work areas.

Impacts to noise and vibration 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 4.11.4.2 of the FEIR. All applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

The excavating work is not expected to significantly change impacts to air quality or greenhouse gas emissions. All other 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. Other than the excavating equipment, the type and quantity of construction equipment would be the same as identified in NTPR-1 and NTPR-2. 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. The excavating equipment would have Tier 4 engines. In accordance with 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 air quality and greenhouse gas emissions associated with MPR No. 15 would not create a new significant impact or a substantial increase in the severity of a previously identified impact identified in Section 4.3.4.2 and 4.7.4.2 of the 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 excavating and grading, pole installation, and anchor installation. In the event of an inadvertent discovery, SCE would follow the procedures in Project's Contaminated Soil and Groundwater Contingency Plan. Furthermore, the proposed work areas in MPR No. 15 are located within elevated and extreme 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. In addition, all applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

The proposed refinements are located within the San Jacinto and Santa Ana Watersheds. The proposed work areas are not located within a flood zone, as shown in Figure 4.9-4 of the FEIR.

Most of the proposed work areas are located away from surface water bodies. Installation of structures 453E and 454E would occur adjacent to an ephemeral drainage that runs parallel to

Lake Street. 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. Therefore, 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.

The quantity of construction equipment and personnel would be the same as identified in NTPR-1 and 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

An additional grading permit from the City of Lake Elsinore is required for MPR No. 15 activities.

MPR No. 15 Conditions of Approval

MPR No. 15 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 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. 15 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 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
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. 15 shall occur within approved project workdays and hours. In the event that MPR No. 15 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. 15 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. 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. 15) as well as removing acreage that was included in the COI but not disturbed by construction activities.
11. SCE will obtain required encroachment and/or grading permits from the appropriate jurisdiction(s) prior to the start of MPR No. 15 work. SCE will submit copies of these permits to the CPUC prior to the start of MPR No. 15 work.
12. SCE will export cut material from the project site to a facility licensed/permitted to receive such material. Excess material placed at the project site area will be covered. SCE will expedite removal of the excess material from the project site area. Prior to material delivery SCE will notify the CPUC of the intended facility, and at the conclusion will provide CPUC with documentation of quantities of material delivered to the facility. During transport SCE will follow appropriate regulations, including SWPPP requirements regarding track-out, and covering any load to prevent dust, etc.
13. SCE shall notify CPUC after completing MPR No. 15 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.1 and B.1:
MPR No. 15 Biological Resources Report**

**Attachment A.2 and B.2:
MPR No. 15 Cultural Resources Report**

**Attachment A.3 and B.3:
MPR No. 15 Paleontological Resources Report**