

STATE OF CALIFORNIA
PUBLIC UTILITIES COMMISSION

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Edmund G. Brown Jr., Governor



April 2, 2015

Susan J. Nelson, AIA
Regulatory Affairs and Policy
Southern California Edison
8631 Rush Street, General Office 4 – G10J
Rosemead, California 91770

RE: Review of Southern California Edison's Proponent's Environmental Assessment for the Mesa 500-kV Substation Project. A. 15-03-003

Dear Ms. Nelson,

The Energy Division received Southern California Edison Company's Application for a Permit to Construct (Application No. A15-03-003) and Proponent's Environmental Assessment (PEA) on March 13, 2015.

The Energy Division is currently in the process of identifying data gaps and other deficiencies within the Proponent's Environmental Assessment. Attached is a list of deficiencies in the PEA that require clarification prior to deeming the Application complete.

Sincerely,

MJ Orsaba.

Lisa Orsaba,
California Public Utilities Commission
Energy Division

CC: Mary Jo Borak, CPUC Infrastructure Permitting and CEQA
Molly Sterkel, CPUC Infrastructure Planning and Permitting
Nicolas Sher, CPUC Legal Division
Rachel James, Ecology and Environment, Inc.

Attachment 1: Deficiencies in the Proponent's Environmental Assessment

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The following items refer to SCE's Proponent's Environmental Assessment (PEA) filed March 13, 2015.

Project Description

PEA Section 3.4, "Proposed Project," describes construction phases. Several references throughout Chapter 3 refer to the "initial phase or "final phase" of the project. The air emission calculations, as well, reference grading phases 1 through 3. Per discussions with SCE during the February 2015 site visit, the CPUC understands that the project would be constructed in distinct phases because the existing substation must remain online during the construction of the first half of the new substation. "Construction phasing" and "grading phasing," however, are not clearly defined leading to difficulty in understanding how and when construction and/or grading phases would occur and, thus, in understanding the underlying analysis presented in the PEA.

For example, the PEA identifies the total cubic yards (cy) of import and export from cut and fill associated with two phases of grading for the proposed project. Specifically, Section 3.5.4.19, "Substation Grading and Drainage Description," states that the initial construction of Mesa Substation would require approximately 100,000 cy of imported fill to develop the substation site, and the final phase would require exporting 200,000 cy of fill material from the new substation site. It also states that 550,000 cy of structural fill would be required to raise the substation site to the conceptual design level and that 650,000 cy of cut would be generated during the decommissioning process. Based on these assumptions, it appears that some cut and some fill is anticipated to be balanced on the project site.

Based on PEA Attachment 3C, "Construction Equipment and Workforce Estimates," as well as discussions with SCE during the February 2015 site visit, the CPUC understands that decommissioning cannot occur until after construction of the western portion of the proposed Mesa Substation. The CPUC also understands that structural fill would primarily be required to construct the western portion of the proposed Mesa Substation site, which is at a lower elevation than the eastern portion, whereas cut would be generated during decommissioning of the existing Mesa Substation and grading for the eastern portion of the proposed Mesa Substation.

If the western portion of the proposed Mesa Substation must be constructed prior to decommissioning of the existing Mesa Substation and grading for the eastern portion of the proposed Mesa Substation, then it seems unreasonable to assume that cut generated during the decommissioning process and/or subsequent grading on the eastern portion of the site can be used to as fill to raise the western portion of the substation site to the conceptual level design during the initial phase.

PD-01: To clarify the phasing of the proposed project, the CPUC requests that SCE clearly identify project phases, particularly for construction of the substation site area. Phases should include decommissioning of the existing Mesa Substation, and be consistent with the phases used to determine the air emission calculations. Assumptions associated with each phase, particularly expected quantities of cut and fill (and associated import/export), peak truck trips, and the anticipated maximum number of employees should be clarified for each phase.

The CPUC understands the following to be the main phases of construction within the substation area:

Phase 1: Construction of the western portion of the proposed Mesa Substation

Phase 2: Demolition of the existing Mesa Substation

Phase 3: Construction of the eastern portion of the proposed Mesa Substation

Traffic and Transportation

Under "Impact Analysis" in PEA Section 4.16, "Transportation and Traffic," the Applicant states that the number of truck trips is estimated to average approximately 235 trips per day and states that the number of truck trips would increase during the grading periods, where hauling soil would require approximately 100 additional truck trips per day for an estimated 40 weeks. Based on review of Section 3.5.4.19, "Substation Grading and Drainage Description," the assumption of 100 additional truck trips per day appears to be based on the assumption of 100,000 cy of imported fill, which the PEA states would generate 10,000 haul truck loads.

However, the assumption that additional cut and fill generated during site grading would be balanced on site is inconsistent with the CPUC's understanding of the proposed project phasing. If cut generated during decommissioning of the existing Mesa Substation or during grading for the eastern portion of the proposed Mesa Substation cannot be used for structural fill on the western portion of the proposed Mesa Substation site, the total amount of fill that would need to be imported and the total amount of cut that would need to be exported may be much greater than the 300,000 cy (100,000 cy of fill and 200,000 cy of cut) assumed in the project description with a corresponding significant effect on the total number of daily truck trips estimated for the proposed project during grading activities.

For example, if the same calculation for haul truck loads associated with importing soil is applied to a worst case scenario of 550,000 cy of imported soil, this could result in up to 55,000 haul truck loads versus the 10,000 haul truck loads assumed in Chapter 3.

In addition, PEA Section 4.16.4, "Impact Analysis," states that the increase in total truck trips during grading periods would occur for a total of 40 weeks, and does not differentiate between grading periods. However, the project description states that the total additional 100 truck trips per day associated with the grading period would occur for an estimated 5 to 12 months during the initial grading phase and for an estimated 6 to 8 months to complete the final grading phase.

TRA-01: Clarify the assumptions used to determine the total number of haul truck trips associated with the grading phase and the duration of soil hauling activities.

Additionally, PEA Section 4.16.4, "Impact Analysis," describes that an average of 235 truck trips are assumed to occur per day in addition to the 100 truck trips per day during the grading periods. However, the peak number for truck trips is not provided, and it is unclear how many trips are anticipated to occur during the AM and PM peak traffic periods. The section further assumes that 150 to 200 construction personnel would be working at the Mesa Substation site and adjacent rights-of-way on any given day. However, only 126 personal vehicle trips are assumed to occur per day to and from the Mesa Substation construction area during peak construction times.

TRA-02: Provide the peak number of haul truck trips to and from the construction site on a given day and the total number of trips that would occur during the AM and PM peak periods. Confirm whether all haul truck trips would originate at the same location and travel to the same location, or whether those haul trips would occur at various locations throughout the project area.

TRA-03: Provide the rationale for the assumptions used to calculate personal vehicle trips for personnel traveling to and from the Mesa Substation site during construction.

Air Quality

Although landfills within the vicinity of the proposed project have been identified, it is unclear where fill would be sourced from.

AIR-01: For the purposes of verifying the assumptions used in the air emission calculations and confirming that sufficient fill is available for import to construct the project, please list the facility (ies) that may be used to source fill for the project.

Noise

The number of haul trucks identified in the Noise Technical Report appears inconsistent with the number of trucks identified in the Air Quality Calculations. For example, the Air Quality Calculations state that four off highway trucks, operated for 10 hours per day, would be required for Grading Phase 1 in 2016. Haul trucks are not specifically identified; therefore, the CPUC assumes that these four off highway trucks could represent soil hauling trucks. However, Appendix A of the Noise Technical Report states that Grading Phase 1 would require 20 haul trucks operated for 10 hours per day. This is one example of an inconsistency in the equipment numbers and does not represent a detailed review of the possible inconsistencies between these two technical reports.

NOI-01: Correct inconsistencies within the various technical reports and other appendices or sections of the PEA. Clearly explain any deviation in the numbers between reports.