

Southern California Edison
Moorpark-Newbury A.13-10-021

DATA REQUEST SET A1310021 Moorpark-Newbury-ED-SCE-02 Supplemental

To: ENERGY DIVISION

Prepared by: Kevin Darney

Title: Project Manager, Transmission Project Delivery L&E

Dated: 10/07/2014

Question 20 Supplemental:

PEA Table 3.7-4b shows zero acres of land disturbance that would be associated with rehabilitation of existing access/spur roads and construction work sites. However, the PEA Project Description includes language in numerous places that indicates that work would occur on existing access and spur roads and construction work sites; this work should be considered land disturbance. Below are examples of PEA language that indicate that land disturbance would occur.

- As noted in footnote 1 in Table 3.7-41b, “light brushing” would occur within previously disturbed areas. PEA Section 3.7.1.5, Vegetation Clearance (page 3-55) defines “brushing” as removal of “shrubs and other low-lying vegetation within approximately 2-5 feet of the edge of access or spur roads...to prevent vegetation from intruding into the roadway.”
- PEA Section 3.7.1.5 (page 3-55) declares that “[b]lade-grading, mowing, or brushing may also occur during future construction activities in Project Sections 2, 3, and 4 depending upon the condition of the access roads, spur roads, and construction work sites; vegetation that has grown in these areas in the period between past construction activities and future construction activities would be trimmed and/or removed.”
- PEA Section 3.7.1.3 (page 3-49) states: “Prior to the restart of Project construction, some segments of the existing access and spur roads and work areas may be rehabilitated to facilitate the safe movement of construction vehicles and personnel. At present, future construction activities are projected to require only minor rehabilitation work to most existing access and spur roads; this work would be necessary due to the time elapsed between past and future construction activities.”
- PEA Table 3.7-2 (page 3-48) states that, for existing access roads that would have permanent improvements, “limited sections may require widening at curves or heavier grading.”
- Table 3.7-8b (page 3-83) shows that heavy equipment (e.g., grader, dozer, loader) would be required for ROW clearing, and road and landing work. All of these activities would result in temporary and/or permanent land disturbance.

- a. Please revise PEA Table 3.7-4b to include the estimated miles of road disturbance and the amount of sites disturbed, area to be disturbed (acres), area to be restored (acres), and area that would be permanently disturbed (acres) based on worst-case estimates associated with the proposed construction activities described in the PEA (listed above).
- b. As requested in Data Request Item 10, please provide a figure that shows locations of future road rehabilitations, including locations that may require widening at curves, grading, and/or vegetation removal.

Response to Question 20 Supplemental:

As stated in the PEA, there would be no new or additional surface disturbance associated with any future construction of the Moorpark-Newbury project. All areas required for future construction activities were established during the past construction activities; these areas existed as “previously disturbed” areas at the time the Notice of Preparation was issued.

As part of the future construction activities, some portions of these existing, previously disturbed areas may be subject to “minor rehabilitation work,” “[b]lade-grading, mowing, or brushing,” and/or “light brushing” as described in Chapter 3 of the PEA. These activities are normal operations and maintenance-type activities that are periodically and routinely conducted along access roads, spur roads, and in the vicinity of towers/TSPs/poles. These activities would be conducted in areas where the surface is currently disturbed, and thus do not constitute any new or additional surface disturbance. In addition, the PEA notes that “limited sections may require widening at curves or heavier grading.”

On September 27, 2014, SCE construction personnel conducted an on-site inspection of all Moorpark-Newbury Project construction areas, stringing sites, access roads, spur roads, and other areas associated with construction. The inspection was conducted to identify areas where minor rehabilitation work (e.g., “[b]lade-grading, mowing, or brushing,” and/or “light brushing”) would be necessary to facilitate safe and efficient construction of the Moorpark-Newbury Project. In addition, this inspection was conducted to identify areas where curve widening, heavier grading, or other activities may occur. The inspection was conducted as if construction were imminent—it represents SCE’s most informed opinion of the work that would currently be necessary to facilitate the safe and efficient construction of the Project. The results of this inspection are captured in the revised Table 3.7-4b below; the areas that would require minor rehabilitation work are shown in the accompanying figure set.

Table 3.7-4b Subtransmission Approximate Land Disturbance Table, Future Activities (Revised 7 October 2014)

Project Feature	Sites or Miles	Previously-Disturbed Areas Included in the Existing Environment as of the publishing of the Notice of Preparation (March 26, 2014) (Acres)	Previously-Disturbed Areas Included in the Existing Environment as of the publishing of the Notice of Preparation (March 26, 2014) That Are Permanently Disturbed (Acres)	Previously-Disturbed Areas Included in the Existing Environment as of the publishing of the Notice of Preparation (March 26, 2014) that may be subject to future light blading/grading/brush removal prior to construction	Previously-Disturbed Areas Included in the Existing Environment as of the publishing of the Notice of Preparation (March 26, 2014) that may be subject to curve widening or heavier grading prior to future construction	Area to be Temporarily Disturbed During Future Construction (Acres)	Area that would be Permanently Disturbed by Future Construction Activities (Acres)
Access and Spur Roads	20.9 Miles	4.82	4.82	0.54	0	0	0
Construction Work Site – Install TSPs	39 Sites	5.92	1.32	0	0	0	0
Construction Work Site – Install LWS Poles	27 Sites	0.44	0.15	0	0	0	0
Construction Work Site – Remove Wood Poles	27 Sites	0	0	0	0	0	0
Stringing Sites	10 Sites	5.42	0	0.77	0	0	0
Construction Work Site – Guard Pole Locations	0 Sites	0	0	0	0	1.61	0
Construction Work Site – Remove Existing LSTs	14 Sites	0.08	0	0	0	0	0
Total⁹		14.46	6.29	1.31	0	1.61	0

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Title: Project Manager, Transmission Project Delivery L&E

Dated: 10/07/2014

Question 21 Supplemental:

PEA Table 3.7-4b shows zero acres of land disturbance that would be associated with installation of new TSPs, with a footnote that states: “22 new TSPs would be installed utilizing construction areas developed during past construction activities. Some TSP construction work sites overlap existing access and spur road locations rehabilitated during past activities. All disturbances associated with TSP installation are captured on Table 3.7-4a.” However, PEA Section 3.7.2.2.3 indicates that onsite grading could be necessary during site preparation (page 3-67), and that an equipment pad would be constructed within the construction work site if existing terrain around the TSP location is not suitable to support crane activities (page 3-69). In addition, the Proposed Project would include installation of 14 TSP foundations. All of these actions would result in land disturbance, as they would require grading, excavation, and/or removal of existing vegetation. Please revise Table 3.7-4b to accurately describe the area to be disturbed (acres), area to be restored (acres), and area that would be permanently disturbed (acres) as a result of installation of the proposed new TSPs.

Response to Question 21 Supplemental:

Please refer to SCE's supplemental response to Question 20. On-site inspection has revealed that at this time it does not appear that any of the TSP construction sites would require onsite grading prior to the start of construction activities. However, depending on the condition of the previously-disturbed areas at the time that construction begins, on-site grading may be conducted within previously-disturbed areas established during past construction activities.

Any equipment pads that would be constructed during future construction activities would be constructed within previously-disturbed areas, and thus do not represent new surface disturbance. The excavation of foundations would occur within the previously-disturbed areas, and thus do not represent a new surface disturbance. Table 3.7-4b has been revised as shown in the supplemental response to Question 20.

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Question 22 Supplemental:

PEA Table 3.7-4b shows zero acres of land disturbance from 10 stringing sites, with a footnote that reads: “The ten stringing setup areas established during past construction activities may be used during future construction activities; these disturbance areas are accounted for on Table 3.7-4a. Additional stringing setup areas, if needed, would be established on existing access roads and in areas within the Moorpark-Ormond Beach 220 kV Transmission Line ROW” (page 3-60). Regardless of when the 10 stringing setup locations were established, please confirm that work at the sites would not require ground disturbance, such as light grading, brushing, or vegetation removal. Please update Table 3.7-4b accordingly.

Response to Question 22 Supplemental:

Please refer to SCE's supplemental response to Question 20. On-site inspection has identified that two of the stringing sites would require minor rehabilitation work (e.g., “[b]lade-grading, mowing, or brushing,” and/or “light brushing”); this work would occur over a 0.77 acre area. This minor rehabilitation work would be conducted on previously-disturbed areas, and would not represent a new surface disturbance. Please see the figure and the revised Table 3.7-4b attached to SCE's supplemental response to Question 20 for the stringing sites that would require rehabilitation work.

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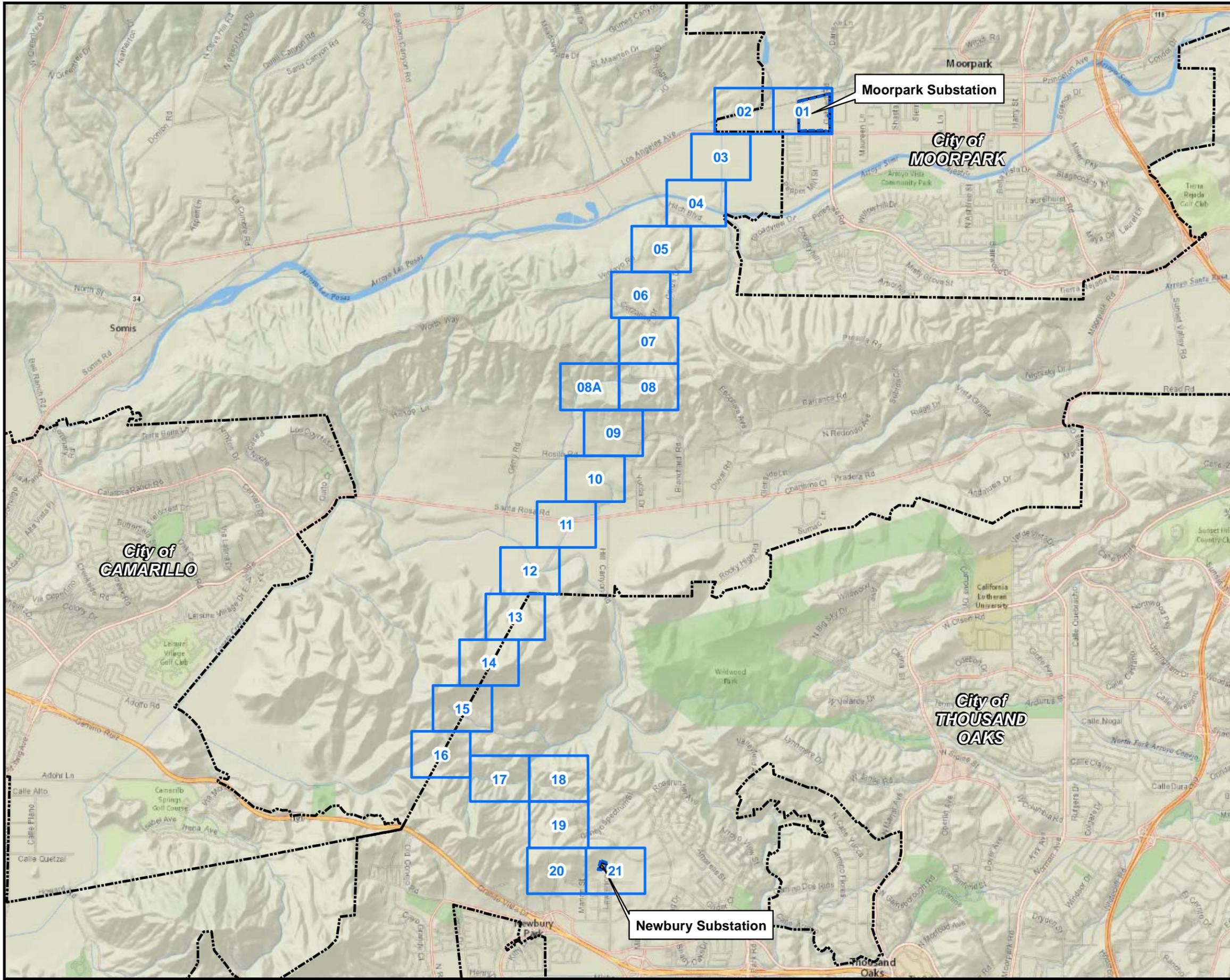
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Question 23 Supplemental:

PEA Table 3.7-4b shows zero acres of land disturbance associated with removal of existing LSTs, and 0.08 acre to be restored, with a footnote that reads: “The construction areas used for removing existing LSTs were established as part of past construction activities, and have been maintained since then; therefore, there would be no additional land disturbance for these activities during future construction activities. The area disturbed during past construction activities for removal of the LST between TSP locations 39 and 40 (0.08 acres) would be restored following final construction activities. This restoration is not associated with the HMRP discussed in Section 4.4” (page 3-60). However, PEA Section 3.7.2.2.1 (page 3-66) describes LST removal and states: “If previously disturbed areas adjacent to the structure are not available, an area would be cleared of vegetation and could be graded if the ground is not level. The crane could be positioned up to approximately 60 feet from the tower location to dismantle the tower.” Please update the numbers in Table 3.7-4b to include consideration of these construction practices.

Response to Question 23 Supplemental:

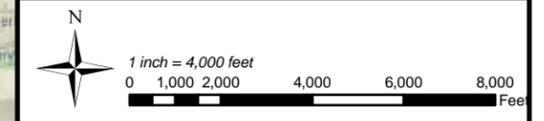
The removal of some LSTs will require a construction area at or near the base of the LST for use by ground-based vehicles (e.g., cranes). Some LSTs will be dismantled and removed by hand, or with the use of a helicopter; these LSTs will not require a construction area. For those LSTs that require a construction area, previously-disturbed areas are available adjacent to those LSTs. These areas were established during the past construction activities. On-site inspection has revealed that at this time none of the LST removal construction areas would require any onsite grading prior to the start of construction activities. However, depending on the condition of the previously-disturbed areas at the time that construction begins, on-site grading may be conducted within previously-disturbed areas established during past construction activities. Minor rehabilitation work, if necessary, would be conducted on previously-disturbed areas adjacent to LSTs, and would not represent a new surface disturbance. Please see the figure and the revised Table 3.7-4b attached to SCE’s supplemental response to Question 20.



- Legend**
-  Existing Substation Fence Line
 -  Map Index
 -  City Boundary
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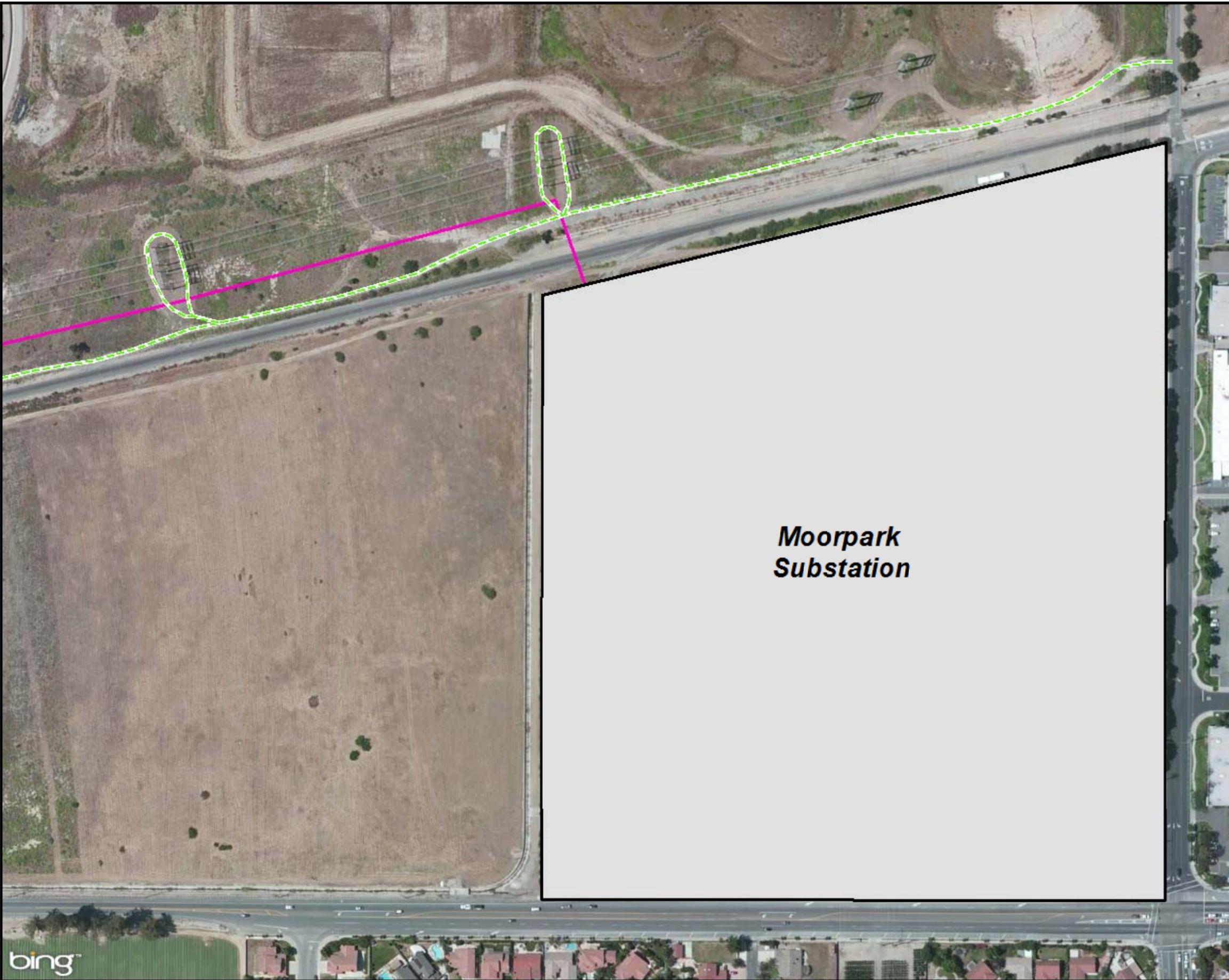
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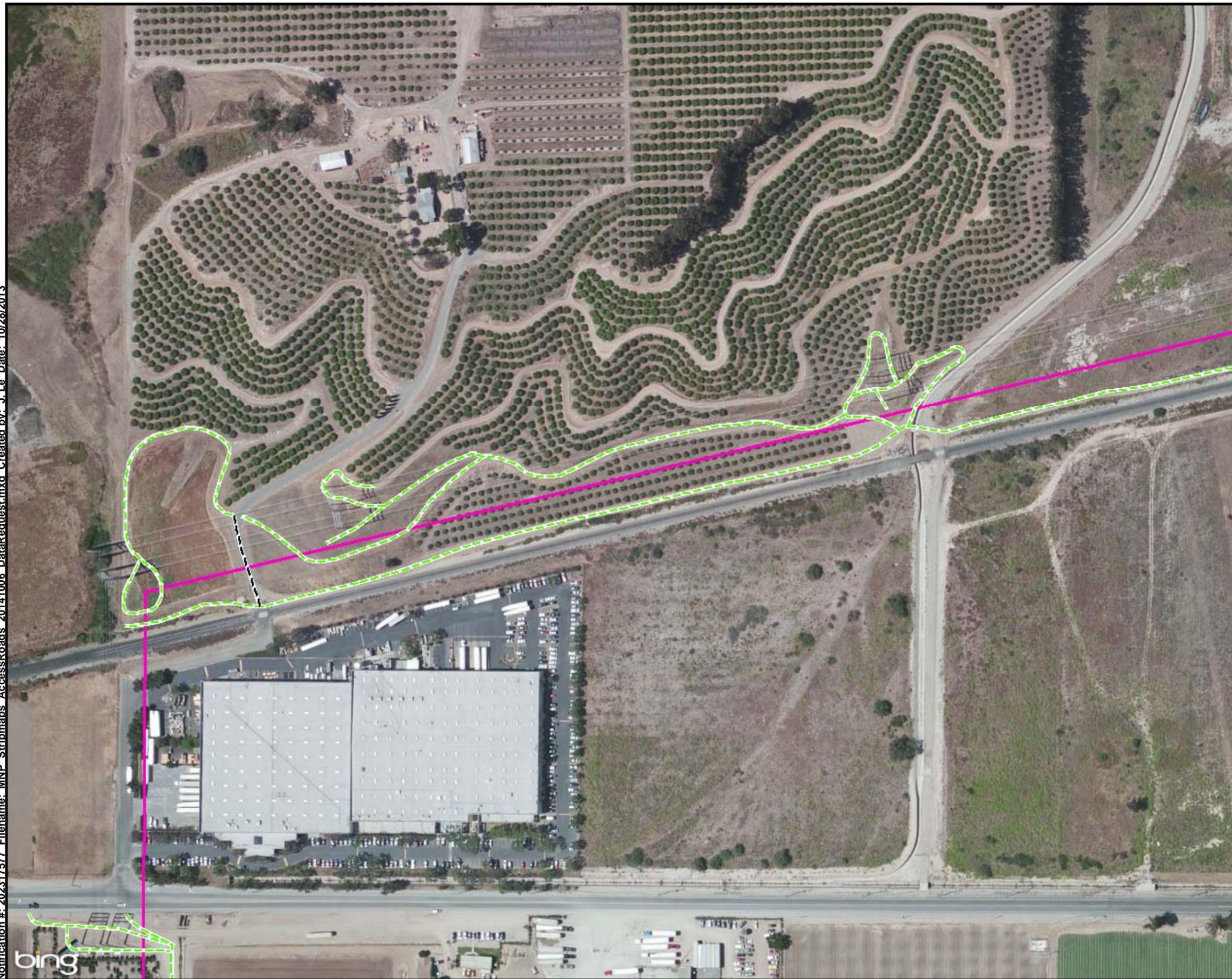


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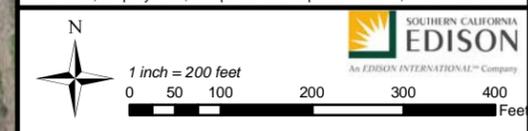
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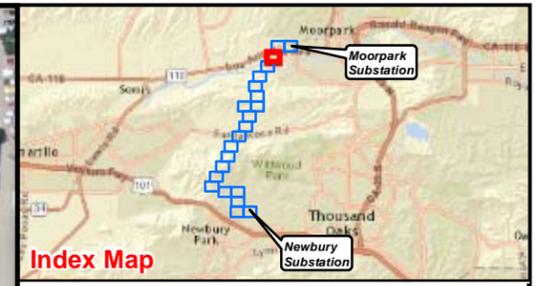


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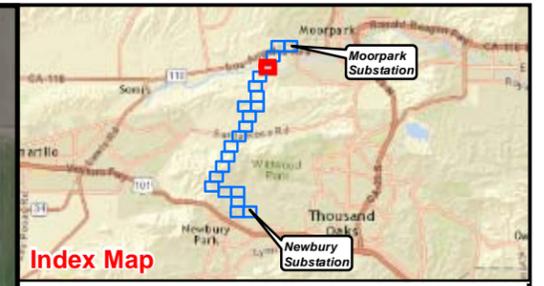
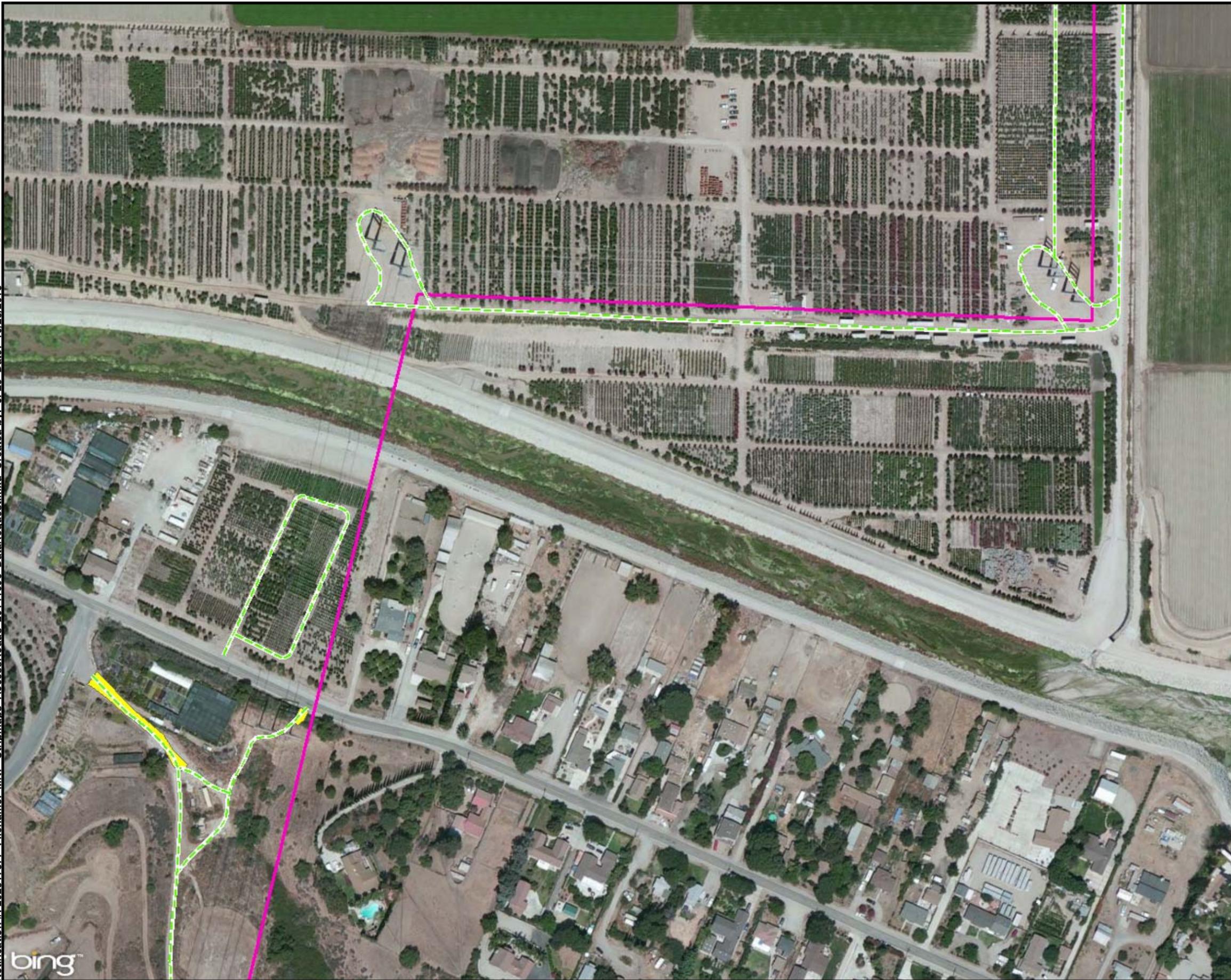


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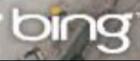
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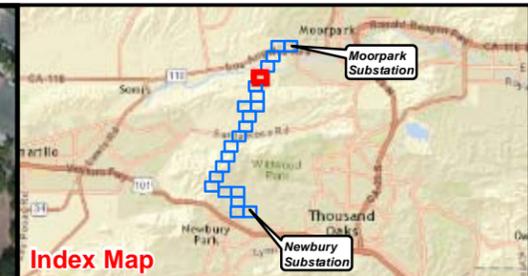
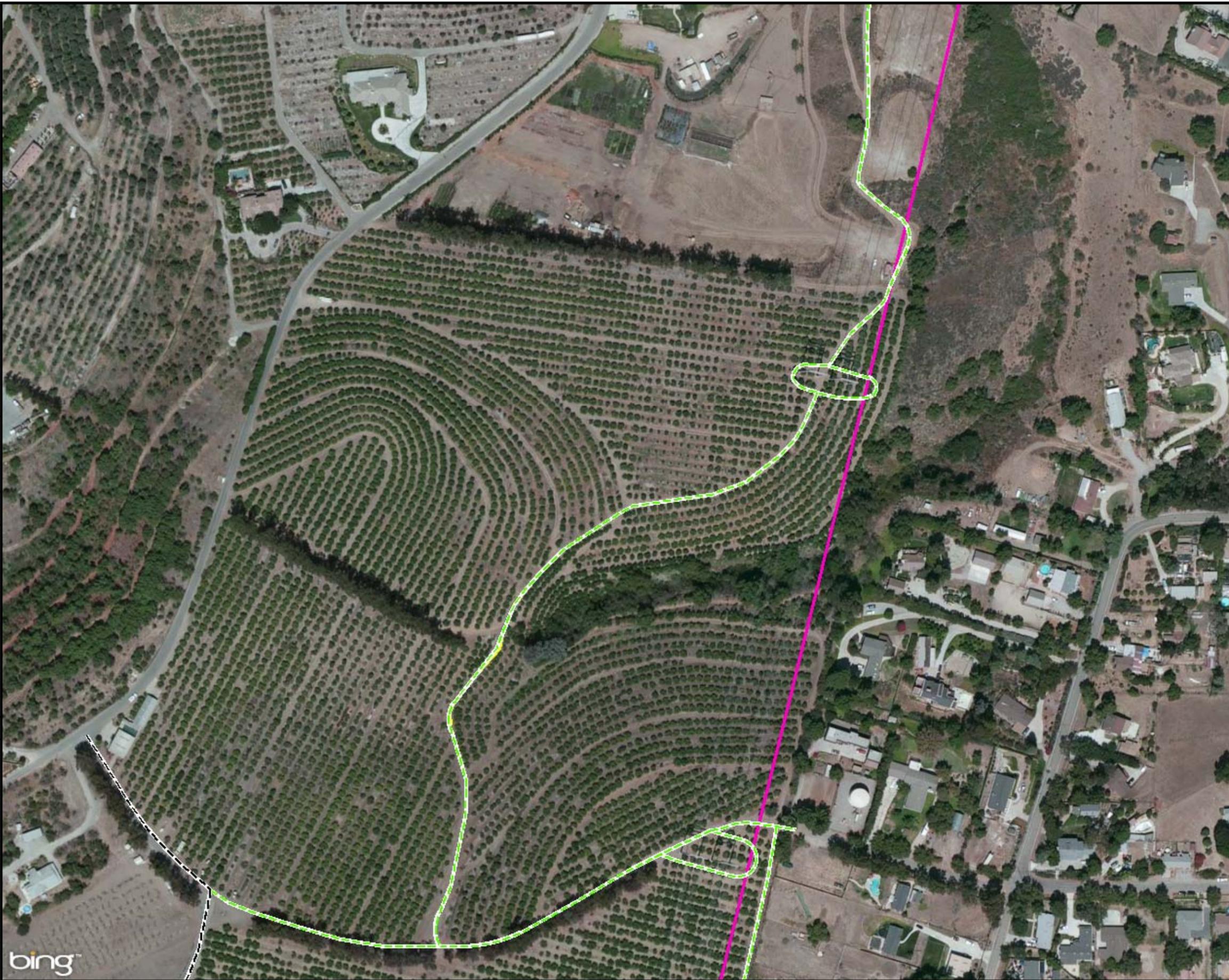


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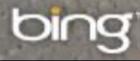
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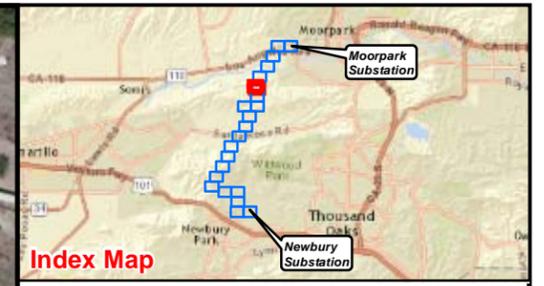


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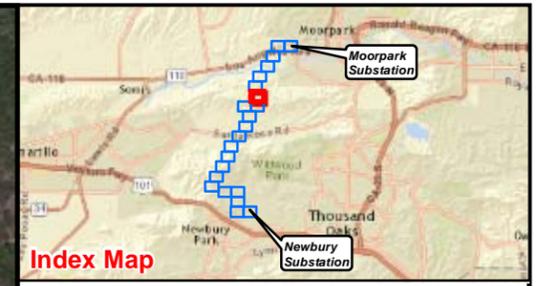
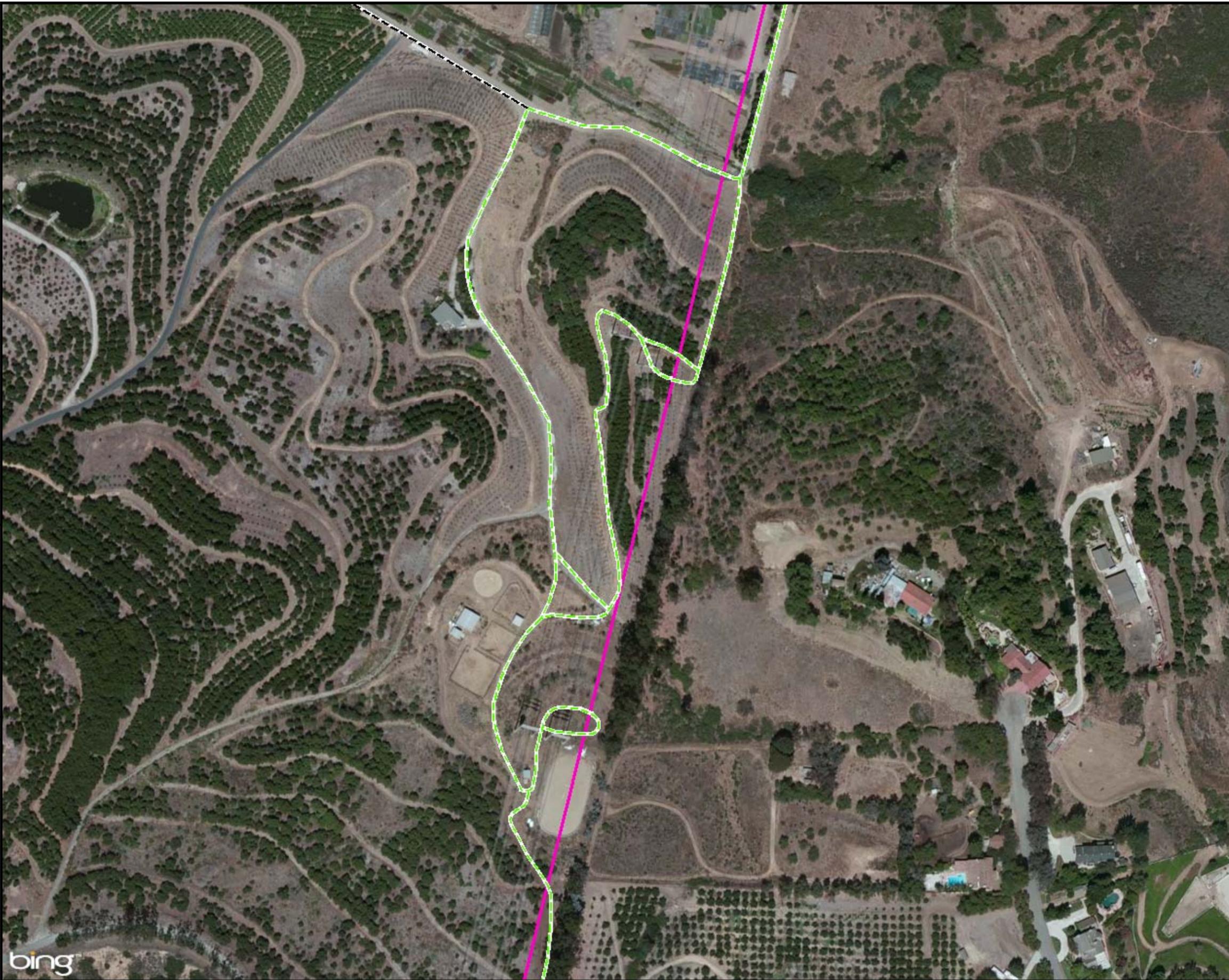
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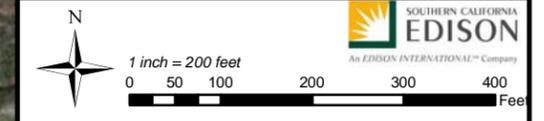


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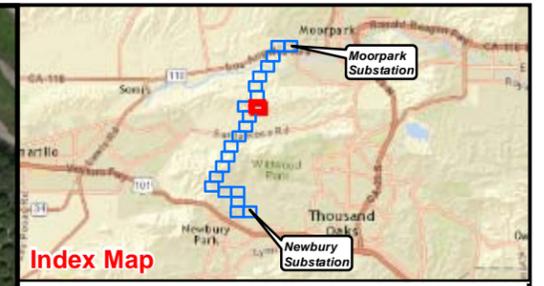
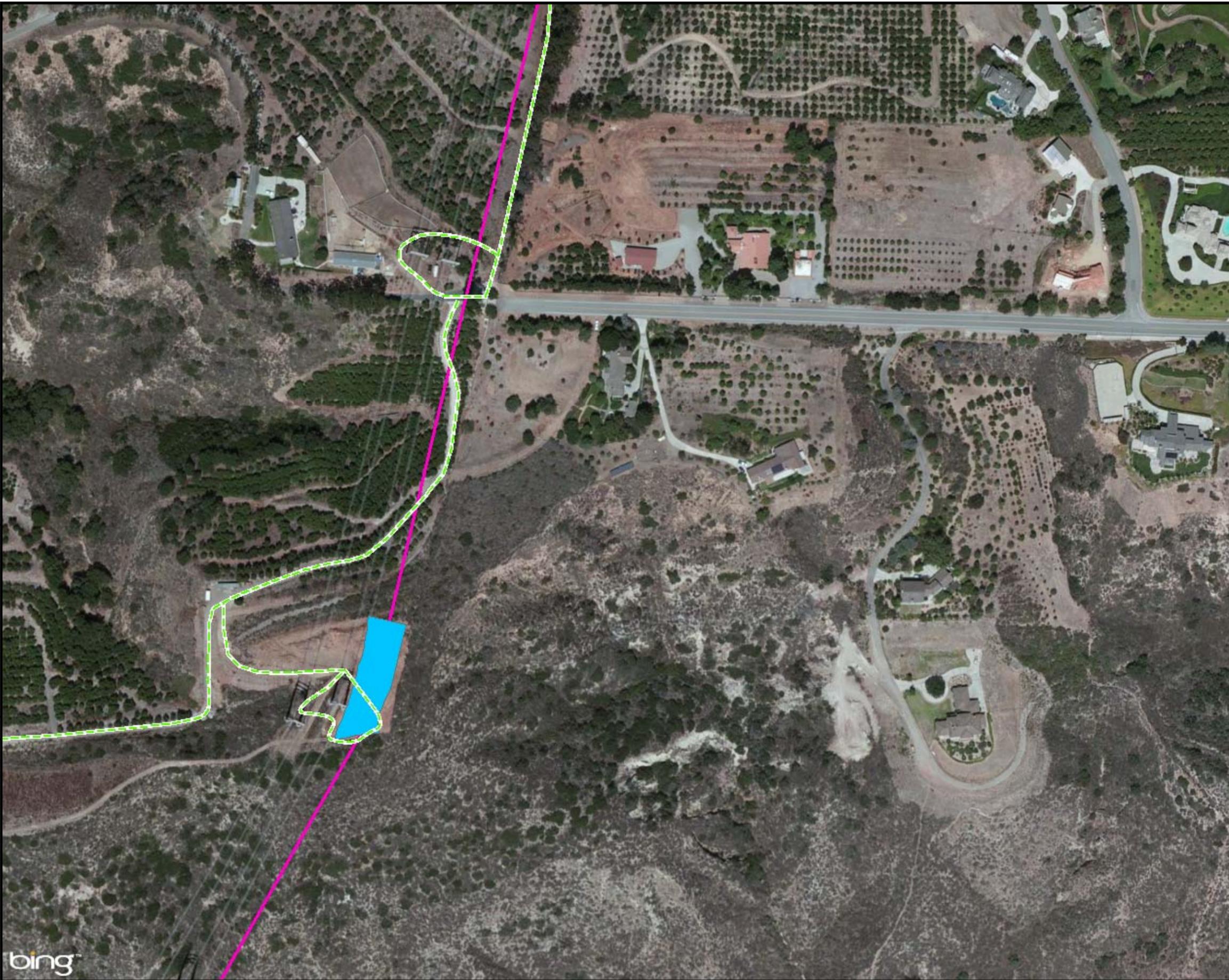


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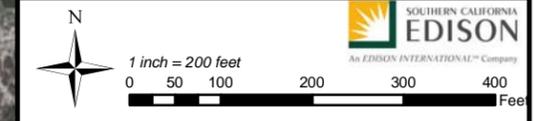


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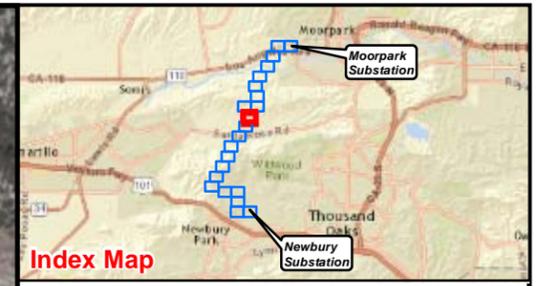
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Legend

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- Existing Access Road**
- 220kV
- 66kV
- 66kV 220kV (Combination)
- 66kV 220kV
(Roads Maintained by Property Owner/Licensee)
- Brushing and Light Grading**
- Access and Spur Roads
- Stringing Sites
- Proposed Moorpark-Newbury 66kV Lines**
- Section 2
- Section 3
- Section 4

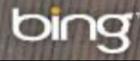
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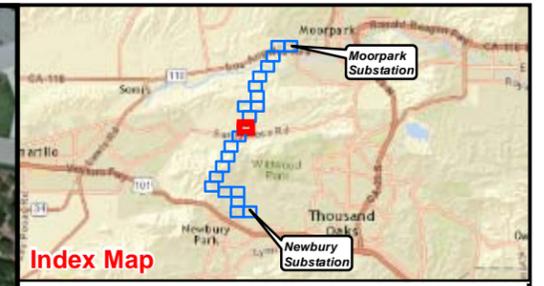


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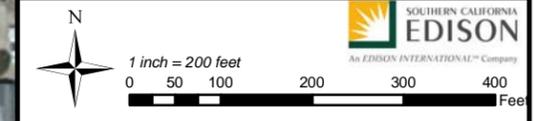


Legend

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- Existing Access Road**
- 220kV
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- 66kV 220kV (Combination)
- 66kV 220kV
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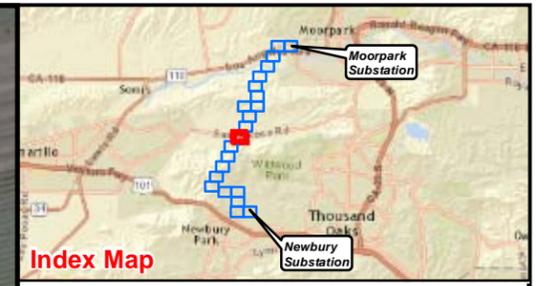
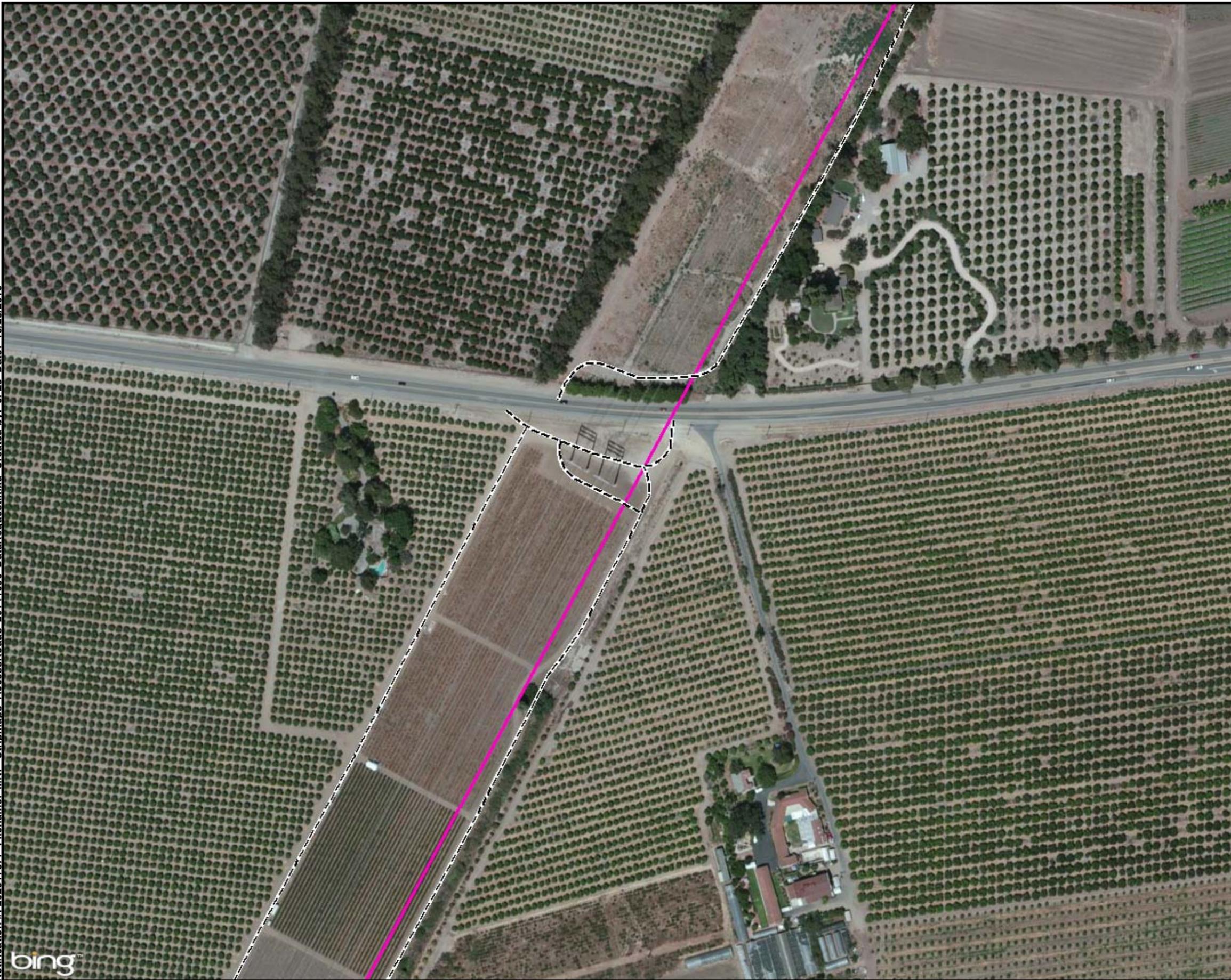
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Legend

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 - 220kV
 - 66kV
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 - 66kV 220kV
(Roads Maintained by Property Owner/Licensee)

- Brushing and Light Grading**

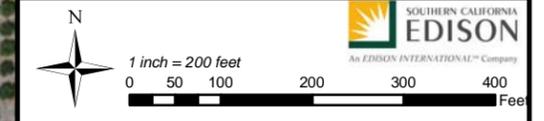
 - Access and Spur Roads
 - Stringing Sites

- Proposed Moorpark-Newbury 66kV Lines**

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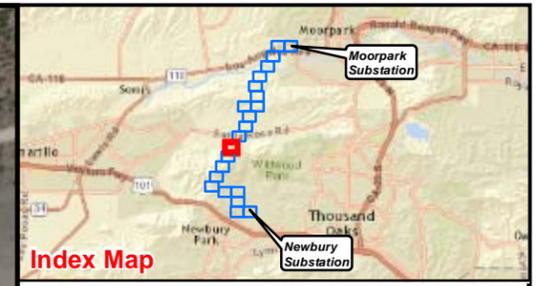
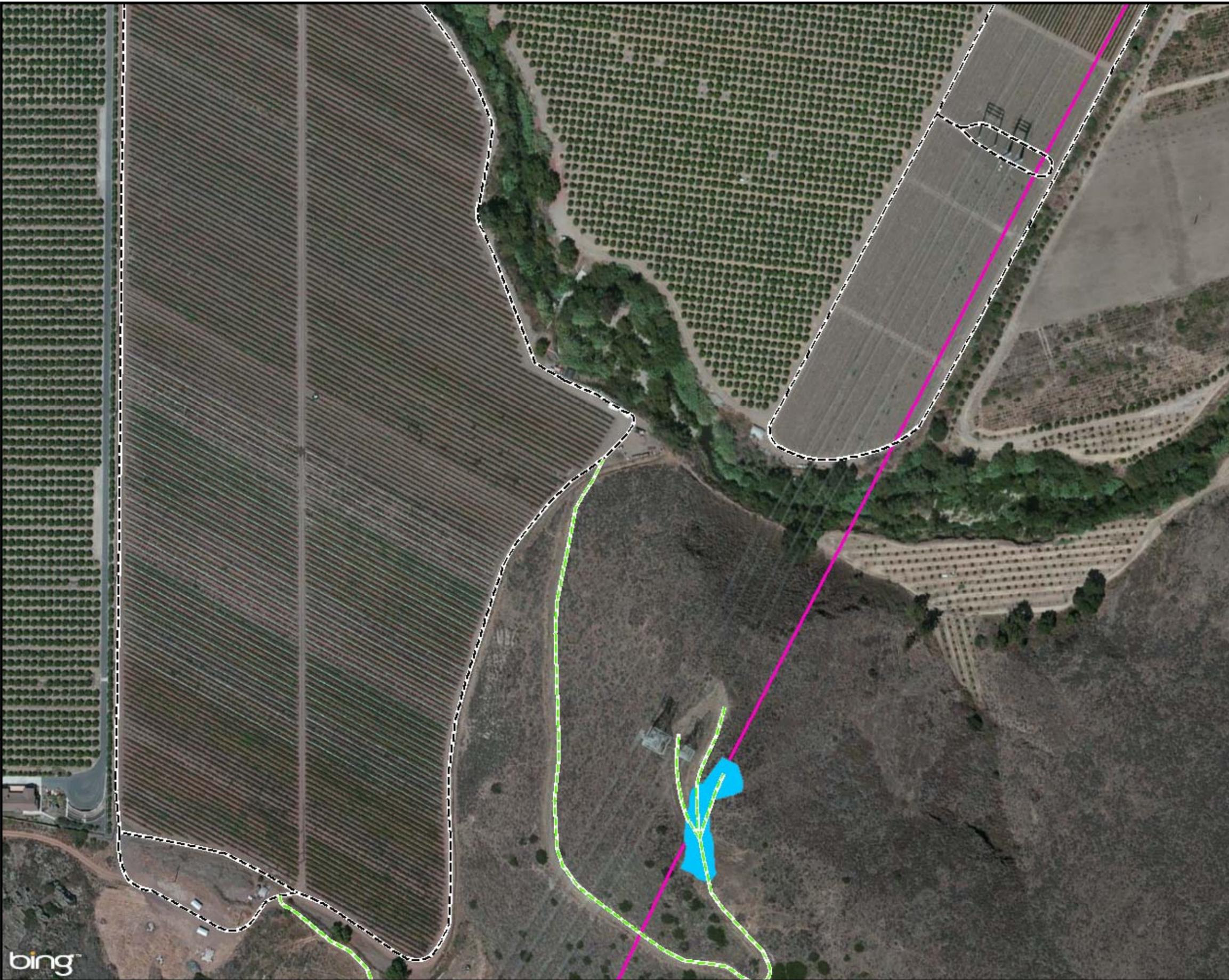


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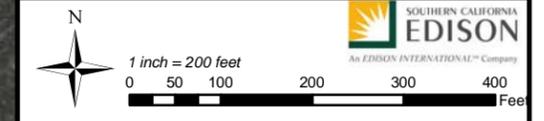


Legend

- Existing Substation Boundary
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- 220kV
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- 66kV 220kV
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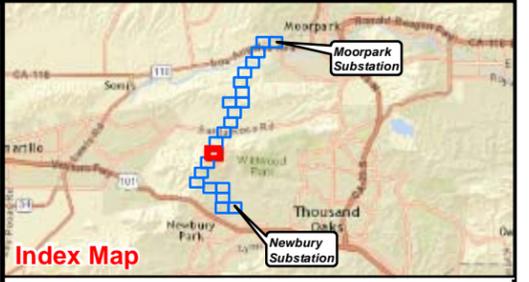
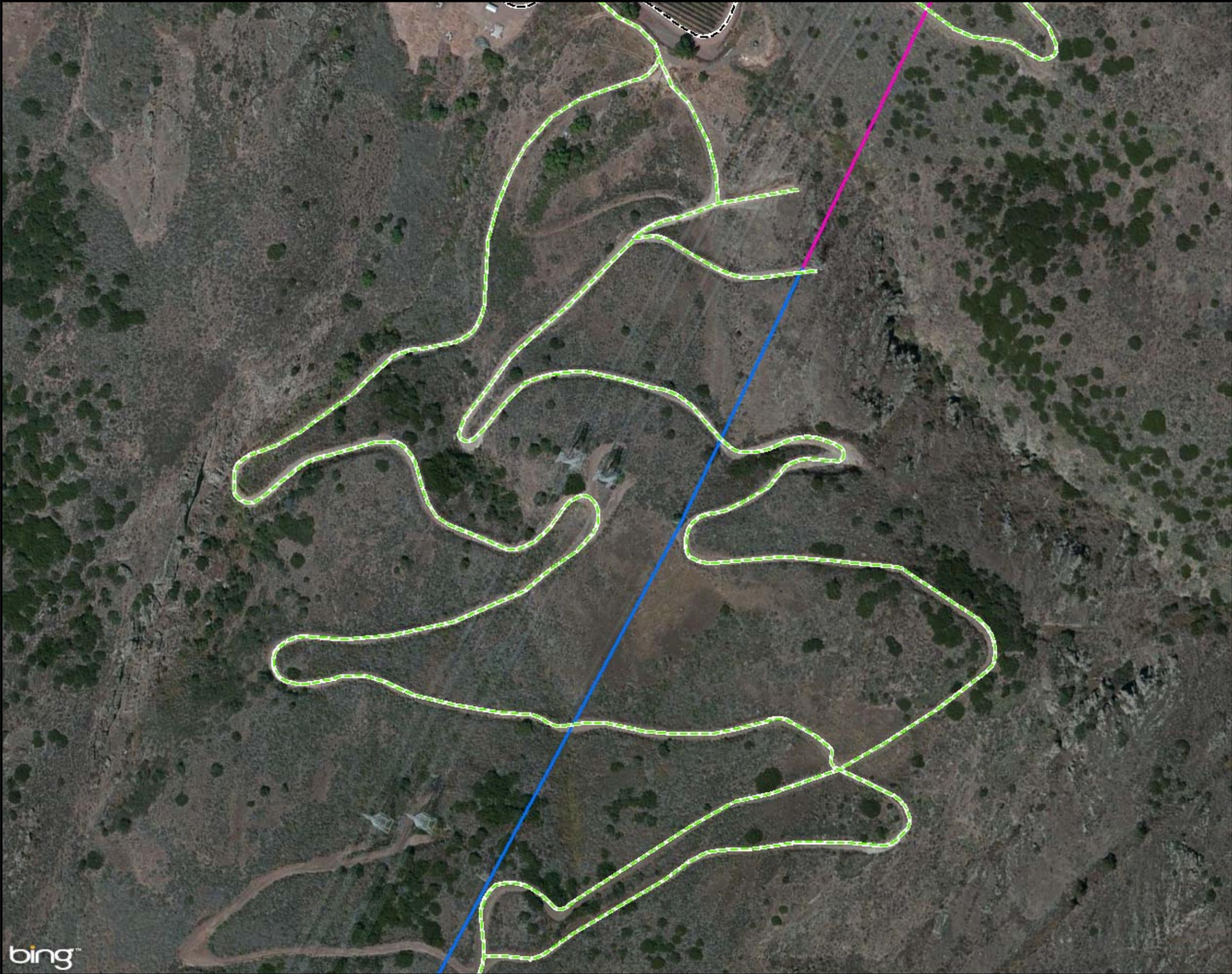


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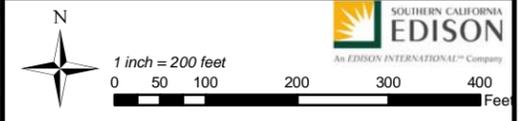
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- Legend**
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 - 220kV
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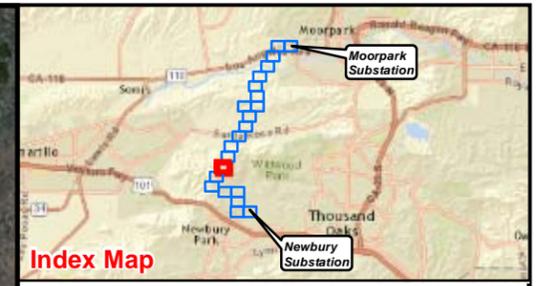
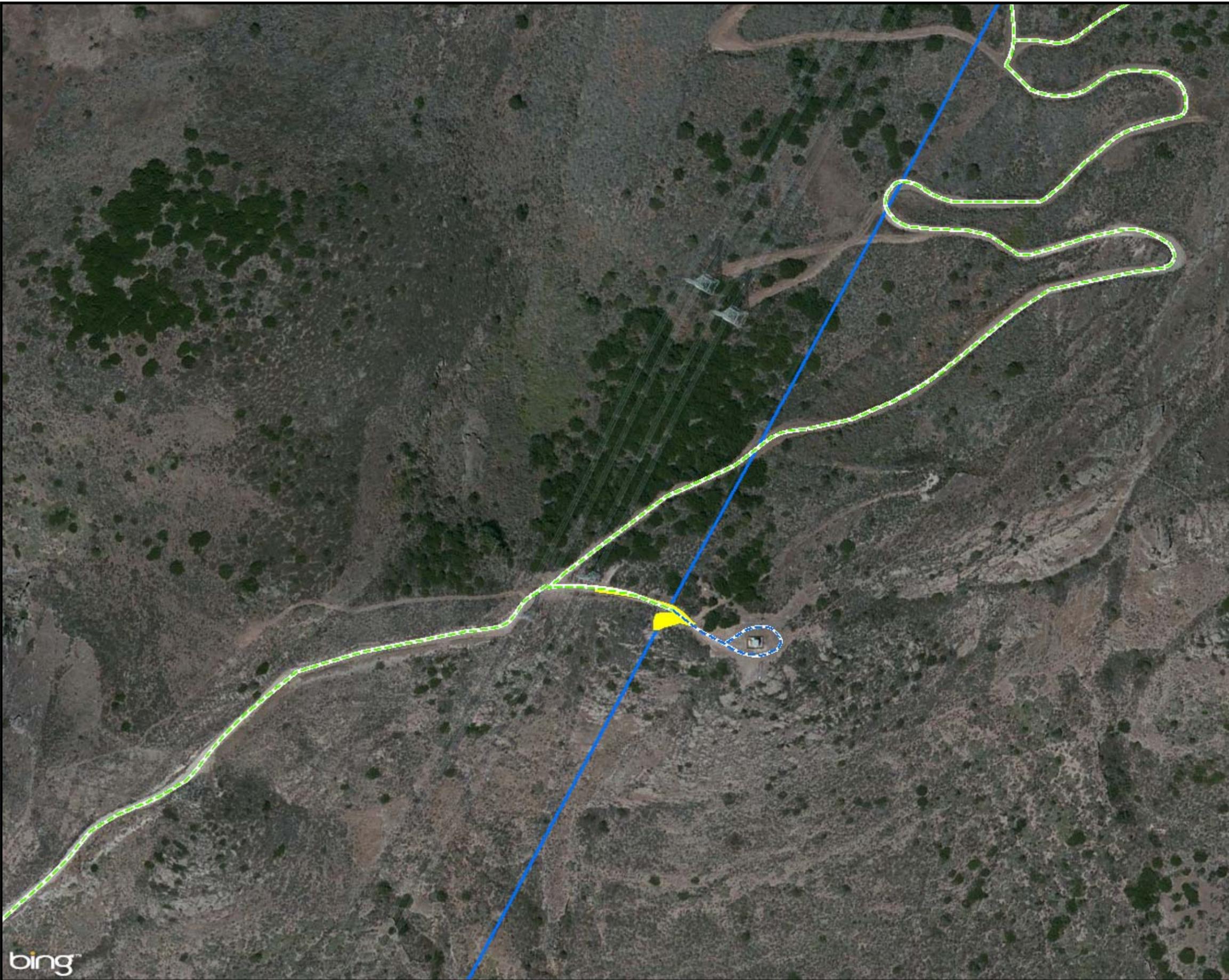


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Legend

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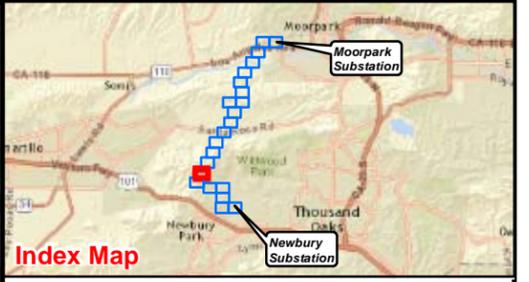
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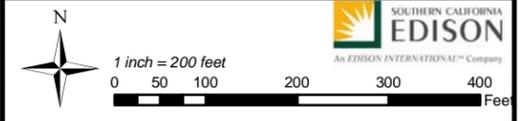
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- Legend**
-  Existing Substation Boundary
 - Existing Access Road**
 -  220kV
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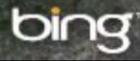
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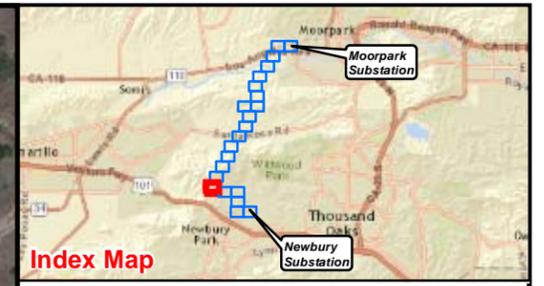
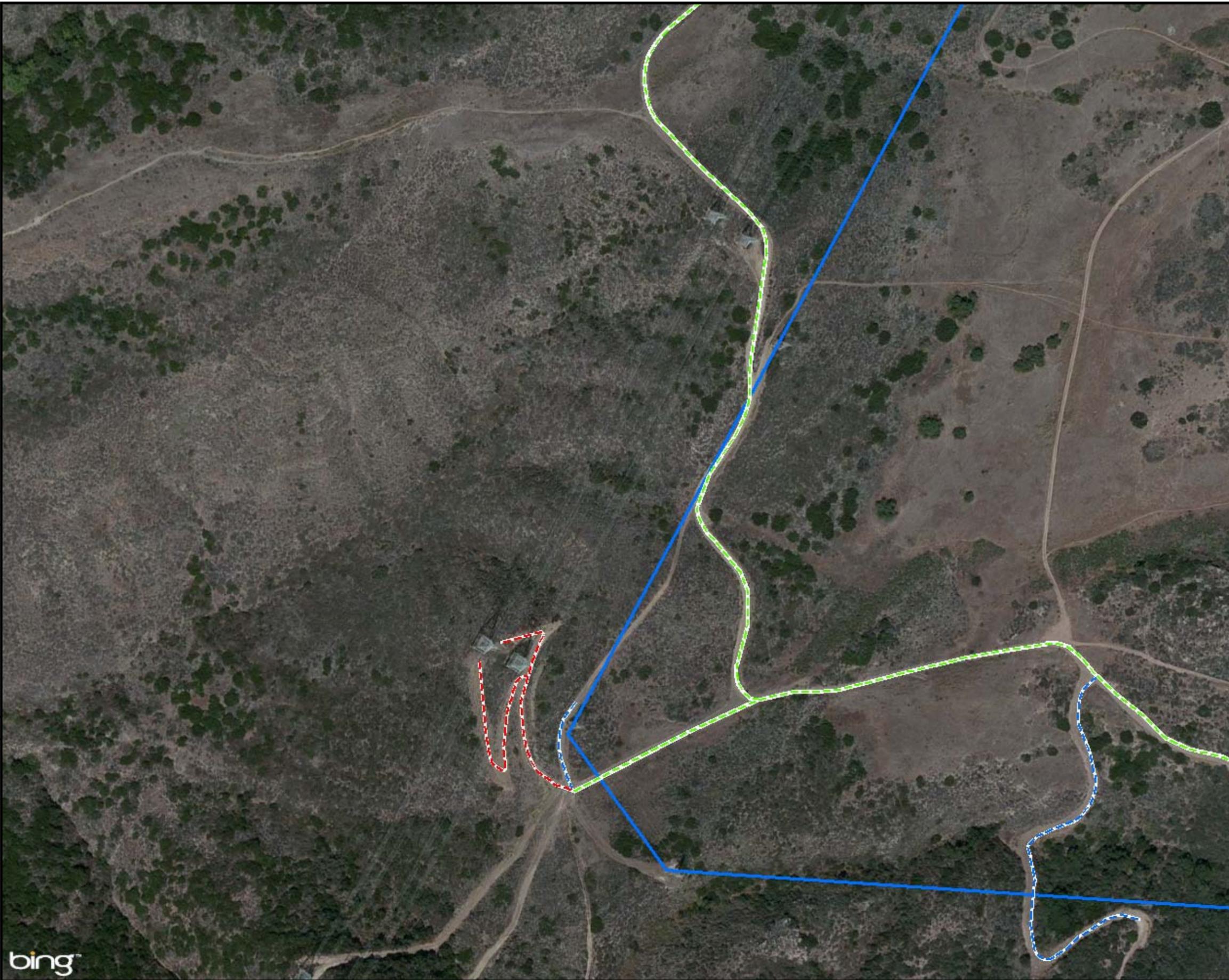


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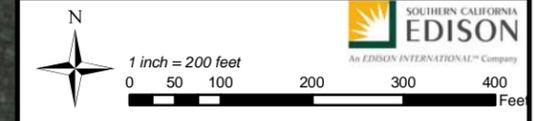


Legend

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- Existing Access Road**
- 220kV
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- 66kV 220kV (Combination)
- 66kV 220kV
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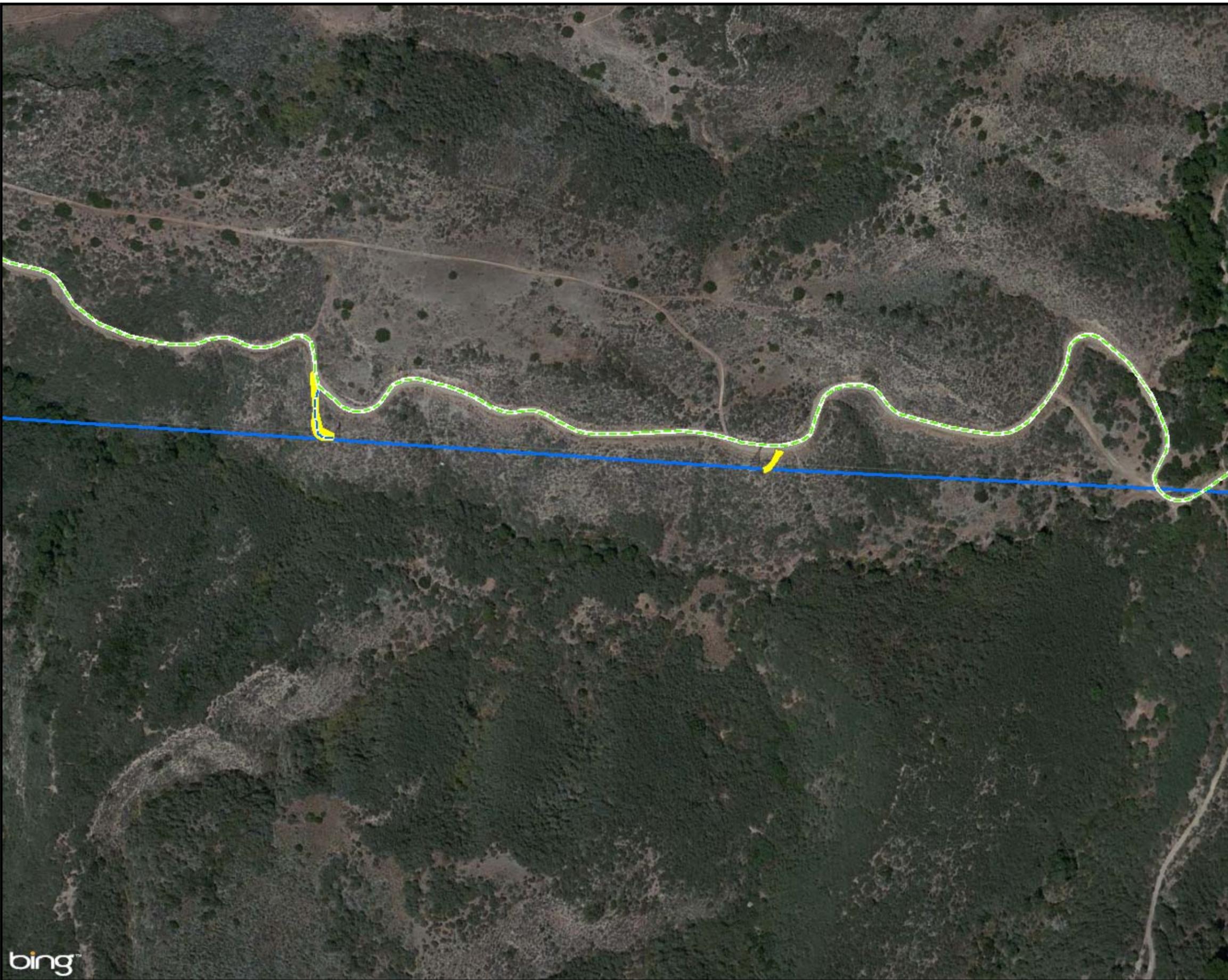


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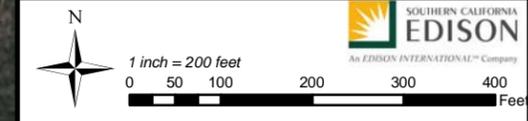
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- Legend**
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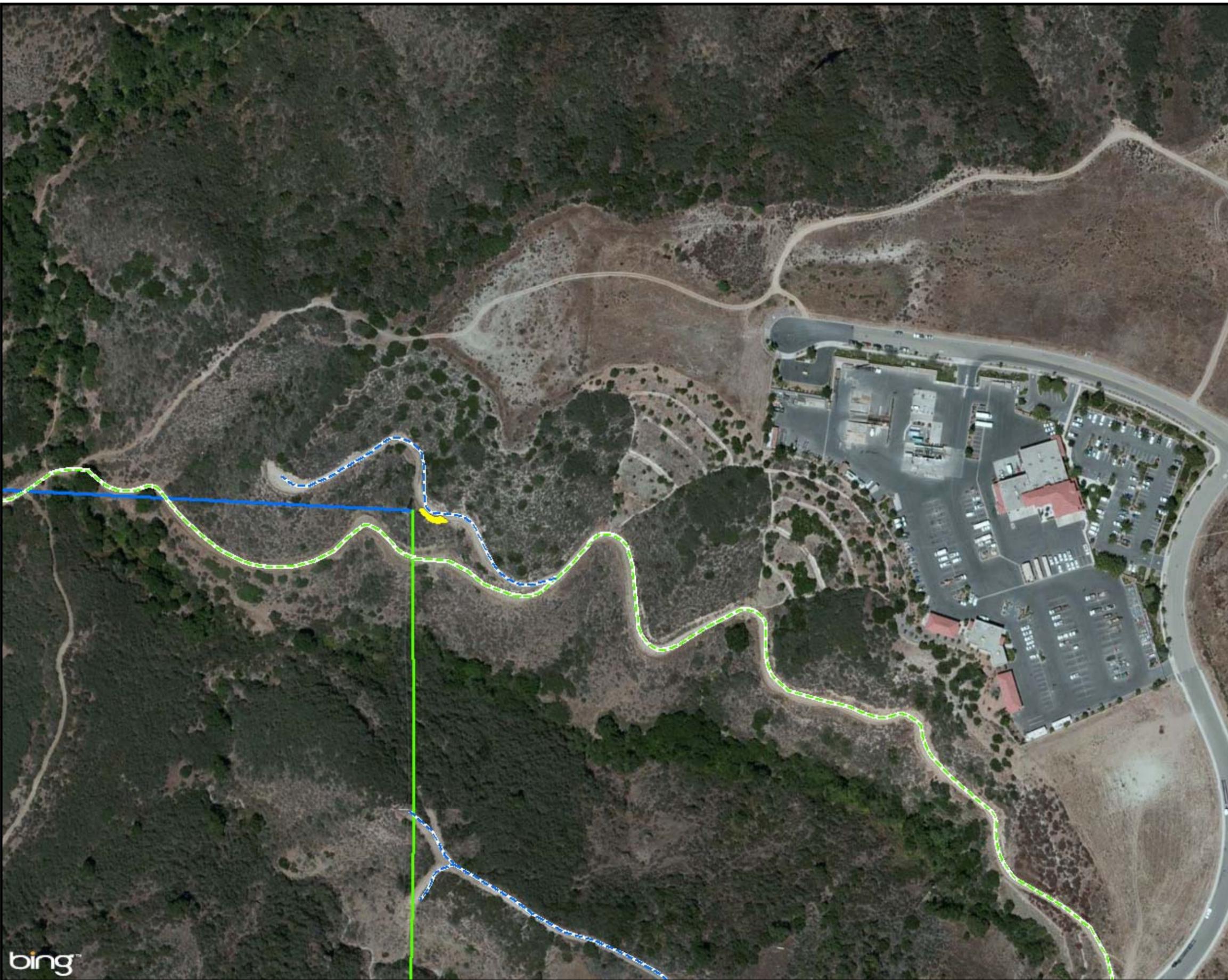


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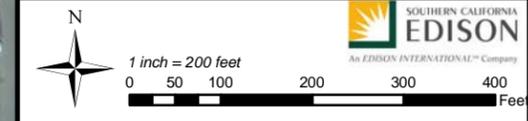
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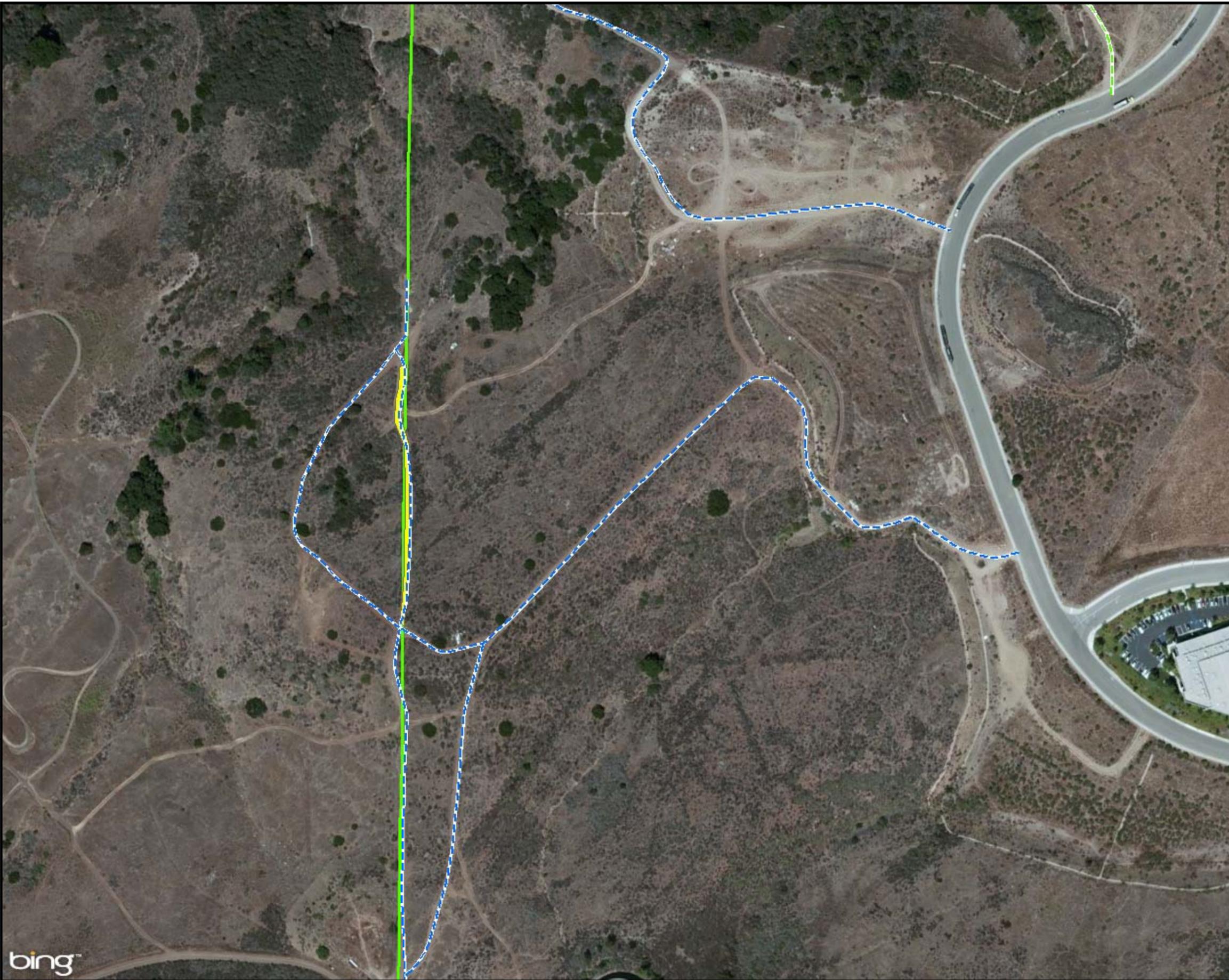


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Legend

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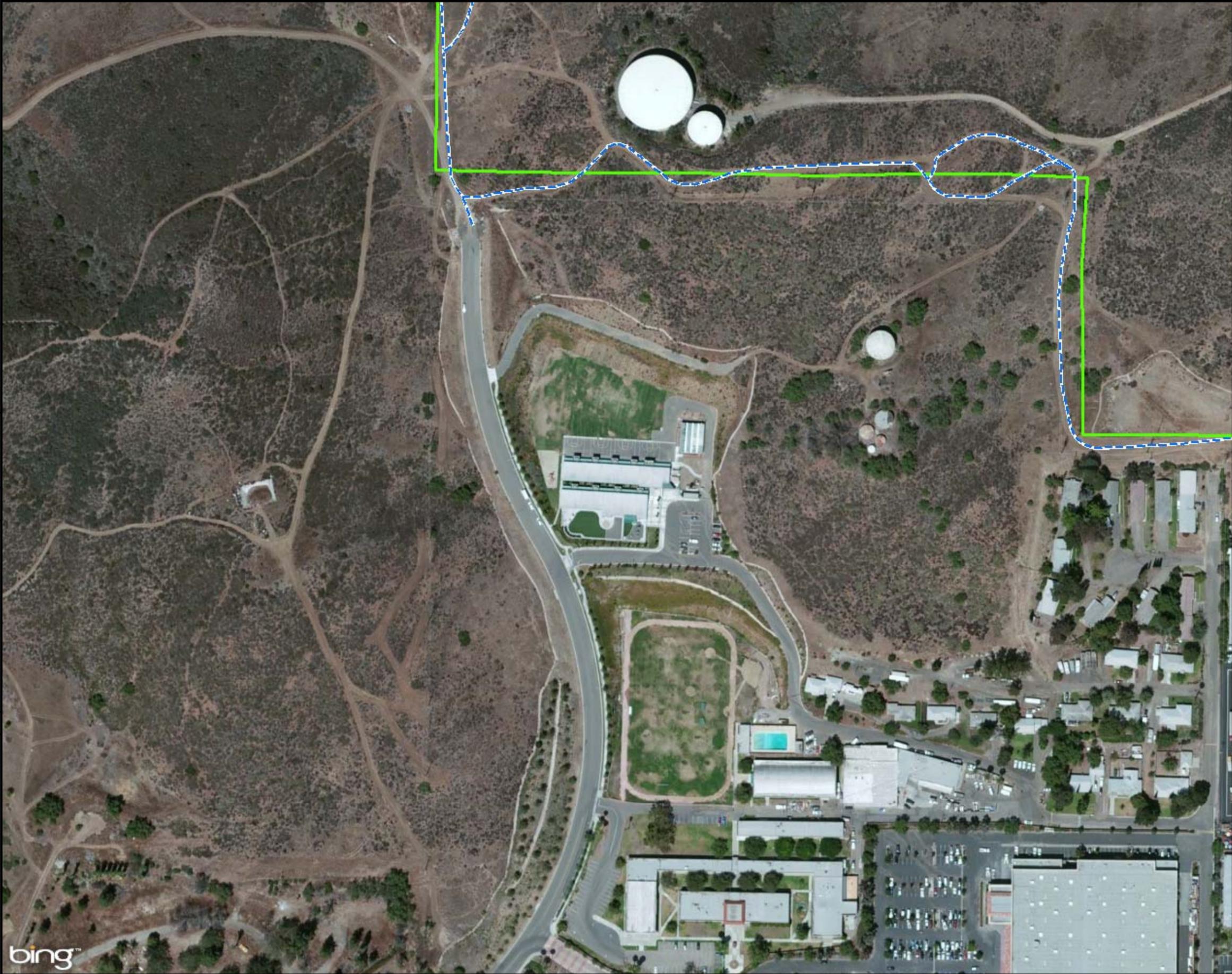
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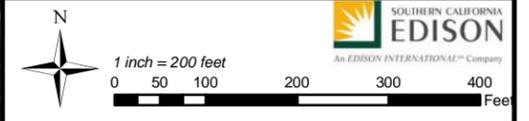
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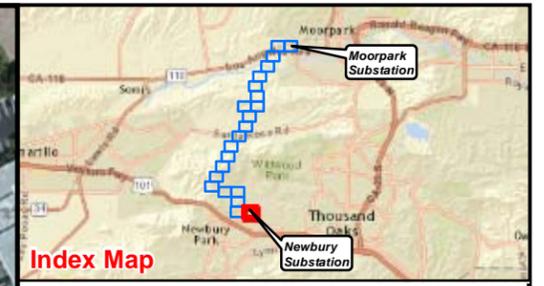


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