

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



July 10, 2018

Lori Charpentier
Project Manager
Major Environmental Projects
Southern California Edison
2244 Walnut Grove Avenue
Rosemead, CA, 91770

RE: Valley South Subtransmission Project: Minor Project Change #2

Dear Ms. Charpentier,

On July 8, 2019, Southern California Edison (SCE) submitted Minor Project Change (MPC) Request #2 to the California Public Utilities Commission (CPUC) for the use of a laydown area immediate south of the Valley Substation Yard (see Figure 1) which was approved under Notice to Proceed (NTP) #1. SCE is proposing to add the additional laydown area for wood pole storage. SCE proposes to store/stage up to 50 wood poles at a time, placed on plastic in a single layer. The area would be staked but not fenced. The area is SCE owned property and is the right-of-way for various SCE transmission lines heading east and west. The proposed area is located between the Valley Substation and a private contractor yard that obstructs the view as shown in Figure 1. Additional information was provided on July 9 and 10.

SCE's Valley South Subtransmission Project was evaluated in accordance with the California Environmental Quality Act (CEQA). The mitigation measures described in the Final Environmental Impact Report (FEIR) were adopted by the CPUC as conditions of project approvals. The CPUC voted on December 1, 2016 to approve SCE's Valley South Subtransmission Project (Decision 16-12-001) and a Notice of Determination was submitted to the State Clearinghouse (SCH# 2015051012). The CPUC also adopted a Mitigation Monitoring, Compliance and Reporting Program (MMCRP) to ensure compliance with all mitigation measures imposed on the Valley South Subtransmission Project during implementation.

MPCs are reviewed for consistency with CEQA requirements and are located within the geographic boundary of the project study area. MPCs do not create new or substantially more severe significant impacts, or conflict with any mitigation measure or applicable law or policy. Also, they do not trigger other permit requirements unless the appropriate agency has approved the change, and clearly and strictly comply with the intent of the mitigation measure or applicable law or policy.

This letter documents the CPUC's thorough evaluation of all activities covered in this MPC, including the mitigation measure requirements. The evaluation process ensures that all mitigation measures applicable to the location and activities covered in the MPC are implemented, as required in the CPUC's Decision.

MPC #2 for the use of the additional laydown area south of the Valley Substation Yard is granted by CPUC based on the factors described below.

CPUC Evaluation of Minor Project Change Request

In accordance with the MMCRP, the request for MPC #2 was reviewed by CPUC to confirm that no new impacts or increase in impact severity would result from the requested MPC activities. Impacts associated with the use of the additional laydown area are equal to or less than those associated with the Valley Substation Yard. All applicable avoidance/minimization measures identified in the FEIR Appendix 6 Mitigation Monitoring Plan will be followed. The following discussion summarizes the supplemental analysis for biological and cultural resources conducted for the MPC request. The proposed MPC request would not result in any changes to impacts or required mitigation for other issue areas, including aesthetics, air quality, noise, traffic/transportation, and water resources.

Biological Resources: A preconstruction survey of the adjacent Valley Substation Yard was conducted on January 21 and 22, 2019. The results of the preconstruction survey show that no special-status species or protected waters are known to occur in the immediate vicinity of the Valley Substation Yard. The area does not contain suitable habitat for jurisdictional or MSCHP riparian riverine resources.

Cultural and Paleontological Resources: SCE provided an Addendum to the Cultural Resources Assessment for the SCE VSSP Antelope Materials Yard Expansion, the Addition of the Valley Substation Yard, and the Addition of Six Vegetation Management Locations dated December 10, 2018. While the proposed new laydown area was not included in the cultural analysis for the FEIR, it was included in the records search area of the Project analysis (Wilson and Gibson, 2015). One cultural resources inventory encompassing the Valley Substation Yard, was completed in 2009 ("RI-08374). The survey was completed with negative results. No grading or excavation is proposed for use of the laydown area. However, if unanticipated archaeological resources are identified, the requirements of the Cultural Resources Management Plan will apply. The proposed laydown area occurs in the same paleontological sensitive substrate as the Valley Substation Yard and monitoring for paleontological resources will be conducted according to the Paleontological Resources Mitigation and Management Plan.

Conditions of NTP Approval

The conditions noted below shall be met by SCE and its contractors prior to use of the laydown area:

- All applicable project mitigation measures, APMs, 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.
- Copies of all relevant permits, compliance plans, and this MPC #2 shall be made available on site for the duration of construction activities.

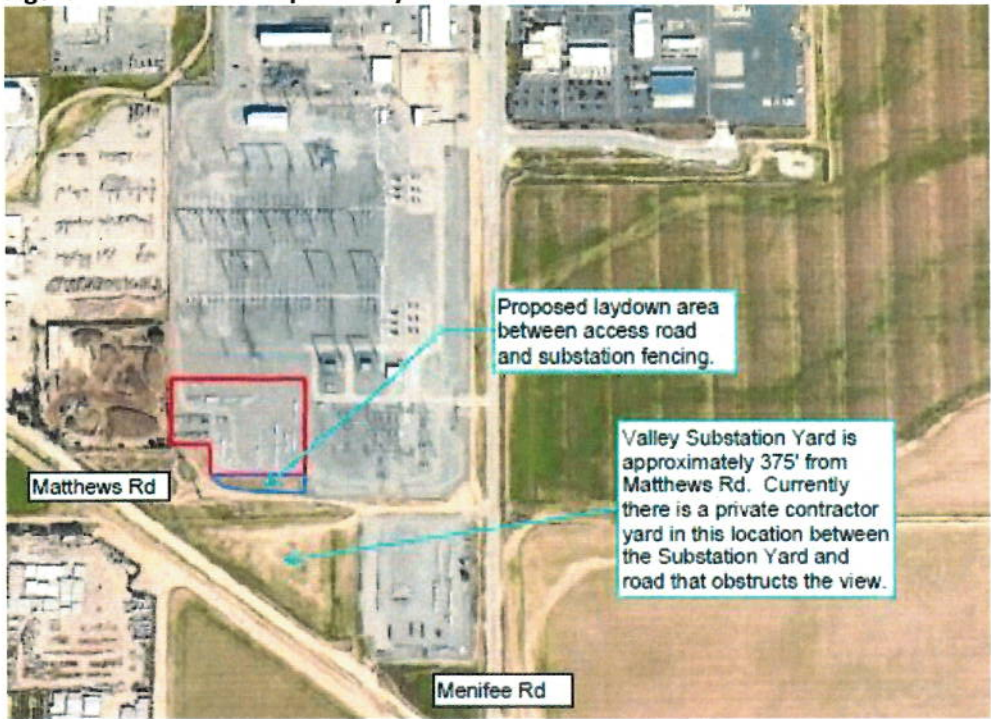
Sincerely,



Eric Chiang
CPUC Environmental Project Manager

cc: V. Strong, Aspen

Figure 1: Location of Proposed Laydown Area



---- Valley Substation Yard (approved under NTP #1)

---- Proposed Laydown Area