

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 29, 2019

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 #4

Dear Ms. Charpentier,

On October 24, 2019, Southern California Edison (SCE) submitted Minor Project Change (MPC) Request #4 to the California Public Utilities Commission (CPUC) for additional work area to be used for a crane set up area adjacent to structure number 4401074E. The area is located in Segment 2 on private lands. A review of the requested site was conducted by the CPUC Environmental Monitor on October 28, 2019. A request for additional information was provided to SCE on October 25 and SCE provided responses on October 25.

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 is working with SCE to develop 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 #4 for the use of the additional work area in Segment 2 is granted by CPUC based on the factors described below.

SCE Minor Project Change Request. Excerpts from the SCE MPC #4 request are presented below (indented):

SCE is requesting use of additional work area in Segment 2 adjacent to structure number 4401074E to set up a crane.

Original Condition: Additional work area was not previously identified in NTP request. The area is mapped as Non-native Grassland.

Justification for Change: Additional work area as needed to set up a crane to assist for construction activities in Segment 2.

Impacts associated with the additional work area are equal to or less than those already associated with the Segment 2 work areas. All applicable avoidance/minimization measures identified in FEIR Appendix 6 Mitigation Monitoring Plan will be followed.

Developer Coordination: Per mitigation measures, Wilson will coordinate with any developers within 30 days prior to construction.

CPUC Evaluation of Minor Project Change Request

In accordance with the draft MMCRP, the request for MPC #4 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 work area are equal to or less than those previously identified. 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, and fire hazards 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: Biological resources assessments were conducted and were included in Notice to Proceed (NTP) Request #2 dated December 21, 2018, in NTP Request #3 dated May 9, 2019, and in the preconstruction survey dated August 2, 2019. The newly identified area was included in the assessment areas. Paniculate tarplant were recorded south and northwest of pole 4401074E during previous surveys and additional Paniculate tarplant were recorded south of the pole during the preconstruction survey. In addition, a small amount of Paniculate tarplants are mapped in the southwestern corner of the requested area. Any Paniculate tarplant observed will be mapped and environmentally sensitive areas (ESAs) will be established. Project monitors will coordinate with construction foreman to determine if potential impacts can be avoided to the extent possible. If impacts cannot be avoided, the monitor will document the number of individuals impacted and the information will be noted in the daily monitoring reports uploaded to FRED.

Cultural and Paleontological Resources: SCE provided a Resource Summary Table which indicated that no cultural resources are present. Low to High sensitivity paleontological formations are mapped in the area of the proposed work area; however, no ground disturbing activities are proposed. Monitoring for paleontological resources will be consistent with the approved Paleontological Resources Mitigation and Monitoring Plan (PRMMP).

Fire Hazards: Mowing for fire safety will occur at the requested work area. SCE has committed to implementation of SCE standard fire prevention protocols during construction and is requiring contractors to implement the Fire Prevention Plan submitted to and approved by SCE. SCE indicates that their standard protocols will be implemented when the National Weather Service issues a Red Flag Warning. Further, SCE indicates that the portions of the proposed Project area located within moderate to high fire hazard areas would be grubbed of vegetation and graded (if necessary) prior to staging construction equipment on the site, further minimizing the potential for vehicles or equipment to start a fire.

Conditions of NTP Approval

The conditions noted below shall be met by SCE and its contractors prior to use of the work 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 #4 shall be made available on site for the duration of construction activities.
- Per Mitigation Measure LU-3, Wilson will coordinate with any developers within 30 days prior to construction.
- Vegetated areas approved under this MPC request shall be mowed prior to equipment mobilization for fire safety.

Sincerely,



Eric Chiang
CPUC Environmental Project Manager

cc: V. Strong, Aspen

Attachment A: Location of Proposed Additional Access and Work Areas