

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 12, 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 #5

Dear Ms. Charpentier,

On November 18, 2019, Southern California Edison (SCE) submitted Minor Project Change (MPC) Request #5 to the California Public Utilities Commission (CPUC) for 10 additional access and work areas on Segment 1 private lands. A review of the requested sites was conducted by the CPUC Environmental Monitor (EM) on November 20, 2019. Additional information from SCE was requested on December 2 and a revised MPC was submitted on December 6 with additional follow up on December 9.

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 #5 for the use of the additional access and work areas on Segment 1 is granted by CPUC based on the factors described below.

SCE Minor Project Change Request. Excerpts from the revised SCE MPC #5 request, received December 6, 2019, are presented below (indented):

SCE is requesting use of 10 additional access and work areas in Segment 1.

Original Condition: Additional access roads will be overland travel within SCE easement, in agricultural areas, or use of other existing dirt access roads not previously identified in NTP request.

Additional work areas added in previously disturbed or agriculture areas with no sensitive resources. Ground disturbance will occur in additional work areas identified for distribution conduit work. Vegetation will be removed as needed for construction.

Justification for Change: Additional work area as needed for construction and newly identified access to existing work areas that were not previously identified.

Environmental Impact: Impacts associated with the additional work areas and access roads are equal to or less than those already associated with the Segment 1 work areas and access roads. All applicable avoidance/minimization measures identified in FEIR Appendix 6 Mitigation Monitoring Plan will be followed.

CPUC Evaluation of Minor Project Change Request

In accordance with the draft MMCRP, the request for MPC #5 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 access and work areas 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 agricultural, biological and cultural resources, and land use 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.

Agriculture: None of the requested sites are located on designated Prime agricultural lands, so coordination per MM AG-1 is not required.

Biological Resources: Biological resources assessments were conducted and were included in the Notice to Proceed Request 2 dated December 21, 2018; in the Notice to Proceed Request 3 dated May 9, 2019; and in the preconstruction surveys dated July 30, September 3, September 10, and October 29, 2019. The newly identified areas were included in the survey assessment areas. Special-status species or protected waters are known to occur in the survey area, but not within the areas requested in this MPC. The areas requested do not contain suitable habitat for jurisdictional or MSHCP Riparian Riverine resources. The requested areas are considered to be suitable Stephens kangaroo rat (SKR) habitat, although no suitable burrows are located within the requested sites. A clearance sweep will be conducted prior to construction activities. Any new SKR burrows observed within work areas are mapped and ESA buffers are established. Both paniculate and smooth tarplant were recorded within the survey areas but are located outside of the requested work areas.

Cultural and Paleontological Resources: SCE provided a Resource Summary Table which indicated that no cultural resources are present within 100 feet of the requested access and work sites. Low to High sensitivity paleontological formations are mapped in the area of the proposed work areas; however, no ground disturbing activities are proposed. Monitoring for paleontological resources, will be consistent with the approved Paleontological Resources Mitigation and Monitoring Plan (PRMMP).

Land Use: None of the requested areas are located on designated development properties, so coordination per MM LU-3 is not required.

Conditions of NTP Approval

The conditions noted below shall be met by SCE and its contractors prior to use of the requested access and work areas:

- 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.

- Disturbance area and resource staking shall be validated by the CPUC EM prior to site use.
- Copies of all relevant permits, compliance plans, and this MPC #5 shall be made available on site for the duration of construction activities.

Sincerely,

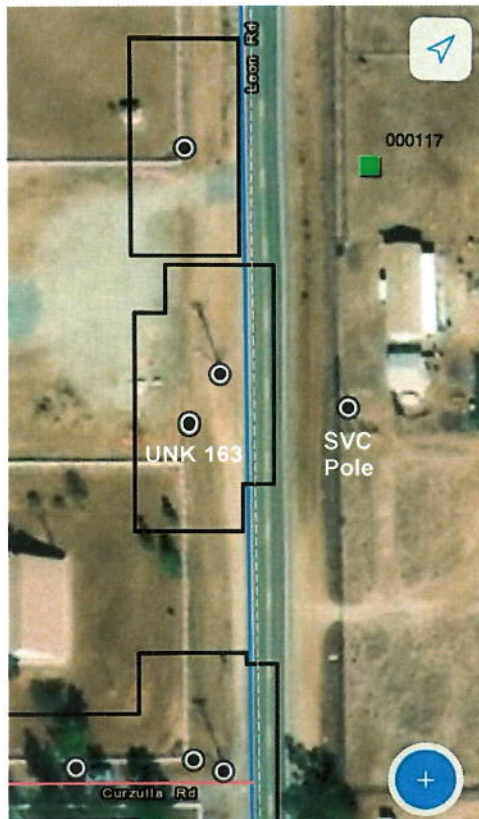


Eric Chiang
CPUC Environmental Project Manager

cc: V. Strong, Aspen

Attachment A: Location of Proposed Additional Access and Work Areas

VSSP MPR 5 – Additional work areas and access roads



Biological Resources
No resources recorded in the survey area during historical surveys. Paniculate tarplant (FRED ID 117) recorded during preconstruction survey 2. No new resources recorded within the area requested.

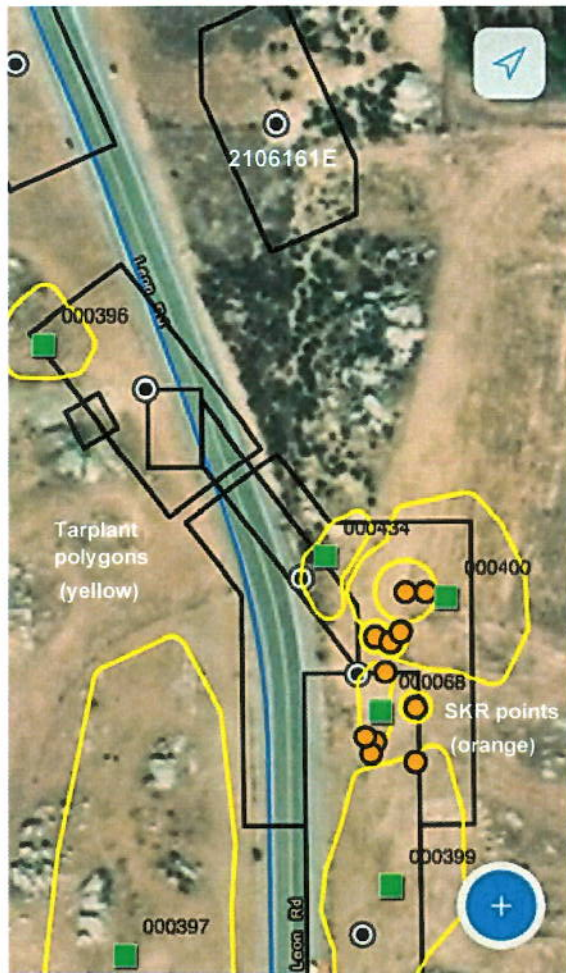
Management Strategies
Paniculate Tarplant: A clearance sweep is conducted prior to construction activities. Any new paniculate tarplant observed is mapped and ESA are established. The monitor coordinates with foreman to determine if potential impacts to paniculate tarplant can be avoided to the extent possible. If impacts cannot be avoided, then the monitor documents the number of individuals impacted and the information is noted in the daily monitoring report uploaded to FRED

Add work area for SVC Pole across from 4936882E (UNK 163)



Biological Resources
No resources recorded in the survey area during historical surveys. No new resources recorded during preconstruction survey 2 within the area requested.

Add work area and access road for SVC Pole across from 4936861E (UNK 142)



Add access road to 2106161E

Biological Resources
<p>Paniculate tarplant recorded in the survey area during historical surveys. Potential SKR habitat recorded with the work area for UNK 125. Paniculate tarplant recorded (FRED ID 434, 400, 399) in the during preconstruction survey 6. No new resources recorded within the area requested.</p>

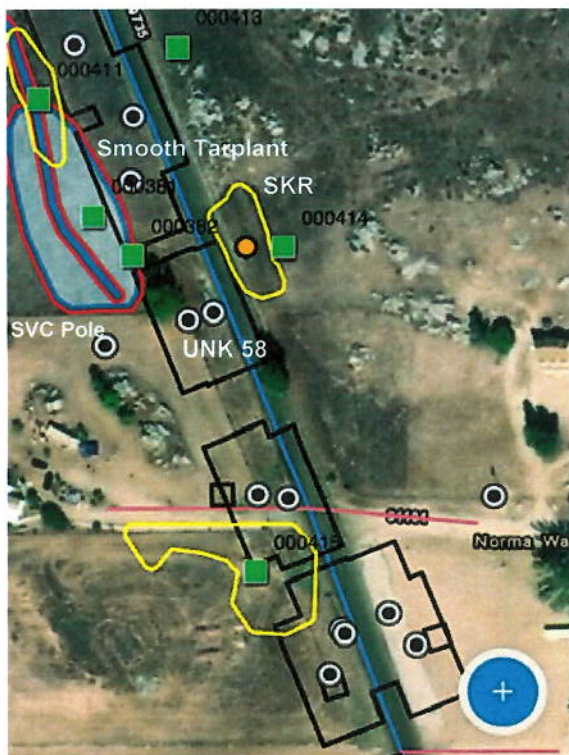
Management Strategies
<p>Paniculate Tarplant: A clearance sweep is conducted prior to construction activities. Any new paniculate tarplant observed is mapped and ESA are established. The monitor coordinates with foreman to determine if potential impacts to paniculate tarplant can be avoided to the extent possible. If impacts cannot be avoided, then the monitor documents the number of individuals impacted and the information is noted in the daily monitoring report uploaded to FRED</p>
<p>SKR: A clearance sweep is conducted prior to construction activities. Any new potential SKR burrows observed within work areas are mapped and ESA buffers are established. The monitor coordinates with the foreman to determine if potential impacts can be avoided to the burrows to the extent possible. If impacts cannot be avoided, then the monitor documents the number of potential burrows impacted, level of impact (i.e. lightly impacted by foot traffic or removed from grading), and the information is noted in the daily monitoring report uploaded to FRED.</p>



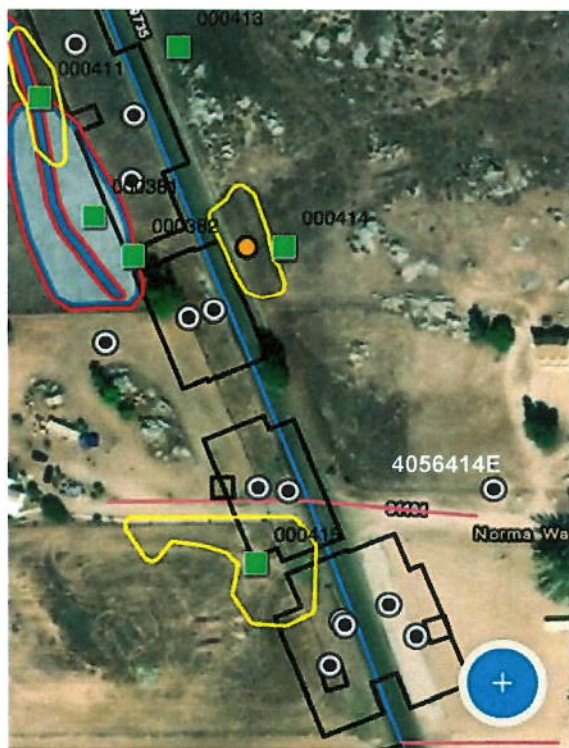
Biological Resources
No resources recorded in the survey area during historical surveys. Potential SKR habitat recorded in the survey area during preconstruction survey 6. No new resources recorded within the area requested.

Management Strategies
SKR: A clearance sweep is conducted prior to construction activities. Any new potential SKR burrows observed within work areas are mapped and ESA buffers are established. The monitor coordinates with the foreman to determine if potential impacts can be avoided to the burrows to the extent possible. If impacts cannot be avoided, then the monitor documents the number of potential burrows impacted, level of impact (i.e. lightly impacted by foot traffic or removed from grading), and the information is noted in the daily monitoring report uploaded to FRED.

Add work area and access road for 4250133E



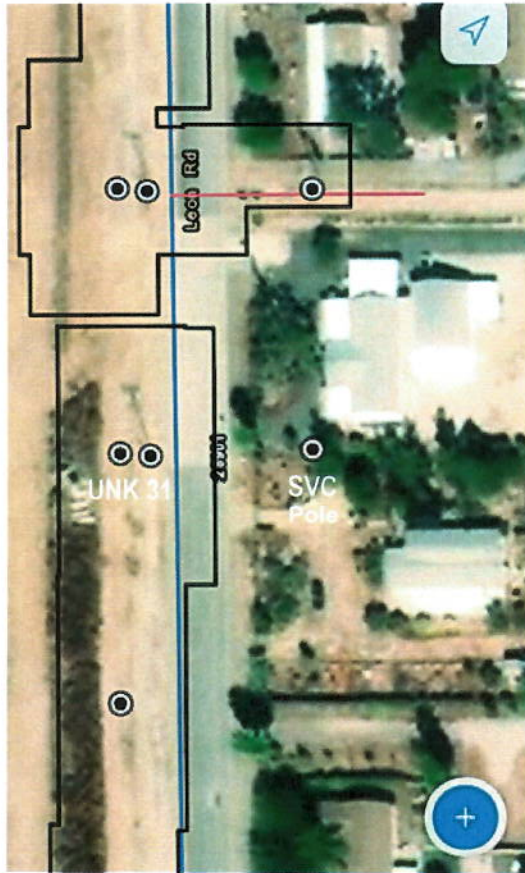
Add work area and access road for SVC Pole across from 4936628E (UNK 58)



Add work area for 4056414E

Biological Resources
MSHCP riparian riverine resource and smooth tarplant recorded north of the site during historical surveys. Additional paniculate tarplant recorded (FRED 414, 415) and potential SKR habitat during preconstruction survey 6. No new resources recorded within the area requested.

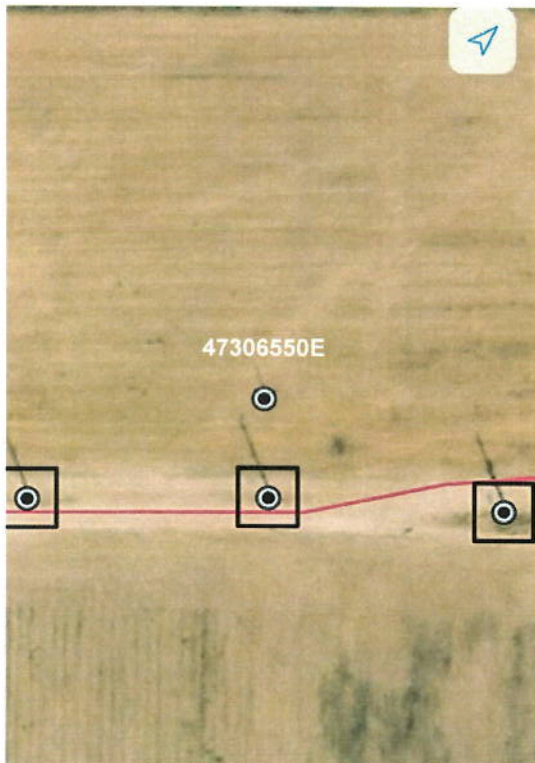
Management Strategies
Paniculate Tarplant: A clearance sweep is conducted prior to construction activities. Any new paniculate tarplant observed is mapped and ESA are established. The monitor coordinates with foreman to determine if potential impacts to paniculate tarplant can be avoided to the extent possible. If impacts cannot be avoided, then the monitor documents the number of individuals impacted and the information is noted in the daily monitoring report uploaded to FRED
Smooth tarplant: A clearance sweep is conducted prior to construction activities. Any new smooth tarplant observed are mapped and ESA are established. The monitor coordinates with the foreman to determine if potential impacts can be avoided to the extent possible. If impacts cannot be avoided, then the monitor documents the number individuals impacted, and the information is noted in the daily monitoring report uploaded to FRED. Impacts to smooth tarplant will be avoided within the MSHCP Criteria Areas Species Survey Area (CASSA) located south of Scott Road along the Project ROW.
SKR: A clearance sweep is conducted prior to construction activities. Any new potential SKR burrows observed within work areas are mapped and ESA buffers are established. The monitor coordinates with the foreman to determine if potential impacts can be avoided to the burrows to the extent possible. If impacts cannot be avoided, then the monitor documents the number of potential burrows impacted, level of impact (i.e. lightly impacted by foot traffic or removed from grading), and the information is noted in the daily monitoring report uploaded to FRED.



Biological Resources

No resources recorded in the survey area during historical surveys. No resources recorded during preconstruction survey 5 within the area requested.

Add work area and access road for SVC Pole across from 4936526E (UNK 31)



Biological Resources

No resources recorded in the survey area during historical surveys. No resources recorded during preconstruction survey 2 within the area requested.

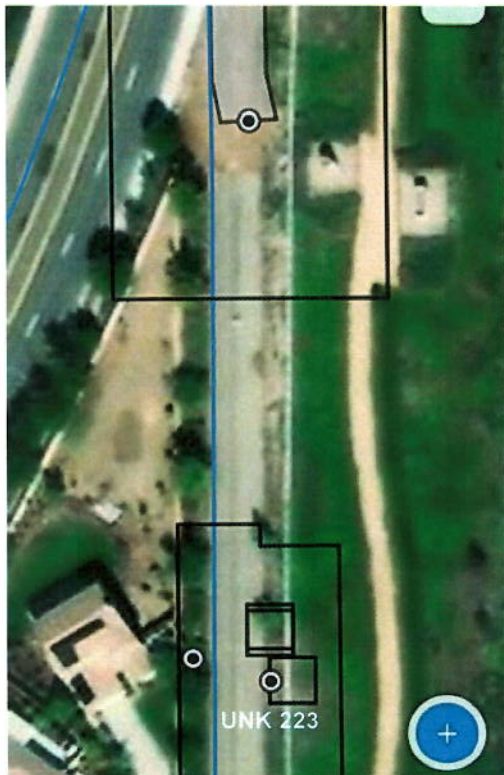
Add work area and access road for 47306550E



Biological Resources
MSHCP riparian riverine resource recorded southwest of the site during historical surveys. No new resources recorded during preconstruction survey 4 within the area requested.

Management Strategies
MSHCP Riparian Riverine Resource: All riparian/riverine resources will be avoided. The ESAs are established in the field. The monitor coordinates with the foreman to ensure boundaries are clear prior to starting work.

Extend work area for 4936959E (UNK 189) for distribution conduit work



Biological Resources
No resources recorded in the survey area during historical surveys. No resources recorded during preconstruction survey 2 within the area requested.

Extend work area for 4937028E (UNK 223) for distribution conduit work