

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

March 26, 2020



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 #8

Dear Ms. Charpentier,

On March 24, 2020, Southern California Edison (SCE) submitted Minor Project Change (MPC) Request #8 to the California Public Utilities Commission (CPUC) for an additional work area to be used for the installation of an anchor on existing pole #4393118E. The area is located in Segment 1 within the existing SCE right-of-way.

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 #8 for the use of the additional work area in Segment 1 is granted by CPUC based on the factors described below.

SCE Minor Project Change Request. Excerpts from the SCE MPC #8 request are presented below (indented):

SCE is requesting use of additional work area in Segment 1 surrounding existing pole number 4393118E to install an anchor.

Original Condition: Additional work area requested is within SCE existing right-of-way easement, within a disturbed developed area.

Justification for Change: Work area needed to support installation of an anchor on the existing pole 4393118E. Initial engineering calculations for this pole did not require a new anchor to be added. After a design change (change in wire size and length of span) and the SCE review process, it was determined an anchor was needed.

Impacts associated with the additional work area are equal to or less than those already associated with the Segment 1 work areas. 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 #8 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, cultural, and paleontological 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: 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 October 26, 2019. The newly identified area was included in the assessment areas. Paniculate tarplant was recorded in the survey area during historical surveys. An incidental observation of burrowing owl was noted to the southwest of the area requested in the surveys conducted in 2014. Paniculate tarplant was recorded at 4393118E during the preconstruction survey. Any paniculate tarplant observed during preconstruction sweeps will be mapped and environmentally sensitive areas (ESAs) will be established. Project monitors will coordinate with the 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. No sensitive paleontological formations are mapped in the area of the proposed work area and no cultural resources are present within 100-feet. No paleontological sensitive soils are located in the subject area; therefore, no monitoring is required in accordance with the approved Paleontological Resources Mitigation and Monitoring Plan.

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 #8 shall be made available on site for the duration of construction activities.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Chiang", with a long horizontal flourish extending to the right.

Eric Chiang
CPUC Environmental Project Manager

cc: V. Strong, Aspen