

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



June 7, 2019

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

RE: Valley South Subtransmission Project: Notice to Proceed #3

Dear Ms. Charpentier,

On May 16, 2019, Southern California Edison (SCE) submitted a request for Notice to Proceed (NTP) #3 to the California Public Utilities Commission (CPUC) for the construction of the Valley South Subtransmission Project (VSSP or Project). The Project includes construction of a new 115 kilovolt (kV) subtransmission line approximately 15.4 miles in length from Valley Substation in the City of Menifee to just west of Triton Substation in the City of Temecula. 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.

Final engineering of some towers and spans (UNK 68-UNK 95, UNK 222-UNK 228) was necessary and these locations were originally excluded from NTP #2. The request for NTP #3 includes the previously excluded sites (UNK 68-UNK 95, UNK 222-UNK 228 and associated work areas). Given that the Valley South Subtransmission Project has been approved by the CPUC, as described above, this phased construction review process allows SCE to proceed with individual project components where compliance with all applicable mitigation measures and conditions can be documented.

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

NTP #3 for the construction of the Valley South Subtransmission Project is granted by the CPUC based on the factors described below.

SCE provided the following information:

**SITE LOCATIONS AND CONDITIONS**

The construction activities for the Project would occur within cities of Menifee, Murrieta, Temecula, and portions of unincorporated southwestern Riverside County, California. The Project spans

approximately 15.4 miles from the Valley Substation in the City of Menifee to just west of SCE's Triton Substation in the City of Temecula (Exhibit 1). For reference, the Project is located within the Romoland, Winchester, and Bachelor Mountain United States Geological Survey (USGS) 7.5' topographic quadrangles.

Additional information on the features associated with the Project is described below.

This NTPR includes the locations that were excluded from NTPR #2, specifically:

- Structures UNK 68-UNK 95 and associated work areas
- Structures UNK 222-UNK 228 and associated work areas

**PROJECT COMPONENTS**

This section describes the Project facilities, components, and site work associated with the Valley South Subtransmission Project. Construction equipment operating hours for these activities would occur as follows:

- County of Riverside. If activities occur within one-quarter mile of an inhabited dwelling, construction shall occur between 6:00 a.m. and 6:00 p.m. from June through September and 7:00 a.m. and 6:00 p.m. from October through May.
- City of Perris. Between 7:00 a.m. and 7:00 p.m., Monday through Saturday. No construction is allowed on Sundays or legal holidays, except for Columbus Day and Washington's Birthday.
- City of Menifee. If activities occur within one-quarter mile of an inhabited dwelling, construction shall occur between 6:30 a.m. and 6:00 p.m., Monday through Saturday, from June through September and 7:00 a.m. and 6:00 p.m., Monday through Saturday, from October through May. No construction is allowed on Sundays or nationally recognized holidays.
- City of Temecula. If the activities occur within one-quarter mile of an inhabited dwelling, construction shall occur between 7:00 a.m. and 6:30 p.m., Monday through Friday. Construction activities are only allowed between 7:00 a.m. and 6:30 p.m. on Saturdays. No construction activities are allowed on Sunday or nationally recognized holidays.

Construction equipment operating hours for the Project will comply with county municipal code noise ordinances, or as otherwise approved by the appropriate jurisdiction. In the event construction activities are necessary on days or hours outside of what is specified by municipal code, SCE would obtain variances as necessary from appropriate jurisdictions where the work would take place. SCE has established a Valley South Subtransmission Project toll-free information line (1-866-785-7057) and website link under Riverside County projects (<https://www.sce.com/valleysouth>). The information line is the designated public notification contact for the Valley South Subtransmission Project.

**Project Elements/Construction Activities**

Following is a list of elements and activities that will possibly be present or active thought Project construction.

<b>Project Elements</b>	<b>Construction Activities</b>
<ul style="list-style-type: none"> <li>• Project and contractor equipment, vehicle and material storage areas</li> <li>• Office trailers and temporary power</li> <li>• Portable toilets</li> <li>• Temporary fencing and guard structures</li> </ul>	<ul style="list-style-type: none"> <li>• Surveying activities</li> <li>• Aboveground construction activities</li> <li>• Underground construction activities</li> <li>• Vegetation trimming, mulching, and removal</li> <li>• Installation, maintenance, and removal of</li> </ul>

<ul style="list-style-type: none"> <li>• Temporary concrete clean-out area</li> <li>• Existing access roads</li> <li>• Overhead subtransmission foundations, anchors, guy wires, structures, and conductor</li> <li>• Underground subtransmission vaults, duct banks, trenches, and conductor</li> <li>• Overhead distribution risers and conductor</li> <li>• Telecommunications cable installation</li> <li>• Substation modifications</li> <li>• Planned construction work areas and wire set-up sites (i.e., pull sites, wire splice sites)</li> <li>• Construction equipment and vehicles</li> <li>• Permit requirements (e.g., Best Management Practices (BMPs))</li> </ul>	<ul style="list-style-type: none"> <li>temporary fencing and BMPs</li> <li>• Replacement and upgrades of existing facilities</li> <li>• Temporary traffic control</li> </ul>
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## Site Work for 115 kV Subtransmission Line Construction

Site work for the installation and upgrades of the 115 kV subtransmission line will include but is not limited to installation of new subtransmission line structures, foundations, anchors, guy wires, conductor, and hardware assemblies, and disposal of removed poles, conductor, and hardware. Specific information on these activities is provided below.

### Access Roads

Construction of the Project will require temporary access throughout SCE easement areas and public road franchise area Rights of Ways (ROWs). The Proposed Project would use existing public roads and existing subtransmission line roads and will not require new road construction.

### Site Preparation

Site preparation for construction activities associated with the installation of the subtransmission line components may include surveying and installation of BMPs that will be maintained throughout the remaining construction activities described below.

Staging for construction activities will be located at the yard at Valley Substation, temporary staging areas, and within contractor work limits. Typical structure work areas will measure between 150 to 200 feet by 75 to 100 feet.

### Major Construction Activities

Planned Light-Weight Steel (LWS) pole, Tubular Steel Pole (TSP) and wood pole construction activities are summarized below.

- **Anchor and guy wire installation.** A backhoe and/or line truck digs/drills a hole to install plate or screw anchors. For a screw anchor, an auger drills a hole approximately 1–2 feet wide, and the

anchor is inserted to a depth of approximately 10–15 feet below ground. For a plate anchor, the hole is 2–5 feet in diameter and approximately 2–5 feet deep. Spoils are covered as needed and stored onsite before being spread onsite and compacted to existing line and grade following completion of the work.

- **Installation of LWS poles.** LWS poles are direct-buried to a depth of approximately 10–13 feet below ground. The diameter of the pole is approximately 2–3 feet. A line truck with an auger drills holes for pole placement. Spoils are temporarily stockpiled on site, then used to backfill the hole around the pole. The ground around the hole will be compacted to existing line and grade.
- **Wood Pole Installation.** Wood poles are direct-buried to a depth of approximately 9–12 feet below ground. The diameter of the pole is approximately 2–3 feet. A line truck with an auger drills holes for pole placement. Spoils are temporarily stockpiled on site, then used to backfill the hole around the pole. The ground around the hole will be compacted to existing line and grade.
- **Tubular Steel Pole Installation.** Holes for concrete pier foundations approximately 5–9 feet in diameter are drilled to a depth of 20–40 feet below ground using a drilling rig. Rebar cages are tied on-site. Spoils are covered as needed and staged onsite. A crane sets the rebar cage in the hole. Concrete trucks pour concrete. Concrete wash-outs will be in designated areas with appropriate control measures in place. Spoils will be spread around the foundation and compacted to line and grade, any excess soil will be hauled offsite for disposal.
- **Conductor/Wire Stringing.** Activities associated with the installation of the primary conductors onto subtransmission structures include the installation of conductor, shield wire, vibration dampers, weights, and suspension and dead-end hardware assemblies, and attachment of insulators and stringing sheaves (rollers or travelers). Wire set up and work areas vary from 300 feet by 100 feet for pulling and tensioning equipment, to 150 feet by 100 feet for splicing equipment.
- **Guard Structures.** Temporary equipment (boom trucks) are staged at transportation, flood control, utility, and railroad crossings for wire-stringing and wire removal activities.
- **Temporary Staging Yards.** Materials and equipment will be temporarily staged and stored at yard located at Valley Substation and designated temporary staging areas.

### Activity Schedule

Construction of the work associated with NTP #3 is anticipated to commence in June 2019.

### CPUC Evaluation of Preconstruction Mitigation Implementation

All applicable project mitigation measures (MMs), Applicant Proposed Measures (APMs), compliance plans, and permit conditions shall be implemented. Some measures have on-going/time-sensitive requirements and are required to be implemented prior to and during construction where applicable. Table 2 in SCE's NTP request provides the required environmental submittals for the issue areas addressed by the Valley South Subtransmission Project Final EIR. The following contains a status of applicable MM and APM required submittals, including any outstanding requirements:

**Aesthetics:** As required by MM AES-2, only the minimum amount of vegetation necessary for the construction of structures and facilities shall be removed during construction. In compliance with MM AES-4, SCE shall not apply paint or permanent discoloring agents to rocks or vegetation to indicate survey or construction activity limits or for any other purpose. As required by MM AES-5, SCE shall avoid night lighting where possible and minimize its use under all circumstances. To ensure this, SCE prepared a Night Lighting Management Plan for both construction and operations and maintenance. The Night Lighting Management Plan was approved by the CPUC on 09/07/18.

In compliance with MM AES-6, SCE shall treat the surfaces of all structures visible to the public such that: a) their colors minimize visual contrast by blending with the characteristic landscape colors and b)

their colors and finishes do not create excessive glare. SCE provided a Surface Treatment Plan describing the materials and dulling treatment proposed along with samples of treated material. The Surface Treatment Plan was approved by the CPUC on 09/17/18.

**Air Quality:** As required by MM AQ-1, SCE submitted a Fugitive Dust Control Plan which was approved by the CPUC on September 26, 2018. The Plan includes restrictions for vehicle traffic speeds on unpaved roads, that yards be graveled, watering frequencies for staging areas, covering soil truck loads, and the discontinuation of construction activities on unpaved areas if visible dust plumes cannot be avoided by approved dust suppression methods. In addition, in compliance with MM AQ-2, off-road equipment with engines larger than 50 horsepower shall have engines that meet or exceed U.S. EPA/CARB Tier 3 Emissions Standards.

**Biological Resources:** A Worker Environmental Awareness Program (WEAP) has been prepared to educate on-site workers about the proposed Project's sensitive environmental issues in accordance with MM BIO-1. Throughout the duration of construction, SCE shall be responsible for ensuring that all on-site project personnel receive this training prior to beginning work. SCE shall maintain a list of all personnel who have completed the WEAP training. This list shall be provided to the CPUC upon request. The WEAP was approved by the CPUC on October 31, 2018.

SCE prepared a Nesting Bird Management Plan (NBMP) consistent with MM BIO-7. This plan was developed to describe methods to minimize potential project effects to nesting birds, and to avoid any potential for unauthorized take. CPUC comments on SCE's NBMP were provided to SCE on November 15, 2018. Comments on the NBMP have been received from CDFW and SCE is currently waiting for USFWS input prior to Plan finalization.

SCE has prepared a Habitat Restoration and Monitoring Plan (HRMP) in accordance with MM BIO-4 to outline the restoration or revegetation of all temporary disturbance areas. The HRMP was submitted to CPUC/Aspen on March 21, 2019 and a revised Plan was submitted on May 14, 2019 which is under review.

As required by MM BIO-17, SCE is required to compensate for permanent impacts to vegetation communities and listed or special-status plants and wildlife. Instead of preparing a Habitat Mitigation and Monitoring Plan, SCE has received a Certificate of Inclusion from the RCA to authorize "take" for MSHCP protected species and SCE has become a Participating Special Entity (PSE) within the MSHCP Plan Area. SCE provided documentation of compliance with the MSHCP to the CPUC.

Preconstruction surveys for special-status plants and wildlife will be conducted consistent with MMs BIO-6, BIO-7, BIO-8, BIO-9, BIO-10, BIO-12, BIO-15, BIO-18, BIO-20, BIO-21, BIO-22, BIO-23 and BIO-24. SCE will ensure wildlife impact avoidance and minimization through measures outlined in MM BIO-2 during project construction.

As required by APM BIO-4, 115 kV subtransmission structures would be designed consistent with the Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006 (Avian Power Line Interaction Committee, 2006).

**Cultural Resources:** As required by MM CR-2, a Cultural Resources Management Plan (CRMP) was submitted by SCE on December 20, 2018. Comments on the CRMP were provided to SCE on 02/19/19. A revised CRMP was submitted to the CPUC on 03/13/19 and was approved by the CPUC on 03/21/19.

**Noise.** Best Management Practices for construction noise management will be implemented as outlined in MM NOI-2 to reduce construction noise levels to the extent feasible. Construction noise shall be confined to days and hours consistent with local jurisdiction regulations. Construction traffic shall be routed away from residences, recreational facilities, and schools to the maximum extent feasible.

**Paleontological Resources:** A Paleontological Resource Mitigation and Monitoring Plan (PRMMP) has been completed for the Valley South Subtransmission Project and was submitted to the CPUC for review and approval. The PRMMP was approved on 01/11/19.

**Traffic and Transportation.** Consistent with MM TRA-1, SCE submitted a Construction Traffic Control Plan to Caltrans, the CPUC, and all agencies with jurisdiction over public roads. SCE's Construction Traffic Control Plan was provided to the CPUC on September 24, 2018.

**Water Resources.** Jurisdictional waters (which were also characterized as MSHCP riparian/riverine resources) were identified at 45 locations in Segment 1 and at 18 locations on Segment 2. According to SCE, the Project was designed to avoid jurisdictional waters/wetlands and MSHCP riparian/riverine resources. Direct and indirect impacts to these features will be avoided by perimeter marking, careful siting of work areas, and appropriate water use and soil movement measures. Vehicles and equipment will follow the Best Management Practices discussed in MM BIO-2 to avoid potential disturbance to jurisdictional water features and MSHCP riparian/riverine resources.

### **Conditions of NTP Approval**

The conditions noted below shall be met by SCE and its contractors prior to the start of construction:

- 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 NTP shall be available on site for the duration of construction activities. All permits and plans shall be made available to the CPUC Environmental Monitors (EMs) upon request.
- To capture ongoing project and resource changes during construction, updated construction and resource maps, and digital spatial data (KML/KMZ or GIS data viewable from mobile device) shall be made available to SCE/contractor field monitoring staff and the CPUC EMs as changes occur.
- **AES-3:** If construction unavoidably introduces graveled surfaces that cause substantial visual contrast from sensitive public viewing locations, the graveled surfaces shall be treated with an appropriate color or material. SCE shall consult with the CPUC on a site-by-site basis and obtain written approval prior to the use of any colorants.
- **AG-1:** SCE shall document its coordination efforts with affected agricultural landowners regarding the continued use of Farmland and Agricultural Preserves and shall submit this documentation to the CPUC at least 30 days prior to the start of any construction activities on the affected agricultural parcels.
- **LU-3:** A minimum of 30 days prior to construction, SCE shall provide the CPUC with written documentation that verifies coordination with project developers, as applicable, and in particular, document status and coordination on the pending tentative tract map (TTM 36467) near the Project alignment.
- **NOI-1:** SCE shall provide a hotline where residents can call with questions or issues. Documentation of the complaint and resolution shall be submitted to the CPUC monthly.
- **REC-1:** SCE shall coordinate with applicable local or regional agencies and/or an agency representative(s) for all recreational areas affected by Project construction. SCE shall provide documentation of these coordination efforts to the CPUC prior to construction.
- **MMCRP:** Once preconstruction survey reports are submitted, the CPUC EMs shall conduct site reviews to verify that the required site boundary and resource staking has been installed in work

areas. Typically, each work site shall be delineated by markers (usually wooden stakes) which define the approved work area boundaries. Any Environmentally Sensitive Area (ESA) identified during preconstruction surveys shall also be delineated for avoidance. Only after the preconstruction survey reports and staking verification reviews occur, is construction permitted to begin.

- **MMCRP:** SCE will prepare and distribute a weekly environmental compliance status report for distribution to the CPUC consistent with project permits, mitigation measures, and the Mitigation Monitoring, Compliance and Reporting Plan (MMCRP).
- **MMCRP:** No movement or staging of construction vehicles or equipment shall be allowed outside of the approved areas. If additional temporary workspace areas or access routes, or changes in technique and mitigation implementation to a lesser level are required, a Temporary Extra Work Space (TEWS) or Minor Project Change (MPC) request shall be submitted for CPUC review (MMCRP Section 4.6). In addition, all water sources and disposal sites not previously identified shall require a TEWS or an MPR.

Sincerely,



Eric Chiang  
CPUC Environmental Project Manager

cc: V. Strong, Aspen