

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 27, 2018

Mr. Thomas Diaz
Licensing & Regulatory Affairs
Southern California Edison
2244 Walnut Grove Ave. 235G/GO4
Rosemead, CA 91770

Re: Second Application Completeness – No. A.18-05-007 SCE Eldorado-Lugo-Mohave Series Capacitor Project - Proponent's Environmental Assessment

Dear Mr. Diaz:

On May 2, 2018, SCE submitted an Application for a Permit to Construct (PTC) and a Proponent's Environmental Assessment (PEA) for the proposed Eldorado-Lugo-Mohave Series Capacitor Project (A.18-005-007). On June 1, 2018, the California Public Utilities Commission (CPUC) provided SCE a letter and attachments identifying certain deficiencies in the PEA and requesting that SCE remedy these deficiencies before the PEA and Application could be deemed complete and ready for the CPUC to initiate its environmental assessment of the project under the California Environmental Quality Act (CEQA). During July and August 2018, SCE provided responses to these deficiencies in a series of individual submittals. Thank you for your responsiveness.

Based on the additional material submitted and on further review of the PEA. The CPUC Energy Division has determined that the PEA remains deficient in some respects and that additional information is needed before it can be determined that the application is complete for review. A table identifying these deficiencies is provided as Attachment A. Responses to the June 1, 2018 letter ended at Q.55. To distinguish requests in this table from those in the earlier letter and tables, the numbering begins with Question 56 (Q.56).

Pending a determination of application completeness, CPUC cannot move forward with required steps in the CEQA process. However, while waiting for SCE to assemble and provide the requested information to address these deficiencies, the CPUC will prepare for developing the required CEQA document.

In addition to these outstanding completeness items, during preparation of the CEQA document the CPUC and its Consultant may identify additional information that is needed. This information may not be required to determine the completeness of the PEA and Application but may be needed to support our CEQA document preparation. The CPUC Energy Division will request any additional information needed in the form of data requests to SCE.

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We are available to discuss with you at your convenience any of the items listed in the attachment to this letter. Should you have any questions, please call me at (415) 703-2068 or email at billie.blanchard@cpuc.ca.gov.

Sincerely,

Billie Blanchard

Billie C. Blanchard

Senior Analyst/Project Manager

Infrastructure, Planning, and Permitting Branch/Energy Division

Attachment

cc: Rosalie Barcinas, Southern California Edison
Lonn Maier, CPUC CEQA Unit Supervisor
Molly Sterkel, CPUC Energy Division, Program Manager
Greg Heiden, CPUC Legal Division
Greg Miller, Bureau of Land Management, Calif. Desert District
Susan Lee, Aspen Environmental Group
Fritts Golden, Aspen Environmental Group

Attachment A. Proponent’s Environmental Assessment (PEA) Checklist [Part]

This table includes only PEA Checklist items that are applicable to this second request for information. Checklist items for which no addition information is being requested have been omitted. The numbering of identified deficiencies in the Deficiency Comments column begins with Q.56. Responses Q.01 through Q.55 were provided previously.

| Attachment A: A.18.05.007 – Eldorado-Lugo-Mohave Series Capacitor Project Proponent’s Environmental Assessment (PEA) Checklist for Transmission Line Projects – 2nd Review | | |
|--|------------------|--|
| Requirement | Complete? | Deficiency Comments |
| 3.5.2 Poles/Towers | | |
| Describe any special pole types (e.g., poles that require foundations, transition towers, switch towers, microwave towers, etc.) and any special features. | No | <p>PEA Figure 3-6 Typical Single-Circuit 500 kV Dead-End Tower and Figure 3-7 Typical Single-Circuit 500 kV Suspension Tower illustrate existing towers and provide typical dimensions. At PEA page 3-75ff (Lattice Steel Tower Modification) it is noted that towers may be raised using either tower body extensions or vertical leg extensions.</p> <ul style="list-style-type: none"> • Q.56. Please provide illustrations similar to Figures 3-6 and 3-7 that show how the towers altered using these two methods would appear after construction. <p>OPGW would be installed on approximately 855 existing lattice steel towers. PEA page 3-36 notes that “To support OPGW installation, tower modifications would be required.”</p> <ul style="list-style-type: none"> • Q.57. Please clarify whether the modifications referenced at PEA page 3-36 are those already identified as being needed to address discrepancies, or if modifications will be required on the tops of all or most existing towers to support OPGW installation. If tower modification is required for OPGW installation, please describe the modification, including what would be removed/installed and how it would alter the appearance of the tower. If appropriate, provide an illustration of the modification. |
| 5.3 Air Quality | | |
| Provide supporting calculations / spreadsheets / technical reports that support emission estimates in the PEA. Identify Project Green House Gas (GHG) emissions | No | <p>Under 5.3 Air Quality, the CPUC 2008 checklist specifies two items: “Provide supporting calculations / spreadsheets / technical reports that support emission estimates in the PEA.” & “Identify Project Greenhouse Gas (GHG) Emissions” – both of which require itemized quantification of emissions.</p> <p>Supporting calculations for the emissions estimates remain incomplete. In our June 1, 2018 completeness review letter, we noted that the PEA Appendix F included emission factors. However, the PEA’s information did not include: supporting calculations for the emissions estimates; emission factors from current versions of models; or activity assumptions. SCE’s Response to Question 46 includes updated activity assumptions and emission factors. Supporting calculations appear to still be missing from SCE’s Response to Question 46. The Response to Question 46 says “emissions...were calculated separately, then combined to generate the total Project emissions” without showing the separate calculations or the itemized separate results that must have been combined to arrive at the sum of emissions.</p> <ul style="list-style-type: none"> • Q58. Please provide the spreadsheets that were used to arrive at the tables in SCE’s Response to Question 46: “ATTACHMENT D: ATTACHMENT D: UPDATED CRITERIA AIR POLLUTANT AND GREENHOUSE GAS EMISSIONS.” To provide complete supporting calculations of emissions estimates, the work leading to itemized quantifications of emissions from separate sources need to be shown, and the sums of emissions from the separate sources that were combined to arrive at the totals need to be shown. This information is necessary for the CPUC to verify each criteria air pollutant and GHG emission rate total in each timespan reported (daily or per year) and in each jurisdiction (California air districts and Nevada). |

**Attachment A: A.18.05.007 – Eldorado-Lugo-Mohave Series Capacitor Project
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| Requirement | Complete? | Deficiency Comments |
|---|-----------|---|
| 5.4 Biological Resources – In addition to an impacts analysis: | | |
| Provide a copy of special status surveys for wildlife, botanical and aquatic species, as applicable. Any GIS data documenting locations of special-status species should be provided. | Yes | <p>The initial examination of the PEA identified that survey information had been included in the PEA. However, a closer examination of the 1,400 pages has identified deficiencies.</p> <p>A central difficulty is relating the information in the biological report information to specific locations. Some information appears to be lacking. Below is an itemization of identified deficiencies:</p> <ol style="list-style-type: none"> 1. The Revised Biological Resources Technical Report (BRTR), Section 2.4.2, indicates that a total of 8.8 acres would be permanently disturbed, and 385.2 acres would be temporarily disturbed. The project description and route maps indicate that these disturbance areas would be at a number of separate locations. Additionally, the BRTR identifies 17 Potential Staging Yard Locations (Table 1). <ul style="list-style-type: none"> • Q.59. Are the permanent and temporary disturbances of potential staging yards included in the total disturbance area figures cited above? 2. The BRTR Section 4.2 indicates that surveys were conducted for several resources. Table 7 indicates acreages surveyed for each resource, and attachments to the BRTR include a series of maps indicating survey areas and special-status species observations. However, these acreages and mapping data do not correspond clearly to the proposed disturbance areas shown on the route maps. The methods section indicates that field surveys were conducted with a Biological Resources Survey Area (BRSA), described as “composed of the Proposed Project area and a buffer of variable widths...” However, the text does not define or map the Proposed Project area or BRSA. Additionally, the text does not indicate if the potential staging yard locations were surveyed for biological resources. <ul style="list-style-type: none"> • Q.60. Please provide a definition of the “Proposed Project area” and any “buffer”, as used during the surveys. • Q.61. For the BRSA, identify on maps or GIS data the geographic limits of the areas surveyed, including the potential staging yards. If biological survey results are available in GIS format, provide a GIS data set that can be combined with previously provided project GIS data to identify these areas relative to project elements and work activities. 3. According to Table 7 (Surveys Conducted in the BRSA), varying numbers of acres were surveyed for special-status plants and other resources, on various dates. The two 2016 rare plant surveys each covered 2,511 acres; smaller areas were surveyed in March and May 2017, and the only fall season surveys (Sep-Oct 2017) covered 774 acres. The desert tortoise surveys covered 1,342 acres. Surveys for listed riparian birds covered smaller acreages. The location of survey results is often difficult to identify. It is not clear that potential yard areas were surveyed. <ul style="list-style-type: none"> • Q.62. For each potential staging yard location, please provide survey information equivalent to that provided for the other proposed disturbance areas (vegetation mapping, tortoise surveys, rare plant surveys, riparian bird surveys if appropriate) as well as additional survey data and habitat characterization identified below (burrowing owl, MFTL). • Q.63. Please provide a table or spreadsheet identifying each proposed disturbance area (capacitor site, repeater site, new access, tower work area, helicopter landing zone, potential yard site, wire set up, etc.). Distinguish each site by a method (e.g., tower number, HLZ number, etc.) that can be cross linked to the project’s GIS data. Also link each site to corresponding mapped locations provided in the surveys (e.g., desert tortoise survey map number, rare plant survey map number, etc.). <ul style="list-style-type: none"> ○ For each proposed disturbance area please indicate <ul style="list-style-type: none"> ▪ the number of acres of potential disturbance and ▪ by resource: <ul style="list-style-type: none"> • the actual acres surveyed (e.g., project area and any buffer) • indicate whether the location has been surveyed for rare plants (during spring, fall, or both), desert tortoise, jurisdictional waters, other resources (LBV, SWWF, MFTL, etc.). • Q.64. Please describe the reasoning for the varying numbers of acres surveyed on the different field dates. 4. The BRTR indicates that 11 sensitive natural communities were identified within the BRSA. |

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| Requirement | Complete? | Deficiency Comments |
|-------------|-----------|---|
| | | <ul style="list-style-type: none"> • Q.65. Please indicate which, if any, of these sensitive natural communities are located within planned disturbance areas (including yards) and indicate the number of acres of each community that would be disturbed directly or indirectly by project activities. <p>5. The botanical survey report (attached to the BRTR) indicates that none of the target species (white-margined beardtongue, Harwood’s eriastrum, and playa milk-vetch) could be identified at reference locations in 2016, presumably due to poor rainfall. Table 9 in the BRTR indicates that these and other species not found during field surveys are “absent” from the survey area. Considering the poor rainfall, the documented failure to locate three species at known locations, and the absence of reference location verifications for the other species, the “absent” conclusion in Table 9 is not warranted.</p> <ul style="list-style-type: none"> • Q.66. For all proposed disturbance sites, including potential staging yards, please revise Table 9 to indicate probability of occurrence for all special-status plants based on consideration of habitat, geographic range, known proximity to the project area, elevational range, and detectability during poor rainfall years. <p>6. The desert tortoise survey maps indicate locations of various sign identified during the surveys, but do not identify sign condition.</p> <ul style="list-style-type: none"> • Q.67. Please provide mapping symbols or a table, indicating “classes” for burrows, scat, carcasses, etc. for each observation, following the USFWS terminology. <p>7. The BRTR and the focused desert tortoise survey report attached to it do not indicate whether surveys for burrowing owl or other special-status wildlife were conducted, or how incidental observations of other wildlife species were recorded during desert tortoise surveys. There is no list of wildlife species observed, and only two incidental observations of special-status wildlife are noted (one incidental observation each of desert bighorn sheep and burrowing owl, both during botanical surveys).</p> <ul style="list-style-type: none"> • Q.68. Please provide a compilation of all wildlife species observed (from wildlife biologists’ field notes), including locations of all special-status status species and their sign (such as burrows with sign of occupancy by burrowing owls). <p>8. There is no burrowing owl survey report is included with the PEA.</p> <ul style="list-style-type: none"> • Q.69. Please provide a field survey for burrowing owls for each proposed disturbance area (including the potential staging yards), identifying any suitable burrowing owl burrows or “surrogate burrows” (e.g., drain pipes or rubble piles), and burrows showing sign of likely burrowing owl activity or occupancy, and any observations of ground squirrel activity on the site. One 100-percent coverage field survey of each site will be suitable for the purpose of evaluating project impacts, although additional surveys (per the CDFW guidelines) may provide additional useful information for the analysis. <p>9. The PEA and attachments do not indicate special-status wildlife observations or habitat suitability at any of the proposed disturbance sites or potential staging yard locations.</p> <ul style="list-style-type: none"> • Q.70. Please provide Mojave fringe-toed lizard (MFTL) habitat evaluations and any MFTL observations at each proposed disturbance site or potential staging yard location. • Q.71. For each of the following species, please indicate if suitable habitat is found at any of the proposed disturbance areas or yard locations and, if so, for which ones was suitable habitat identified and of what type (such as habitat for roosting, nesting, or foraging): <ul style="list-style-type: none"> ○ banded Gila monster, ○ Bendire’s thrasher, ○ golden eagle, and ○ pallid bat. |

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| Requirement | Complete? | Deficiency Comments |
|--|-----------|--|
| 5.5 Cultural Resources – In addition to an Impacts Analysis: | | |
| Cultural Resources Report documenting a cultural resources investigation of the Proposed Project. This report should include a literature search, pedestrian survey, and Native American consultation. | No | <ul style="list-style-type: none"> • Q.72. If geographic areas of Cultural and Paleontological surveys are available in GIS format, provide a GIS data set that can be combined with previously provided project GIS data to identify these areas relative to project elements and work activities. |
| 5.7 Hazards and Hazardous Materials [Note: reference and list the documents that apply:] –In addition to an impacts analysis: | | |
| Environmental Data Resources report Hazardous Substance Control and Emergency Response Plan Health and Safety Plan | No | <p>SCE has responded satisfactorily to questions on hazards and hazardous materials, but one omission is noted that is relevant to the project area.</p> <p>Several known Formerly Used Defense Sites (FUDS) sites are known to exist in the Mojave area in the vicinity of the proposed project. FUDS are not discussed in the PEA. The FUDS sites cleanup is being overseen by the US Army Corps of Engineers. Information about the FUDS program, interactive GIS, and a basic inventory of FUDS sites can be found at: https://www.usace.army.mil/Missions/Environmental/Formerly-Used-Defense-Sites</p> <p>If not done previously, consider contacting the local FUDS/Corps office to verify current status of any sites at or adjacent to the Project.</p> <ul style="list-style-type: none"> • Q.73. Please provide a discussion of FUDS sites closest to the proposed project and the potential to encounter unexploded ordnance (UXO) or heavy metals in the soil during project construction. Address how this hazard will be avoided and how unanticipated discoveries will be handled. |