

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



January 16, 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 #6

Dear Ms. Charpentier,

On January 6, 2020, Southern California Edison (SCE) submitted Minor Project Change (MPC) Request #6 to the California Public Utilities Commission (CPUC) for additional overland travel routes in Segment 1. Field validation of the requested MPC was conducted by the CPUC Environmental Monitor (EM) on January 8, 2020. Additional information from SCE was requested on January 7 and on January 9. A revised MPC was submitted on January 10.

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 #6 for the use of the additional overland travel routes in Segment 1 is granted by CPUC based on the factors described below.

**SCE Minor Project Change Request.** Excerpts from the revised SCE MPC #6 request, received January 10, 2020, are presented below (indented):

SCE is requesting use of additional overland travel access 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.

**Justification for Change:** Additional overland travel access needed for wire stringing activities in Segment 1. Crews need in-line access on the far side of the poles to pull in the rope and/or wire for wire stringing. In areas where there are ESAs or it's not possible to access a truck, crews will hand-walk/pass the rope through the travelers to the next pole.

**Other Potential Impacts:** Impacts associated with the additional overland travel 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 #6 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 overland travel routes 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 resource 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, August 30, and September 10. The newly identified overland travel routes were included in the survey assessment areas. The following special-status species are known to occur in the survey area: paniculate tarplant and smooth tarplant. MSHCP riparian riverine and vernal pool resources are present and overlap some of the overland travel routes; however, no overland travel will occur in protected waters. The requested overland travel routes are located in suitable Stephens kangaroo rat (SKR) habitat (the entire project is located within SKR habitat), and suitable SKR burrows are located within the requested MPC areas. A clearance sweep will be conducted prior to construction activities. Any new SKR burrows, tarplant locations, vernal pools, or MSCHP riparian riverine resources observed within work areas will be mapped and Environmentally Sensitive Area (ESA) buffers established.

**Cultural and Paleontological Resources:** SCE provided a Resource Summary Table which indicated that cultural resources are present within 100 feet of some of the requested overland travel routes and that these sites will be monitored per the Cultural Resources Management Plan (CRMP). High sensitivity paleontological formations are mapped in the area of the proposed overland travel routes; however, no ground disturbing activities are proposed. Monitoring for paleontological resources will be consistent with the approved Paleontological Resources Mitigation and Monitoring Plan (PRMMP).

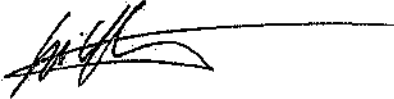
**Land Use:** None of the requested areas are located on designated development properties, so coordination per MM LU-3 is not required.

### **Conditions of NTP Approval**

The conditions noted below shall be met by SCE and its contractors prior to use of the requested overland travel routes:

- 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 #6 shall be made available on site for the duration of construction activities.
- No overland travel shall occur within MSHCP riparian riverine, vernal pool, tarplant, or SKR burrow ESA buffer areas.
- Monitoring for paleontological resources will be consistent with the approved PRMMP.

Sincerely,

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

Eric Chiang  
CPUC Environmental Project Manager

cc: V. Strong, Aspen