

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



January 4, 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 #1

Dear Ms. Charpentier,

On December 11, 2018, Southern California Edison (SCE) submitted Notice to Proceed (NTP) Request #1 to the California Public Utilities Commission (CPUC) for two contractor yards (Antelope Road and Valley Substation Contractor Yards) and initial vegetation removal in six locations in support of the Valley South Subtransmission Project (Project).

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.

As currently proposed by SCE, the Valley South Subtransmission Project includes multiple components (material yards, subtransmission, distribution and telecommunication relocations, and substation modification). A separate NTP will be issued for the remainder of the work. This is a typical process for large-scale projects with multiple components. 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.

A 4-acre portion of the current Antelope Yard was previously analyzed in the Project's FEIR as Subtransmission Material Yard 4 (Aspen 2016). The currently proposed Antelope Yard encompasses Substation Material Yard 4 and includes an expansion to the west. The expanded portion of the Antelope Road Yard was not included in the FEIR; however, the expanded area is already a developed material staging yard. The newly proposed Valley Substation Yard is located within the existing Valley Substation and is graveled and fenced. Both yards will be used for material staging and no ground disturbance will occur. SCE is also proposing six areas where vegetation management is necessary prior to construction of the subtransmission line. Activities will be limited to tree trimming or removal and no ground disturbance will occur. SCE provided maps showing the yard and vegetation management locations in Exhibit 1 of the NTP Request.

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. In addition, a site visit of the NTP #1 work areas was conducted by the CPUC Lead Environmental Monitor on December 3, 2018.

NTP #1 for the Antelope Road and Valley Substation Contractor Yards and initial vegetation removal at six locations for 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 Antelope Road Contractor Yard consists of approximately 9.5 acres located in the City of Menifee, Riverside County, California. The Antelope Road Contractor yard is located south of Ethanac Road, between Dawson Road to the west, and Antelope Road to the east. For reference, the Antelope Yard is located within the Romoland United States Geological Survey (USGS) 7.5' topographic quadrangle. The coordinates for the approximate center of the site are Latitude 33.74 N, Longitude -117.17 W.

The Valley Substation Contractor Yard consists of approximately 3.1 acres located in the City of Menifee, Riverside County, California. The Valley Substation Contractor Yard is located inside the existing SCE Valley Substation located on Menifee Road, south of Highway 74 and north of Case Road. The Valley Substation Yard is located within the Romoland USGS 7.5' topographic quadrangle. The coordinates for the approximate center of the site are Latitude 33.73 N, Longitude -117.15 W.

Initial vegetation clearance activities for the Project would occur in unincorporated southwestern Riverside County, California (Exhibit 1). For reference, locations of vegetation clearance are within the Winchester USGS 7.5' topographic quadrangles.

PROJECT COMPONENTS

The Contractor Yards will serve as the daily operating location for Project construction crews. Operating hours for the Contractor Yard are planned to be 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.

Vegetation clearing equipment operating hours would occur in accordance with ordinances for the County of Riverside. Activities 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.

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.

Site Facilities/Activities

The facilities and activities that will possibly be present or active at the Contractor Yards throughout Project construction, and during vegetative clearance activities are identified below:

Facilities	Activities
<ul style="list-style-type: none"> • Contractor equipment and vehicle parking areas • Material storage areas • Office trailers and temporary power • Portable toilets • Tool storage areas 	<ul style="list-style-type: none"> • Yard development, operation, and maintenance • Contractor equipment and material receipt and storage • Equipment repair • Welding and cutting

<ul style="list-style-type: none"> • Shipping containers • Trash Containers • Fire equipment and spill kit storage • Fueling areas • Existing access roads • Lighting/Security • Welding equipment 	<ul style="list-style-type: none"> • Equipment and vehicle fueling • Vegetation trimming, mulching, and removal • Installation and removal of temporary fencing and BMPs • Temporary traffic control
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Site Work for Antelope Contractor Yard

i. Site Preparation

The site preparation for the Antelope Contractor Yard will require the clearing and removal of weeds and brush. Best Management Practices (BMPs) will be installed as required by the Project Stormwater permit.

ii. Underground Major Activities

No underground major activities are planned at the Contractor Yard.

iii. Aboveground Major Activities

Fuel storage tanks with secondary containment will be installed at the Contractor Yard, as needed. BMPs will be employed when mobile fuel trucks are onsite delivering fuel. Electrical power and communication services will be provided to the onsite office trailer from the nearby distribution source. New fence installation and fencing repairs will occur as necessary.

Site Work for Valley Substation Contractor Yard

iv. Site Preparation

No site preparation is required for the Valley Substation Contractor Yard as it is contained entirely within an existing SCE substation. The Contractor Yard will be in a designated area within the rockered, graveled and fenced substation.

v. Underground Major Activities

No major underground activities are planned at the Contractor Yard.

vi. Aboveground Major Activities

New fencing will be installed for security purposes within the substation and fencing repairs will occur as necessary. No screening will be installed for safety reasons. The Contractor Yard is not visible from the street or near any sensitive receptors, therefore screening is not necessary. Fuel storage tanks with secondary containment will be installed at the Contractor Yard, as needed. BMPs will be employed when mobile fuel trucks are onsite delivering fuel. Electrical power and communication services will be provided to the onsite office trailer from the nearby distribution source.

Site Work for Initial Vegetation Clearance

vii. Underground Major Activities

No underground major activities are planned for vegetation clearance.

viii. Aboveground Major Activities

Vegetation will be trimmed or removed as necessary to allow for future construction, operation, and maintenance of the Valley South Subtransmission Project. Fire prevention tools and equipment will be onsite during vegetation clearance activities.

ACTIVITY SCHEDULE

SCE has indicated that the Contractor Yards construction and initial vegetation clearance activities is scheduled for first quarter 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-1, construction yards, staging areas, and material and equipment storage areas, including storage sites for excavated materials, shall be visually screened using temporary screening fencing. If construction yard temporary screening is not proposed, SCE shall define the site on a detailed map demonstrating its visibility from nearby roads, residences, or recreational facilities and submit the map to the CPUC for review and approval.

Air Quality: As required by MM AQ-1, SCE submitted a Fugitive Dust Control Plan and the Plan 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. Establishment and use of the yards and vegetation clearing shall be conducted in accordance with an approved NBMP.

SCE will prepare 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 has not yet been submitted; however, no ground disturbing activities are proposed for NTP #1 activities.

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 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.

Cultural Resources: As required by MM CR-2, a Cultural Resources Management Plan (CRMP) was submitted by SCE on December 20, 2018 and is currently under review. The two material yards and six vegetation management areas are not located within 100-feet of an established Environmentally Sensitive Area for cultural resources. Additionally, no ground disturbance is proposed for NTP #1 activities.

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 is currently under review; however, no ground disturbing activities are proposed for NTP #1 activities.

Traffic and Transportation. Consistent with MM TRA-1, SCE submitted a Construction Traffic Control Plan for review and approval by 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. One riparian/riverine feature was identified within approximately 70 feet of Vegetation Management Area #1 but will be avoided during vegetation removal. Two drainage features were observed in close proximity to the Antelope Yard but are located outside of the yard boundaries. Direct and indirect impacts to drainages near the Antelope Yard will be avoided by maintaining all staging of equipment within the boundaries of the yard outside of the riverine features. Vehicles and equipment will follow the Best Management Practices discussed in MM BIO-2 to avoid potential disturbance to jurisdictional water features.

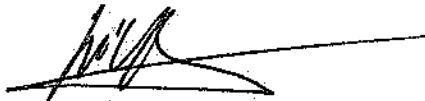
Conditions of NTP Approval

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-1:** If construction yard temporary screening is not proposed, SCE shall define the site on a detailed map demonstrating its visibility from nearby roads, residences, or recreational facilities and submit the map to the CPUC for review and approval.
- **BIO-7:** The revised Nesting Bird Management Plan shall be reviewed and approved by CPUC prior to establishment and/or use of the yards and vegetation clearing.
- **TRA-1:** SCE to provide local jurisdiction approval of the Construction Traffic Control Plan 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). Prior to the start of monitoring activities, SCE shall provide a proposed format describing content and organization of Weekly Compliance Reports for CPUC review and approval.
- **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