

PUBLIC UTILITIES COMMISSION

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SAN FRANCISCO, CA 94102-3298



March 2, 2021

Michael Bass  
Environmental Project Manager  
Southern California Edison  
2244 Walnut Grove Avenue  
Rosemead, CA 91770

**RE: Valley-Ivyglen 115kV Subtransmission Project (VIG) – Minor Project Refinement No. 9 Request: Notice to Proceed- (NTP-) 1 and 2 Supplemental Work Areas at multiple locations throughout Segments VIG1, VIG2, VIG3, VIG4, VIG5, VIG6, VIG7, and VIG8**

Dear Mr. Bass,

On January 26, 2021, Southern California Edison (SCE) submitted Minor Project Refinement (MPR) No. 9 Request to the California Public Utilities Commission (CPUC) for review. The proposed MPR would involve additional work areas and land disturbances that were not included in NTPR-1 and NTPR-2 but are necessary to construct the Project work described in Section 2.3.1.1 of the Final Environmental Impact Report (FEIR). The proposed work areas are within the general disturbance area of the VIG Project, except as noted in Table 1, and are of the sizes described in Table 2-5 of the FEIR as being necessary to construct the Project components. The primary activities to be conducted at the proposed work areas would include installation of guy anchors, conductor, and fiber optic. Furthermore, site preparation activities would include vegetation clearing, improvement/ construction of access roads and work areas, and installation of Stormwater Pollution Prevention Plan (SWPPP) best management practices (BMPs).

**Additional Work Areas within General Disturbance Areas:**

The proposed refinements would result in a net increase of 0.67 acres of permanent and temporary disturbance in Segments VIG1 – VIG8. The locations, dimensions, and activities to occur at each site are provided in Table 1 and are virtually shown in the biological resources maps (see Attachment A.1, B.1).

**Table 1: VIG1 – VIG8 Additional Requested Work Areas**

Segment	Pole / Feature Name	Nearest Structure	Latitude	Longitude	Description	Activity
VIG1	Anchor Site	112E	33.73644	-117.23888	15 feet north of 112E. 560 square feet of temporary work area for installation of a guy anchor.	Installation of a guy anchor for the stability of 112E.

VIG1	Access Road	120E	N/A	N/A	1,385 linear feet of Level 0 access road extending northeast and northwest of 120E to allow for ingress/egress during construction. 329 linear feet of the road are outside of the general disturbance area.	Ingress and egress of equipment during construction at 120E.
VIG2	4405252E	184E	33.73357	-117.28719	7 feet south of 184E. 840 square feet of temporary work area for an existing wood pole and installation of an associated guy anchor.	Modification to existing wood pole and installation of guy anchor for pole stability.
VIG2	3312199S	184E	33.73333	-117.28704	106 feet southeast of 184E. 2,500 square feet of temporary work area for the replacement of an existing wood pole and installation of a guy anchor. 1,092 square feet of the work area and guy anchor area are outside the general disturbance area.	Replacement of existing wood pole and installation of a guy anchor for pole stability.
VIG2	Access Road	184E	N/A	N/A	314 linear feet of Level 1 access road to access 3312199S, south of 184E. 184 linear feet of the proposed road is outside of the general disturbance area.	Overland travel for ingress/egress to 3312199S.
VIG2	4648633E	245E	33.71221	-117.3099	52 feet southwest of 245E. Removal of an existing wood pole within the previously approved work area of 245E.	Removal of an existing wood pole.
VIG4	Access Road	359E–366E	N/A	N/A	Revision to previously approved Level 5 access road between 359E and 366E to add 254 linear feet, 4,746 square feet of permanent disturbance, and 15,895 square feet of temporary disturbance.	Improvement of road for future SCE maintenance.
VIG5	Access Road	456E	N/A	N/A	63 linear feet and 1,740 square feet of permanent disturbance for a Level 5 access road turnaround at 456E.	Improvement of road for future SCE maintenance.
VIG5	Access Road	456E	N/A	N/A	530 linear feet of Level 0 access road along an existing route that runs along the east side of the work area for 456E and branches to the north and northwest of 456E.	Use of existing access road during construction.
VIG7	4765619E	542E	33.74099	-117.43335	103 feet southeast of 542E. 3.14 square feet of permanent disturbance for the installation of a LWS pole within the existing work area for 542E.	Installation of interset LWS pole to keep conductor from overhanging adjacent property.
VIG7	4765620E	542E	33.74110	-117.43329	115 feet northeast of 542E. 812 square feet of temporary work area and 3.14 square feet of permanent disturbance for installation of a wood guy stub pole and guy anchor	Installation of wood guy stub pole and anchor to support load from 542E.
VIG7	4765621E	543E	33.74135	-117.43425	43 feet northeast of 543E. 1,225 square feet of temporary work area and 3.14 square feet of permanent disturbance for installation of a wood guy stub pole and guy anchor.	Installation of wood guy stub pole and anchor to support load from 543E.
VIG8	4561935E	580E	33.76072	-117.47768	74 feet southwest of 580E. 1,225 square feet of temporary work area for an existing stub pole.	Removal of an existing wood pole and guy anchor once the FIG line is reconfigured.

The Valley-Ivyglen Subtransmission Line Project was evaluated in accordance with the California Environmental Quality Act (CEQA), and an Environmental Impact Report (EIR) was prepared by the CPUC. The CPUC issued a Permit to Construct the Project on April 2, 2013 (Decision 10-08-009). The mitigation measures (MMs) and project commitments (PCs) described in the EIR were adopted by the CPUC as conditions of Project approval. In May 2020 the CPUC adopted the Mitigation Monitoring, Compliance, and Reporting Plan (MMCRP) to ensure compliance with all PCs and MMs during project implementation.

This letter documents the CPUC's evaluation of activities covered in the MPR No. 9 Request. The CPUC has reviewed this MPR request and has verified that the proposed activities adhere to applicable PCs and MM requirements. The evaluation process ensures that PCs and MMs applicable to the location, and activities covered in the MPR are implemented, as required in the CPUC's decision. The evaluation process further ensures that the following criteria are met:

- The proposed change does not trigger additional discretionary permit requirements that are not defined in the EIR or MMCRP.
- The proposed change does not increase the severity of an impact or create a new impact, based on the thresholds used in the EIR.
- The proposed change is within the geographic scope of the study area utilized in the EIR.
- The proposed change does not conflict with any PC or MM, and the refinements would not result in a new conflict with any applicable guideline, ordinance, code, rule, regulation, order, decision, statute, or policy not already identified within the EIR.

The CPUC has determined that MPR No. 9 meets the above criteria. MPR No. 9 is approved by the CPUC for the proposed activities based on the factors described below.

### **CPUC Evaluation of MPR No. 9 Request**

The CPUC evaluated SCE's MPR Request No. 9 to verify that they fulfill the requirements of the MMCRP. In accordance with the MMCRP, the CPUC reviewed the request to confirm that no new impacts on sensitive resources, or increases in impact severity, would result from the requested MPR activities. The following discussion summarizes this analysis for biological, cultural, paleontological, aesthetics and visual resources, as well as other environmental resources.

#### ***Location of Ground Disturbance Areas***

MPR No. 9 activities would occur at several locations, work areas, or portions of work areas, throughout Segments VIG1, VIG2, VIG3, VIG4, VIG5, VIG6, VIG7, and VIG8. The temporary and permanent disturbance areas associated with MPR No. 9 are shown in Table 2. The quantity and dimensions of MPR No. 9 disturbance areas are consistent with what is described in Table 2-5 of the FEIR. Section 2.4.2.1 of the FEIR, which states that construction of VIG would disturb approximately 633.7 acres of land, including approximately 141.5 acres of permanent disturbance. Total impacts for all VIG NTPRs/MPRs are anticipated to be below the quantities given in the FEIR. If quantities in future NTPRs/MPRs exceed the FEIR, an explanation of significance will be provided.

**Table 2: Requested Disturbances Associated with MPR No. 09**

<b>Feature</b>	<b>Number of Miles</b>	<b>Temporary Impact Total</b>	<b>Permanent Impact Total</b>
Level 0 Access Road	0.36	--	--
Level 1 Access Road	0.06	--	--
Level 5 Road Improvement	0.06	0.36 ac (15,895 sq ft)	0.15 ac (6,486 sq ft)
Temporary Work Areas	--	0.16 ac (7,162 sq ft)	--
LWS Pole, New	--	--	0.0002 ac (9.42 sq ft)
<b>Total</b>	<b>0.48 Miles</b>	<b>0.52 ac (23,057 sq ft)</b>	<b>0.15 ac (6,495 sq ft)</b>

***Aesthetics/Visual Impacts***

The proposed additional work areas and the work to be conducted are consistent with the descriptions of structures to be installed and disturbances to occur during construction provided in Sections 2.3.1.1, 2.3.1.3, and Table 2-5 of the FEIR.

Aesthetic impacts associated with work under MPR No. 9 would not create a new significant impact or a substantial increase in the severity of a previously identified impact identified in Section 4.1.4.2 of the FEIR. Additionally, applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

***Biological, Cultural, Paleontological Resources, and other Environmental Resources***

The proposed work areas were included in previous biological surveys for the FEIR, as described in the biological report (Attachment A.1, B.1). Furthermore, the work areas do not overlap with wetlands or waterways; no amendments to the water permits would be needed.

Proposed work areas in Segments VIG1 and VIG8 overlap with disturbed Riversidean sage scrub and Riversidean sage scrub, respectively. In accordance with MM BR-5, removal of Riversidean sage scrub habitat would not occur during the coastal California gnatcatcher breeding season.

Refinements in VIG4 include changes to the previously approved Level 5 access road between 359E and 367E, including a shift to the road alignment, additional turnaround areas at 361E, 363E, and 354E, and additional temporary ground disturbance along the road perimeter that is necessary to construct the permanent roadway. The Multiple Species Habitat Conservation Plan (MSHCP) Phase 2 Certificate of Inclusion (COI) a re-route of the access road between 356E and 357E to avoid smooth tarplant within the MSHCP’s Criteria Area Species Survey Area (CASSA); this change was approved in MPR No. 7. MPR No. 5 would affect 540 linear feet of road within a mapped population of smooth tarplant between 359E and 361E that is outside the CASSA. The refinements would result in an additional 4,792 square feet of temporary disturbance within the smooth tarplant population. During construction, crews will implement avoidance and minimization measures to the extent possible in coordination with biological monitors and in compliance with the VIG MSHCP Phase 2 COI.

Following the completion of all construction, the temporary work areas would be restored/reclaimed in accordance with the Project SWPPPs, Project Commitment D<sup>1</sup>, and the

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<sup>1</sup> With input from the appropriate resource agencies, the applicant would develop and implement a Habitat Restoration and Revegetation Plan to restore temporarily impacted areas where construction of the projects would be unable to avoid impacts on native vegetation and sensitive resources, such as wetlands, wetland buffer areas, riparian habitat, and other sensitive natural communities. The applicant would restore all temporarily impacted areas disturbed during construction of the projects, including staging areas and pull, tension, and splicing sites, to as close to preconstruction conditions as possible, or to the conditions agreed upon between the applicant and landowner. Replanting and reseeding would be conducted under the direction the applicant or contract biologists. If revegetation would occur on private property, revegetation conditions would be part of the agreement between the applicant and the landowner.

## VIG Habitat Restoration and Revegetation Plan.

The proposed refinements in VIG1 and VIG2 are outside of the VIG WR-MSHCP Phase 1 COI coverage area, except for the removal of an existing pole in the previously approved work area for 245E. The proposed refinements in VIG4–VIG8 are largely outside of the VIG WR-MSHCP Phase 2 COI coverage area as well. Based on the guidance provided by the RCA, construction of these features will not require notification and approval by the RCA prior to construction because the overall permanent disturbance to baseline vegetation of RCA concern does not exceed the acreage proposed in the MSHCP PSE applications. The VIG MSHCP Phase 1 COI included 0.0012 acres of permanent impacts to grasslands of concern in Segments VIG1 and VIG 2 (Table 3). MPR No. 9 refinements do not propose any additional impacts in Phase 1 (Table 3). The VIG MSHCP Phase 2 COI included 0.96 acres of permanent impacts to grasslands of concern between poles 359E and 367E (Table 4). MPR No. 9 refinements, along with previously approved MPR No. 7 refinements, result in a 0.01 acre decrease in permanent impacts to grasslands (Table 4). No other MPR No. 9 proposed areas are in areas of baseline vegetation of RCA concern. All temporary impacts to vegetation will be restored in accordance with the HRRP.

**Table 3. Permanent Impacts to MSHCP Baseline Grasslands in Segments VIG1 and VIG2**

<b>MSHCP PSE Application</b>	<b>0.0012 Acres</b>
<b>Currently Proposed Impacts (MPR No. 9)</b>	<b>0.00 Acres</b>
<b>Change in Grassland Impacts</b>	<b>0.00 Acres</b>

**Table 4. Permanent Impacts to MSHCP Baseline Grasslands Between Poles 359E and 367E**

<b>MSHCP PSE Application</b>	<b>0.96 Acres</b>
<b>Currently Proposed Impacts (MPR No. 9)</b>	<b>0.95 Acres</b>
<b>Reduction in Grassland Impacts</b>	<b>0.01 Acres</b>

MPR No. 9 proposed work areas are covered under the Stephens' kangaroo rat (SKR) Habitat Conservation Plan. Although 0.71 acres of the proposed refinements are outside of the SKR buffer depicted in the COI the Riverside County Habitat Conservation Agency has agreed that SCE may reconcile impacted acreage once the Project has reached final design. SCE will be responsible for identifying acreage not previously included in the COI (such as the acreage proposed here) as well as removing acreage that was included in the COI but not disturbed by construction activities.

The activities described in MPR No. 9 would not create a new significant impact or a substantial increase in the severity of an identified impact listed in Section 4.4.4.2 of the FEIR. Indirect impacts that may occur to sensitive species in the vicinity of the proposed work areas would be mitigated in accordance with the Project Commitments and Mitigation Measures. Applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation Monitoring,

Compliance, and Reporting Plan would be followed.

The proposed work areas were surveyed and analyzed in the cultural and paleontological resources addendum reports (Attachments A.2, B.2, A.3, B.3); no supplemental surveys were necessary. The survey results indicate that there are no new sensitive archaeological or paleontological resources located at the proposed work areas. Cultural and tribal monitoring would be conducted in accordance with the Cultural Resources Monitoring and Treatment Plan (CRMTP). Paleontological monitoring, spot checking, and fossil recovery would be implemented for excavations at the proposed work areas in accordance with the Project's Paleontological Resource Monitoring Plan (PRMP). If a resource is found at the site, SCE would comply with the procedures for unanticipated discoveries provided in MMs CR-1b, CR-4, CR-5, CR-7, the CRMTP, and the PRMP. Impacts to cultural resources associated with this refinement would not create a new significant impact or a substantial increase in the severity of a previously identified impact identified in the Section 4.5.4.2 of the FEIR. All applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

MPR No. 9 work activities occurring at the proposed locations and the types of equipment used are consistent with the activities described in Sections 2.3.1.1 and 2.3.1.3 of the FEIR. Implementation of the Project Noise Control Plan would ensure noise reduction measures are performed as required. Blasting activities are not anticipated at any of the proposed work areas. Therefore, impacts to noise and vibration associated with work under MPR No. 9 would not create a new significant impact or a substantial increase in the severity of a previously identified impact identified in Section 4.11.4.2 of the FEIR. Additionally, all applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

Work activities occurring at the proposed locations and the types of equipment used are consistent with the activities described in Sections 2.3.1.1 and 2.3.1.3 of the FEIR. The type and quantity of construction equipment would be the same as identified in NTPR-1 and NTPR-2; the areas requested would not require the use of additional equipment. In compliance with MM AQ-1, nitrogen oxide (NO<sub>x</sub>) and particulate matter (PM) emissions from off-road diesel-powered construction equipment would be minimized to the extent feasible by using Tier 4 interim or Tier 4 Standards for equipment with engines greater than 150 horsepower. Per MM AQ-2, daily emissions of equipment would be tracked to ensure NO<sub>x</sub> emissions stay within the NO<sub>x</sub> Regional Clean Air Incentive Market Trading Credits (RTCs) purchased for the Project.

Impacts to greenhouse gas emissions associated with MPR No. 9 would not create a new significant impact or a substantial increase in the severity of a previously identified impact identified in Section 4.7.4.2 FEIR. All applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

All proposed locations under MPR No. 9 are within the 1,000-foot corridor evaluated for solid waste disposal sites, Cease and Desist Orders, or Cleanup and Abatement orders per Section 4.8.1.1 of the FEIR. Planned ground-disturbing activities includes excavating, including drilling of holes for light-weight steel (LWS) pole installation. In the event of an inadvertent discovery, SCE would follow the procedures in Project's Contaminated Soil and Groundwater Contingency Plan. Proposed work areas in MPR No. 9 are located within a Very High Fire Hazard Zone. Fire

danger mitigation would be implemented in accordance with the Project Emergency Action Plan and Fire Control and Emergency Response Plan. Impacts to hazards and hazardous materials associated with this refinement would not create a new significant impact or a substantial increase in the severity of a previously identified impact identified in Section 4.8.4.2 of the FEIR.

The proposed refinements under MPR No. 9 are located within the San Jacinto and Santa Ana Watersheds. Refinements in Segments VIG1 and VIG2 are in the San Jacinto Groundwater Basin and refinements in Segments VIG4–VIG8 are in the Elsinore Groundwater Basin. Some of the proposed work areas are located within a flood zone, as shown in Figure 4.9-4 of the FEIR; however, the proposed work is consistent with the work described in sections 2.3.1.1, 2.3.1.2, and 2.3.1.3 of the FEIR and would not alter flood flows.

Most of the proposed work areas are located away from surface water bodies. Proposed VIG4 work areas are within 130 feet of a water channel to the south and the VIG8 refinement is adjacent to an ephemeral stream to the north. Erosion that could affect water quality would be controlled at locations of earth disturbance through the implementation and adherence to the Project linear SWPPP. If stained or odorous soil is found during excavating, SCE would follow the procedures in Project’s Contaminated Soil and Groundwater Contingency Plan. Dewatering, if necessary, would be performed in accordance with the Project linear SWPPP.

Impacts to hydrology and water quality associated with this refinement would not create a new significant impact or a substantial increase in the severity of a previously identified impact identified in Section 4.9.4.2 of the FEIR.

Furthermore, the quantity of construction equipment and personnel would be the same as identified in NTPR-1 and NTPR-2. Adherence to the Project Traffic Management and Control Plan would ensure compliance with traffic-related Project mitigation measures, TT-1, TT-2, and TT-7. There would be no change to the access routes identified in the Traffic Management and Control Plan.

Impacts to transportation and traffic associated with this refinement would not create a new significant impact or a substantial increase in the severity of a previously identified impact identified in Section 4.15.4.2 of the FEIR. In addition, applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

### ***Permits***

No additional permits or approvals are required for MPR No. 9 activities.

## **MPR No. 9 Conditions of Approval**

MPR No. 9 is approved by the CPUC with conditions. The conditions presented below shall be met by SCE and its contractors:

1. All applicable Project MMs, PCs, 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.
2. Copies of all relevant permits, compliance plans, and this MPR, shall be available on site for the duration of construction activities.
3. SCE shall implement appropriate erosion and sediment control best management practices (BMPs) for the MPR No. 9 additional disturbance areas, in compliance with the SWPPP and as specified by the Qualified SWPPP Practitioner. Sediment and erosion control BMPs shall be properly maintained throughout the duration of construction activities.
4. All activities (e.g., stabilizing construction entrance/ ground surface, fence installation, etc.) shall be monitored by CPUC-approved monitors in accordance with the MMCRP, where appropriate.
5. In the event that MPR No. 9 activities require additional road improvement/ design, or vegetation clearing/ grubbing, SCE shall meet and confer with appropriate agencies and/or local jurisdictions as needed and notify the CPUC for concurrence and approval.
6. In the event that blasting or fracturing is needed, a blasting plan would be submitted for CPUC review and approval in accordance with MMs WQ-1 and NV-2. Blasting would only be used in areas where subsurface obstructions reasonably preclude excavation using conventional construction equipment
7. SCE shall ensure that construction equipment at the proposed locations will have adequate and properly placed secondary containment to avoid and minimize potential spills.
8. The work associated with MPR No. 9 shall occur within approved project workdays and hours. In the event that MPR No. 9 scheduling necessitates work outside of the hours permitted under local noise ordinances, SCE shall meet and confer with the local jurisdictions as needed and notify the CPUC for concurrence.
9. SCE and its contractors shall adhere to the WR-MSHCP terms and conditions, including but not limited to adherence to the Project Habitat Restoration and Revegetation Plan, adherence to the SWPPP, performance of preconstruction surveys for burrowing owls, and the use of biological monitors to record compliance with work area boundaries and compliance with the avoidance of environmentally sensitive areas (ESAs).
10. All complaints related to MPR No. 9 activities received by SCE shall be logged and reported immediately to the CPUC. This includes complaints relevant to traffic, as well as lighting, noise, vibration, dust, etc. Where feasible, complaints shall be resolved, depending on the nature of the complaint, through construction site or activity modifications. Complaints or disputes that cannot be modified through construction site or activity modifications shall be resolved through the dispute resolution communications processes described in the MMCRP.
11. SCE shall notify CPUC after completing MPR No. 9 work activities including use of access roads and temporary work areas and provide photos of the restored additional work disturbance areas. In addition, in the event that new disturbance is foreseen, for maintenance or other activities, SCE shall notify CPUC for evaluation and approval.



Please contact me if you have any questions or concerns regarding this MPR approval.

Sincerely,

A handwritten signature in blue ink that reads "Patricia Kelly". The signature is written in a cursive, flowing style.

Patricia Kelly  
CPUC Project Manager

cc:

Chuck Cleeves, WSP Compliance Manager

Fernando Guzman, WSP Deputy Compliance Manager

Marcus Obregon, SCE Environmental Project Manager

**Attachment A.1 and B.1:  
MPR No. 9 Biological Resources Report**

**Attachment A.2 and B.2:  
MPR No. 9 Cultural Resources Report**

**Attachment A.3 and B.3:  
MPR No. 9 Paleontological Resources Report**