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## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



September 8, 2020

Tom Diaz  
Regulatory Affairs  
Southern California Edison  
2244 Walnut Grove Ave  
GO4, 2<sup>nd</sup> Floor  
Rosemead, CA 91770

**RE: Valley-Ivyglen 115 kV Subtransmission Line Project – Notice to Proceed Request (NTPR)-2 for construction of Segments VIG4, VIG5, VIG6, VIG7, and VIG8 in the City of Lake Elsinore and in unincorporated Riverside County: Excluding sites requiring jurisdictional water permits**

Dear Mr. Diaz:

Southern California Edison (SCE) is requesting authorization from the California Public Utilities Commission (CPUC) to commence construction on select activities for the Valley-Ivyglen 115kV Subtransmission Line Project (Project, or VIG) on Segments VIG4 through VIG8. NTPR-2 would include: installation of overhead 115-kV subtransmission line and fiber optic line on new structures and in underground trenches, transfer of existing distribution circuits along the subtransmission line to new 115-kV structures or underground positions, and installation of new 115-kV switching and protective equipment at Ivyglen Substation. NTPR-2 excludes work at sites requiring jurisdictional water permits. Construction for this NTPR-2 will be confined to the following activities:

**Subtransmission, Distribution, and Telecommunications Components**

NTPR-2 would include work within the general disturbance area in Segments VIG4 through VIG8 as described in the VIG Final Environmental Impact Report, with the exclusion of locations that require jurisdictional water permits as described here:

- Structure work within the channel area at Structures 338E, 339E, 340E, 341E, 342E, 343E, and 344E (VIG4);
- Structure work within the ephemeral streambed at Structure 344E (VIG4);
- Structure work within the wetland at Structure 369E (VIG4);
- Structure work, wire work, and tree trimming within the wetland/riparian area at Structure 370E (VIG4);
- Structure work within the wetland at Structure 372E and tree trimming before and after Structure 372E (VIG4);
- Structure work within the riparian area at Structure WP1 (VIG4);
- Structure work within the ephemeral streambed/riparian area at Structure 413E (VIG5);
- Structure work within the ephemeral streambed/riparian area at Structure 421E (VIG5);
- Structure and access road work within the ephemeral streambed at Structure 424E (VIG5);
- Structure work within the riparian area at Structure 449E (VIG5);

- Structure and access road work within the ephemeral streambed/riparian area at Structures 481E and FIG-015 (VIG5);
- Tree trimming within the riparian area between Structures 481E and 482E and between FIG-015 and FIG-016 (VIG5);
- Guard pole work within the ephemeral streambed/riparian area at Structures FIG-030 (VIG5);
- Structure work within the riparian area at Structure FIG-039 (VIG5);
- Structure work within the ephemeral streambed at Structure FIG-048 (VIG5);
- Structure work within the ephemeral streambed/riparian area at Structure 520E (VIG6);
- Tree trimming within the riparian area between Structures 520E and 521E (VIG6);
- Structure and access road work within the riparian area at Structure 522E (VIG6);
- Tree trimming within the wetland/riparian area between Structures 522E and 523E (VIG6);
- Structure work within the ephemeral streambed/riparian area at Structures TBD and TBD, west of 525E (VIG6);
- Gabion basket and access road work within the ephemeral streambed leading to Structures 528E and 529E (VIG6);
- Gabion basket and access road work within the riparian area leading to Structures 533E (VIG6);
- Structure work within the ephemeral streambed at Structure 574E (VIG7);
- Structure work within the ephemeral streambed/riparian area at Structure 580E (VIG8);
- Structure and wire work within the ephemeral streambed/riparian area at Structures 581E and 2378044E (VIG8).

The excluded sites requiring jurisdictional waters permits are adjacent to sites requested in NTPR-2. To ensure that construction activities do not inadvertently occur within the excluded work areas, protective measures shall be implemented. Per MM BR-1, areas requiring waters permits will be flagged and marked with signs as Environmentally Sensitive Areas (ESAs). If the ESAs are immediately adjacent to active work areas, fencing may be installed at the ESA boundary to ensure that encroachment does not occur. Construction monitors will regularly inspect ESA flagging, signage, and fencing and perform repairs, as necessary. Furthermore, Project personnel will have access to the Collector for ArcGIS application via their smart phones. Collector will provide project maps showing their current location relative to ESA avoidance areas.

#### **Segment VIG4**

The following work in Segment VIG4 would be completed under NTPR-2, except for work at locations requiring jurisdictional water permits as described above:

- Install 2.40 miles of new 115-kV conductor.

- Install 53 light weight steel (LWS) poles, 10 tubular steel poles (TSPs) and two guy poles.<sup>1</sup>
- Install 2.257 miles of fiber optic line overhead and 0.143 miles of fiber optic line underground.
- To facilitate installation and relocation of conductor in VIG4, helicopter landing may occur within work areas within the VIG4 general disturbance area. Guard sites would be established at eight locations, and 24 pulling/tensioning sites would be established.

### **Segment VIG5**

Work within the general disturbance area of Segment VIG5 would be completed under NTPR-2, as follows:

- Install 5.46 miles of new 115-kV conductor.
- Install 95 LWS, 53TSPs, and three guy poles.<sup>2</sup>
- Relocate existing distribution line to new structures, remove 28 distribution poles.
- Relocate a portion of the existing Fogarty-Ivyglen 115-kV circuit from Temescal Canyon Road to Lake Street.
- Install 5.63 miles of fiber optic line overhead.
- To facilitate installation and relocation of conductor in VIG5, helicopter landing may occur within work areas within the VIG5 disturbance area. Guard sites would be established at 11 locations, and 45 pulling/tensioning sites would be established.

### **Segment VIG6**

Work within the general disturbance area of Segment VIG6 would be completed under NTPR-2, as follows:

- Install 1.14 miles of new 115-kV conductor.
- Install three LWS and 13 TSPs.<sup>3</sup>
- Relocate existing distribution line to new structures, remove 13 distribution poles.
- Install 1.14 miles of fiber optic line overhead.
- To facilitate installation and relocation of conductor in VIG6, helicopter landing may occur within work area within the VIG6 general disturbance area. No guard sites would be established and 10 pulling/tensioning sites would be established.

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<sup>1</sup> LWS poles 65 to 115 feet tall, TSPs 45 to 115 feet tall, guy poles 30 to 60 feet tall.

<sup>2</sup> LWS poles 65 to 115 feet tall, TSPs 80 to 115 feet tall, guy poles 30 to 60 feet tall.

<sup>3</sup> LWS poles 65 to 155 feet tall, TSPs 80 to 115 feet tall.

### **Segment VIG7**

Work within the general disturbance area of Segment VIG7 would be completed under NTPR-2, as follows: Install 1.75 miles of new 115-kV conductor for the VIG 115-kV circuit and 0.55 miles of new 115-kV conductor for the Fogarty-Ivyglen circuit

- Install 23 LWS, 23 TSPs, 12 wood shoofly poles, and one riser pole.<sup>1</sup>
- Relocate existing distribution line to new structures, remove 30 distribution poles.
- Install 1.13 miles of fiber optic line overhead and approximately 1,330 feet of fiber optic line underground in new conduit.
- To facilitate installation and relocation of conductor in VIG7, helicopter landing may occur within work area within the VIG7 general disturbance area. Guard sites would be established at six locations, and 16 pulling/tensioning sites would be established.

### **Segment VIG8**

Work within the general disturbance area of Segment VIG8 would be completed under NTPR-2, as follows:

- Install 1.89 miles of new underground 115-kV cable and 0.05 miles of new overhead 115-kV conductor
- Install three TSPs.<sup>2</sup>
- Install 1.89 miles of underground duct bank and eight underground vaults.
- Relocate existing distribution line to new structures.
- Install approximately 10,670 feet of fiber optic line underground in existing conduit and approximately 1,500 feet in new underground conduit.
- Guard sites would be established at two locations, and one pulling/tensioning site would be established.

### **Ivyglen Substation**

The following subtransmission-related work would be completed at Ivyglen Substation under NTPR-2:

- Install 115-kV circuit breakers and 115-kV disconnect switches.

### **Staging Areas**

Under NTPR-2, SCE or its contractor would establish and use temporary staging areas. Staging areas would be used as reporting locations for workers, vehicle and equipment parking, and material storage. These areas could also have construction trailers for supervisory and clerical

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<sup>1</sup> LWS poles 60 to 115 feet tall, TSPs 80 to 115 feet tall, wood poles 70 to 90 feet tall.

<sup>2</sup> TSPs 80 to 115 feet tall.

personnel and could be lit for staging and security purposes. Additionally, normal maintenance and refueling of construction equipment would also be conducted at staging areas. All refueling and storage of fuels would be performed in accordance with the SWPPP.

Materials commonly stored at the staging areas would include but not be limited to the following: construction trailers, construction equipment, temporary sanitation facilities, steel bundles, steel/ wood poles, conductor reels, fiber optic reels, hardware, insulators, cross arms, signage, consumables (such as fuel and filler compound), tools, waste materials for salvaging, recycling, or disposal, and materials used according to best management practices, such as straw wattles, gravel, and silt fences.

Temporary lighting (mobile light standards) may be installed at any of the staging areas. To mitigate the escape of artificial light from mobile light standards, the lights would be shielded and directed inward to illuminate the staging area. Lights would be manually controlled and used only when necessary. In addition, construction trailers may be equipped with external lights over stairways and external doors for safety.

Hazardous materials (fuels, lubricants, compressed gasses) may be used at any of the staging yards. As described in FEIR Section 2.4.4.7, Hazardous Materials Use and Hazardous Waste Disposal, Hazardous materials would be stored, handled, and used in accordance with applicable regulations. Safety Data Sheets would be made available at the construction site for all crew workers.

Temporary sanitation facilities and bins for construction-related waste may be placed at any of the staging areas. Additionally, waste that cannot be reused or recycled (e.g., wood, soil, vegetation, and sanitary waste) would be disposed at approved disposal facilities.

The previously approved Concordia yard, under MPR No. 1, would be used for contractor show-up staging of equipment and materials. The existing vegetation would be removed, and gravel placed over the entire surface area. Perimeter fencing with visual screening would be installed. Fuel storage tanks with secondary containment will be installed, as needed. Electrical power and communication services will be provided to the onsite office trailer from the nearby distribution source.

### **Grading**

Prior to the start of construction activities described above, access roads and structure work areas would be constructed or improved. Only access roads or work areas that need improvement will be improved.

Water control features, including v-ditches, downdrains, water bars, and berms, among others, would be installed along the access roads as necessary. In some locations along the access road network, steel plates will be placed to protect existing infrastructure (e.g., culverts). The lengths of the access roads to be improved are presented in Table 1 below.

**Table 1 Road Improvement Lengths**

Segment	Improvement Level	Length (miles)
VIG4	0	5.49 <sup>a</sup>
	1	0.1
	5	0.07
VIG5	0	5.56 <sup>a</sup>
	1	1.24
	5	0.5
VIG6	0	10.87 <sup>a</sup>
	1	0.41
	5	1.05
VIG7	0	2.3 <sup>a</sup>
	1	0.05
	5	0.05
VIG8	0	1.84 <sup>a</sup>
	5	0.06

<sup>a</sup> = Includes paved haul roads used to access Project right-of-way.

**Improvement Level key:**

- 0, No improvements = No improvements: No improvements to be performed on road.
- 1, Overland Travel = Drive and crush only. No road improvement or design. No vegetation clearing/ grubbing.
- 2, Minimum Improvement = Scraping/ blading, grubbing, vegetation clearing within existing road prism, no widening of road.
- 3, Medium Improvement = Level 2 plus additional grading, fill ruts and washouts. No widening of road.
- 4, Heavy Improvement = Includes all previous improvements and road widening.
- 5, Design Road = Civil engineering-designed road with grading, cut, and fill.

Blasting or fracturing would not occur in Segments VIG4 and VIG7, and is not anticipated during access road construction, site preparations, excavation work, or foundation work in Segments VIG5, VIG6, and VIG8.

**Excavation**

In total, approximately 9,248 cubic yards of material would be excavated under NTPR-2 during the construction of the components above. Non-contaminated soils excavated as part of NTPR-2 Project components would be used for backfilling, improvement/ construction of access roads and work areas, spread onsite to match existing grade, recycled, or disposed of at an approved facility.

**Helicopter Support**

NTPR-2 work activities include the use of light-duty helicopters for materials delivery, hardware installation, and wire stringing. Helicopter operations will be limited to areas within the general disturbance area in in proximity to wire stringing sites or access roads and previously disturbed areas near construction sites. Helicopter fueling, takeoff, and landing may occur at Skylark Field Airport, Perris Valley Airport, the Chino Air Operations Facility at Chino Airport, and within the VIG4, VIG5, VIG6, and VIG7 general disturbance area.

**Excavation**

In total, approximately 9,248 cubic yards of material would be excavated under NTPR-2 during the construction of the components above. Non-contaminated soils, excavated as part of the NTPR-2 Project components will be used for backfilling, improvement/construction of access roads and work areas, spread onsite to match the existing grade, recycled, or disposed of at an approved facility.

### **Underground Facility Installation**

NTPR-2 work activities include the following underground facility installations:

- Segment VIG4, installation of fiber optic duct bank.
- Segment VIG4, installation of fiber optic manhole.
- Segment VIG8, installation of subtransmission duct bank.
- Segment VIG8, installation of fiber optic duct bank.
- Segment VIG8, installation of 8 underground vaults.
- Segment VIG8, installation of 8 fiber optic manhole.

### **Project Understanding**

**NTPR-2 is granted by the CPUC for the proposed construction activities based on the following understanding:**

- SCE will comply with all Project Commitments and Mitigation Measures included in the Mitigation, Monitoring, Compliance, and Reporting Program (MMCRP) for VIG. All project compliance plans and permit conditions will be implemented during construction activities. Some measures are ongoing/time-sensitive requirements and will be implemented prior to and during construction where applicable.
- Copies of all relevant permits, compliance plans (i.e., MMCRP, SWPPP, etc.), and this Notice to Proceed-2 (NTP-2) will be available onsite for the duration of construction activities. Copies of permits will be provided to the CPUC upon request.
- Preconstruction clearance surveys for biological, cultural, and paleontological resources will be conducted as appropriate prior to construction activities by CPUC-approved monitors.
- All crew personnel will be appropriately trained on environmental issues, including requirements of the MMCRP, prior to starting work. A log will be maintained onsite with the names of all crew personnel trained and will be made available to the CPUC upon request.
- No movement or staging of construction vehicles or equipment will be allowed outside of the approved workspace areas. If additional temporary workspace areas or access routes, and/or changes to construction techniques, are required, the CPUC must review and approve them.
- If construction debris or spills enter into environmentally sensitive areas, the jurisdictional agencies and the CPUC will be notified immediately.

**The Conditions noted below will be met by SCE and its contractors:**

- Copies of all relevant permits (i.e., General Permits, National Pollution Discharge Elimination System permit, Certified Unified Program Agency Permit, etc.) compliance plans (i.e., MMCRP, SWPPP, etc.), and this NTP will be available onsite for the duration of construction activities. Copies of permits will be provided to the CPUC.
- SCE will submit as needed resumes for biologists, cultural resources consultants, and paleontological monitors prior to the start of construction for approval by the CPUC.
- Prior to starting work, SCE will provide the CPUC sign-in sheets containing a list of all project personnel that completed Worker Environmental Awareness Plan training on environmental issues, including requirements of the MMCRP.
- SCE will apply for an Encroachment Permit from the California Department of Transportation (Caltrans) for I-15/I-215 crossings, south of Central Ave at 3<sup>rd</sup> Street, and will obtain all permits from Caltrans prior to conducting any work within the Caltrans right-of-way.
- A copy of the certified tier specification, best available control technology documentation, and/or California Air Resources Board or South Coast Air Quality Management District (SCAQMD) operating permit for each piece of construction equipment, as applicable, will be provided to the CPUC at the time the equipment is mobilized.
- Prior to construction, SCE will provide the CPUC with documentation of purchase of the required Reclaim Trading Credits to the SCAQMD.
- SCE will provide the CPUC results for preconstruction surveys for burrowing owl within 14 days of the start of construction.
- At least two weeks prior to the anticipated start of construction, SCE or its contractors will notify all property owners within 300 feet of construction that activities are about to commence so owners are aware there may be significant noise levels during construction. SCE will provide a copy of the notification to the CPUC.
- SCE will provide the CPUC with completed agreements between SCE and the City of Lake Elsinore for the proposed underground segments covered by this authorization.
- SCE will contact affected landowners regarding underground facilities prior to and during construction. SCE will notify the CPUC prior to or during construction if there are any affected landowners, and if any affected landowners are to be temporarily relocated.
- SCE will provide the CPUC with proof of authorization (legal right) prior to entering privately owned property at construction work areas under NTP-2 work activities.
- If blasting activities are deemed necessary at a later date, a blasting mitigation and monitoring plan will be submitted to the CPUC for review and approval at least 30 days prior to the start of blasting.
- SCE will provide the CPUC with a Helicopter Lift Plan prior to commencing helicopter operations, including any necessary coordination with the Federal Aviation Administration (FAA).
- SCE will provide the CPUC with FAA documentation prior to the use of equipment or installation of structures that require notification.
- Privately owned asphalt roads that would be used to access work sites shall be protected from damage from construction vehicle traffic. SCE shall notify the owners of these roads prior to the start of construction. Furthermore, SCE will provide documentation of



roadway conditions with photographs prior to construction to the CPUC, and after completion of any repairs to document restoration and pre-project pavement conditions.

- SCE will provide the CPUC a weekly status report of project activities scheduled/anticipated under NTP-2.

Sincerely,

A handwritten signature in blue ink that reads "Patricia Kelly". The signature is written in a cursive style with a large initial "P".

Patricia Kelly  
CPUC Environmental Project Manager

Cc:

Chuck Cleeves, E & E Project Manager  
Fernando Guzman, E & E Deputy Project Manager  
Mike Bass, SCE Project Manager  
Marcus Obregon, SCE Environmental Project Manager

Attachment 1: Valley-Ivyglen 115 kV Subtransmission Line Project – Notice to Proceed Request (NTPR)-2 for construction of Segments VIG4, VIG5, VIG6, VIG7, and VIG8 in the City of Lake Elsinore and in unincorporated Riverside County: Excluding sites requiring jurisdictional water permits