

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



October 29, 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)-3 for Construct sites requiring jurisdictional waters permits in Segments VIG1, VIG2, and VIG4 through VIG8 in the City of Perris, City of Lake Elsinore and in unincorporated Riverside County**

Dear Mr. Diaz:

Southern California Edison (SCE) is requesting authorization from the California Public Utilities Commission (CPUC) to commence construction for the Valley-Ivyglen 115kV Subtransmission Line Project (Project, or VIG) at sites requiring jurisdictional waters permits in Segments VIG1, VIG2, VIG4, VIG5, VIG6, VIG7, and VIG8, NTPR-3 would include installation of overhead 115-kV subtransmission line and fiber optic line on new structures, and transfer of existing distribution circuits along the subtransmission line to new 115-kV structures. Construction for this NTPR-3 will be confined to the following activities:

**Subtransmission, Distribution, and Telecommunications Components**

NTPR-3 work sites requiring jurisdictional waters permits were analyzed in NTPR-1 and NTPR-2; however, the sites were excluded from the requests due to pending approval of waters permits. NTPR-3 requests approval of the jurisdictional waters sites that were excluded from NTPR-1 and NTPR-2.

**Segment VIG1**

The following work within the general disturbance area of Segment VIG1 would be completed under NTPR-3 as described in the VIG FEIR Section 2.3, Table 2-1, and Table 2-5:

- Gabion basket and access road work within the wetlands between Structures 097E and 098E;
- Road plate work within the riparian area and ephemeral streambed between Structure 106E and 107E;
- Gabion basket work within the ephemeral streambed near Structure 111E;
- Structure and access road work within the ephemeral streambed at Structure 116E;
- Structure and tree trimming work within the wetland/riparian area near the San Jacinto River between Structures 119E and 120E;
- Installation of a TSP, structure work, and access road work near the San Jacinto River at Structure 120E;
- Installation of a TSP, structure work, and access road work near the San Jacinto River at Structure 121E;

- Gabion basket work within the ephemeral streambed between Structures 126E and 127E;
- Tree trimming within the wetland/riparian area between Structures 135E and 137E;  
Access road and rip rap installation within the ephemeral streambed between Structures 145E and 146E

### **Segment VIG2**

Work within the general disturbance area of Segment VIG2 would be completed under NTPR-3, as follows:

- Structure work within the riparian component at Structure 215E.

### **Segment VIG4**

Work within the general disturbance area of Segment VIG4 would be completed under NTPR-3, as follows:

- Structure work, wire work, and tree trimming within the wetland/riparian area at Structure 370E;
- Structure work within the wetland at Structure 372E and tree trimming before and after Structure 372E.

### **Segment VIG5**

Work within the general disturbance area of Segment VIG5 would be completed under NTPR-3, as follows:

- Structure work within the ephemeral streambed/riparian area at Structure 421E;
- Structure and access road work within the ephemeral streambed at Structure 424E;
- Structure and access road work within the ephemeral streambed/riparian area at Structures 481E and 4962161E (FIG-015);
- Tree trimming within the riparian area between Structures 481E and 483E (previously 482E) and between 4962161E (FIG-015) and 4962163 (FIG-017; previously FIG-016);
- Structure work within the ephemeral streambed/riparian area northwest of Structure 4962176E (FIG-030);
- Structure work within the riparian area at Structure 4962185E (FIG-039);
- Structure work within the ephemeral streambed at Structure 4962194E (FIG-048).

### **Segment VIG6**

Work within the general disturbance area of Segment VIG6 would be completed under NTPR-3, as follows:

- Structure work within the ephemeral streambed/riparian area at Structure 520E;
- Tree trimming within the riparian area between Structures 520E and 521E;
- Structure and access road work within the riparian area at Structure 522E;
- Tree trimming within the wetland/riparian area between Structures 522E and 523E;
- Structure work within the ephemeral streambed/riparian area at Structures TBD and TBD, west of 525E;
- Gabion basket and access road work within the ephemeral streambed leading to Structures 528E and 529E;
- Gabion basket and access road work within the riparian area leading to Structures 533E.

### **Segment VIG7**

The following work within the general disturbance area of Segment VIG7 would be completed under NTPR-3:

- Structure work within the ephemeral streambed at Structure 574E.

### **Segment VIG8**

Work within the general disturbance area of Segment VIG8 would be completed under NTPR-3, as follows:

- Structure work within the ephemeral streambed/riparian area at Structure 580E;
- Structure and wire work within the ephemeral streambed/riparian area at Structures 581E and 2378044E.

### **Staging Areas**

Staging areas approved in NTP-1 and NTP-2 would be used to support the activities described in NTPR-3. As described in Section 2.4.3 of the VIG FEIR, construction of the Project requires the establishment of 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 personnel and could be lit for staging and security purposes. In addition, 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 Stormwater Pollution Prevention Plan (SWPPP).

Materials commonly stored at the staging areas would include, but not be limited to, construction trailers, construction equipment, temporary sanitation facilities, steel bundles, steel/wood poles, conductor reels, fiber optic cable 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.

### Grading

Access road and structure work areas would be constructed or improved as described in the VIG FEIR Sections 2.3.1.3, Access Roads, and 2.4.5.4, 115-kV Structure Construction, Grading and Laydown Areas. Only those access roads or work areas that need improvement would be improved. The lengths of the access roads to be improved were included in Table 2.2-2 of NTPR-1 and NTPR-2. Furthermore, blasting or fracturing would not occur at the requested sites.

### Excavation

Excavation totals for tubular steel poles (TSPs), light-weight Steel (LWS) poles, and gabion installation associated with NTPR-3 was included in Section 2.6 of NTPR-1 and NTPR-2, respectively.

### Helicopter Support

NTPR-3 includes 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 VIG1, VIG4, VIG5, VIG6, and VIG7 general disturbance area.

### Construction Activities

**Table 1.0-1 Activities Associated with NTPR-3 Components**

Project Component	Approval Device	Sub-area	Primary Project Activities to be Conducted	Site Preparation Activities
Segment VIG1	Final Environmental Impact Report (FEIR)	Subtransmission Telecommunications Distribution	Install tubular steel poles (TSPs), light-weight steel (LWS) poles, conductor, and fiber optic.	Improve/construct access roads and work areas as necessary, install Stormwater Pollution Prevention Plan (SWPPP) best management practices (BMPs).
Segment VIG2	FEIR	Subtransmission Telecommunications Distribution	Install wood pole, conductor, and fiber optic.	Improve work area as necessary, install SWPPP BMPs.
Segment VIG4	FEIR	Subtransmission Telecommunications Distribution	Install tubular steel poles (TSPs), light-weight steel (LWS) poles, conductor, guy anchors, cable, and fiber optic.	Improve work areas as necessary, install Stormwater Pollution Prevention Plan (SWPPP) best management practices (BMPs).
Segment VIG5	FEIR	Subtransmission Telecommunications Distribution	Install TSPs, LWS poles, guard poles, conductor, and fiber optic.	Improve/construct access roads and work areas as necessary, install SWPPP BMPs.
Segment VIG6	FEIR	Subtransmission Telecommunications Distribution	Install TSPs, conductor, and fiber optic.	Improve/construct access roads and work areas as necessary, install SWPPP BMPs.
Segment		Subtransmission	Install TSPs and	Improve work area as

VIG7	FEIR	Telecommunications Distribution	conductor.	necessary, install SWPPP BMPs.
Segment VIG8	FEIR	Subtransmission Telecommunications Distribution	Install TSPs and conductor.	Improve/construct access roads and work areas as necessary, install SWPPP BMPs.

A description of the construction activities associated with each of the Project components included in NTPR-3 is provided in Table 1.0-1 above. Construction of these components would be accomplished in a manner consistent with the descriptions contained in the following VIG FEIR Sections: 2.4.5.1, Access Road Construction; 2.4.5.4, 115-kV Structure Construction; 2.4.5.6, Wire Stringing; and 2.4.7.1, Fiber Optic Line Installation.

**Ancillary Activities**

Several ancillary activities would be conducted prior to or during the construction, development, or establishment of the components described within NTPR-3.

For example, as described in the VIG FEIR Section 2.4.4.3, Storm Water Pollution Prevention Plans, Storm Water Pollution Prevention Plans (SWPPPs) would be prepared to include Project information, monitoring and reporting procedures, and Best Management Practices (BMPs). Work included in NTPR-3 will be covered by the Project’s linear SWPPP. Project Commitment J addresses dust control, stating that watering would occur three times per day or as needed during excavation, bulldozing, scraping, and grading activities to control fugitive dust. Prior to excavation, underground utilities would be located and marked. Exploratory excavations (potholing) may be required to verify the location of existing utilities.

Material and equipment would be moved from staging areas to work areas throughout construction of VIG. Appropriate traffic control measures would be established as described in the VIG Traffic Management and Control Plan and as required by the California Department of Transportation (Caltrans) or Riverside County.

As necessary, privately-owned asphalted roads that would be used to access work sites would be protected from damage from construction vehicle traffic. These roads are part of SCE’s access road network, and SCE has rights to use them to access their infrastructure. SCE will notify the owners of these roads prior to the start of construction. Pursuant to MM TT-6, photographs of these roads would be taken prior to construction and after completion of any repairs to document restoration to pre-project pavement conditions.

**Project Locations**

Construction of the components included in NTPR-3 would occur at locations within the general disturbance area in Segments VIG1, VIG2, and VIG4–VIG8. Work locations are located in the Cities of Perris and Lake Elsinore, and in unincorporated Riverside County. The property ownership by component is listed below:

- Segment VIG1: SCE fee owned property and SCE easements over private property.

- Segment VIG2: Public Right of Way.
- Segment VIG4: Public Right of Way and SCE easement over Riverside County Flood Control property.
- Segment VIG5: SCE easements over private property and Public Right of Way.
- Segment VIG6: SCE easements over private property and Public Right of Way.
- Segment VIG7: SCE easements over private property and Public Right of Way.
- Segment VIG8: SCE fee owned property.

### **Consistency with the FEIR**

The Project components and activities included under NTPR-3 are addressed in the VIG FEIR. Specifically, the work to be conducted under NTPR-3 is described in the following VIG FEIR Sections: 2.3.1.1, 115-kV Subtransmission Lines; 2.3.1.2, Telecommunications. All components that would be completed under NTPR-3 are in areas that have been subject to biological and cultural resources surveys and have been analyzed in the VIG FEIR.

### **Project Understanding**

**NTPR-3 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-3 (NTP-3) 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 adhere to all applicable permits and respective conditions under NTPR-3, including but not limited to the following: City of Lake Elsinore and City of Riverside Encroachment Permits, City of Lake Elsinore and Riverside County Grading Permits, Permit for Clean Water Act Section 401 Water Quality Certification/ Porter Cologne Act, Permit for Clean Water Act 404 Nationwide Permit, California Department of Fish and Wildlife (CDFW) Section 1602 Streambed Alteration Agreement, National Pollution Discharge Elimination System Permit, and OSHA T-1 Annual Trench/ Excavation Permit.
- For work under NTPR-3, SCE will submit as needed resumes for biologists, cultural resources consultants, and paleontological monitors for approval by the CPUC.
- Prior to starting work under NTPR-3, SCE will provide the CPUC sign-in sheets containing a list of all new project personnel that completed Worker Environmental Awareness Plan training on environmental issues, including requirements of the MMCPRP.
- 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 new piece of construction equipment, as applicable, will be provided to the CPUC at the time the equipment is mobilized.
- As applicable, SCE will provide the CPUC with documentation of purchase of the required Reclaim Trading Credits to the SCAQMD.
- SCE shall conduct all required preconstruction surveys for biological resources prior to the start of construction, as applicable (e.g. 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.
- As applicable, SCE will provide the CPUC with proof of authorization (legal right) prior to entering privately owned property at construction work areas under NTP-3 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.

- 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 will provide the CPUC a weekly status report of project activities scheduled/anticipated under NTP-3.
- Following the completion of all construction at a given site, sites would be restored/reclaimed in accordance with the Project SWPPPs, Project Commitment D<sup>1</sup>, and the VIG Habitat Restoration and Revegetation Plan.

Sincerely,



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)-3 for Construct sites requiring jurisdictional waters permits in Segments VIG1, VIG2, and VIG4 through VIG8 in the City of Perris, City of Lake Elsinore and in unincorporated Riverside County

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<sup>1</sup> The applicant shall develop a Habitat Restoration and Revegetation Plan to address ground disturbance in all project areas. Per MM BR-7, the Habitat Restoration and Revegetation Plan shall detail topsoil segregation and conservation methodology; restoration of special status plant species habitat; vegetation removal and revegetation methods, including seed mixes, rates, and transplants, criteria to monitor and evaluate revegetation success, and alternative restoration and revegetation methods in the event that the revegetation success criteria are not initially reached.