

PUBLIC UTILITIES COMMISSION

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November 19, 2012

Christine McLeod, Project Manager
Regulatory Affairs Department
Southern California Edison
8631 Rush Street, General Office 4 – G10Q (Ground Floor)
Rosemead, CA 91770

Re: Completeness of Southern California Edison's Application for a Permit to Construct the Santa Barbara County Reliability Project (CPUC Proceeding A1210018)

Ms. McLeod:

The Energy Division of the California Public Utilities Commission has completed its first review of Southern California Edison's (SCE's) application to construct the Santa Barbara County Reliability Project (SBCRP).

Section 15100 of the California Environmental Quality Act (CEQA) requires the agency responsible for the certification of the proposed project to assess the completeness of the project proponent's application. The Energy Division uses the Commission's Proponents Environmental Assessment (PEA) Checklist (2008 Working Draft), among other resources, as the basic guide for determining the adequacy of the application.

After performing its review of SCE's application and PEA for the SBCRP, the Energy Division finds that the information contained in the PEA is currently incomplete. Attached is a list of items and issue areas of the PEA that were found to be deficient. Additional information submitted in accordance with this letter should be filed as supplements to the above application. We request that responses to these items be provided to us within thirty days.

Upon receipt of the supplemental information, the Energy Division will perform a second review to assess the adequacy of the data submitted and a determination of the application's adequacy will once again be issued.

The Energy Division reserves the right to request additional information at any point in the process. Questions relating to the SBCRP application review should be directed to Lon Payne at (415) 703-3175 or lon.payne@cpuc.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Lon Payne".

Lon Payne
Energy Division
Transmission and Environmental Permitting
California Public Utilities Commission

Cc: Hallie Yacknin, Administrative Law Judge
Nicolas Sher, Legal Division
Rachel Wilkinson, Ecology & Environment Inc.

DEFICIENCIES IN THE SANTA BARBARA COUNTY RELIABILITY PROJECT PROPONENT'S ENVIRONMENTAL ASSESSMENT

Chapter 1.0, Purpose and Need

Section 1.2, Project Need, provides system capacity in megavolt amperes (MVAs) as opposed to megawatts (MWs). The Energy Division requests that SCE submit details about system capacity and the proposed increase in capacity in MWs.

Chapter 3.0, Project Description

In general, the Energy Division's overarching comment is that a greater level of detail is needed with respect to specific project components. In order to accurately describe and assess the entire proposed project footprint and area of disturbance, the Energy Division requests geographic information system (GIS) data layers for all components, including:

- existing components;
- replacement components, including currently proposed locations;
- components that would be removed but not replaced;
- components that would be left in place and/or idled;
- existing access and spur roads;
- proposed modifications to access and spur roads;
- proposed locations of new access and spur roads;
- location of new right-of-way (ROW) to be acquired;
- accessor's parcel numbers (APNs) for new and existing ROW;
- preliminary locations of marker balls to be installed; and
- locations of laydown/work areas.

All components should have unique identification numbers to match GIS database information and details for transmission structures should include specifics regarding the type of pole (e.g., wood, steel, etc.) or tower (e.g., lattice, single-circuit, double-circuit, etc.) for both existing and proposed structures. More detail regarding specific deficiencies and information required is described below.

New Right-of-Way

Section 3.1.2.5, Segment 3B, describes an approximately 2,500-foot section of Segment 3B that would be moved from the current ROW and constructed in new ROW; however, the location of the current and new ROW and the locations of the existing and proposed structures are not identified. In addition, specific APNs should be provided.

Components to be Replaced or Idled and/or Left in Place

Section 3.1.2.6, Segment 4, discusses the replacement of 70 LSTs (and other components) with 63 TSPs (predominantly). The footnote on page 3-28 states that there are three sets of subtransmission structures, only one set of which would be replaced; however, the discussion states that 5,700 feet of double-circuit 954 ACSR would be installed. Further, Figure 4.1-8 depicts a visual simulation from SR-150 showing the replacement of two sets of single-circuit structures with one set of double-circuit TSP structures. As a result, the discussion in Chapter 3 and the visual simulation in Chapter 4 appear to conflict. In order to clarify, the exact locations of structures to be replaced or idled should be identified.

Access and Spur Roads

Section 3.1.2.10, Access and Spur Roads, describes a network of 120 miles of existing dirt access roads and states that "[r]ehabilitation and/or upgrades to existing access and spur roads and construction of new spur roads *may* be required" (emphasis added). In addition, Section 3.2.3.1, Access and Spur Roads, describes 25 miles of roads requiring minor restoration work, 5 miles requiring more extensive rehabilitation, and 4 miles of new spur roads that would be constructed. However, Figure 3.1-5b depicts the preliminary locations of nearly 40 mechanically stabilized embankments, indicating extensive rehabilitation and/or upgrades. In addition, approximately 70 permanent turnarounds would be required for spur roads that are more than 500 feet long; however, the locations are not

provided. Although access roads are shown in the Biological Technical Report, Appendix A - Vegetation Maps, it is unclear whether these maps depict all access roads that would be used during construction. More specific information about the locations of access and spur roads should be provided in order to more accurately estimate disturbance.

Helicopters

Page 3-56 concludes that helicopters would likely not be used for tower or pole assembly, but Section 3.2.3.10, Helicopter Use, states that helicopters would be used to support various other construction activities in areas where access is limited. Considering the required road rehabilitation and general terrain in portions of the project area, assumptions about helicopter use should be clarified and a more detailed description of helicopter construction should be provided. In addition, page 3-44 describes SCE's expectation that the Federal Aviation Administration will determine that marker balls would be required on approximately 42 spans. Section 3.2.3.14, Installation of Marker Balls, states that installation by crane would likely be infeasible in areas where marker balls would be required and assumes that helicopters would be used for marker ball installation. Considering the terrain along various segments, the Energy Division requests that SCE identify the preliminary spans that could require marker ball installation.

Vegetation Removal

In Table 3.4-1a and 3.4-1b approximate disturbance acres are reported by three general project feature types (substations, subtransmission, and telecommunications), but not by vegetation type or a generalized vegetation removal type (e.g., mowing, brush-hogging, brush trimming, etc.). In Chapter 4, Figures 4.4-1a, b, and c show vegetation types within 500-feet of all project areas but does not depict specific disturbance areas. Although structure pad locations and laydown/work areas and other disturbance would be refined during final engineering, a preliminary estimate showing an approximation of habitat types that would be disturbed, such as an estimate of grassland vs. shrubland vs. woodland vs. wetland (e.g., 20% of disturbance would be in grasslands, 70% in shrublands, and 5% in woodlands, etc.) should be provided.

In addition, Tables 3.2-6a and 3.2-6b list the number of trees that were trimmed along Segment on 3A (12 trees) and the number of trees that would be trimmed along Segment 3B and 4 (530 trees); however, it is unclear whether the numbers include tree removal. Further information is required to distinguish between tree trimming as required under General Order-95-D and tree removal.

Applicant Proposed Measures

Applicant Proposed Measure AQ-1 states, "Graded and/or excavated in active areas of the construction site shall be monitored by (*indicate by whom*) at least weekly for dust stabilization" (emphasis added). The Energy Division requests that SCE specify the responsible party.

Chapter 4.0, Environmental Impact Assessment

4.3 Air Quality

Section 4.3.4.1 provides the methodology for the air calculations for Segment 3A; however, Section 4.3.4.2 does not include a description of the methodology for air calculations for the balance of the project nor does it reference Appendix F. The Energy Division requests that SCE confirm that Appendix F includes calculations for the "balance of the project" in addition to Section 3A and define the methodology for air calculations for the balance of the project.

4.4, Biological Resources

Section 4.4.2 lists features that could be considered jurisdictional (i.e., by USACE and other agencies), but Section 4.4.5 (page 4-151) states that surveys still need to be conducted and that impacts on jurisdictional features are likely but that implementation of BMPs and compliance with any state or federal permit conditions would result in less than significant impacts. The Energy Division requests that SCE provide GIS data showing a more detailed characterization of wetlands and waterbodies in the project area. In addition, more specifics regarding BMPs and how they would reduce impacts should be included.