

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 19, 2023

Thomas Diaz - Infrastructure Projects & Programs
Southern California Edison Company
2244 Walnut Grove Avenue
Rosemead, California 91770

Re: Completeness Review of Southern California Edison Company's Eldorado-Pisgah-Lugo 220 kV Project (A.23-04-009) Proponent's Environmental Assessment and Certificate of Public Convenience and Necessity Application

Dear Mr. Diaz:

The California Public Utilities Commission (CPUC) Energy Division CEQA Unit has completed its review of Southern California Edison's (SCE) Application (A.23-04-009) and related Proponent's Environmental Assessment (PEA) for a Certificate of Public Convenience and Necessity (CPCN) for the Proposed Eldorado-Pisgah-Lugo 220 kV (EPL) Project (proposed project). Section 15100 of the California Environmental Quality Act (CEQA) requires the agency responsible for the certification of a proposed project to assess the completeness of the project proponent's application. The Energy Division uses *CPUC's Guidelines for Energy Project Applications Requiring CEQA Compliance: Pre-filing and Proponent's Environmental Assessments* (November 2019) as the guide for determining the adequacy of project applications.

After review of SCE's application for the proposed project, the Energy Division finds that the information contained in the Application and PEA is incomplete. While it is thorough in many sections, there are information gaps in critical areas that would prevent preparation of an adequate CEQA environmental compliance document in a timely manner. The attached report identifies the portions of the application found to be deficient. Information provided by SCE in response to the Energy Division's finding of deficiency should be filed as supplements to Application A.23-04-009.

One set of responses should be sent to the Energy Division and one to our consultant Panorama Environmental, Inc. in electronic format. We request that SCE respond to this report no later than June 19, 2023. Upon receipt of this information, we will review it within 30 days and determine if it is adequate to accept the PEA and application as complete. We are available to meet with you at your convenience to discuss these items. The Energy Division reserves the right to request additional information at any point in the application proceeding and during subsequent construction of the project should SCE's CPCN be approved.

Please direct questions related to this application to me at Eric.Chiang@cpuc.ca.gov.

Sincerely,

Eric Chiang
Project Manager, Energy Division

Attachment A: Detailed PEA Comments

cc: Case Administration, Southern California Edison
Susanne Heim and Jessica Koteen, Panorama Environmental, Inc.

Attachment A: Proponent's Environmental Assessment Review Form



Submittal

Document Title: Proponent's Environmental Assessment for Southern California Edison Company's Eldorado-Pisgah-Lugo 220 kV Project

Review Form No. No. 1

Description: **Application and PEA Review**

From: Panorama Environmental Inc.

To: Southern California Edison

Date Submitted: 5/19/2023

Determination

- Meets CPUC Requirements, No Additional Information Needed
- Does not Meet CPUC Requirements (see Deficiencies below)
- Additional Data Needed (see Data Requests below)

PEA Deficiencies

PEA Section or Page #	Comment Code	Deficiency
Section 5: Environmental Analysis		
5.1 Aesthetics		
Section 5.1 Aesthetics. Page 5-3	DD-AES1	<p>Issue: In the introduction of Section 5.1 Aesthetics, it states that "The KOPs represent views where the project would be most visible to the public from sensitive locations such as designated scenic roadways, recreation facilities, areas in proximity to residences, or public land subject to scenic resource management policy."</p> <p>There are no KOPs from Landscape Unit 3, which holds several recreational facilities and public land subject to scenic resource management policies such as the Mojave Trails National Monument, Cady Mountain Wilderness Study Area, Kelso Dune Wilderness Area, Mojave National Preserve, Historic Route 66, Old Mojave Road (aka Old Government Road), as well as two San Bernardino County Scenic Road (I-40 and ST 127).</p> <p>How to Address: Provide photograph viewpoints (in .jpg format) of Landscape Unit 3.</p>
Section 5.1.4.1.2.1, Page 5-22	DD-AES2	<p>Issue: On page 5-22 it explains that there are several San Bernardino County designated scenic routes, including SR-18 which the project would cross. The PEA states, "EPL Project activity in the vicinity of this highway crossing would include the introduction of a steel inter-set H-frame structure along the alignment approximately 650 feet east of the view shown in Figure 5.1-3b."</p> <p>There is no visual simulation of the potential impact on the county designated scenic route.</p> <p>How to Address: Provide a KOP and visual simulation for this site described above.</p>

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5.3 Air Quality/5.8 Greenhouse Gas		
Section 5.3.4.2 and Section 5.8.4.1	DD-AQ1	<p>Issue: The PEA states that CalEEMod v2020.4.0 was used. This model is outdated.</p> <p>How to Address: Provide updated modeling and results using CalEEMod Version 2022.1.1.12</p>
Section 5.3.4.2	DD-AQ2	<p>Issue: The PEA states the emission model input and outputs data sheets in Microsoft Excel format are provided to the CPUC under separate cover. No data sheets have been provided.</p> <p>How to Address: Provide data sheet inputs and outputs from the CalEEMod Version 2022.1.1.12 (see prior deficiency).</p>
Section 5.3.4.4 and Table 5.13-5	DD-AQ3	<p>Issue: The PEA states that a Health Risk Assessment is not required for the EPL Project because no new stationary source of air pollutants is included in the EPL Project.</p> <p>However, according to the CEQA Prefiling Guidance PEA Checklist, <i>"Health Risk Assessment. Complete a Health Risk Assessment when air quality emissions have the potential to lead to human health impacts¹. If health impacts are not anticipated from project emissions, the analysis should clearly describe why emissions would not lead to health impacts."</i></p> <p>And according to Office of Environmental Health Hazard Assessment (OEHHA) most recent guidance for preparation of Health Risk Assessments to determine whether a Health Risk Assessment is required, <i>"Due to the uncertainty in assessing cancer risk from very short-term exposures, we do not recommend assessing cancer risk for projects lasting less than two months at the MEIR. We recommend that exposure from projects longer than 2 months but less than 6 months be assumed to last 6 months (e.g., a 2-month project would be evaluated as if it lasted 6 months).</i></p> <p>In Table 5.13-5 the PEA shows that the Project would use staging areas for 180 days, which is equal to approximately 6 months and that the closest residence is 650 feet from the staging area. This would indicate the need for a Health Risk Assessment</p> <p>How to Address: Conduct and provide a Health Risk Assessment for the staging area or provide additional rationale for why the activities at the staging area do not require a health risk assessment consistent with OEHHA guidance.</p>
Appendix B – Emission Summary EPL with heli	DD-AQ4	<p>Issue: The emission summary tables do not have titles on the tables, so it is unknown what the difference between all four summary tables are (e.g. controlled versus uncontrolled)</p> <p>How to Address: Please provide tables with titles that indicate what the summary tables are representing and indicate which control measures were applied (i.e., is this SCE APMs or other measures?) for the controlled emissions calculations.</p>

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5.4 Biological Resources		
Appendix C	DD-BIO1	<p>Issue: Botanical surveys were conducted over 5 years ago in the spring of 2017 and 2018. The biological resources reports lack data on rainfall to evaluate whether the reports were conducted during wet or dry years in the region. In addition, the biological resources reports do not address the State of California status for Joshua Tree as a candidate species. The reports show the location of Joshua Tree woodland vegetation communities, but do not provide the locations of individual Joshua trees.</p> <p>How to address: The botanical surveys need to be updated to reflect current conditions. Rainfall conditions (e.g., wet or dry year) at the time of survey need to be discussed in the rare plant survey report. Because Joshua Tree is a candidate species, the locations of Joshua trees need to be provided and the number of Joshua trees that would need to be removed needs to be quantifiable. Provide GIS data for all Joshua Tree locations in the study area.</p>
5.5 Cultural Resources		
Appendix D	DD-CUL1	<p>Issue: The Cultural Resource Technical Studies (Archeological Resources Report and the Historic Built Environment Report) have not been provided to the consultant for review.</p> <p>How to address: Provide cultural resources technical studies that addresses the requirements of PEA Checklist item 5.5.1 and Attachment 3.</p>
5.6 Energy		
Section 3.5.13.1.1 Page 3-41	DD-ENG1	<p>Issue: Table 3.5-6. is missing Jet A fuel that is mentioned in Section 5.6 and is missing the approximate volume in gallons of Jet A fuel found in Table 5.6-1</p> <p>How to address: Please provide the quantity of Jet A fuel that would be required for the project.</p>
5.7 Geology, Soils and Paleontology		
Appendix J	DD-Paleo1	<p>Issue: No paleontological resources report has been provided for review, and the PEA's findings are entirely reliant on the paleontological resources report since no independent substantiation for paleontological sensitivity/paleontological risk levels is provided in the PEA Environmental Setting section. As a result, it's not possible to evaluate the adequacy of either the setting information or the impact analysis.</p> <p>How to Address: Provide a paleontological resources report that addresses the requirements of PEA Checklist item 5.7.1.5: Paleontological Report.</p>
5.10 Hydrology and Water Quality		
Section 5.10.1.1 Page 5-221	DD-HYD1	<p>Issue: The section states "Within the EPL Project alignment, approximately 552.7 acres and approximately 24,076,000 square feet of potentially jurisdictional non-wetland waters subject to the jurisdiction of the USACE, RWQCBs, and NDEP were identified. The drainages total 1,187,264 feet."</p> <p>However, the Wetlands and Other Waters JD Report states "Within the EPL Project survey area, approximately 430 acres (18,743,868 square</p>

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		feet) and 1,187,263 linear feet of potentially jurisdictional other waters subject to the jurisdiction of the USACE and RWQCB were identified. Streams and drainages totaling 552.7 acres (24,075,612 square feet) and 1,187,263 linear feet under CDFW jurisdiction were identified." How to address: Please clarify the correct acreages.
5.13 Noise		
Section 5.13.4.1.1.1, page 5-260	DD-NOI1	Issue: The discussion indicates that stationary equipment used at staging areas would generate a noise level of 55 dB, Leq at approximately 3,000 feet. This would equal a noise level of approximately 100 dB at 50 feet, which is a very loud reference noise level that is not typical of stationary construction equipment that is listed in Table 5.13-3. How to Address: Please provide which construction equipment would be used in staging areas would generate a noise level of 55 dB, Leq at approximately 3,000 feet away.
Figure 5.13-1	DD-NOI2	Issue: The CPUC Guidelines for Energy Project Applications Requiring CEQA Compliance: Pre-filing and Proponent's Environmental Assessments (November 2019, Page 62, Section 5.13.1.1) states that projects should "Identify all noise sensitive land uses within 1,000 feet of the proposed project and provide GIS data for sensitive receptors within 1,000 feet of the project." Figure 5.13-1 of the PEA provides several locations of "Potential Sensitive Receptors" but does not indicate what type of sensitive receptor they are (residences, schools, hospitals, etc.). Furthermore, the GIS data did not indicate location of residences as sensitive receptors, but rather used residential land use/zoning, which does not identify the location or proximity of occupied residence as a sensitive receptor. How to Address: Please provide the location of sensitive receptors by type within 1,000 feet of the project, including staging areas and access roads used during construction provide GIS data for those locations.
5.17 Transportation		
Section 5.17.4.2 Page 5 293	DD-TRA1	Issue: Section 5.17.4.2 states 40 daily vehicle roundtrips while Section 5.17.4.1.1 states 172 daily vehicle roundtrips. How to Address: Please provide the accurate number of daily vehicle roundtrips that would occur as a result of the proposed project.
5.19 Utilities and Service Systems		
Figure 5.19-1	DD_UTIL1	Issue: Figure 5.19-1 does not include the telecommunication lines discussed in Section 5.19.1.2.3 How to Address: Please provide the underground telecommunication GIS data.
GIS Data Needs		
NA	GIS	Spatial Data Needed: <ul style="list-style-type: none"> - Landscape Units - Photo Points and KOP points - Sensitive Receptors within 1,000 feet of project work areas. Sensitive receptors must be identified separately (e.g. school, hospital, individual residences, etc). Residential zoning alone

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		does not determine whether or not there is a residence or whether it's occupied. - Location of Joshua Trees