

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 1, 2020

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. 4 Request: Alternative Shoofly in Segment VIG7

Dear Mr. Bass,

On September 3, 2020, Southern California Edison (SCE) submitted Minor Project Refinement (MPR) No. 4 Request to the California Public Utilities Commission (CPUC) for review. The proposed MPR would involve an alternative shoofly route (Option 2) on the north side of Temescal Canyon road. The shoofly poles and anchors would be installed first. An electrical outage would be necessary to connect the shoofly to existing structures. This route is within public right-of-way, and would not require additional property acquisition. The shoofly poles would be removed, as described in the project EIR, after the main 115-kV line is energized. Currently, the construction schedule identifies removal starting in November 2021 and the area being completely restored prior to the end of project in November 2022.

Portions of two of the requested work areas, totaling 0.053 acres (2,306 square feet), are located outside of the general disturbance area. The first would provide work area north and east of pole 4765632E, the second would provide work area for temporary guy anchor to support pole 4765631E.

The shoofly route proposed in NTPR-2 (referred to here as Option 1) is located south of the 115-kV VIG line, on the south side of Temescal Canyon Road. This alignment was preferred because it would allow for an energized transfer of the 115-kV line from the shoofly poles to the permanent structures if an electrical outage was not available. Although this was the preferred route, unforeseen difficulties in property acquisition will prevent its use. Option 1 requires the acquisition of four private parcels, at least one of which would require condemnation. Furthermore, COVID-19 restrictions are significantly delaying the condemnation process in the courts, which will prevent the property from being acquired in time to meet the outage-driven construction schedule.

Expanding Boundaries of General Disturbance Areas:

The Option 2 shoofly would require the installation of 11 temporary direct-bury wood poles (4765628E-4765638E), and five temporary guy anchors as shown in Attachment A, and as described in Table 1.

Table 1. Description of Option 2 Disturbance Areas Requested in MPR No. 4.

Segment	Structure	Latitude	Longitude	Description
VIG7	4765628E	33.74751	-117.44550	Installation of a wood pole and guy anchor within a previously approved work area.
VIG7	4765629E	33.74785	-117.44577	3,540 square feet of temporary work area for a wood pole and guy anchor.
VIG7	4765630E	33.74838	-117.44665	1,576 square feet of temporary work area for wood pole.
VIG7	4765631E	33.74886	-117.44745	Installation of a temporary wood pole within a previously approved work area and 760 square feet of temporary work area for a guy anchor located outside of the general disturbance area.
VIG7	4765632E	33.74913	-117.44845	2,800 square feet of temporary work area for a wood pole, of which 1,546 square feet is outside of the general disturbance area.
VIG7	4765633E	33.74944	-117.44957	808 square feet of temporary work area for a wood pole.
VIG7	4765634E	33.74958	-117.45010	1,210 square feet of temporary work area for a wood pole.
VIG7	4765635E	33.74975	-117.45073	3,640 square feet of temporary work area for a wood pole.
VIG7	4765636E	33.74997	-117.45120	4,707 square feet of temporary work area for a wood pole.
VIG7	4765637E	33.75058	-117.45196	3,809 square feet of temporary work area for a wood pole and guy anchor.
VIG7	4765638E	33.74949	-117.45090	Installation of a wood pole and guy anchor within a previously approved work area. 4765638E, located on the south side of Temescal Canyon Road, serves as a stub pole supporting 4765635E.

The Option 2 shoofly would require 0.52 acres (22,850 square feet) of temporary disturbance area. Impacts associated with excavating pole holes would be temporary and because the Option 2 shoofly poles would eliminate the need for Option 1 poles, there would be no net change to impacts from pole excavations. There are no permanent impacts associated with MPR No. 4.

Following the completion of all construction, the shoofly poles would be removed, the holes would be filled, and work areas would be restored/reclaimed in accordance with the Project linear Stormwater Pollution Prevention Plan (SWPPP), Project Commitment D¹, and the VIG Habitat Restoration and Revegetation Plan.

Environmental impact analysis for use of the above described areas was conducted as part of this

¹ 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.

MPR and is provided in the attached biological (Attachment B), cultural (Attachment C), and paleontological reports (Attachment D).

The 0.52 acres of temporary disturbance associated with MPR No. 4 is consistent with what is described in Table 2-5 of the FEIR. Section 2.4.2.1 of the FEIR 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.

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 all activities covered in the MPR No. 4 Request. The CPUC has carefully reviewed this MPR request and has verified that the proposed activities adhere to all applicable PCs and MM requirements. The evaluation process ensures that all PCs and MMs applicable to the location, and all 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. 4 meets the above criteria. MPR No. 4 is approved by the CPUC for the proposed activities based on the factors described below.

CPUC Evaluation of MPR No. 4 Request

The CPUC evaluated SCE's MPR Request No. 4 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.

Aesthetics/Visual Impacts

The proposed disturbance and work areas for the Option 2 shoofly are consistent with the descriptions provided in Sections 2.3.1.1, 2.4.5.4, and Table 2-5 of the FEIR, that describe the installation and later removal of approximately 10 temporary wood shoofly poles within 2.6 acres of temporary disturbance. The Option 2 shoofly includes 10 temporary wood poles as well as an eleventh wood pole that serves as a temporary stub pole for 4765635E. Aesthetic impacts associated with these refinements do 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. All 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 B).

The proposed work activities would avoid wetlands and waterways; no amendments to the waters permits would be needed. Five of the proposed shoofly work areas occur within or partially within disturbed Riversidean sage scrub (DRSS): 4765629E–4765632E, and 4765638E. In accordance with MM BR-5, removal of Riversidean sage scrub habitat would not occur during the coastal California gnatcatcher breeding season. Following the completion of construction and removal of the temporary shoofly poles, the work areas would be restored/reclaimed in accordance with the Project linear SWPPP, Project Commitment D, and the VIG Habitat Restoration and Revegetation Plan (HRRP).

The proposed work area for 4765632E overlaps with coast live oak riparian forest (CLORF). Prior to construction, the CLORF area will be flagged as an ESA and fenced to prevent construction activities from occurring within the ESA. Construction monitors will ensure compliance with the ESA boundary.

The activities described in MPR No. 4 do 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.

All of the proposed features are within the WR-MSHCP Phase 2 certificate of inclusion (COI) coverage area, except for a small amount of work area for pole 4765632E. Based on the guidance provided by the RCA, the use of this work area does not require notification to the RCA because the temporary disturbance to occur would not pose a significant impact to sensitive vegetation of concern. All temporary impacts to vegetation will be restored in accordance with the HRRP.

The proposed work areas are covered under the Stephens' kangaroo rat Habitat Conservation Plan as depicted in the biological resource maps (Attachment B). All applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

Additionally, if active nests are observed within the additional general disturbance areas, SCE must avoid impacts to the nests by implementing the relevant protection measures of the MMCRP. These include surveying for and monitoring of active nests and other sensitive

biological resources (MM BR-3) and implementing disturbance buffers and other measures in the Nesting Bird Management Plan (MM BR-11).

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 included in the VIG MMCRP. The proposed work areas have coverage under the WR-MSHCP certificate of inclusion for Phase 1. The proposed work areas are covered under the Stephens' kangaroo rat Habitat Conservation Plan as depicted in the biological resources report (Attachment B). All applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

The proposed refinements were included in the cultural and paleontological resource analyses (Attachments C and D respectively). 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 do not create a new significant impact or a substantial increase in the severity of a previously identified impact identified in 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. 4 work activities occurring at the proposed locations and the types of equipment used are consistent with the activities described in Section 2.3.1.1 of the FEIR. The type and quantity of construction equipment would be the same as identified in NTPR-2; the areas requested do not require the use of additional equipment. In compliance with MM AQ-1, Nitrogen Oxides (NO_x) 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_x emissions stay within the NO_x Regional Clean Air Incentive Market Trading Credits (RTCs) purchased for the Project. Impacts to greenhouse gas emissions associated with this refinement do 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 of the 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. 4 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 drilling of holes for wood 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 VIG7 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 do 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. All applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

The proposed refinements are located within the Santa Ana Watershed. The proposed work areas are not located within a flood zone. Structures 4765628E and 4765629E are located within 580 feet of Lee Lake. The Temescal Wash streambed is located between Structures 4765630E and 4765631E, and 4765632E and 4765633E.

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 do 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. All applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

Lee Lake/Corona Lake is identified as a recreational area in Section 4.14 of the FEIR and is in close proximity to the east end of the proposed refinements. However, the proposed refinements would not cause deterioration to any recreational facilities and would not overlap or impact the use of trails. Impacts to recreation associated with this refinement do not create a new significant impact or a substantial increase in the severity of a previously identified impact identified in Section 4.14.4 of the FEIR. All applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

Furthermore, the quantity of construction equipment and personnel would be the same as identified in 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 do 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. All applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

Permits

SCE has submitted for Riverside County encroachment permits at Temescal Canyon Road.

MPR No. 4 Conditions of Approval

MPR No. 4 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. Following approval of MPR No. 4, the SWPPP shall be updated to show the proposed work areas. Additionally, SCE shall implement all appropriate erosion and sediment control best management practices (BMPs) for the MPR No. 4 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. No road improvement or design, and no vegetation clearing, or grubbing should occur. In the event that MPR No. 4 activities require 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. SCE shall ensure that construction equipment at the proposed locations will have adequate and properly placed secondary containment to avoid and minimize potential spills.
7. The work associated with MPR No. 4 shall occur within approved project workdays and hours. In the event that MPR No. 4 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.
8. 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).
9. Prior to commencing work activities under MPR No. 4, the coast live oak riparian forest (CLORF) area shall be flagged as an ESA and fenced to prevent construction activities from occurring within the ESA.
10. All complaints related to MPR No. 4 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. Per NTP-2, all proposed work areas with planned Project impacts to jurisdictional waters, Riparian/Riverine resources or otherwise protected aquatic features within VIG 4, 5, 6, 7, or 8 are excluded. Additionally, any work areas that intersect protected aquatic features are areas that shall be planned for avoidance and will not be permitted. Furthermore, the excluded sites requiring jurisdictional waters permits are adjacent to sites under NTP-2. To

ensure that construction activities do not inadvertently occur within the excluded work areas, MM BR-1 protective measures shall be implemented.

12. Prior to commencing work activities under MPR No. 4 and per the VIG Traffic Plan Section 2.3.1, a copy of all encroachment permits and public notifications for conducting MPR No. 4 work activities shall be provided to the CPUC for documentation.
13. SCE shall notify CPUC after completing MPR No. 4 work activities 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 A. Kelly". The signature is written in a cursive, flowing style.

Patricia Kelly
CPUC Project Manager

cc:
Chuck Cleeves, E & E Compliance Manager
Fernando Guzman, E & E Deputy Compliance Manager
Marcus Obregon, SCE Environmental Project Manager