Notice of Preparation
for an Environmental Impact Report
for the
Ivanpah-Control Project
Proposed by Southern California Edison
Application No. 19-07-015

A. Introduction

Southern California Edison Company (SCE) has filed an application for a Permit to Construct (PTC) with the California Public Utilities Commission (CPUC) for its proposed Ivanpah-Control Project, a 115 kilovolt (kV) transmission line rebuild project, also referred to as the Proposed Project or the I-C Project. The CPUC, as lead agency under the California Environmental Quality Act (CEQA), will prepare an Environmental Impact Report (EIR) to analyze the effects of the Proposed Project to comply with CEQA.

The CPUC has provided detailed comments on SCE's application and Proponent's Environmental Assessment (PEA) but has not deemed the application complete. The CPUC has elected to start the scoping process for the EIR in advance of deeming the application complete in order to obtain early public feedback on the environmental issues that will need to be addressed under CEQA. Consultation with Native American tribes (required as a result of Assembly Bill 52) has recently been initiated.

PUBLIC MEETING NOTICE

(See details on page 6)

Two meetings will be held via Zoom (and accessible by phone):

August 3, 2020 (2:00–3:30 p.m.)

August 10, 2020 (6:30–8:00 p.m.)

Scoping Comments are due by September 30, 2020

What is Scoping?

Scoping is the process of soliciting public and government agency input regarding the scope and content of the EIR. The purpose of this Notice of Preparation (NOP) is to inform recipients that the CPUC is beginning the scoping process and starting preparation of an EIR for the Proposed Project. As required by CEQA, this NOP is being sent to interested agencies and members of the public. This notice includes a description of the project that SCE proposes to construct and operate, a description of the CEQA process, and a brief summary of anticipated potential project impacts, information on the public meetings, and how to comment on what should be included in the EIR.

After the scoping period ends, a Scoping Report will be prepared to summarize comments made to the CPUC. Both this NOP and the Scoping Report will be available on the CPUC's website for the project, at https://tinyurl.com/ivanpahcontrol.

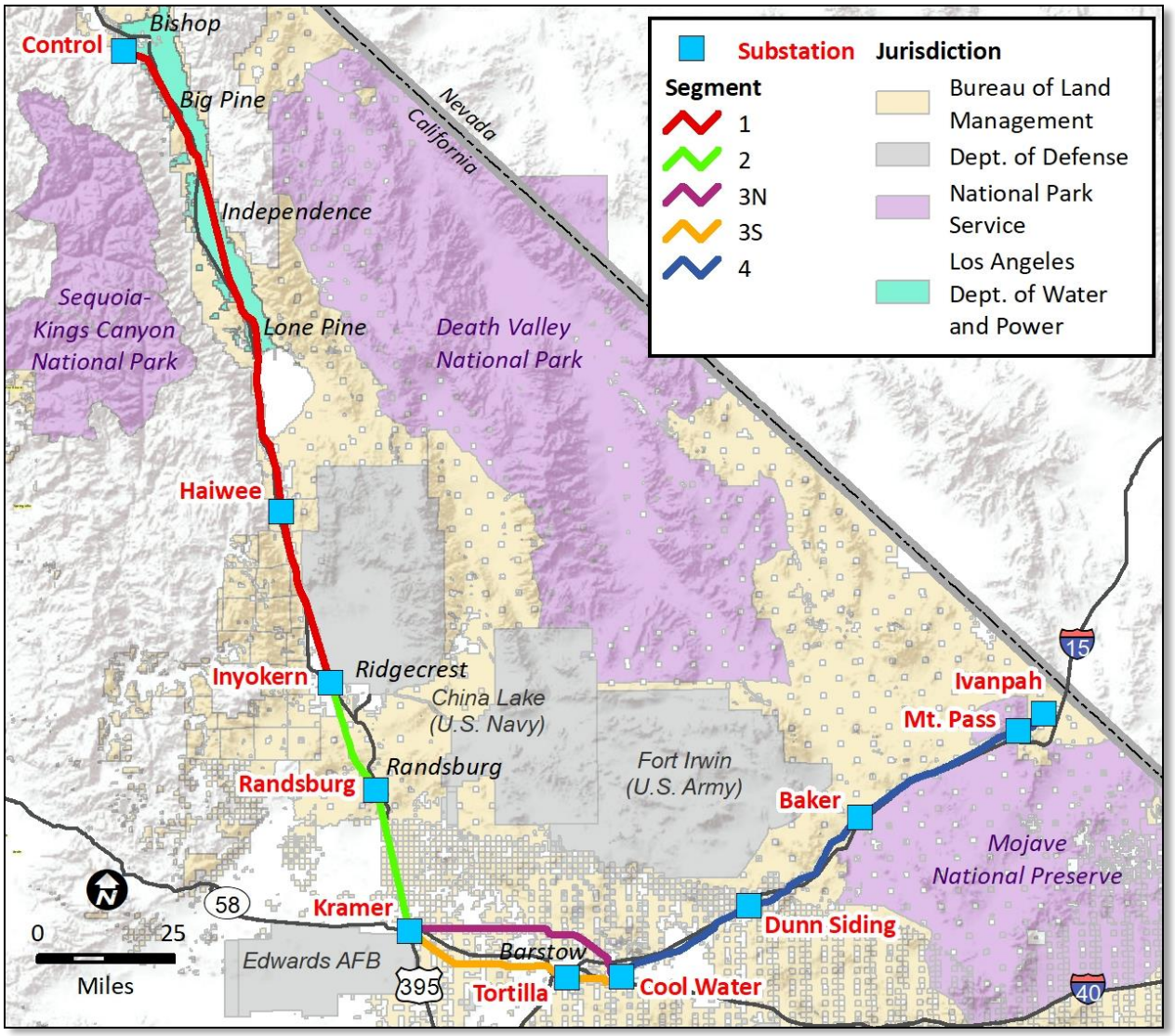
BLM Preparing a Separate NEPA Document

The Bureau of Land Management (BLM) is the lead agency under the National Environmental Policy Act (NEPA). The BLM will prepare an Environmental Impact Statement (EIS). The BLM will observe the CPUC's scoping meetings and will hold its own public scoping meetings in the future, after issuing a Notice of Intent (NOI) to prepare an EIS in the Federal Register.

B. Project Description

SCE is proposing to rebuild components of its existing 115 kilovolt (kV) transmission lines that extend over 358 miles between the existing SCE Control and Haiwee Substations in Inyo County, the Inyokern Substation in Kern County, and the Kramer, Tortilla, Coolwater, and Ivanpah Substations in San Bernardino County. The Proposed Project is located on private land, Department of Defense land, and on federal lands administered by the BLM.

Figure 1 illustrates the location of the Proposed Project and its five segments.



The I-C Project is one of SCE's "Transmission Line Rating Remediation (TLRR)" projects. To comply with the CPUC's General Order (GO) 95 requirement, SCE proposes to implement the TLRR program to correct 2,950 conductor clearance problems, where the conductors are now too close to the ground. The solutions include re-tensioning powerline to reduce the sag between towers; installing taller poles to increase the clearance between powerlines and ground, replacing individual poles, and derating a line segment.

Proposed Conductor and Increased Capacity. SCE proposes to replace the existing conductors and structures on the 115 kV system, installing a new type of conductor, except in Segment 4, with Aluminum Conductor Composite Core (ACCC) called "Dove." Compared with a conventional conductor that is made of steel (and has no composite core), the ACCC conductor type is lighter in weight, has higher tensile strength and can be operated at a much higher temperature. Since the ACCC conductor sags less at its higher operating temperature it can carry more electricity than conventional conductors.

The ACCC Dove conductors that SCE proposes to install would have the capacity to carry more power than the existing transmission lines. For example, in Segment 1, the capacity would increase by three times with the new conductor, and in Segments 2 and 3 the capacity could increase by about 50%. In Segment 2, replacement structures would also be designed to carry two circuits, but only a single new circuit of ACCC conductor would be installed, allowing for future installation of an additional circuit, if necessary.

The CPUC will review SCE's conductor selection as it relates to structure height requirements and structure spacing (span lengths) because these factors may have associated visual impacts or construction disturbance.

The 5 segments of the Proposed Project (as illustrated in Figure 1) are described below.

Segment 1: Control Substation (Bishop) to Inyokern

This 126-mile project segment is located primarily in Inyo County. The existing 115 kV line generally parallels U.S. 395. Nearly half of the route would be on land owned by the Los Angeles Department of Water and Power and about 30% is on federal land administered by the BLM.

In this segment, SCE would install approximately 905 new structures and new ACCC conductor in a new right-of-way adjacent to the existing line, then remove all (approximately 1,161) existing subtransmission structures. In addition, SCE would install new fiber optic cable, and marker balls on overhead wire where determined to be appropriate.

Pre-Project Reconductoring. In order to reduce wildfire risk during the time before construction of the I-C Project begins in 2022, SCE will have replaced 42 circuit-miles of 115 kV conductor south of the Control Substation. This replacement is not part of the I-C Project but is an urgent repair action that will reduce the risk of fire in the northern portion of this segment in compliance with SCE's 2019 Wildfire Mitigation Plan. After this new conductor is installed on the existing poles as part of the repair action, the I-C project includes permanent replacement of all poles and conductor within this segment.

Segment 2: Inyokern–Kramer Junction

This 48-mile project segment closely follows U.S. 395 from the existing Inyokern Substation in northeastern Kern County to the existing Kramer Substation in western San Bernardino County . About 58 percent of the land crossed by the route is federal land administered by the BLM, and 41 percent is private land. SCE's specific proposals for this line segment include removing approximately 390 existing transmission structures, installing approximately 342 double-circuit structures, and installing new ACCC conductor. SCE would also install, and then remove, approximately 110 temporary poles with a single circuit of conductor installed, install new fiber optic cable, and install marker balls on overhead wire where determined to be appropriate.

Segment 3N: Kramer Junction–Coolwater Substation (East of Barstow)

This segment passes north of the City of Barstow and is 44 miles long. This segment is 49% on federal land administered by the BLM. SCE's proposal for Segment 3N includes removal of approximately 43 existing transmission structures (leaving about 254 structures unchanged), installation of approximately 45 new structures, and installation of a single circuit of ACCC conductor.

Segment 3S: Kramer Junction–Tortilla Substation (Barstow)–Coolwater Substation

This southern segment of the Kramer-Coolwater line passes through the City of Barstow and the existing Tortilla Substation and is 44 miles long. This segment is 44% on federal land administered by the BLM. SCE proposes removal of approximately 42 existing transmission structures (leaving about 275 structures unchanged), installation of approximately 42 new structures, and installing replacement ACCC conductor on the entire segment.

Replacement of Segment 3 Deteriorated Poles. Segments 3N and 3S of the I-C Project include nearly 400 existing wood poles along the existing 115 kV line that have been identified by SCE as being severely deteriorated due to age. These poles are being replaced during 2020 and 2022, prior to the construction of the I-C Project (about 50% of this work had been completed as of July 2020). The immediate replacement of severely deteriorated poles is a part of SCE's ongoing maintenance program and not part of the I-C Project. The I-C Project proposal includes replacement of all poles and conductor within the segment, including those poles that are being replaced in 2019 and 2020.

Segment 4: Coolwater Substation (East of Barstow) to Ivanpah Substation

This 96-mile project segment begins at the Coolwater Substation (east of Barstow), and ends at the Ivanpah Substation (adjacent to the Ivanpah Solar Electric Generating System). It roughly follows Interstate 15 to the northeast, and two-thirds of it are on federal land administered by the BLM within a designated utility corridor. SCE proposes removing approximately 60 existing structures, installing approximately 62 new structures, and modifying approximately 83 structures (leaving about 480 structures unchanged).

Project Construction

Construction would include removal of many transmission structures and electrical conductors, and installation of new structures and conductors in most segments. In addition, SCE describes the following construction components or details:

- **Staging Yards:** SCE proposes to use a number of staging yards to support its construction activities; typically between one and five acres for each staging yard.
- **Work Areas:** At each pole site, a work area ranging from ¼ acre to ¾ acre would be required.
- **Access Roads:** SCE would use approximately 426 miles of existing access roads (running along the entire transmission line) and spur roads (short roads to reach each tower from the access road). Public roads would also be used, and no new permanent access roads would be constructed.
- **Vegetation Removal:** During road rehabilitation and preparation of staging areas, vegetation would be trimmed or removed, as needed. Tree removal would be minimized.
- **Helicopter Use:** SCE would use helicopters to support construction activity.
- **Construction Personnel:** SCE anticipates approximately 200 construction personnel working on a given day.

Project Purpose

SCE has stated that the purpose of the Proposed Project is to ensure compliance with CPUC General Order GO 95 by remediating approximately 2,950 discrepancies identified through SCE's TLRR Program along the 115 kV circuits described above.

SCE states that its Proposed Project will focus on meeting the following objectives:

- Ensure compliance with CPUC General Order 95 and NERC Facility Ratings for this project by 2025
- Continue to provide safe and reliable electrical service
- Meet Proposed Project needs while minimizing environmental impacts
- Design and construct the physical components of the Proposed Project in conformance with industry and/or SCEs approved engineering, design, and construction standards for substation and subtransmission system projects.

The objectives presented by SCE will be reviewed by the CPUC and will guide the development of alternatives to the Ivanpah-Control Project. Because CEQA does not require that alternatives meet all objectives, these objectives do not unreasonably constrain the alternatives development process.

C. CEQA Process and Analysis of Potential Environmental Effects

Impact Analysis

In accordance with CEQA, the CPUC intends to prepare an EIR to evaluate potential environmental effects of the Proposed Project. The Proposed Project may result in potentially significant impacts. The EIR will present impact significance determinations after the full and thorough consideration of all impacts and SCE's Applicant Proposed Measures (APMs). The EIR will also include analysis of additional issues identified in the scoping process, and it will evaluate the project's cumulative impacts (project impacts combined with other present and planned projects in the area). Attachment A lists the environmental disciplines that will be considered in the EIR for the Proposed Project.

Applicant-Proposed Mitigation Measures

SCE has proposed its own measures (APMs) that could reduce or eliminate potential impacts of the Proposed Project. SCE has provided over 30 APMs for the Ivanpah-Control Project. The EIR will contain an evaluation of the effectiveness of these measures, and the CPUC will develop additional mitigation measures to reduce significant impacts, if required. The CPUC will require implementation of a mitigation monitoring program if the project or an alternative is approved.

Alternatives

The EIR will analyze a range of alternatives to the Proposed Project that could potentially reduce, eliminate, or avoid impacts of the Proposed Project, in compliance with CEQA. The EIR will also include an evaluation of the comparative environmental impacts of the alternatives.

CEQA requires that the EIR include and analyze the No Project Alternative. This alternative will describe the situation that would likely occur in the absence of the implementation of the Proposed Project or its alternatives.

In the Proponent's Environmental Assessment (PEA) for the Proposed Project, SCE analyzed a range of alternatives, five of which were considered by SCE to be infeasible. The alternatives that were considered feasible by SCE include combinations of "full-rebuild" segments (as now proposed for Segments 1 and 2) and "reconductor and remediate" segments (as now proposed for Segments 3N, 3S, and 4). These potential alternatives will be considered by the CPUC for analysis in the EIR. It is likely that the CPUC will consider other alternatives to include in the EIR, as well as alternatives identified in public scoping comments.

D. Public Scoping Meetings (Virtual)

The CPUC will conduct two public scoping meetings at different days and times, conducted through Zoom and accessible through an internet connection or a phone call, as shown in Table 1. The purpose of the scoping meetings is to present information about the Proposed Project and the CPUC's decision making processes. The scoping meetings are an important public outreach tool, allowing the CPUC to listen to the views of the public on the range of issues relevant to the Proposed Project and the content of the EIR. All verbal comments made at the scoping meetings will be recorded. Written comments will also be accepted.

Table 1. Public Scoping Meetings

	Virtual Meeting #1	Virtual Meeting #2
Day & Date	Thursday, September 3, 2020	Thursday, September 10, 2020
Time	Afternoon 2:00 to 3:30 p.m.	Evening 6:30 to 8:00 p.m.
How to Participate	Via Zoom Meeting: https://us02web.zoom.us/j/86439196759 or by Phone: (669) 900-6833 then enter Webinar ID: 864 3919 6759	Via Zoom Meeting: https://us02web.zoom.us/j/86867547120 or by Phone: (669) 900-6833 then enter Webinar ID: 868 6754 7120

E. Scoping Comments

Currently, the CPUC is soliciting information regarding the topics and alternatives that should be included in the EIR. Suggestions for submitting scoping comments are presented at the end of this section. **All comments for the CPUC's CEQA scoping period must be postmarked or received by September 30, 2020.** However, if more time is needed, you may request an extension of time to submit your comments from the CPUC project manager (see contact information below).

Scoping Comments: You may make comments in a variety of ways, including: (1) by U.S. mail, (2) by electronic mail, or (3) by providing oral comments at a Virtual Scoping Meeting.

By Mail: If you send comments by U.S. mail, please use first class mail and be sure to include your name and a return address. Please send written comments on the scope and content of the EIR to:

John Forsythe (CPUC Project Manager)
California Public Utilities Commission
c/o Aspen Environmental Group
235 Montgomery Street, Suite 640
San Francisco, CA 94104-2920

By Electronic Mail: Email communications are welcome, however, please remember to include your name and return address in the email message. Email messages should be sent to Ivanpah-Control@aspeneg.com

Suggestions for Effective Participation in Scoping

1. Review the description of the project (see Section B of this Notice of Preparation and the maps provided on the project website). Additional detail on the project description is available on the Project website where SCE's Proponent Environmental Assessment may be viewed.
2. Attend the virtual scoping meetings to get more information on the Project and the environmental review process (see times and dates in Table 1 above).
3. Submit written comments or attend the virtual scoping meetings and make oral comments. Explain important issues that the EIR should cover.
4. Suggest mitigation measures that could reduce the potential impacts associated with SCE's Proposed Project.
5. Suggest alternatives to SCE's Proposed Project that could avoid or reduce its impacts.

F. For Additional Project Information

Website: https://tinyurl.com/ivanpahcontrol

Telephone Line for Project Information (do not leave scoping comments on this line): (800) 535-2572

Project Email: Ivanpah-Control@aspeneg.com

G. Issuance of NOP

The California Public Utilities Commission hereby issues this Notice of Preparation of an Environmental Impact Report.

Project Manager
California Public Utilities Commission

Attachment A:
Environmental Disciplines to be Considered in the Ivanpah-Control Project EIR

- Aesthetics
- Agriculture and Forestry
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology, Soils, and Paleontology
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

Issues not Addressed in the EIR

- Economic impacts and assessment of project merit and need are outside the scope of CEQA, but may be addressed through the CPUC's concurrent proceeding.