

Notice of Preparation

To: Responsible and Trustee Agencies

(Agency)

(Address)

From: California Public Utilities Commission

(Agency)

505 Van Ness Avenue

(Address)

San Francisco, CA 94102-3298

Subject: Notice of Preparation of an Environmental Impact Report for the Control-Silver Peak Project Proposed by Southern California Edison

The California Public Utilities Commission (CPUC) will be the lead agency and will prepare an environmental impact report (EIR) for the project identified below. We are requesting the views of your agency as to the scope and content of the environmental information that is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency may need to use the EIR and/or subsequent related environmental documents prepared by our agency when considering your permit or other approval for the project. The project description, location, and potential environmental effects are contained in the attached materials. Because of the time limits mandated by state law, your response must be sent at the earliest possible date but not later than 32 days after receipt of this notice. Please send your response to control-silverpeak@montrose-env.com or Patrick Donaldson, Montrose Environmental, 1 Kaiser Plaza, Suite 340, Oakland, CA 94612. Please include your name or the name of a contact person in your agency.

Project Title: Control-Silver Peak Project

Project Applicant, if any: Southern California Edison

Date: August 17, 2023

Signature:



Title:

Project Manager, Energy Division,
Infrastructure Permitting and CEQA

Email:

control-silverpeak@montrose-env.com

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INTRODUCTION

Purpose of the Notice of Preparation

The CPUC is the lead agency for preparation and review of an EIR for Southern California Edison's (SCE, or the "Applicant") proposed Control-Silver Project (Proposed Project). The Proposed Project would involve the rebuilding of portions of two existing single-circuit 55 kilovolt (kV) subtransmission lines (Control-Silver Peak 'A' and 'C' circuits) along with selective replacement of subtransmission structures along portions of these same lines; as well as related actions at interconnected facilities, to remediate identified discrepancies¹ as part of SCE's Transmission Line Rating and Remediation (TLRR) program. The Proposed Project would be located within unincorporated Inyo and Mono counties in the eastern portion of California, and portions of the alignments would cross lands managed by the United States Bureau of Land Management (BLM) and United States Forest Service (USFS).

This Notice of Preparation (NOP) presents general background information on the scoping process, the environmental issues to be addressed in the EIR, and the anticipated uses of the EIR. It also briefly describes the Proposed Project as currently envisioned. The project description is subject to refinement during the process of preparing the EIR, depending on, among other things, input received in comments responding to this NOP and revisions to the Proposed Project. The CPUC has prepared this NOP pursuant to Section 15082 of the State California Environmental Quality Act (CEQA) Guidelines.

Scope of the Environmental Impact Report

The EIR will evaluate the environmental impacts of the Proposed Project. As the lead agency under CEQA, the CPUC has determined that the Project may have a significant impact on the environment and has decided to prepare an EIR. Consistent with the basic purposes of CEQA (State CEQA Guidelines Section 15002[a]), the purposes of the EIR will be to:

1. Inform governmental decision makers and the public about the potential, significant environmental effects of the proposed activities;

¹ An individual instance of non-compliance with General Order (G.O.) 95 is referred to as a discrepancy. Discrepancies are defined as potential clearance problems between an energized conductor and its surroundings, such as the structure, another energized conductor on the same structure, a different line, or the ground, among others (SCE 2021).

2. Identify the ways that environmental damage can be avoided or significantly reduced;
3. Prevent significant, avoidable damage to the environment through the use of feasible alternatives or mitigation measures.

Based on the Proponent's Environmental Assessment (PEA) (SCE 2021) for the Proposed Project, and a preliminary environmental review of the Proposed Project by CPUC's consultant, the following resource topics will be evaluated in the EIR: aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, energy, geology and soils, 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, and wildfire. Potential significant environmental effects include impacts to historic resources (i.e., existing subtransmission lines), buried archaeological resources, paleontological resources, aesthetics (e.g., taller poles made of a different material), and biological resources (e.g., sage grouse).

No significance determinations have been made regarding any possible impacts of the Proposed Project. The analysis in the EIR ultimately will determine whether such impacts could occur and their level of significance. The EIR also will propose feasible mitigation measures to reduce any identified significant impacts. Thresholds for determining significant impacts will be based on applicable sections of the State CEQA Guidelines, regulatory agency standards, and the judgment of the CEQA lead agency, CPUC.

Public Involvement

The CPUC is soliciting the views of interested persons and agencies on the scope and content of the environmental information that is germane to the Proposed Project. A virtual scoping meeting for the Proposed Project will be held on **Wednesday, August 30th, 2023 at 5 p.m.** via Zoom:

<https://montrose-env.zoom.us/j/84174510599?pwd=K0pNUFBNazFic1hGZVY0THljNWRNz09>

Passcode: 834444

The scoping meeting will feature a presentation on the Proposed Project and environmental review process and an opportunity for interested members of the public to submit comments. Written comments may be submitted at any time during the scoping period. All available documents pertaining to the Proposed Project can be located at the following website: <https://ia.cpuc.ca.gov/environment/info/horizonh2o/control-silver/index.html>. Because of the time limits mandated by state law, your written comments on the scope and content of the EIR must be **received no later than September 18th, 2023 at 5:00 p.m.** Please send written comments to the Project email address (control-silverpeak@montrose-env.com) or by hard copy to Patrick Donaldson, Montrose Environmental, 1 Kaiser Plaza, Suite 340, Oakland, CA

94612. Please include the name and phone number of the contact person for your agency, if applicable. CPUC will consider and incorporate scoping comments on the Proposed Project in preparation of the EIR, as appropriate.

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PROJECT DESCRIPTION

Background and Need

The CPUC is responsible for environmental review and permitting of SCE's proposed Control-Silver Peak Project (Proposed Project). As noted above, the Proposed Project would involve the rebuilding of portions of the existing Control-Silver Peak 'A' and 'C' 55 kV subtransmission lines along with selective replacement of subtransmission structures along portions of these same lines; as well as related actions at nearby or interconnected facilities (i.e., substations), to remediate identified discrepancies as part of SCE's TLRR program. The design and construction of overhead electric power lines in California is governed by the CPUC's G.O. 95, which is promulgated to "ensure adequate service and secure safety to persons engaged in the construction, maintenance, operation or use of overhead lines and to the public in general." All utilities that operate overhead electric power lines in California must ensure their facilities comply with the specifications in G.O. 95. SCE is a public utility that provides electric service to a population of approximately 15 million people within a 50,000-square-mile service area that encompasses 180 cities throughout Southern California (SCE 2021). Pursuant to the TLRR program, SCE identified discrepancies along the Control-Silver Peak 'A' and 'C' 55 kV subtransmission lines, and the scope of work to correct these discrepancies constitutes the Proposed Project.

The Applicant submitted to CPUC a PEA in August 2021, as part of its application (A.21-08-009) for a Permit to Construct (PTC). The PEA and related project documents are available at: <https://ia.cpuc.ca.gov/environment/info/horizonh2o/control-silver/index.html>.

Project Objectives

Applicant's Project Objective

In its PEA, SCE identified the following objective for the Proposed Project: Ensure compliance with standards contained in G.O. 95 and North American Electric Reliability Corporation (NERC) Facility Ratings.

SCE provided additional discussion of the Proposed Project objective as follows:

The purpose of the Rules contained within G.O. 95 is to "formulate, for the State of California, requirements for overhead line design, construction, and maintenance, the application of which will ensure adequate service and secure safety to persons engaged in the construction, maintenance, operation or use of overhead lines and to the public

in general.” The objective of the [Proposed] Project is to remediate the identified discrepancies in order to comply with the standards contained in G.O. 95 Rule 37, Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, Etc., Table 1; Rule 38, Minimum Clearances of Wires from Other Wires, Table 2; and Rule 39, Minimum Clearance of Wires from Signs, Table 2-A.²

Remediating the identified discrepancies will bring the lines into operational compliance with SCE’s published facility rating, which requires a review of actual field conditions as recommended by NERC.³ Remediating the identified discrepancies will also comply with applicable Western Electricity Coordinating Council (WECC) reliability planning criteria.

CPUC’s Project Objectives

As part of its authority as the lead agency under CEQA for preparation of the EIR for the Proposed Project, the CPUC is responsible for identifying appropriate project objectives, which may differ from the Applicant’s objectives, that would inform the CEQA process/evaluation, including the development and screening of project alternatives. At this time, the CPUC has identified the following CEQA objectives for the Proposed Project:

- **Objective 1:** Remediate or otherwise address identified discrepancies in SCE’s Control-Silver Peak ‘A’ and ‘C’ 55 kV circuits, such that these facilities meet the clearance standards in G.O. 95 and meet NERC Facility Ratings.
- **Objective 2:** Eliminate or reduce any safety hazards (e.g., wildfire) posed by SCE’s existing infrastructure that is not currently meeting standards in G.O. 95.
- **Objective 3:** Maintain existing interconnections between SCE, VEA, and NV Energy, which provide for system redundancy, reliability, and operational flexibility.
- **Objective 4:** Maintain acceptable service reliability for customers served through area substations interconnected with Control-Silver Peak 55 kV circuits ‘A’ and ‘C’ (e.g., Control, Zack, White Mountain, and Deep Springs substations).

Project Location

The Proposed Project would be located within unincorporated Inyo and Mono counties in the eastern portion of California (see **Figure 1**). Portions of the existing and proposed 55 kV

² Where a G.O. 95-specified clearance is exceeded by an SCE clearance standard, the more-conservative SCE clearance standard is used in the design.

³ The rating of transmission lines depends on many factors including the electrical rating of elements, the thermal rating of elements, and conductor clearance.

alignments traverse lands managed by BLM and USFS, as well as lands owned by the Los Angeles Department of Water and Power (LADWP). The Proposed Project would extend from the Owens Valley on the west to Fish Lake Valley on the east and, in between, would cross the intervening White Mountains. The region is characterized by abrupt changes in topography, with steep, relatively narrow mountain chains, generally oriented on a north-south axis, that are separated by flat, arid alluvial valleys.

Land uses in the Project area are a mixture of rural residential development, residential and commercial land uses in the vicinity of the City of Bishop; irrigated agriculture and associated residences in Fish Lake Valley, and an institutional use (Deep Springs College). Much of the Proposed Project alignments are located within the Inyo National Forest and on BLM desert lands.

Proposed Project Components

The Proposed Project would consist of a variety of improvements to existing infrastructure, which would serve to correct identified discrepancies with the G.O. 95 standards. This would include rebuilding⁴, replacement⁵, and/or modification⁶ of existing subtransmission poles and conductors along portions of the Control-Silver Peak 'A' and 'C' 55 kV circuits. Additionally, SCE proposes to install overhead groundwire (OHGW) and optical groundwire (OPGW) along portions of the subtransmission line alignments, and transfer existing distribution circuitry underbuilt on the subtransmission structures to replacement poles. SCE would install additional telecommunications cables and equipment within and adjacent to existing substations, and would make other improvements within area substations that interconnect with the Control-Silver Peak 'A' and 'C' 55 kV subtransmission lines.

As shown in Figure 1, SCE has subdivided the Proposed Project into 5 segments based on the geographic extent and type of work performed within the given segment. These segments are as follows:

- **Segment 1:** This segment consists of portions of the Control-Silver Peak 'A' and 'C' 55 kV circuits (two existing single-circuit pole lines), spanning from the Control Substation located near the City of Bishop to where the Proposed Project alignment intersects U.S.

⁴ "Rebuilding" refers to the removal of all existing subtransmission poles and conductor along a given portion of existing subtransmission line and then the installation of new subtransmission poles and conductor in that portion.

⁵ "Replacement" refers to the installation of an individual new pole adjacent to an existing pole, the transfer of existing conductor from the existing pole to the new individual pole, and then the removal of the existing pole.

⁶ "Modification" refers to activities such as lowering of crossarms, installing or removing insulators, etc., on existing poles with no installation of new poles or conductor or removal of existing poles or conductor at the location of the pole being modified.

Highway 395 (U.S. 395). This segment is approximately 3.4 miles in length and is located entirely in Inyo County. In Segment 1, existing OHGW that is installed on existing poles along one of the two pole lines found in Segment 1 would be removed and OPGW would be installed on those existing poles.

- **Segment 2:** This segment consists of portions of the Control-Silver Peak 'A' and 'C' 55 kV circuits (two existing single-circuit pole lines), spanning from the point where the alignment intersects U.S. 395 near the City of Bishop to the point where the two pole lines merge north-northeast of the U.S. 395 crossing. This segment is approximately 1.4 miles in length and located entirely in Inyo County. The work along Segment 2 would include rebuilding of existing subtransmission poles and conductor (maintaining a configuration of two single-circuit pole lines), and installation of OPGW and OHGW on the new poles.
- **Segment 3:** This segment consists of portions of the Control-Silver Peak 'A' and 'C' 55 kV circuits (two existing single-circuit pole lines), spanning from the eastern end of Segment 2 to the Fish Lake Valley Metering Station located just west of the California-Nevada border, approximately 2 miles east of the community of Oasis. This segment is approximately 37.3 miles in length and is located in both Inyo and Mono counties. The work in Segment 3 would include the removal and rebuilding of existing subtransmission poles and conductor, and installation of OPGW on the new poles. One of the existing single-circuit pole lines along this segment would be removed and the remaining single-circuit pole line would be rebuilt into a new double-circuit pole line.
- **Segment 4:** This segment consists of that portion of the Control-Silver Peak 'C' 55 kV circuit known as the Zack Tap (one existing single-circuit pole line), which spans from Segment 3 north of the City of Bishop to the Zack Substation. This segment is approximately 16 miles in length and is located in both Inyo and Mono counties. In Segment 4, a select number of poles would be replaced and existing conductor and third-party infrastructure (if present) would be transferred to the replacement poles.
- **Segment 5:** This segment consists of that portion of the Control-Silver Peak 'A' 55 kV circuit known as the Deep Springs Tap (one existing single-circuit pole line), which spans from Segment 3 south to the Deep Springs Substation. This segment is approximately 2.4 miles in length and is located in Inyo County. In Segment 5, a select number of poles would be replaced and existing conductor and third-party infrastructure (if present) would be transferred to the replacement poles.

The Proposed Project also would require a variety of work at substations that interconnect with the Control-Silver Peak 'A' and 'C' subtransmission lines, as follows:

- Disconnect existing conductor conductor from existing positions at the White Mountain Substation and connect new conductor to existing positions.

- Install new OPGW and OHGW and make minor modifications to the existing terminal racks at White Mountain Substation to accommodate the new OPGW and OHGW.
- Install telecommunication equipment on existing rack structures, install cable in new or existing underground cable raceways, and install new or replacement telecommunications infrastructure within existing cabinets, control buildings, or Mechanical and Electrical Equipment Rooms within the Control Substation and at the Fish Lake Valley Metering Station.
- Update relay settings at Control, Deep Springs, White Mountain, and Zack Substations.
- Install a capacitor bank and circuit breaker at Fish Lake Valley Metering Station.

The work at the Fish Lake Valley Metering Station would require expansion of the station footprint (by approximately 1,000 square feet, or an area measuring 50 feet by 20 feet); however, none of the other substations would need to be expanded. Underground telecommunication cable installation (e.g., at Control Substation and Fish Lake Valley Metering Station) would require ground disturbance (i.e., trenching) outside of the substation footprints.

Project Construction

Schedule

Construction of all Project components would take about 33 months to complete. Construction would typically occur six days per week (Monday through Saturday) throughout the duration of construction. During Proposed Project construction, approximately 100 construction personnel would be working on any given day. Daily work hours would generally be 12 hours per day with construction typically occurring between 7:00 am and 7:00 pm. Occasionally, at limited times, some construction along the Proposed Project alignment may be required or finished outside these hours.

Access

Construction work areas and temporary disturbance areas would be accessed via existing and modified access roads, via helicopter, and/or via overland access routes. Construction crews would employ a network of existing dirt access and spur roads along the proposed alignment; this network would be accessed from paved and unpaved public roads. Approximately 65 miles of existing access and spur roads in Segments 2 and 3⁷ would be employed for construction of the Proposed Project. The widths of these roads vary across the proposed alignment, but are generally 15 to 25 feet wide. Where existing spur or access roads to a construction work area are not present, and where surface conditions are amenable, that location may be accessed

⁷ The limited scopes of work in Segments 1, 4, and 5 can be accomplished without access road rehabilitation.

overland. Where overland travel is feasible, vegetation would be trimmed while leaving the root structure intact, or vehicles would drive overland over the extant vegetation. Approximately 7.5 miles of overland access routes would be used during construction of the Proposed Project. The overland access routes would be approximately 14 feet wide. Helicopters would be used to support construction activities along the majority of the length of Segment 3 of the Proposed Project alignment. Helicopter takeoff and landing areas would typically include helicopter landing zones, staging areas (see below), construction laydown areas (CLAs; see below), and public and private airports or airstrips.

Staging and Laydown Areas

Construction of the Proposed Project would require approximately 38 staging areas and/or CLAs. Staging areas would be used as a reporting location for workers, vehicle and equipment parking, helicopter landing zones, and as material storage areas. Materials commonly stored at the staging areas would include, but not be limited to, construction trailers, construction equipment, portable sanitation facilities, steel bundles, steel/wood poles, conductor/OHGW/OPGW reels, hardware, insulators, cross arms, signage, consumables (such as fuel and filler compound), waste materials for salvaging, recycling, or disposal, and SWPPP BMPs materials such as straw wattles, gravel rolls, and silt fences. Staging areas may be lit for security purposes; this lighting would be directed internally and on-site. No new access roads would be constructed to access any of the staging areas. Any land that may be disturbed at the staging areas or CLAs would be returned to preconstruction conditions following the completion of construction for the Proposed Project.

Permits and Approvals

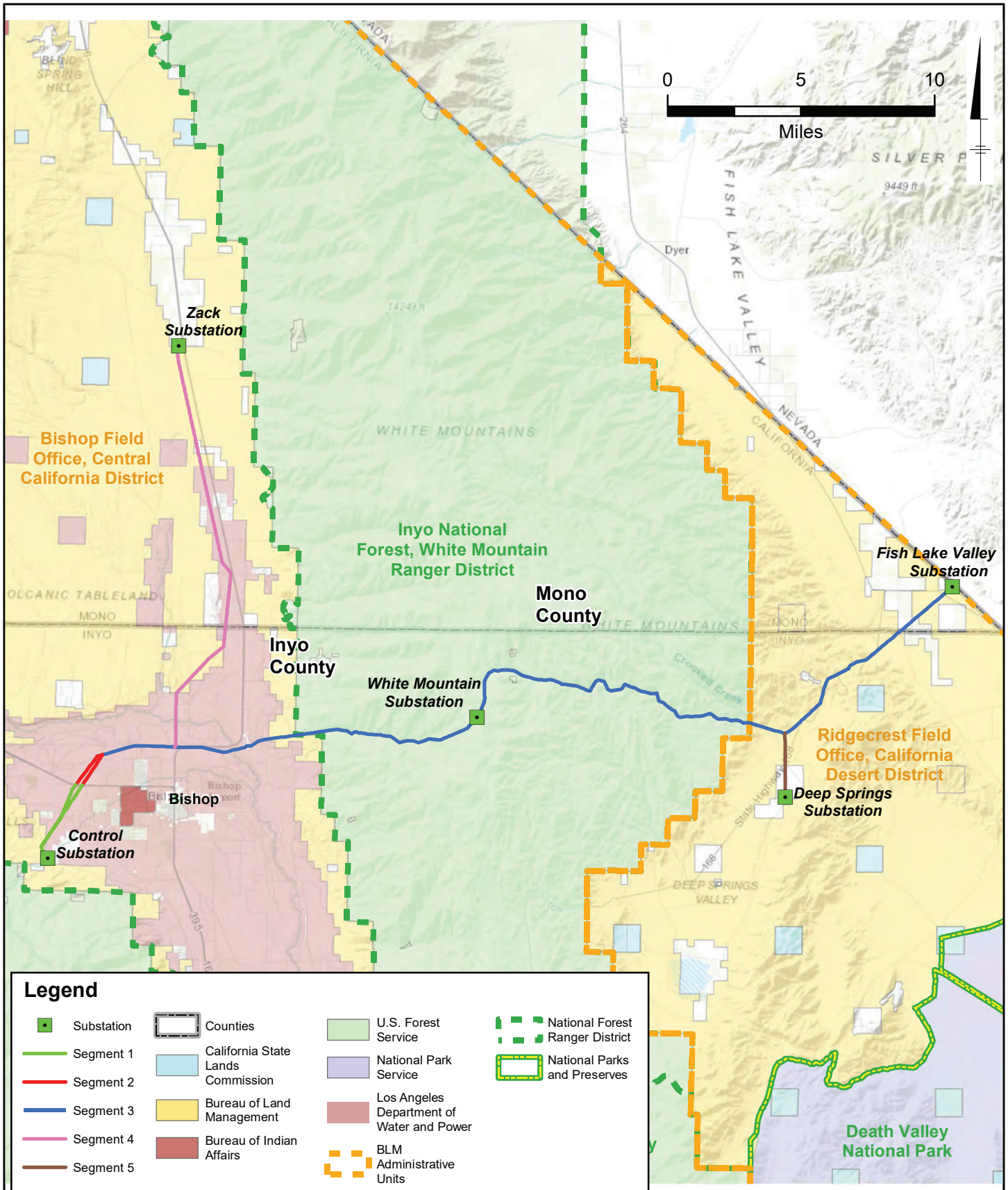
The Proposed Project is anticipated to require a number of permits and approvals, as shown in **Table 1**.

Table 1. Anticipated Discretionary¹ Permits and Approvals

Agency	Permit or Approval	Regulation
<i>Federal</i>		
United States Army Corps of Engineers	Section 404 Permit	Clean Water Act
United States Fish and Wildlife Service	Section 7 Consultation	Federal Endangered Species Act
United States Department of Agriculture, Forest Service	Special Use Authorization	National Forest Management Act/National Environmental Policy Act (NEPA)
United States Department of	Right-of-Way Grant	Federal Land Policy and

the Interior, Bureau of Land Management		Management Act/NEPA
State		
State Water Resources Control Board/Regional Water Quality Control Board	Section 401 Water Quality Certification, and NPDES permit	Clean Water Act, and Porter-Cologne Water Quality Control Act
California Department of Fish and Wildlife	Section 1602 Lake and Streambed Alteration Agreement	California Fish and Game Code
California Department of Fish and Wildlife	Section 2080.1 Consistency Determination	California Fish and Game Code
California Department of Fish and Wildlife	Section 2080 Take Permit	California Fish and Game Code
State Historic Preservation Officer	Section 106	National Historic Preservation Act

Notes: 1. Ministerial permits, such as encroachment permits and grading permits that may be required from state and local agencies, are not included in the table.



Source: SCE 2021

Prepared by:



Figure 1
Proposed Project Location,
Components, and Land Jurisdiction

CPUC Control-Silver Peak Project

References

SCE. *See* Southern California Edison.

Southern California Edison. 2021. Proponent's Environmental Assessment for Southern California Edison's Control-Silver Peak Project. August 13, 2021. Available: <https://ia.cpuc.ca.gov/environment/info/horizonh2o/control-silver/pea.html>.

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