

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 26, 2015

Heather Neely
Environmental Project Manager
Downs Substation Environmental Coordinator
Corporate Environmental, Health and Safety
Southern California Edison
6 Pointe Drive
Brea, CA 92821

RE: Downs Substation: Privacy Screening on Perimeter Chain Link Fencing

Dear Ms. Neely,

On May 20, 2015, Southern California Edison (SCE) submitted a request to the California Public Utilities Commission (CPUC) for a Minor Project Change for use of privacy slats on all chain link fencing encompassing the perimeter of the Downs Substation, including the expansion area. The Downs Substation is located at the corner of Downs Street and Ridgecrest Boulevard in Ridgecrest California

The CPUC voted on November 29, 2012 to approve the Final MND for the SCE Downs Substation Expansion Project (Decision D.12-11-027) and a Notice of Determination was submitted to the State Clearinghouse (SCH#2012011044).

The CPUC also adopted a Mitigation, Monitoring, Compliance and Reporting Program (MMCRP) to ensure compliance with all mitigation measures imposed on the Downs Project during implementation. The MMCRP also acknowledges that minor changes to the project are anticipated and common practice for construction efforts of this scale. This letter documents the CPUC's thorough evaluation of all activities covered in this Minor Project Change and that no new impacts or increase in impact severity would result from the requested Minor Project Change activities.

Minor Project Changes are reviewed for consistency with CEQA requirements and are located within the geographic boundary of the project study area. Minor Project Changes do not create new or substantially more severe significant impacts, or conflict with any mitigation measure or applicable law or policy. Also, they do not trigger other permit requirements unless the appropriate agency has approved the change, and clearly and strictly comply with the intent of the mitigation measure or applicable law or policy.

Minor Project Change #2 to allow for the use of privacy slats in all chain link fencing, encompassing the perimeter of the Downs Substation and expansion area, is granted by CPUC based on the factors described below.

SCE Minor Project Change Request. Excerpts from the SCE Minor Project Change request, received May 20, 2015, are presented below (indented):

Subsequent to approval of the NTPR (NTP # 1 dated 22 October 2014) by the California Public Utilities Commission (CPUC), the City of Ridgecrest presented additional requirements to SCE including the need for privacy slats on all chain link fencing encompassing the perimeter of the Downs Substation, including the expansion area. All work to be conducted is in the City of Ridgecrest, Kern County.

Specifically, the privacy slats shall be extruded from High Density Polyethylene (HDPE), color pigments and ultra-violet (UV) inhibitors. The slats shall be Pexco pre-woven in the color beige or approved equivalent and shall be included in all new chain link as well as the existing fence that will remain on the north and east sides of the Downs Substation.

The revised Landscaping Plan, which includes a revised landscaping design that has been approved by the City of Ridgecrest and the addition of privacy slats, will be provided to the CPUC for review, approval and eventual implementation per MM V-1: Downs Substation Expansion Area Landscaping Plan. Together, SCE believes the privacy screening and new landscaping design will satisfy the intent of MM V-1 by screening the proposed substation expansion area and existing facilities from surrounding views.

CPUC Evaluation of Minor Project Change Request

In accordance with the MMCRP, the subject Minor Project Change request was reviewed by CPUC to confirm that no new impacts or increase in impact severity would result from the requested Minor Project Change activities.

Visual Resources: Per MM V-1, SCE shall provide a landscaping plan to screen the substation and expansion area from surrounding views. The use of fencing slats will be used in conjunction with the vegetation screening as outlined in MM V-1 (presented below).

V-1 Downs Substation expansion area Landscaping Plan. SCE shall provide landscaping that is effective in screening the proposed substation expansion area and existing facilities from surrounding views. Trees and/or shrubs must be strategically placed and of sufficient density and height to effectively screen the majority of structural forms within five years of Project construction. SCE shall submit a Landscaping Plan to the city of Ridgecrest for review and approval and shall include a detailed list of plants to be used and times to maturity given their size and age at planting. The Landscaping Plan shall also be submitted to the CPUC for review. The Landscaping Plan shall be submitted at least 90 days prior to installing the landscaping. SCE shall not implement the plan until approval of the submittal from the CPUC and the city of Ridgecrest is received. If the CPUC notifies SCE that revisions of the plan are needed, within 30 days of receiving that notification, SCE shall prepare and submit to the CPUC a revised plan. SCE shall notify the CPUC within seven days after completing installation of the landscaping that the landscaping is ready for inspection.

Other Resources: No ground disturbance is required for the installation of slats and all work will occur within existing work areas. No impacts to cultural, paleontological, or biological resources are anticipated with the implementation of the conditions noted below.

The conditions noted below shall be met by SCE and its contractors:

- All applicable project mitigation measures, APMs, compliance plans, and permit conditions shall be implemented.
- The use of fence slats, as well as slat characteristics (such as color and material), shall be consistent with the City of Ridgecrest's General Plan and Circulation Element, and be approved by the City of Ridgecrest for use at the Downs Substation.

- Per MM V-1, SCE shall submit a landscaping plan to the City of Ridgecrest for approval. The City approved plan will then be submitted to the CPUC for review and approval.

Sincerely,

Eric Chiang
CPUC Environmental Project Manager

cc: V. Strong, Aspen