

*Southern California Edison*  
**WODUP A.13-10-020**

**DATA REQUEST SET A.13-10-020 WODUP ED-SCE-01**

**To:** ENERGY DIVISION  
**Prepared by:** Nicole Di Jerlando  
**Title:** Environmental Project Manager  
**Dated:** 02/21/2014

---

**Question PD-09 b:**

**Project Description**

**PD-9** Response to Completeness Question #14d states that: “SCE conducts an environmental review for all operations and maintenance activities that involve *ground disturbance* ” (emphasis added).

b. Provide examples for each of the three risk categories defined as part of SCE’s environmental analysis.

**Response to Question PD-09 b:**

CEQA requires state and local agencies to identify the significant environmental impacts of their actions and to avoid or mitigate those impacts, if feasible. As such, it's not clear to SCE why the additional requested detail regarding operations and maintenance (O&M) activities is necessary to comply with CEQA, given that the WOD Upgrade Project is essentially replacing the existing facilities with new facilities and the O&M work is not anticipated to change and should have no impact from an existing conditions or projected future baseline perspective. To the extent that Aspen/CPUC is seeking to develop mitigation measures with respect to SCE's O&M work related to the WOD Upgrade Project, SCE would appreciate a meeting to discuss how this could possibly be aimed at reducing a "significant" environmental impact (*See* , e.g., Ca. Pub. Res. Code § 21068. “Significant effect on the environment” means a substantial, or potentially substantial, adverse change in the environment.). Notwithstanding this concern, and as a courtesy, SCE responds below.

The three risk categories referenced previously pertain to environmental analysis for O&M activities that take place on public lands. SCE developed risk categories (Low, Medium, and High) as part of SCE’s O&M Plan to facilitate notification or receive approval of O&M activities within a public land management agency’s authorization (i.e. Right of Way Authorization or Easement), such as U.S. Department of Agriculture - Forest Service or U.S. Bureau of Land Management. The O&M plan is currently pending approval by these agencies. SCE follows a similar environmental analysis process, including the implementation of applicable avoidance and minimization measures, for O&M activities on privately owned lands based on the type of maintenance activity and potential to affect sensitive environmental resources. On private lands, environmental clearance process is internal and public land agency

notification or approval is not necessary.

Risk levels for activities on public lands are assigned based on the maintenance activity type and the potential affect to a sensitive environmental resource and categorized as follows:

*Low Risk Level Environmental Impact*

- The repair or maintenance will not require any ground or vegetation disturbing activity.
- The proposed repair or maintenance activity is not located in an area of any known sensitive cultural or biological resource, and/or the activity will occur in a previously disturbed location.
- Impact prevention measures for Low Risk activities include removing all materials, leaving the project area clean and safe, keeping all vehicles within the existing road prism or designated work area, and ensuring that all personnel remain on existing roads and trails.
- The work can proceed with a notification to the public land agency and does not require a monitor.

*Medium Risk Level Environmental Impact*

- Some activities that involve ground and/or vegetation disturbance that require additional field review by an SCE approved subject matter expert.
- Special Status Species likely or known to be present
- Impacts can be reduced or avoided with the implementation of avoidance and minimization measures
- Monitoring may be required
- SCE Environmental Staff will perform tailboards as necessary
- The work can proceed with a notification to the public land agency with proper avoidance and minimization measures and potential monitoring in place.

*High Risk Level Environmental Impact*

- Activities involve ground and/or vegetation disturbing activities in an area(s) known to have critical habitat, Special Status Species, jurisdictional waters, or cultural sites.
- Monitoring and other specific measures required due to protected resources likely or known to be present.
- SCE Environmental Staff will perform the necessary clearance surveys and tailboards with construction crews.
- Work cannot proceed without review and approval of the public land agency.