

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
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November 22, 2017

Ryan Stevenson
Principal Advisor
Regulatory Affairs
Southern California Edison
8631 Rush St, General Office 4 – 235E (2nd Floor)
Rosemead, CA, 91770

RE: West of Devers Upgrade Project: Minor Project Refinement #1

Dear Mr. Stevenson,

On November 13, 2017, Southern California Edison (SCE) submitted Minor Project Refinement #1 request for a minor shift/adjustment to the previously approved Maraschino Telecom alignment to the California Public Utilities Commission [(CPUC) Notice to Proceed No. 3, August 10, 2017] in support of the West of Devers Upgrade Project, in the City of Beaumont, Riverside County, California. Additional information was provided November 17, 2017.

The CPUC voted on August 18, 2016 to approve SCE's West of Devers Upgrade Project (Decision D.16-08-017) and a Notice of Determination was submitted to the State Clearinghouse (SCH# 2014051041).

The CPUC also adopted a Mitigation, Monitoring, Compliance and Reporting Plan (MMCRP) to ensure compliance with all mitigation measures imposed on the West of Devers Upgrade Project during implementation. The MMCRP also acknowledges that temporary changes to the project, such as final project design and engineering or need for addition workspace, are anticipated and common practice for construction efforts of this scale and that a Minor Project Refinement request would be required for these activities. This letter documents the CPUC's thorough evaluation of all activities covered in this Minor Project Refinement, and that no new impacts or increase in impact severity would result from the requested Minor Project Refinement activities.

Minor Project Refinements are reviewed for consistency with CEQA requirements and are located within the geographic boundary of the project study area. Minor Project Refinements 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 Refinement #1 for a minor shift/adjustment to the previously approved Maraschino Telecom alignment is granted by CPUC based on the factors described below.

SCE Minor Project Refinement Request. Excerpts from the SCE Revised Minor Project Refinement request, received November 13, 2017 (revised November 17, 2017), are presented below (indented):

The Notice to Proceed Request (NTPR) #3 Map Figure 2, pages 47 through 56, have been revised to reflect a minor shift/adjustment to the previously approved Maraschino Telecom alignment. The adjustment has been made to adapt to new road construction and development along Highland Springs Avenue and to minimize disturbance

along Highland Springs Avenue and First Street by using existing conduit for the installation of new fiber optic cable. The adjustment does not create new significant impacts for the project. The revised project description is as follows:

The existing Devers-Valley OPGW will connect to the MEER building in Maraschino Substation (FEIR page B-16 Item #3). Approximately 645 feet of fiber optic cable and new underground conduit will be installed from existing Devers-Valley No. 2 500-kV structure M24-T1 in the City of Beaumont, to a new manhole located on the west side of Highland Springs Avenue and the north boundary of the SCE 500 kV ROW. From this location, approximately 5,250 feet of fiber optic cable will be installed north, in existing conduit, to underground vault V5528679, located approximately 300 feet north of Potrero Boulevard. From this existing vault, approximately 1,520 feet of fiber optic cable and new underground conduit will be installed to a new manhole on East First Street. From the manhole, another 9,230 feet of fiber optic cable will be installed in existing conduit on East First Street to riser pole 4201995E, where the line will transition overhead for approximately 4,680 feet along East First Street and north on Veile Avenue on existing subtransmission poles to the northeast corner of the Maraschino Substation. From this location, the fiber optic cable will transition underground for approximately 400 feet in an existing underground conduit and cable trench to the MEER building located in Maraschino Substation.

Updated Temporary Disturbance Impacts:

| | |
|---------------------|-------------------------|
| Developed/Disturbed | Approximately 2.4 acres |
| Grassland/Forbland | Approximately 2.4 acres |

Biological Resources

Most of the alignment, from the Maraschino Substation south and east to the intersection of Crooked Creek Road and Highland Springs Road, is located in a highly urbanized, developed/disturbed portion of the city of Beaumont. No special-status species habitats are located along this portion of the alignment. Therefore, no special-status species are anticipated. This portion of the alignment includes habitats for nesting birds (e.g., trees, shrubs, the ground surface, man-made structures). The work is expected to be conducted outside the breeding season (January 1 – August 31 for this project); therefore, no impacts to nesting birds are anticipated.

Suitable habitats for listed riparian bird species are located immediately southwest of the intersection of Highland Springs Road with Crooked Creek Road and east of Highland Springs Road from Breckenridge Avenue to the DPV2 tie-in. The latter is historically occupied by Least Bell's Vireo (LBVI) (*Vireo bellii pusillus*). Construction activities are not expected to occur during the breeding season. Therefore, no impacts are anticipated.

The south end of the alignment is located in a quasi-native area. Soils are relatively compact compared to the native scrub habitats in the vicinity. Due in part to post-construction restoration efforts for DPV2, vegetation including weedy grasses and forbs such as bromes (*Bromus* spp.), mustards, and Doveweed (*Croton setiger*); annual grasses; and immature native scrub species such as four-winged saltbush (*Atriplex canescens*) and California buckwheat (*Eriogonum fasciculatum*) were observed. The work areas are located within a habitat historically suitable for the federal Endangered and California Threatened Stephens' kangaroo rat (SKR) (*Dipodomys stephensi*) and other special-status small mammal species such as the San Diego pocket mice (*Chaetodipus fallax* ssp.) (California Species of Special Concern). SKR and the San Diego pocket mice are Covered Species in the WR-MSHCP. SKR are known to occur in higher quality habitats south of the site. However, the habitat within the work areas and immediate vicinity is highly degraded. According to Mitigation Measure WIL-2d, a pedestrian survey was conducted by Stephen Myers (Wood Group; formerly AMEC Foster Wheeler), a Qualified Biologist holding a USFWS Section 10(a)(1)(A) permit for SKR. Current or recent diggings of Botta's pocket gophers (*Thomomys bottae*) were observed and burrows consistent with pocket mice species were observed. A few small burrows consistent with kangaroo rats were observed, but found in degraded condition (i.e., caving in and covered by spider webs). No recent sign of SKR occupation (e.g., active burrows, dust baths, tracks with tail drag) was observed. Therefore, SCE is not required to conduct trapping surveys or to implement additional measures. No impacts to SKR are anticipated. Due to the "drive and crush" nature of the proposed activities and large populations of San Diego pocket mice, impacts are expected to be minimal.

Due to the degraded nature of the habitat (albeit recovering) and lack of positive survey data from surveys conducted during the appropriate blooming periods in 2015, 2016, and 2017, no special-status plants are expected to occur. No special-status plants were observed; however, the preconstruction survey was conducted outside the typical blooming periods for the special-status plants potentially occurring in the area.

The methods and results of a pre-construction clearance survey can be found on the Field Reporting Environmental Database, FRED_Survey_Report_000004.

No impacts to regulated trees are anticipated at this time. If tree removal or trimming are required, the contractor will be responsible for obtaining permits, if needed, from the local jurisdiction.

Jurisdictional Waters

The alignment crosses a jurisdictional feature north of the intersection of East 1st Street and Veile Avenue. However, the feature will be avoided. Telecom improvements in the vicinity of the feature involve removal of existing and stringing of new telecom lines on existing poles. Ground-based activities will not occur within the mapped limits of the jurisdictional feature.

Cultural Resources

The area has been surveyed for archaeological resources. Results were negative, as reported in:

McLean, Roderic, Natalie Brodie, and Jacqueline Hall. 2013. Cultural Resources Assessment and Class III Inventory, West of Devers Project, San Bernardino and Riverside Counties, California. LSA Associates, Inc. for Southern California Edison.

and DeCarlo, Matthew M., Scott C. Justus, and William T. Eckhardt. 2013. Summary Class III Cultural Resource Inventory, Proposed Southern California Edison Devers-Palo Verde 2 500kV Transmission Line Project, Riverside County, California. ASM Affiliates for Southern California Edison and Department of the Interior, Bureau of Land Management.

CPUC Evaluation of Minor Project Refinement Request

In accordance with the MMCRP, the subject Minor Project Refinement request was reviewed by CPUC to confirm that no new impacts or increase in impact severity would result from the requested Minor Project Refinement activities and that the subject request was within the geographic boundary of the Project study area. This review also included a visit of the subject site on November 14, 2017 by the CPUC Environmental Monitor (EM). The following discussion summarizes this analysis for agriculture, air quality, biological resources, cultural resources, geology and soils, hazards and hazardous materials, land use, noise, paleontological resources, traffic and transportation, visual resources, water resources, and wildland fire. A list of bulleted conditions is presented to define additional information and clarifications regarding mitigation requirements. In some cases, these items exceed the requirements of the Mitigation Measures (MMs) and Applicant Proposed Measures (APMs), and are based on specific site conditions and/or are proposed conditions by SCE.

Agricultural: No Important Farmland will be impacted with the implementation of this MPR #1.

Air Quality: During proposed telecom construction, SCE shall implement the Fugitive Dust Control Plan approved by the CPUC on May 22, 2017, as well as the Exhaust Emissions Control Plan approved by CPUC on June 8, 2016. In addition, in compliance with MM AQ-1b, off-road equipment with engines larger than 50 horsepower shall have engines that meet or exceed U.S. EPA/CARB Tier 3 Emissions Standards. No additional impacts to air quality will occur with the implementation of this MPR #1.

Biological Resources: The telecom work described in this MPR #1 is in a highly urbanized, developed/disturbed portion of the city of Beaumont. Approximately 2.4 acres of grassland/forbland will be temporarily disturbed. No impacts to regulated trees are anticipated at this time. If tree removal or trimming are required, the contractor will be responsible for obtaining permits, if needed, from the local jurisdiction. No special-status

species habitat is present in the work area. As required by MM WIL-1a, preconstruction surveys for wildlife will be conducted 10 days prior to construction, and no more than four days prior to construction for nesting birds during the nesting season. Preconstruction survey “sweeps” will also be conducted immediately prior to construction. No additional impacts to biological resources will occur with the implementation of this MPR #1.

Cultural Resources: As required by MM CL-1b, a Cultural Resources Management Plan (CRMP) was submitted by SCE on February 2, 2017 and was approved by the CPUC on April 2, 2017. The area has been surveyed for archaeological resources and results were negative (McLean, et al. 2013; DeCarlo, et al. 2013). No additional impacts to cultural resources will occur with the implementation of this MPR #1.

Geology and Soils: SCE conducted geotechnical studies to evaluate faults, landslides and unstable slopes, and soil characteristics as outlined in MMs G-1a, G-2a, and G-5a. The geotechnical survey reports were reviewed and approved by the CPUC on August 17, 2017. No additional impacts to geology and soils will occur with the implementation of this MPR #1.

Hazards and Hazardous Materials: As required by MM HH-1a, SCE prepared and submitted a Hazardous Materials and Waste Management Plan to the CPUC on September 27, 2017. Hazardous materials used and stored on site for the duration of construction activities and will be managed according to the Plan. A Soil Management Plan has been developed consistent with MM HH-2a and HH-3a to provide guidance for the proper handling, onsite management, and disposal of impacted soil that might be encountered during construction activities, including soil samples to be collected in construction areas where the land has historically or is currently being used for agriculture and would be subject to ground disturbance by the project. SCE’s Soil Management Plan was combined with the Hazardous Materials and Waste Management Plan described above. Also, SCE’s contractor submitted information including written procedures for fueling and maintenance of construction equipment and an Emergency Response Plan. No additional impacts from hazards or hazardous materials will occur with the implementation of this MPR #1.

Land Use: As required by MM LU-1a, a Construction Notification Plan was prepared by SCE and approved by CPUC on May 22, 2017. The Plan identified the procedures to ensure that SCE will inform property and business owners of the location and duration of construction. The Plan includes provisions for public noticing including mailers, newspaper advertisements, public venue notices, and includes the establishment of a public liaison and toll-free information hotline. No additional impacts to land use will occur with the implementation of this MPR #1.

Noise: Best Management Practices for construction noise management will be implemented as outlined in MM N-1a to reduce construction noise exposure at noise-sensitive receptors and to avoid possible violations of local rules, standards, and ordinances during construction. Construction noise shall be confined to daytime, weekday hours (7:00 a.m. to 6:00 p.m.) or an alternative schedule developed by SCE based on its coordination with local jurisdiction. Construction traffic and helicopter flights shall be routed away from residences and schools, where feasible. No additional impacts to noise will occur with the implementation of this MPR #1.

Paleontological Resources: A Paleontological Resource Mitigation and Monitoring Plan (PRMMP) has been completed for the West of Devers (WOD) Project and was submitted to the CPUC and BLM for review and approval. The PRMMP was approved by the CPUC on May 9, 2017. Monitoring for paleontological resources will be conducted in compliance with MM PAL-1d and the PRMMP requirements. No additional impacts to paleontological resources will occur with implementation of this MPR #1.

Traffic and Transportation: Consistent with MM T-1a and MM T-1b, Construction Transportation and Traffic Control Plans have been developed and approved. The Construction Transportation Plan describes timing of

commutes, methods of reducing crew-related traffic, and other methods for reducing construction-generated additional traffic on regional and local roadways. No additional impacts to traffic and transportation will occur with the implementation of this MPR #1.

Visual Resources: The construction activities described in this Minor Project Refinement #1 are no different than what was described in NTP #3. No additional impacts to visual resources will occur with the implementation of this MPR #1.

Water Resources: As required by MM WR-2a, SCE developed and submitted an Erosion Control Plan to the CPUC and BLM. The Erosion Control Plan was incorporated into the Stormwater Pollution Prevention Plan, which will be kept onsite and readily available on request. SCE submitted the Stormwater Pollution Prevention Plans to the CPUC on May 25, 2017. Any changes included in this Minor Project Change #1 will be incorporated into the SWPPP document. No additional impacts to water resources will occur with the implementation of this MPR #1.

Wildland Fire: SCE submitted a Fire Management Plan on February 10, 2017 to satisfy the conditions of MM WF-1a and the Plan was approved by the CPUC on July 18, 2017. This Fire Management Plan has been submitted to local fire departments. No additional impacts to wildland fire will occur with the implementation of this MPR #1.

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

- All applicable Project MMs, APMs, 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.
- Copies of all relevant permits, compliance plans, and this Minor Project Refinement shall be available on site for the duration of construction activities. All permits and plans shall be made available to the CPUC EM upon request.
- SCE shall provide CPUC with the revised GIS data, which includes the project changes in this MPR #1.
- All crew members shall be WEAP trained prior to working on the Project. A log shall be maintained on-site with the names of all crew personnel trained. The WEAP training brochure can be provided in Spanish or other languages if appropriate. All participants will receive a hard-hat sticker for ease of compliance verification.
- No movement or staging of construction vehicles or equipment shall be allowed outside of the approved areas. If additional temporary workspace areas or access routes, or changes in technique and mitigation implementation to a lesser level are required, a Minor Project Refinement request shall be submitted for CPUC review.

Sincerely,



Billie Blanchard
CPUC Environmental Project Manager

cc: V. Strong, Aspen