

PUBLIC UTILITIES COMMISSION

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December 14, 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 #2

Dear Mr. Stevenson,

On December 13, 2017, Southern California Edison (SCE) submitted Minor Project Refinement (MPR) #2 request for the addition of two temporary work areas 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.

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 MPR request would be required for these activities. This letter documents the CPUC's thorough evaluation of all activities covered in this MPR, and that no new impacts or increase in impact severity would result from the requested MPR activities.

MPRs are reviewed for consistency with CEQA requirements and confirmation that they are located within the geographic boundary of the project study area. MPRs 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.

MPR #2 for the addition of two temporary work areas to the previously approved Maraschino Telecom alignment is granted by CPUC based on the factors described below.

SCE MPR Request. Excerpts from the SCE Revised MPR request, received December 13, 2017, are presented below (indented):

The Notice to Proceed Request (NTPR) #3 Map Figure 2, page 55, has been revised to reflect the addition of two temporary work areas (approximately 60-feet by 60-feet each) for access to two existing manholes/vaults along the project alignment on Highland Springs Avenue, to locate existing conduit for cable pulls and connections, in the City of Beaumont, Riverside County. The temporary work areas are in disturbed land, currently under development and do not create new significant impacts for the project.

Additional Temporary Disturbance Impacts:

Developed/Disturbed Approximately 0.17 acre

Biological Resources

The area surrounding the two-access manhole/vaults along Highland Springs Avenue, between Crooked Creek Road and Breckenridge Avenue, is currently under development. The designated work areas for the manhole/vaults measure approximately 60 feet by 60 feet and are located within previously disturbed or developed areas. This portion of the alignment is located in an urbanized part of Beaumont, between the Highland Springs Avenue right-of-way and a residential development. No ground disturbing activities are planned. Construction workers will park vehicles on the shoulder of the public road or on previously disturbed/developed areas and access the manhole/vaults on foot. Therefore, no direct impacts to special-status species habitats are anticipated. Likewise, due to the nature of the construction activities and absence of suitable habitats for special-status plants and special-status terrestrial wildlife, no impacts to these species are anticipated.

The manhole/vault locations are within 500 feet (north and southeast) of habitats presumed to be historically occupied by the least Bell's vireo (LBVI) (*Vireo bellii pusillus*) and southwestern willow flycatcher (SWFL) (*Empidonax traillii extimus*). However, construction activities at these manhole/vaults are not expected to occur during the breeding season for these species. In addition, the activities are low impact. Therefore, no direct or indirect impacts to breeding LBVI or SWFL are anticipated. SCE will conduct focused nest location surveys as required by MM WIL-1c and consistent with the project Nesting Bird Management Plan (NBMP) beginning January 1. If a breeding territory for LBVI or SWFL is identified, SCE will implement avoidance and minimization measures consistent with MM WIL-2c, in coordination with the RCA, CDFW, and USFWS, in accordance with the NBMP.

The manhole/vault locations and vicinity include suitable nesting substrates for breeding birds protected by the Migratory Bird Treaty Act and California Fish and Game Code. Suitable substrates include trees, shrubs, man-made structures, and the ground surface. Beginning January 1, SCE will conduct focused nest location surveys consistent with the NBMP. If active nests are found, avoidance and minimization measures will be implemented as described in the NBMP.

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

Jurisdictional Waters

The manhole/vault locations and associated work areas are not located within or adjacent to any potentially jurisdictional riparian or riverine areas. Therefore, no impacts are anticipated.

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 MPR Request

In accordance with the MMCRP, the subject MPR request was reviewed by CPUC to confirm that no new impacts or increase in impact severity would result from the requested MPR 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 December 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 MPR #2.

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 MPR #2.

Biological Resources: The telecom work described in this MPR #2 is in a highly urbanized, developed/disturbed portion of the City of Beaumont. Approximately 0.17 acre of developed/disturbed area will be temporarily disturbed. No impacts to regulated trees are anticipated; however, 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. The manhole/vault locations are within 500 feet (north and southeast) of habitats presumed to be historically occupied by the least Bell's vireo and southwestern willow flycatcher. The manhole/vault locations and vicinity include suitable nesting substrates for breeding birds protected by the Migratory Bird Treaty Act and California Fish and Game Code. Beginning January 1, SCE will conduct focused nest location surveys as required by MM WIL-1c and consistent with the project NBMP. If active nests are found, avoidance and minimization measures will be implemented as described in the NBMP. Also, as required by MM WIL-1a, preconstruction surveys for wildlife will be conducted 10 days prior to construction. Additionally, preconstruction survey "sweeps" will also be conducted immediately prior to construction. No additional impacts to biological resources will occur with the implementation of MPR #2.

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 MPR #2.

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 MPR #2.

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 MPR #2.

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. SCE conducted the required notification for the entirety of the Maraschino Telecom alignment in accordance with the Plan. No additional impacts to land use will occur with the implementation of MPR #2.

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 helicopter usage is proposed for the work under MPR #2. No additional impacts to noise will occur with the implementation of MPR #2.

Paleontological Resources: A Paleontological Resource Mitigation and Monitoring Plan (PRMMP) was submitted to the CPUC and BLM for review and 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 MPR #2.

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 MPR #2.

Visual Resources: The construction activities described in this MPR #2 are no different than what was described in NTP #3, and the proposed work areas under MPR #2 are temporary. No additional impacts to visual resources will occur with the implementation of MPR #2.

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 MPR #2 will be incorporated into the SWPPP document. No additional impacts to water resources will occur with the implementation of MPR #2.

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. The proposed work areas under MPR #2 are located within an urban area on developed/disturbed lands. No additional impacts related to wildland fire potential will occur with the implementation of MPR #2.

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 MPR 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 MPR #2 project changes.
- 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, an MPR request shall be submitted for CPUC review.

Sincerely,



Billie Blanchard
CPUC Environmental Project Manager

cc: V. Strong, Aspen