

PUBLIC UTILITIES COMMISSION

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January 3, 2018

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 #4

Dear Mr. Stevenson,

On December 28, 2017, Southern California Edison (SCE) submitted Minor Project Refinement #4 request for the continued construction use of two water hydrants previously approved as Temporary Extra Work Spaces (TEWS) for the Telecom work under 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 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 #4 for the continued construction use of two water hydrants previously approved as TEWS for the Telecom work 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 December 28, 2017, are presented below (indented):

SCE is requesting continued construction use of purple water hydrants located near the intersections of Highland Springs Avenue and Crooked Creek (TEWS #1), and Oak Valley Parkway and Oak View Drive (TEWS #2), in the

City of Beaumont, Riverside County. The landowner is the Beaumont Cherry Valley Water District/City of Beaumont.

Biological Resources

The hydrant located along Highland Springs Avenue, on the north side of Crooked Creek Road, serves a residential housing development, in an urbanized part of Beaumont. Only occasional short-term filling of a water truck will occur at sidewalk curb, while allowing access to local land uses. No ground disturbance will occur. Due to the nature of the construction activity and absence of suitable habitats for special-status plants and special-status terrestrial wildlife, no impacts to these species are anticipated.

The hydrant is located within 500 feet 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 activity at the hydrant is 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 purple hydrant located along Oak Valley Parkway near the intersection of Oak View Drive is also on developed/disturbed land. Only occasional short-term filling of a water truck will occur, while allowing access to local land uses. No ground disturbance will occur. The water source location and vicinity does not include habitats supporting special-status plants or wildlife. No sensitive biological resources were observed during previous surveys. No impacts to sensitive biological resources are anticipated.

The hydrant 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 tree trimming or removal is required for use of the hydrants.

Jurisdictional Waters

The hydrants 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 hydrant locations were covered during previous cultural surveys. 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 2 500 kV Transmission Line Project, Riverside County, California*. ASM Affiliates for Southern California Edison and Department of the Interior, Bureau of Land Management. Mengers, Doug. 2016. *Cultural Resources Survey of Engineering Revision Areas for Southern California Company's West of Devers Upgrade Project (WODUP), Riverside and San Bernardino Counties, California*. PanGIS, Inc. for Southern California Edison. Letter report on file at Eastern Information Center, Riverside, CA.

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. 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 #4.

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 #4.

Biological Resources: The water hydrants are in urbanized environments and no ground disturbance will occur. No special-status plants or terrestrial wildlife are present. The hydrant along Highland Springs Avenue is located within 500 feet of habitats presumed to be historically occupied by the LBVI and SWFL. However, construction activity at the hydrant is 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 hydrant 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 tree removal or trimming will occur. No additional impacts to biological resources will occur with the implementation of MPR #4.

Cultural Resources: As required by MM CR-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. Mengers, Doug 2016). No ground disturbance is required for use of the two hydrants. No additional impacts to cultural resources will occur with the implementation of MPR #4.

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. The hydrants are existing structures and no improvements are required. No additional impacts to geology and soils will occur with the implementation of MPR #4.

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 #4.

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 MPR #4.

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, as well as use of the hydrants, 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 MPR #4.

Paleontological Resources: A Paleontological Resource Mitigation and Monitoring Plan (PRMMP) has been completed for the West of Devers Upgrade 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 ground disturbance is required for use of the two hydrants. No additional impacts to paleontological resources will occur with implementation of MPR #4.

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 #4.

Visual Resources: The construction activities described in this Minor Project Refinement #4 are no different than what was described in NTP #4. No additional impacts to visual resources will occur with the implementation of MPR #4.

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. No ground disturbance is required for use of the two hydrants. No additional impacts to water resources will occur with the implementation of MPR #4.

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 MPR #4.

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.
- 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