

PUBLIC UTILITIES COMMISSION

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January 22, 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 #5

Dear Mr. Stevenson,

On January 16, 2018, Southern California Edison (SCE) submitted Minor Project Refinement #5 request for the continued construction use of access paths previously approved as Temporary Extra Work Spaces (TEWS) under TEWS #3, #4, and #5, and temporary construction access paths through private property adjacent to Old Idyllwild Road along the Coyote Trail 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 Banning, 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 #5 for the continued construction use of areas previously approved as TEWS and along Coyote Trail 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 January 16, 2018, are presented below (indented):

SCE is requesting continued construction use of access paths approved under TEWS #3, TEWS #4, and TEWS #5, and temporary construction access paths through private property adjacent to Old Idyllwild Road along the Coyote Trail in the City of Banning, Riverside County, California.

Biological Resources

Continued use of TEWS #3: This area was covered during previous biological preconstruction surveys. No sensitive biological resources were observed during the surveys. No ground-disturbing activities are anticipated. No impacts to sensitive biological resources are anticipated to result from construction activities along the active utility corridor or the vacant lot adjacent to commercial property.

Continued use of TEWS #4: This area was covered during previous biological preconstruction surveys. No sensitive biological resources were observed during the surveys. No impacts to sensitive biological resources are anticipated.

Continued use of TEWS #5: The temporary work areas north of the Coyote Trail are situated in a developed/disturbed environment along existing city streets. The areas are not located in habitats that support special-status plants or wildlife. A preconstruction survey was conducted for this area. No sensitive biological resources were observed during the surveys. No impacts to sensitive biological resources are anticipated.

Proposed access paths in the vicinity of Coyote Trail: The proposed access paths are located within existing driveways and established access paths which are characterized as disturbed/developed land. The adjacent habitats are classified as grassland/forbland. The lowland areas adjacent to the two entry points from Old Banning Idyllwild Road include presumed occupied pockets of Los Angeles Pocket Mouse (LAPM) habitat. The higher elevation areas in the vicinity are not suitable for LAPM. The proposed access paths feature compacted soils and LAPM prefer friable soils. Therefore, LAPM are not expected to occur within the access paths. An LAPM Qualified Biologist reviewed the construction areas along this segment, including the proposed access paths, with the construction foreman and environmental managers. No impacts to LAPM are anticipated assuming construction activities are limited to approved work areas. A Qualified Biologist will be present during construction activities in LAPM habitat to assist the construction crews with locating their equipment and conducting activities to avoid impacts to LAPM.

Suitable substrates for nesting birds, including trees, shrubs, man-made structures, and the ground surface, can be found near the TEWS areas north of and in the vicinity of the Coyote Trail. Beginning January 1, SCE has conducted preconstruction surveys in compliance with the Nesting Bird Management Plan. If active nests are found, avoidance and minimization measures will be implemented according to that plan.

No regulated trees will be impacted during the use of the access paths described above.

Jurisdictional Waters

The associated work areas are located approximately 30 feet to 40 feet west of a jurisdictional ephemeral streambed. No impacts are anticipated.

Cultural Resources

The work areas were covered during previous cultural surveys. Results were negative as reported in: Williams, A. (2016). *Cultural Resources Management Plan for Southern California Edison Company's West of Devers Transmission Line Upgrade Project, Riverside and San Bernardino Counties, California*. Rosemead, CA: Southern California Edison.

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.

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.

Biological Resources: The access paths are characterized as disturbed/developed and no ground disturbance will occur. No special-status plants or terrestrial wildlife are present within the work areas. Where there is adjacent potential habitat for Los Angeles pocket mouse (LAPM), a Qualified Biologist will be present during construction activities in order to avoid any impacts. SCE will conduct preconstruction nesting bird surveys consistent with the project Nesting Bird Management Plan (NBMP) beginning January 1. If active nests are found, avoidance and minimization measures will be implemented as described in the NBMP. No regulated trees will be impacted. No additional impacts to biological resources will occur with the implementation of this MPR.

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 (Williams, A.; 2016). No ground disturbance is required for use of these access paths. No additional impacts to cultural resources will occur with the implementation of this MPR.

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 accepted by the CPUC on August 17, 2017. No ground disturbance will occur and no new permanent structures will be erected under this MPR. No additional impacts to geology and soils will occur with the implementation of this MPR.

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.

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.

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 this MPR.

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 these access paths. No additional impacts to paleontological resources will occur with implementation of this MPR.

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.

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

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 (SWPPP), which will be kept onsite and readily available on request. SCE submitted the SWPPPs to the CPUC on May 25, 2017. No ground disturbance is required for use of these access paths. No additional impacts to water resources will occur with the implementation of this MPR.

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.

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.
- In accordance with MM VEG-1c and prior to any construction, equipment or crew mobilization at each work site, work areas will be marked with staking or flagging to identify the limits of work and will be verified by project environmental staff and CPUC Environmental Monitor (EM).
- In accordance with WIL-1a, SCE shall complete preconstruction surveys 10 days prior to beginning work in any given area, and repeat the surveys if the work site remains inactive for a period of ten days or more. During nesting season, a qualified biologist shall complete nesting bird surveys no more than four days prior to beginning work at any given area, and repeat the surveys regularly so long as work continues at the site during the nesting season. Surveys shall be submitted to the CPUC EM for review and approval.
- In accordance with WIL-1a, SCE also shall conduct preconstruction “sweeps” of each work site immediately prior to beginning construction or disturbance work, to identify any vulnerable wildlife that may have entered the site. Based on the results of pre-construction surveys and sweeps, SCE or its contractor shall observe buffer areas or other access or activity restrictions to minimize potential impacts to the resources. SCE shall provide documentation of the methods and results of all preconstruction surveys, and follow-up buffer areas or other avoidance measures that are implemented, to the CPUC EM.
- 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