

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 30, 2019

Alex Gutierrez
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 #27

Dear Mr. Gutierrez,

On April 30, 2019, Southern California Edison (SCE) submitted a request for Minor Project Refinement (MPR) #27 for the use of existing water hydrants in the City of Loma Linda (Segment 1); a temporary work area for water tank installation at the east end of Prado Lane in the City of Loma Linda (Segment 2); and a temporary work helicopter hook-up area at El Casco Substation (Segment 3) for activities approved under the California Public Utilities Commission (CPUC) Notice to Proceed (NTP) #4, September 5, 2017, in support of the West of Devers Upgrade Project in the City of Colton, San Bernardino 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 an 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 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 #27 for the work described below to support activities (approved under NTP #4) is granted by CPUC based on the factors described below.

SCE MPR Request. Excerpts from the SCE MPR request, received April 30, 2019 are presented below (indented):

New Water Sources in Segment 1

Rubber tired water trucks will park on existing public roads shoulders adjacent to the two (2) existing municipal water source locations [i.e., hydrants]. Only occasional short-term filling of water trucks will occur, while allowing access to local land uses. No ground disturbance will occur at the water source locations described below:

Hydrant #1 – Potable water hydrant supplied by the City of Loma Linda, located north side of Business Center Drive, adjacent to the SCE corridor.

The new work area consists of approximately 0.03 acre of previously developed/disturbed public right-of-way in the City of Loma Linda.

Hydrant #2 – As an alternative to Hydrant #1, the potable water hydrant supplied by the City of Loma Linda, located on the southwest corner of Business Center Drive and Enterprise Drive may be utilized.

The new work area consists of approximately 0.02 acre of previously developed/disturbed public right-of-way in the City of Loma Linda.

All Water Districts/Agencies listed in the FEIR were contacted to determine the availability of non-potable water. Only the City of Redlands currently provides non-potable water service within the Project Area; however, the City does not provide recycled water for use outside the City boundaries.

Water Tank Installation in Segment 2

A 0.33-acre temporary work area located on vacant land at the east end of Prado Lane in the City of Loma Linda is required to install and operate a water holding tank for Segment 2 construction, utilizing an adjacent previously approved water source. At the Prado Lane water source, approved in MPR #6, a steel encased 3-inch fire hose will be temporarily installed above ground, from the approved hydrant to a portable water tank located in the approximate location shown on Figure 1, page 2 [SCE MPR Request Maps]. The site will be grubbed and lightly graded prior to the installation of the tank to provide a level surface.

The total temporary disturbance area associated with the work area consists of approximately 0.01 acre of developed/disturbed land and 0.32 acre of grassland/forbland, owned by the City of Colton and on private land.

El Casco Substation Helicopter Hook-Up Area in Segment 3

A 0.22-acre temporary work area located on previously developed/disturbed land on the northwest exterior perimeter of the El Casco Substation is required to complete the OPGW installation from 3N02 to 3N25, during the Move 3, California Independent System Operator's allowable outage period, ending May 8, 2019. During this activity, a helicopter will enter the new work area from the southwest to minimize encroachment into an existing least Bell's vireo (LBVI) nest buffer. Workers on the ground will affix the rope to a hook on the helicopter. The helicopter will then proceed with threading the rope through the structures associated with the move until rope is threaded through structure 3N25. The helicopter will remain approximately 100 feet above the ground for approximately 1-2 minutes before departing the work area.

The new work area consists of approximately 0.22 acre of previously developed/disturbed land, owned by the Riverside County Regional Park & Open Space District.

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. Additionally, the CPUC Environmental Monitor (EM) conducted a site visit of the requested work areas on April 30, 2019. 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.

Agriculture: No Important Farmland will be impacted with the implementation of this MPR. The additional work areas associated with this MPR are all previously disturbed/developed lands, with the exception of 0.32 acre of grassland/forbland.

Air Quality: During proposed 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, 2017. 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: SCE submitted biological resource survey information with the MPR request. SCE conducted a desktop analysis of publicly available data and relevant project data to determine the potential for special-status species to occur at the new work areas. The new work areas were included in the study area for previous habitat assessments and focused surveys, as well as recent preconstruction surveys.

Suitable substrates for nesting birds protected by the California Fish and Game Code and Migratory Bird Treaty Act, including trees, shrubs, and the ground surface, are located adjacent to the work areas and in the project vicinity. Preconstruction surveys for nesting birds, and ongoing surveys and monitoring for nesting birds, will take place during the nesting season (January 1 – August 31). If active nests are found, avoidance buffers will be established and potential impacts will be mitigated through implementation of the Nesting Bird Management Plan.

Burrowing owl (*Athene cunicularia*) habitat is widespread in the Project area. Although burrowing owls are not anticipated to occur within the work areas, if active burrows are identified later within 300 feet of construction activities, potential impacts will be addressed according to the Burrowing Owl Management and Passive Relocation Plan.

Special-status small mammals such as the pallid San Diego pocket mouse (*Chaetodipus fallax pallidus*), northwestern San Diego pocket mouse (*Chaetodipus fallax fallax*), American badger (*Taxidea taxus*), desert kit fox (*Vulpus macrotis*), San Diego desert woodrat (*Neotoma lepida intermedia*), and/or San Diego black-tailed jackrabbit (*Lepus californicus bennettii*) can occur in many parts of the project area. Ringtail (*Bassariscus astutus*) and Palm Springs round-tailed ground squirrel (*Spermophilus tereticaudus chlorus*) are not expected. However, if any of these species are found, potential impacts will be addressed according to the Small Mammals Avoidance and Minimization Plan. No impacts to special-status small mammals are anticipated.

No special-status plants were observed within the work areas and most of the work areas are disturbed/developed. If special-status plants are identified during clearance sweeps/monitoring, ESA buffers will be established and special-status plants will be avoided to the extent feasible. Unavoidable impacts to special-status plants will be addressed in accordance with the Special-status Plant Salvage and Relocation Plan. A preconstruction survey for each work area will be conducted prior to use.

No tree trimming, or tree removal is required for construction activities within the work areas.

Proposed Project Water Sources. The two new water sources are existing hydrants, located within existing developed/disturbed areas in an urbanized industrial area. Water trucks will park immediately adjacent to the

water hydrants, and workers will fill the truck tanks using equipped hoses and on-board pumps. No additional ground disturbance (i.e., site preparation) will occur at these locations. Because no ground-disturbance will occur and water trucks will be positioned on paved/disturbed surfaces occasionally for short durations of time, no impacts to special-status terrestrial wildlife (e.g., burrowing small mammals) or special-status plants are anticipated. In addition, the act of filling water trucks will be similar to baseline conditions in both locations (e.g., public traffic, busy freeways and highways, and train travel). Preconstruction surveys for each water source will be conducted prior to initiation of use.

Water Tank Installation. The Prado Lane water source is unique in that above-ground piping will be installed to convey water from the approved water hydrant to an above-ground holding tank adjacent to the approved access road. To mitigate potential impacts, the above ground piping from the hydrant to the tank will be encased in a steel sleeve to prevent puncture and control potential drips. Secondary containment will be placed under the hydraulic motor that is used to raise and lower the tank. Wire-backed silt fence will be installed around the western and southern perimeter of the site in compliance with the SWPPP. The pull cord on the tower will be locked out nightly and will be removed over weekends and holidays.

The Prado Lane water tank installation is located within mapped USFWS-designated Coastal California gnatcatcher (*Poliptila californica californica*; CAGN) critical habitat and within 500 feet of mapped suitable CAGN habitat. Focused surveys for CAGN were conducted in March and April 2018. No CAGN were detected in Segment 2. The land cover types comprising the proposed work area are not comprised of primary constituent elements of gnatcatcher critical habitat and no CAGNs are expected to occur. Preconstruction surveys, including surveys for nesting birds, will be conducted during the avian breeding season (Jan 1 – Aug 31) and prior to the initiation of construction use at each hydrant/work area. Daily sweeps will be conducted prior to construction during the avian breeding season. Based on this process and previous surveys, the Project area in San Bernardino County is considered unoccupied by CAGN at this time and no impacts are anticipated. A preconstruction survey of the work area will be conducted prior to initiation of use.

Wetland and non-wetland jurisdictional features are located south and east of the new water tank site but do not intersect the new work area. No impacts to the jurisdictional features will occur during the use of the area, as BMPs will be implemented along the perimeter of the work area and routine SWPPP inspections will be conducted to ensure they are maintained in accordance with the SWPPP. A preconstruction survey of the work area will be conducted prior to use. Therefore, no impacts to jurisdictional waters are anticipated.

El Casco Helicopter Hook-up Area. Suitable habitat for least Bell's vireo (*Vireo bellii pusillus*; LBVI) and southwest willow flycatcher (*Empidonax traillii extimus*; SWFL) occurs within the El Casco Substation helicopter site. The proposed site is needed to facilitate OPGW installation through structure 3N02, which is currently encompassed by a 500-foot avoidance buffer associated with LBVI Nest Event 00305. To minimize impacts, Barnard has proposed conducting manual sock line pulling (i.e., utilizing cranes to access the structure and people power to pull the sock line) within the buffer. After the sock line is manually pulled through 3N02, it will be hooked up to the helicopter for the remainder of the pull. The proposed work area would serve as a hook-up area on the edge of the nest buffer. The nest is located approximately 440 feet northwest of the helicopter work area, approximately 200 feet from the nearest ground-based construction, and adjacent to the access route into the 3N02 site. No direct impacts to riparian habitat will occur. This approach will minimize use of the helicopter within the buffer. The WR-MSHCP DBESP for riparian and riverine resources will be implemented including full-time noise and nest monitoring by an agency approved LBVI biologist during all work activities. The agency-approved LBVI biologist will be present at all times during the proposed activities and hold a pre-flight meeting with the crew, including the helicopter pilot to explain the wildlife agency approved buffer entry exclusion conditions and describe the necessary precautions to avoid

impacts to LBVI. As per typical protocol, the pilot will load the on-board GPS with the horizontal and vertical nest buffers to facilitate avoidance while in the air. While spikes in noise generation may occur during helicopter use and other construction activities, at the distances from the nest, noise levels from the proposed activities are not expected to exceed the established thresholds. RCA, USFWS, and CDFW agreed that the activities may proceed provided the avoidance measures in the Determination of Biologically Equivalent or Superior Preservation, including noise monitoring, are implemented. The DBESP measures are consistent with MM WIL-2c.

Special-status terrestrial herpetofauna, red-diamond rattlesnake (*Crotalus ruber*), was observed south of the El Casco Substation helicopter hook-up area; however, no other special-status terrestrial herpetofauna were observed within the new work areas. Areas of suitable habitat for Stephen's kangaroo rat (*Dipodomys stephensi*; SKR) are mapped west of the El Casco Substation helicopter work area. A habitat assessment, pedestrian surveys, and trapping surveys were conducted in Segment 3 in 2018. No SKR were captured. Based on a lack of historic data, habitat conditions, and negative results over several years of surveys, SKR are not expected. One concrete-lined jurisdictional channel is located along the exterior western perimeter of the El Casco Substation helicopter hook-up area but does not intersect the work area. No ground disturbance will occur in the work area and the concrete channel will be protected in place during helicopter related activities. A preconstruction survey will be conducted prior to use. With implementation of the mitigation measures and biological monitoring during construction, no impacts to biological resources are anticipated.

Cultural Resources: SCE submitted cultural resource information with the MPR request. A Cultural Resources Management Plan (CRMP) has been completed for the West of Devers Upgrade Project and was approved by the CPUC in October 2017.

The hydrants, water tank site, and helicopter work area are located within the West of Devers Area of Potential Effects (APE) and were covered within the record search data that was conducted during previous WOD cultural surveys and studies; *West of Devers: Cultural Resources Assessment and Class III Inventory* (LSA, 2013) and *Area of Potential Effects for the Engineering Refinements Survey and Recommendation of Eligibility for Cultural Resources with SCE Company's West of Devers Project* (ASM, 2015). The record search and survey results for the new work areas were negative for cultural resources. In addition, the proposed existing hydrants and additional access area are located within mostly disturbed and/or developed areas. In the event of unanticipated discoveries, MM CL-1b, MM CL-1c, MM CL-1d and the CRMP requirements would be implemented. No impacts to cultural resources are anticipated 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 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.

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 will be managed according to the Plan. A Soil Management Plan has been developed consistent with MMs 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 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 the local jurisdiction(s). 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 approved by the CPUC on May 9, 2017. Paleontological sensitivity in the Segment 2 portable water tank site is determined to be Class 2 (PFYC2=low), therefore the site may initially be spot checked during grading to confirm the PFYC2 classification. The proposed water sources are existing hydrants located within existing developed areas and no ground disturbance is proposed; therefore, no monitoring is required as outlined in the PRMMP. No grading, drilling greater than 2 feet diameter, or excavation will be required for the use of the helicopter hook-up area; therefore, no impacts to paleontological resources are anticipated in the new work area. In the event of unanticipated discoveries, MM PAL-1d and the PRMMP requirements would be implemented. 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 use of an additional work area described in this MPR is no different than what was described in NTP #4 and is temporary. 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 SWPPP to the CPUC on May 25, 2017. Any changes necessitated by this MPR will be incorporated into the SWPPP document. 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. A revised Fire Management Plan was submitted by SCE on October 29, 2018, which was approved by the CPUC on October 30, 2018. The revised Plan was also approved by BLM and State and local fire agencies. The work areas in this MPR are located along developed/disturbed areas. 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:

- SCE shall provide the CPUC with Collector data for the new work areas covered in this MPR prior to the start of construction activities.

- 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.
- 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,

A handwritten signature in black ink that reads "John Forsythe". The signature is written in a cursive, flowing style.

John Forsythe
CPUC Environmental Project Manager

cc: V. Strong, Aspen