

## PUBLIC UTILITIES COMMISSION

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November 27, 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 #32

Dear Mr. Gutierrez,

On November 18, 2019, Southern California Edison (SCE) submitted a request for Minor Project Refinement (MPR) #32 for additional workspace to facilitate tower construction, wire stringing activities, and wire wreck-out in several locations located in the City of Banning and the City of Beaumont, Segments 4 and 6. These extra work areas would support transmission line activities approved under the California Public Utilities Commission (CPUC) Notice to Proceed (NTP) #4, September 5, 2017, for the West of Devers Upgrade Project in the County of Riverside, 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 #32 for the additional Segment 4 and 6 work areas to support transmission line 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 November 18, 2019 are presented below (indented):

GS-4-3S01-4S60-1-MPR-32: Expansion of GS-3S01-4S60-1 East of San Timoteo Canyon Road and West of 4S60. A new temporary work area adjacent to the east side of San Timoteo Canyon Road and east of GS-3S01-4S60-1 is required to provide adequate workspace for material and equipment staging during tower construction, wire stringing activities, and wire wreck-out. The new work area consists of approximately 0.23-acre of developed/disturbed land (0.04 acre) and grassland forbland (.19 acre). The land is privately owned and located within the SCE transmission line right-of-way.

GS-4-4X50-4X51-MPR-32: Expansion of GS-4X50-4X51 East of Palmer Avenue and West of M27-T1. A new temporary work area adjacent to the east side of Palmer Avenue, east of GS-4X50-4X51, and west of Supersite M27-T1 is required to provide adequate workspace for material and equipment staging during tower construction, wire stringing, and wire wreck-out activities. The new work area consists of approximately 0.31-acres of developed/disturbed land (.29 acre) and chaparral (.02 acre). The land is privately owned and located within the SCE transmission line right-of-way.

GS-4-4X48-4X50-1-MPR-32, GS-4-4X48-4X50-2-MPR-32, GS-4-4X48-4X50-3-MPR-32: Guard Structures on the East and West sides of Cherry Valley Blvd and on the east and west sides of GS-4X48-4X50. Three new temporary work areas are required along the east and west sides of Cherry Valley Boulevard, on either side of GS-4-4X48-4X50 to provide adequate workspace for material and equipment staging during tower construction, wire stringing, and wire wreck-out activities. The new work areas will be lightly graded to level the existing terrain. The total temporary disturbance area associated with the new work areas consists of approximately 0.93 acres of developed/disturbed (.34 acre) and grassland forbland (.59 acre). The land is privately owned and located within the SCE transmission line right-of-way.

GS-4-4X46-4X47-1-MPR-32: Expansion of GS-4X46-4X47-1 West of Plantation Drive. A new temporary work area along the west side of Plantation Drive within the SCE transmission right-of-way is required to provide adequate workspace for material and equipment staging during tower construction, wire stringing, and wire wreck-out activities. The new work area consists of approximately 0.17-acre of developed/disturbed land (.06 acre) and agricultural (.11 acre). The land is privately owned and located within the SCE transmission line right-of-way.

WSS-4-4X44-2-MPR-32: Expansion of Supersite M25-T4 for Wire Stringing Activities West of 4X44. A new temporary work area is required east of I-10 and west of Supersite 4X44 to facilitate wire stringing activities associated with the tower site. The new work area will be lightly graded to level the existing terrain. The total temporary disturbance area associated with the new work area consists of approximately 0.41 acres of developed/disturbed land. The land is privately owned and located within the SCE transmission line right-of-way.

WSS-4-4X44-1-MPR-32, GS-4-W-4X43-3-MPR-32: Expansion of Supersites 4X44-1 and GP-4X43-W for Wire Stringing Activities at 4X43 and 4X44. Two new temporary work areas are required east of I-10 and Supersite 4X44-1 and west of Supersite GP-4X43-W to facilitate wire stringing activities associated with tower sites 4X43 and 4X44. The new work areas will not require site preparation for use. The total temporary disturbance space associated with the new work areas consists of approximately 2.94 acres of developed/disturbed land. One work area is privately owned and the other is owned by the City of Beaumont and are located within the SCE transmission line right-of-way.

GS-4-E-4X42-MPR-32, GS-4-4X41-4X42-1-MPR-32, GS-4-4XX41-4X42-2-MPR-32: Guard Structures between 4X41 and 4X42. Three new temporary work areas are required east of Supersite 4X42 and west of Supersite 4X41 to facilitate wire stringing activities associated with tower sites 4X41 and 4X42. The new work areas may require light grading to level out the areas in preparation for use. The total temporary disturbance area associated with the new work areas consists of approximately 0.93 acres of developed/disturbed land. The land is privately owned and located within the SCE transmission line right-of-way.

GS-4-W-4X38-1-MPR-32, GS-4-W-4X38-2-MPR-32: Expansion of Supersite 4X38 for Wire Stringing Activities. Two new temporary work areas are required along the east side of Fairway Drive to facilitate wire stringing activities associated with tower site 4X38. The new work areas will require minimal site preparation for use. The total temporary disturbance area associated with the new work areas consists of approximately 0.29 acre of developed/disturbed land. The land is privately owned and located within the SCE transmission line right-of-way.

GS-4-4X29-4X30-MPR-32, WSS-4-4X29-MPR-32: Expansion of GS-4-4X29-4X30 and WSS-4X27-4X29. Two new temporary work areas are required east of GS-4-4X29-4X30 and west of WSS-4X27-4X29 to facilitate wire stringing and wreck-out activities associated with tower sites 4X27, 4X29, and 4X30. The new work areas will require minimal site preparation for use. The total temporary disturbance area associated with the new work areas consists of approximately 3.38 acres of developed/disturbed land (.43 acre) and grassland/forbland (2.95 acres). The work areas are both privately and publicly owned by the City of Beaumont and located within the transmission line right-of-way.

WS-6-CedarRd-MPR-32: Existing water source west of Mountain Avenue. Rubber tired water trucks will park on the shoulder of the existing/public road adjacent to the existing water source location (i.e., hydrant). 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 location. No impacts to regulated trees, jurisdictional waters, biological, or cultural resources are anticipated for use of the water source. Clearance surveys will be conducted prior to use. The potable hydrant is supplied by the City of Banning Public Works Department and is located on the southwest corner of the intersection of Mountain Avenue and Cedar Drive (33°56'11.45"N, -116°55'14.57"W) in the City of Banning. The total temporary disturbance area associated with the new work area consists of approximately .02-acre of previously developed/disturbed land, owned by the City of Banning in the public ROW. All Water Districts/Agencies listed in the FEIR were contacted to determine the availability of non-potable water. Only the City of Redlands provides non-potable water service within the Project Area, however Redlands' recycled water hydrants are located within the northern portion of Segment 1, where it is not economically or environmentally feasible to haul recycled water to other areas of the West of Devers Project.

WA-4-4X04-3-SE-MPR-32: Expansion of Supersite 4X04-3-SE. Supersite 4X04-3-SE requires expansion to the east to create a turnaround area for vehicles and equipment traveling along the access road. The new work area will require minimal site preparation for use. The total temporary disturbance area associated with the new work areas consists of approximately 0.03 acre of developed/disturbed land (.01 acre) and chaparral (.02 acre). The land is privately owned and located within the SCE transmission line right-of-way.

WSS-6-6N25-MPR-32: Expansion of Supersite 6N26. A 1.72-acre temporary work area expansion immediately east of SWA-6-6N26, is required to provide adequate workspace for material and equipment staging during tower construction, wire stringing, and wire wreck-out activities. The new work area will require light grading to level out the areas in preparation for use. The total temporary disturbance area associated with the expanded work area is approximately 1.72-acre of previously disturbed/developed (.18-acre) and Desert Scrub (1.54-acre) vegetated land. The land is privately owned and located within the SCE transmission line right-of-way.

WA-6-6S15-MPR-32: Expansion of Supersite 6S15. Supersite 6S15 requires expansion to the south to provide adequate workspace for material and equipment staging during removal of an existing guy anchor located outside of the currently approved work area. The new work area will require minimal ground disturbance in preparation for use. The total temporary disturbance area associated with the new work area consists of approximately 0.03-acre of desert scrub. The land is privately owned and located within the SCE transmission line right-of-way.

### **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 November 19, 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 is located within the proposed MPR work areas.

**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 using aerial imagery, publicly available data, and relevant Project data to determine the potential for special-status species to occur at the new work areas. The MPR work areas, besides WS-6-CedarRd-MPR-32 hydrant, were also included in the study area for previous habitat assessments and focused surveys, as well as recent preconstruction surveys. No previous surveys were conducted at the proposed WS-6-CedarRd-MPR-32 hydrant.

A preconstruction survey will be conducted prior to initiating work in each new work area. The new work areas were covered in FRED Preconstruction Survey IDs 000132, 000079, 000042, 000175, 000176, 000178, 000190, 000146, 000195 and 000147.

Desert Tortoise (DETO): The new work areas in Segment 6 (WSS-6-6N25-MPR-32, WA-6-6S15-MPR-32) are located within desert tortoise modeled habitat. No definitive signs of DETO were observed during the 2011 and 2012 protocol desert tortoise surveys, during the currently active preconstruction surveys, or during daily sweeps and monitoring, although desert tortoises are present in other portions of the Project area. With implementation of the desert tortoise mitigation measures and permit conditions; however, no direct impacts to DETO are anticipated. To minimize temporal habitat loss, a portion of approved work area that was determined to no longer be necessary for construction will be removed from the Project data and avoided. The other new work areas are not located within the current known range of the DETO; therefore, no impacts to DETO are anticipated at those locations.

Special-Status Terrestrial Herpetofauna: No special-status terrestrial herpetofauna have been observed within the new work areas during prior Project-related surveys. However, many species have the potential to occur throughout the Project area. For instance, an orange-throated whiptail was observed within the 4X51 work area on the west side of Palmer Avenue (Species Event 000059). A preconstruction survey for each work area will be conducted prior to use. With implementation of the mitigation measures and biological monitoring during construction, no significant impacts to special-status terrestrial herpetofauna are anticipated.

Burrowing Owl (*Athene cunicularia*): Burrowing owl habitat in the form of annual and perennial grasslands and scrublands characterized by low-growing vegetation is present throughout the Project area.

Two burrowing owls (FRED Species Events 000201, 000322) were observed on June 1, 2019 and October 9, 2019 approximately 800 feet southwest and 550 northeast, respectively, of WA-6-6S15-MPR-32 and an

active BUOW burrow (FRED Nest Event 000302; FRED Species Event 000212) is located approximately 900 feet northeast of WA-6-6S15-MPR- 32. The burrow was originally identified during Segment 6 preconstruction surveys conducted on March 19, 2019. Considering the distances from the new work area, no impacts are anticipated.

Active burrowing owl burrows observed during preconstruction surveys and during construction will be mitigated in accordance with the Burrowing Owl Management and Passive Relocation Plan. With implementation of the mitigation measures, including appropriate avoidance buffers and biological monitoring during construction, no impacts to burrowing owls are anticipated.

Nesting Birds: Suitable substrates for nesting birds protected by the California Fish and Game Code and Migratory Bird Treaty Act, including trees, shrubs, man-made structures, and the ground surface, can be found throughout the Project area. No active nest buffers intersect the work areas at this time. Preconstruction surveys, including surveys for nesting birds during the avian breeding season (Jan 1 – Aug 31), will be conducted prior to the initiation of construction use in each area. If active nests are identified, avoidance buffers will be established in accordance with the Nesting Bird Management Plan. With implementation of the NBMP, no impacts are anticipated.

Observations of special-status bird species (e.g., Loggerhead Shrike) have been made in the vicinity of the new work areas. However, the observations were ephemeral and are not associated with active nests. Therefore, no impacts are anticipated. If active nests are discovered in the future, impacts will be mitigated in accordance with the NBMP.

Listed Riparian Birds: Historically occupied habitat for the least Bell's vireo (LBVI) and suitable habitat for the Southwestern willow flycatcher (SWFL) is mapped within the vicinity of GS-4-3S01-4S60-1-MPR-32.

Suitable habitat for riparian birds (LBVI/SWFL) is located adjacent to WA-4-4X04-3-SE-MPR-32 (near supersites 4X04-SE-1 and 4X04-3-SE). After several consecutive years of protocol surveys; however, no LBVI or SWFL nests or territories have been observed.

Additionally, areas previously mapped as suitable habitat for the riparian birds are located in the vicinity of GS-4-4x48-4x50- 1-MPR-32 and GS-4-4x48-4x50-3-MPR-32. No LBVI or territorial SWFL were detected in this habitat stand during 2018 or 2019 protocol surveys, or during preconstruction surveys of the areas. Furthermore, during a recent habitat assessment update, a LBVI/SWFL qualified biologist determined that the areas are no longer suitable (report forthcoming).

If active LBVI or SWFL nests are identified during future preconstruction surveys or within 500 feet of construction activities, avoidance buffers will be established and the nest will be monitored according to MM WIL-1c and, since these locations are within the WR-MSHCP, the *Determination of Biologically Equivalent or Superior Preservation for Riverine/Riparian Areas, Vernal Pools, and Associated Species*, would apply. With implementation of these avoidance and minimization measures and biological monitoring during construction, no impacts to listed riparian birds are anticipated.

No suitable habitat for riparian birds (LBVI/SWFL) occurs within 500 feet of the Segment 6 work areas. Therefore, no impacts are anticipated.

Coastal California Gnatcatcher (CAGN): The proposed GS-4-4X50-4X51-MPR-32 (opposite side of Palmer Avenue from 4X51) is located within 500 feet of suitable CAGN habitat. In the history (2014-2018) of protocol surveys conducted for the Project in this area, there have been no detections of CAGN. Results were negative during the May 7- 9, 2018 preconstruction survey (000041).

Suitable habitat for coastal California gnatcatcher (CAGN) overlaps GS-4-4X41-4X42-1-MPR-32 and a new work area. In the history (2014-2018) of protocol surveys conducted for the Project in this area, there have been no detections of CAGN. No CAGN were observed in this area during the June 3, 2019 preconstruction survey (000175).

Preconstruction surveys, including surveys for nesting birds, will be conducted in the new work areas during the avian breeding season (Jan 1 – Aug 31). With monitoring and implementation of mitigation measures, no impacts to CAGN are anticipated.

Golden Eagle: Based on habitat assessments and protocol surveys conducted for the Project, no suitable nesting habitat for golden eagles is located within 2 miles of the new Segment 4 and 6 work areas. Based on habitat assessments, limited suitable nesting habitat for golden eagles was identified within 2 miles of the new Segment 6N25 work area. Protocol aerial surveys conducted for the Project in 2019 showed no golden eagle nests within 2 miles of the Project right-of-way. With monitoring and implementation of mitigation measures, no impacts are anticipated.

Stephen's Kangaroo Rat: Areas of suitable habitat for Stephens' kangaroo rat (SKR) are mapped approximately 55 feet east of the proposed GS-4-3S01-4S60-1-MPR-32. Work areas east of 4X50 and west of 4X44 are also located in the vicinity of mapped suitable habitat for SKR; however, only GS-4-4X48-4X50-2-MPR-32, and 4-4X48-4X50-3-MPR-3232 intersect mapped suitable habitat. Work areas GS-4-4X29-4X30-MPR-32 and WSS-4-4X29-MPR-32 are also located within mapped suitable habitat for SKR.

A habitat assessment, pedestrian surveys, and several consecutive years of trapping surveys have been conducted within suitable habitat areas in the Project area. Based on a lack of historic data, habitat conditions, and negative results over several years of surveys, SKR are not expected. Therefore, no impacts are anticipated.

The other new work areas outside of Segment 4 are not located within suitable habitat for the species; therefore, no impacts are anticipated.

Special-Status Bats: A potential roost site (FRED\_Habitat\_000043) was identified approximately 9 feet northeast of GS-4-3S01-4S60-1. No bats were detected during emergence surveys at FRED\_Habitat\_000043; however, the adjacent field to the east of this habitat feature serves as an important forage site for a high diversity of bats. Construction has been using the access road for ingress/egress near the new work area and no daytime emergence/abandonment or other unusual behavior has been observed at this potential roost location in response to construction activities (ingress/egress).

Previously mapped suitable bat habitat is located approximately 25 feet west of towers 4N44 and 4S44. However, a bat assessment conducted by bat approved MOU bat specialist on May 9, 2018 indicates that no suitable bat habitat exists within the survey area.

Bat surveys conducted by agency-approved bat biologists in 2018 indicate that large cottonwood and sycamore trees associated with the golf course between supersites 4X37 and PP123305 (FRED Habitat Events 000002, 000034, and 000005) serve as bat roosting sites for species including Yuma myotis (FRED Species Event 000035). FRED Habitat Events 000002 and 000034 have 165-foot buffers that intersect supersite PP123305, but do not intersect the new work areas, which do not include suitable bat habitat.

Environmentally sensitive area (ESA) buffers have been established around all potential roost sites. These buffers do not intersect the new work areas. With implementation of the mitigation measures and biological monitoring during construction, no impacts to special status bats are anticipated.

No suitable bat roosting habitat or buffers occur within the other work areas; therefore, no impacts are anticipated.

Special-Status Small Mammals: Special-status small mammals such as the pallid San Diego pocket mouse, northwestern San Diego pocket mouse, American badger, desert kit fox, San Diego desert woodrat, and/or San Diego black-tailed jackrabbit can occur in many parts of the Project area. Ringtail and Palm Springs round-tailed ground squirrel 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 proposed work areas intersect occupied Los Angeles pocket mouse (LAPM) habitats in the WR-MSHCP.

Little pocket mouse subspecies (i.e., Palm Springs pocket mouse [PSPM] and LAPM) occupied habitat is widespread throughout Segment 6. Occurrences of San Diego pocket mice have been documented within Supersites WSS-4X27-4X29 and 4X27. San Diego pocket mice were previously observed at two locations approximately 150 feet west of WA-4-4X04-3-SE-MPR-32.

Five desert woodrat middens were previously observed within supersite SWA-6-6S15-MPR-29 (FRED Habitat Events 000388—000392). Desert woodrat middens have also been observed throughout the vicinity (FRED Habitat Events 000054-000055, 000058, 000060, 000110-000113, 000115-000116, 000172-000173, 000202-000203, 000263, 000279-000280, 000290, 000309, 000317-000322, 000339, 000354, 000356, 000369, 000371, 000382-000387). Sixteen active woodrat middens were observed within 10 feet of access roads and within supersites during the last preconstruction survey (FRED Habitat Events 000608-000624). A 10-foot no-entry buffer was established around each midden using ESA signs. If construction determines avoidance of a buffer is not possible, a qualified biologist will relocate the midden in accordance with the Special Status Small Mammal Avoidance and Minimization Plan.

Potential impacts will be addressed according to the Small Mammals Avoidance and Minimization Plan. With implementation of the plan, no significant impacts are anticipated.

Special-Status Plants: Yucaipa onions and Plummer's mariposa lilies were observed in the vicinity of proposed GS-4-4X50-4X51-MPR-32. However, no special-status plants were observed within the work area itself, and due to the high levels of disturbance and compaction along the roadside, no impacts to these plant species are anticipated. Should they occur in the future, the Yucaipa onion will be addressed in accordance with the Narrow Endemic/Criteria Area Plant DBESP and the Plummer's mariposa lily, which is a CRPR 4 plant and adequately conserved in the MSHCP, will be avoided to the extent feasible.

Coachella Valley milk-vetch (*Astragalus lentiginosus* var. *coachellae*; FE, CRPR 1B.2) modeled habitat overlaps supersite 6S26 and associated access roads between the supersite. However, no milk-vetch plants have been detected after many years of focused surveys. Therefore, no impacts are anticipated. If milk-vetch plants are discovered in the future, they will be addressed in accordance with the Biological Opinion and/or via the CV-MSHCP, in coordination with the CVCC and USFWS.

Chaparral sand verbena (*Abronia villosa* var. *aurita*; CRPR 1B.1) occupied habitat intersects WSS-6-6N25-MPR-32 and associated access roads between the supersites. The boundaries of the occupied habitat were staked with ESA signs along the access roads. If additional special-status plants are later identified during clearance sweeps/monitoring, ESA buffers will be established, and special-status plants will be avoided to the extent feasible. Many of the work areas along this segment have been staked with a 3-foot offset from the approved work limits, which will serve to minimize impacts to occupied habitat. Occupied habitat will continue to be avoided to the extent feasible. With implementation of these avoidance strategies and based on current levels of disturbance, the Project is not expected to impact greater than 10 percent of the local occurrences.

In addition to avoidance, drive and crush methods will be used to the extent possible for temporary work areas. If grading of temporary work areas is required, topsoil salvage will occur. Seed was also collected from these populations in 2019 and will be planted during the restoration phase of the Project. If additional special-status plants are later identified during clearance sweeps/monitoring, ESA buffers will be established, and special-status plants will be avoided to the extent feasible. As described above under "desert tortoise," a portion of approved work area that was determined to no longer be necessary for construction will be removed from the Project data and avoided. While no *Abronia* plants have been observed in this area, it is within 200 feet of occupied habitat and therefore, may support the species in the future. These methods for addressing unavoidable impacts to special-status plants are consistent with the Special-status Plant Salvage and Relocation Plan.

Smooth tarplant (*Centromadia pungens* ssp. *laevis*; CRPR 1B.1, WR-MSHCP Criteria Area Plant Species) occurs throughout the habitat immediately north of the El Casco paved access road. Plants have not been previously identified within the new work areas; therefore, no impacts to smooth tarplant are anticipated. Current polygons accurately delineate the locations of these plants where they occur. ESA signs have been established in the field.

Regulated Trees: No tree trimming or tree removal is required for construction activities within the new work areas. One Englemann Oak (*Quercus engelmannii*; CRPR 4.2) was observed between towers 4N48 and 4N49 approximately 710 feet from the new work area. The oak will not be impacted by construction.

Coachella Valley Jerusalem Cricket: In addition to desert tortoise modeled habitat and chaparral sand verbena occupied habitat, WSS-6-6N25-MPR-32 is located in Coachella Valley Jerusalem cricket modeled habitat. Many of the work areas along this sub-segment have been staked with a 3-foot offset from the approved work limits, which will serve to minimize impacts. The permanent work areas in this area have been graded but drive and crush methods will be used to the extent feasible for temporary work areas such as WSS-6-6N25-MPR-32 to minimize habitat loss. If grading of temporary work areas is necessary, soil salvage will occur. Upon completion of construction, temporary work areas will be restored in accordance with the HRRP. In addition, to minimize temporal habitat loss, a portion of approved work area in cricket and tortoise habitat that was determined to no longer be necessary for construction will be removed from the Project data and avoided.

Jurisdictional Waters: Wetland and non-wetland jurisdictional features are located throughout the Project area. No jurisdictional features intersect the new work areas. One non-wetland jurisdictional feature is located in-between GS-4-3S01-4S60-1 and GS-4-3S01-4S60-1-MPR-32. A second non-wetland jurisdictional feature is located south of GS-4-4X46-4X47-1-MPR-32. A third non-wetland jurisdictional feature is located between the new work areas between 4X42 and 4X41. A fourth non-wetland water feature is located south of WA-4-4X04-3-SE-MPR-32. ESA signs will be established at the edges of work areas and BMPs will be established in accordance with the SWPPP. No impacts to jurisdictional features are expected to result from use of the new work areas.

**Cultural Resources**: With the exception of WS-6-CedarRd-MPR-32, the new work areas are located within the WOD area of potential effect (APE) and were covered within the record search data that was conducted during previous WOD surveys and studies. The record search and survey results for the new work areas were negative for cultural resources. *Williams, Audry. 2016. Cultural Resources Management Plan for Southern California Edison Company's West of Devers Transmission Line Upgrade Project, Riverside and San Bernardino Counties, California. Prepared by Southern California Edison.*

WS-6-CedarRd-MPR-32 has been covered within a new record search conducted for this MPR. The record search and survey results for WS-6-CedarRd-MPR-32 were negative for cultural resources. *Mclean,*

*Roderic, Natalie Brodie, Jacqueline Hall, Shannon Carmack, Phil Fulton, Ingri Quon, Erin Martinelli, Richard Erickson, and Jay Michalsky. 2013. Cultural Resources Assessment and Class III Inventory Volume I. West of Devers Project San Bernardino and Riverside Counties, California. Prepared for Southern California Edison. Prepared by LSA Associates.*

**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:** The WOD Paleontological Resources Mitigation and Monitoring Plan (PRMMP) requires full-time, qualified paleontological construction monitoring in areas determined to have moderate (PFYC 3) to very high (PFYC 5) sensitivity. Sediments of unknown (PFYC U) sensitivity shall be monitored by a qualified paleontological monitor on a part-time basis and geologic units with very low (PFYC 1) or low (PFYC 2) sensitivity may be spot checked to confirm paleontological sensitivity.

The proposed work area listed below is located in an area of unknown (PFYC U) paleontological sensitivity and will be monitored by a qualified paleontological monitor on a part-time basis:

■ WSS-6-6N25-MPR-32

The proposed work areas listed below are located in areas of low (PFYC 2) paleontological sensitivity; therefore, the sites may initially be spot checked by a qualified paleontological monitor to confirm the PFYC 2 classification:

- GS-4-3S01-4S60-1-MPR-32
- GS-4-4X50-4X51-MPR-32
- Portions of GS-4-4X48-4X50-1-MPR-32
- Portions of GS-4-4X48-4X50-2-MPR-32
- Portions of GS-4-E-4X42-MPR-32
- GS-4-4X29-4X30-MPR-32
- WSS-4-4X29-MPR-32
- WA-4-4X04-3-SE-MPR-32
- WA-6-6S-15-MPR-32
- WS-6-CedarRd-MPR-32

The proposed work areas listed below are located in areas of moderate (PFYC 3) paleontological sensitivity and require full time monitoring during ground-disturbing construction activities:

- Portions of GS-4-4X48-4X50-1-MPR-32
- Portions of GS-4-4X48-4X50-2-MPR-32
- GS-4-4X48-4X50-3-MPR-32
- GS4-4X46-4X47-1-MPR-32
- WSS-4-4X44-2-MPR-32
- WSS-4-4X44-1-MPR-32
- GS-4-W-4X43-3-MPR-32
- Portions of GS-4-E-4X42-MPR-32
- GS-4-4X41-4X42-1-MPR-32
- GS-4-4X41-4X42-2-MPR-32
- GS-4-W-4X38-1-MPR-32
- GS-4-W-4X38-2-MPR-32

No proposed work areas are located in an area of very high (PFYC 5) paleontological sensitivity.

**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 additional work areas 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 is 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. 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 (and also for areas to be removed from Project data to offset California gnatcatcher habitat impacts) 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.
- A preconstruction biological survey shall be conducted prior to initiating work in each new work area.
- The proposed MPR work sites shall be monitored in accordance with the PRMP.

Sincerely,



John Forsythe  
CPUC Environmental Project Manager

cc: V. Strong, Aspen