

**PUBLIC UTILITIES COMMISSION**

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June 4, 2020

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 #37

Dear Mr. Gutierrez,

On June 3, 2020, Southern California Edison (SCE) submitted a request for Minor Project Refinement (MPR) #37 for the installation of scour protection measures at seven tower sites and for three new temporary work areas to facilitate wire removal. The seven scour protection measures are located in Segment 6 in Riverside County. One temporary work site is located at the Vista Substation in Grand Terrace and the other two temporary work sites are located on Segment 3 in the Cities of Colton and Redlands in San Bernardino County. The installation of the scour protection measures and temporary 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 #37 for the installation of scour protection measures at seven tower sites and for three new temporary work areas to facilitate wire removal in support of 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 June 3, 2020 are presented below (indented):

## **SCOUR PROTECTION, SEGMENT 6**

WOD Mitigation Measure WR-3a and SCE design standards require that SCE conduct a determination as to the lateral erosion and 100-year scour potential for watercourses near proposed structures and other above-ground features. This determination was conducted by a registered professional engineer with expertise in river mechanics, in accordance with MM WQ-3. The determination identified specific structures (listed below) that may be subject to scour and/or lateral movement in a watercourse. As a result of the scour analysis, SCE is proposing the construction of scour protection countermeasures, including protective subterranean rip-rap/grouted rip-rap structures adjacent to and as extensions of the concrete foundations for recently constructed lattice steel towers, to protect the structures against 100-year scour and/or lateral erosion.

The scour protection countermeasures will be constructed primarily of buried/partially buried riprap/grouted riprap in the following 2 configurations:

1. "Wing-walls" – Rip-rap wing walls constructed just upstream of the transmission structures for which the walls provide protection. In general, the top of the walls will remain approximately 6 inches above ground surface and buried at depths of 4 to 6 feet below the ground surface.
2. Lattice Steel Tower (LST) Foundation Boxes – Rip-rap boxes constructed to surround LST tower legs. The "box" will be approximately 25 feet wide with the individual LST tower leg foundation in the middle of the box. In general, these structures will be buried at a depth of 3.75 feet below the ground surface.

The detailed specifications for the scour protection countermeasures are based on the engineering report prepared for SCE by the Wilson Mikami Corporation for protection of LSTs.

### **Project Description Change Only – Impacts to Permitted Permanent Impact Areas**

The scour protection countermeasures will be located in areas previously approved as permanent tower disturbance areas. Where they intersect jurisdictional features, the impacts have been previously permitted. Scour protection countermeasures will be constructed within the previously approved work areas.

6N23 - Expected high velocities near the site require a high-class rip-rap due to proximity of the wash located east of the site. Due to the size of riprap, a windrow revetment is the recommended countermeasure. The permanent impacts associated with these countermeasures total 0.01-acre of the previously approved disturbed tower pad area.

6S41 - The tower is located within a large flow area with numerous flow lines with indicators of concentrated runoff (gullies and/or wash) at the tower location. Rip-rap scour countermeasures are required to stabilize 6-10-inch diameter loose cobbles and vegetation debris from upstream. The permanent impacts associated with these countermeasures total 0.046-acre of the previously approved disturbed tower pad area.

6N42 - The tower is located within a large flow area with numerous flow lines with indicators of concentrated runoff (gullies and/or wash) at the tower location. Rip-rap scour countermeasures are required to stabilize 6-10-inch diameter loose cobbles and vegetation debris from upstream. The permanent impacts associated with these countermeasures total 0.021-acre of the previously approved disturbed tower pad area.

6S42 - The tower is located within a large flow area with numerous flow lines with indicators of concentrated runoff (gullies and/or wash) at the tower location. Rip-rap scour countermeasures are required to stabilize 6-10-inch diameter loose cobbles and vegetation debris from upstream. The permanent impacts associated with these countermeasures total 0.056-acre of the previously approved disturbed tower pad area.

6N43 - Due to the proximity of a wash east of the tower site, the northeast tower foundation of Tower 6N43 requires construction of the countermeasures recommended in the Scour Analysis. The permanent impacts associated with these countermeasures total 0.005-acre of the previously approved disturbed tower pad area.

6N44 - A gully bisects the Tower 6N44 location and another gully exists east of the tower site. Scour countermeasures are required at the northwest, northeast, and southeast tower foundation in accordance with the Scour Analysis Report. The permanent impacts associated with these countermeasures total 0.042-acre of the previously approved disturbed tower pad area.

6S44 - Scour countermeasures to be implemented at northeast foundation of 6S44 only, due to the gully that exists east of the tower site. The permanent impacts associated with these countermeasures total 0.014-acre of the previously approved disturbed tower pad area.

### **TEMPORARY WORK AREAS FOR WIRE REMOVAL**

TWA-2-VistaSub-MPR-37 - A new temporary 0.81-acre work area located immediately adjacent to the north side of the Vista Substation is required to stage material and equipment to facilitate the fiber-optic cable and new conduit installation from 220-kV Structure 2N36 to an existing manhole inside the Vista Substation. The new work area will not require site improvements in preparation for use since the area is paved. The new work area is located within the SCE Vista Substation property and the Grand Terrace public ROW and consists of approximately 0.81-acre of developed/disturbed land.

GS-3-3X50-MPR-37 - A new temporary 0.06-acre work area located immediately adjacent to the east side of WSS-3-3X50-MPR-34 is required to safely stage material and equipment associated with the wire removal from Supersites 3X29 to 3X50 and 3X51 to 3X65. The new work area will be accessed from WSS-3-3X50-MPR-34. The new work area will be leveled to facilitate the guard structure construction using digger derrick trucks and other equipment associated with wreck-out activities. To the extent possible, the guards will be positioned on existing disturbed or degraded areas within the delineated work area. The new work area is privately owned, consists of approximately 0.06-acres of grassland/forbland, and is located entirely within the SCE transmission line right-of-way in San Bernardino County.

GS-3-3X33-3X35-MPR-37 - A new temporary 0.32-acre work area located east of Redlands Boulevard and south of SF-3-3X33-3X35-2 is required to safely remove the existing Devers-Vista #1 and Devers - San Bernardino #1 circuit wires overhead. Guard structures will be erected within the new work area, on each side of an existing distribution line, to prevent circuit interruptions on the line in the event of a line drop. The work area will be accessed from SF-3-3X33-3X35-2. The new work area will be leveled to facilitate the guard structure construction using digger derrick trucks and other equipment associated with wreck-out activities. To the extent possible, the guards will be positioned on existing disturbed or degraded areas within the delineated work area. The new work area is privately owned, consists of approximately 0.22-acre developed/disturbed land and 0.10-acre riparian woodland, and is located entirely 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 area on June 4, 2020. 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 project biological data. The three new work areas were covered during previous surveys, including FRED Preconstruction Survey IDs 000163; 000221, 000121; and 000117, 000120. The seven scour sites are currently active and were covered during FRED Preconstruction Survey IDs: 000146 and 000173. A preconstruction survey will be conducted prior to initiating work in the new work areas.

Desert Tortoise (DETO): The three new work areas are not located within the range of this species; therefore, no impacts to DETO are anticipated. The seven scour countermeasure sites are located within DETO modeled habitat. A potential (class 4) DETO burrow was observed within supersite 6X42 approximately 25 feet south of the access road during the 2011 and 2012 protocol DETO surveys; however, no DETO or sign have been observed within the scour countermeasure sites during preconstruction surveys, protocol DETO surveys, or construction monitoring covering these areas. With surveys and monitoring, no impacts are anticipated.

Special-Status Terrestrial Herpetofauna: No special-status terrestrial herpetofauna have been observed within the three new work areas or seven scour countermeasure sites during project-related surveys. However, many species have the potential to occur throughout the Project area. A preconstruction survey of the three new work areas will be conducted prior to use; the seven scour countermeasure sites are currently active and biological sweeps will continue. With implementation of mitigation measures and biological monitoring during construction, no significant impacts to special status terrestrial herpetofauna are anticipated.

Burrowing Owl (BUOW): BUOW habitat in the form of annual and perennial grasslands and scrublands characterized by low-growing vegetation is present throughout the Project area. No occupied burrows or associated buffers currently intersect the proposed three new work areas and seven scour countermeasure sites. Active BUOW burrows observed during preconstruction surveys and during construction would be mitigated in accordance with the Burrowing Owl Management and Passive Relocation Plan. With implementation of mitigation measures, including appropriate avoidance buffers and biological monitoring during construction, no impacts to BUOW 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. An active red-tailed hawk (*Buteo jamaicensis*) nest exists within the vicinity of TWA-2-VistaSub-MPR-37 (FRED\_000556) and a common raven nest (FRED\_000835) is located in the vicinity of GS-3-3X33-3X35-MPR-37 (FRED\_000835); however, no active nest buffers intersect the proposed work areas. Red-tailed hawk nest (FRED\_000556) is located approximately 414 feet south of TWA-2-VistaSub-MPR-37 and common raven nest (FRED\_000835) is located approximately 850 feet east of GS-3-3X33-3X35-MPR37, both well outside the existing nest buffers. With implementation of the NBMP, no impacts are anticipated. During the avian breeding season (Jan 1 – Aug 31), nesting bird surveys will be conducted prior to the initiation of construction in the three new work areas and seven scour

countermeasure sites. If active nests are identified, avoidance buffers will be established in accordance with the Nesting Bird Management Plan.

Observations of special-status bird species [e.g., Cooper's hawk (FRED\_Species\_000321), Le Conte's thrasher (FRED\_Species\_000167), American white pelican (FRED\_Species\_000415), and loggerhead shrike (FRED\_Species\_000261)] have occurred in the vicinity of some of the proposed MPR #37 sites. However, the observations were ephemeral and are not associated with active nests. Therefore, no impacts area anticipated. If active nests are discovered in the future, impacts will be mitigated in accordance with the NBMP.

Listed Riparian Birds: No suitable habitat for riparian birds (least Bell's vireo [LBVI]/Southwestern willow flycatcher [SWFL]) occurs within 500 feet of the proposed MPR #37 sites. Therefore, no impacts are anticipated.

Coastal California Gnatcatcher (CAGN): No suitable habitat for CAGN occurs within 500 feet of the proposed MPR #37 sites. Therefore, no impacts are anticipated.

Golden Eagle (GOEA): Based on aerial habitat assessments, limited suitable nesting habitat for GOEA was identified within two miles of the seven scour countermeasure sites in Segment 6. Protocol aerial surveys conducted for the Project in 2019 showed no GOEA nests within 2 miles of the survey area. GOEA have been observed foraging north and east of Segment 6. On March 5, 2020, one GOEA of unknown age was observed soaring on the ridge approximately 0.5 miles NNW of Tower 6N23 and drifted out of sight to the north (FRED Species Event 000414). Based on information from the Coachella Valley Conservation Commission, a perennial GOEA nest is located in Big Morongo Canyon, more than 2-miles from the scour countermeasure sites. Therefore, no impacts are anticipated.

Based on aerial habitat assessments and protocol surveys conducted for the Project, no suitable nesting habitat for GOEA is located within two miles of the proposed three new work areas. Following protocol aerial surveys conducted for the Project, there are no known GOEA nests within two miles of the new work areas; however, an observation of one GOEA (FRED\_Species\_000111) occurred in the vicinity of GS-3-3X33-3X35-MPR-37 but the observation was ephemeral and not associated with an active nest. Therefore, no impacts area anticipated. If active nests are discovered in the future, impacts will be mitigated in accordance with the NBMP.

Stephen's Kangaroo Rat (SKR): Areas of suitable habitat for Stephens' kangaroo rat (SKR) are mapped within GS-3-3X50-MPR37. A habitat assessment, pedestrian surveys, and several consecutive years of trapping surveys have been conducted within suitable habitat areas throughout the Project. 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. To minimize temporal habitat loss, a portion of previously approved work area in San Bernardino County, which was determined to no longer be necessary for construction, will be removed from the Project data and avoided to offset mapped habitat impacts to GS-3-3X50-MPR-37.

The other two new work areas and seven scour countermeasure sites are not located within suitable habitat for the species; therefore, no impacts to SKR are anticipated.

Special-Status Bats: No suitable bat roosting habitat or buffers occur within the three new work areas or seven scour countermeasure sites; therefore, no impacts to special-status bats 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 anticipated to occur in the proposed MPR #37 sites.

Little pocket mouse (including Los Angeles pocket mouse [LAPM] and Palm Springs pocket mouse [PSPM] subspecies) occupied habitat is widespread throughout Segment 6. Historical observations of San Diego pocket mouse occur within supersites 6X41, 6X42, 6X43, and 6X44. The Project has been designed to minimize impacts to little pocket mice to the extent feasible. If any of these species are found, potential impacts will be addressed according to the Special Status Small Mammals Avoidance and Minimization Plan.

A 10-foot no-entry buffer was established around desert midden observed near 6S41, using Environmentally Sensitive Area (ESA) signage. 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.

Special-Status Plants: Coachella Valley milk-vetch (*Astragalus lentiginosus* var. *coachellae* [CVMV]; FE, CRPR 1B.2) modeled habitat overlaps scour supersites 6S23, 6S41 and 6X42. Previous comprehensive surveys have failed to locate CVMV in the survey area. Chaparral sand verbena (*Abronia villosa* var. *aurita*; CRPR 1B.1) occupied habitat intersects supersites 6X23 and associated access roads. White-bracted spineflower (*Chorizanthe xanti* var. *leucotheca*; CRPR 1B.2) occupied habitat are located along the access road approximately 300 feet west of supersite 6S41, approximately 200 feet north of supersite 6X43, and south of 6X42. The special status plants have been flagged for avoidance.

If additional special-status plants are later identified during clearance sweeps/monitoring, they 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.

Regulated Trees: No tree trimming or tree removal is required for construction activities within the three new work areas or seven scour countermeasure sites. Therefore, no impacts are anticipated.

Jurisdictional Waters: Where previously approved temporary and permanent work areas intersect jurisdictional features, SCE obtained permits pursuant to Sections 404 and 401 of the Clean Water Act and Section 1600 et seq. of California Fish and Game Code, as appropriate. The permanent scour design countermeasures were determined necessary by a registered professional engineer, to protect the new transmission line towers against 100-year scour and/or lateral erosion as required by MM WR-3a. The countermeasures are considered fill or permanent impacts with regard to jurisdictional features. Where the scour protection countermeasures intersect jurisdictional features in previously approved permanent work areas, the activity would only constitute a project description change, as permanent impacts were already permitted and mitigated accordingly. Where scour protection countermeasures intersect jurisdictional features within temporary work areas, the area would now be a permanent impact. The USACE, SWRCB, and CDFW have been notified of the proposed activities and SCE will amend the permits and mitigate accordingly, if/as needed as directed by the agencies.

Non-wetland water features intersect scour site countermeasures to be constructed at tower sites 6S41 and 6N42. No jurisdictional water features intersect the other scour countermeasure sites or new work areas. With stormwater pollution prevention plan BMPs in place, no impacts to jurisdictional waters are anticipated in these locations.

**Cultural Resources:** The three new work areas and seven scour countermeasure sites are located within the WOD 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 and scour countermeasure sites were negative for cultural resources (Williams, 2016).

**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.

New work area GS-3-3X50-MPR-37 is located within in area of moderate PFYC 3 paleontological sensitivity and requires full-time construction monitoring by a qualified paleontological monitor, if grading or excavation occur, in accordance with the PRMMP. The other two new work areas and seven scour countermeasure sites are located within areas of low PFYC 2 paleontological sensitivity and may initially be spot checked to confirm paleontological sensitivity by a qualified paleontological monitor, if grading or excavation are required, in accordance with the PRMMP.

**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 installation of scour protection measures and the use of additional work areas described in this MPR are no different than what was described in NTP #4. 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 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. Potential MPR #37 impacts to jurisdictional waters is described above under Biological Resources.

**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 notify the CPUC and provide Collector data for the three new work areas covered in this MPR prior to the start of construction activities.
- SCE will amend wetland permits and mitigate accordingly, if/as needed as directed by the agencies. Amended permits shall be provided to the CPUC prior to work in affected areas.
- 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.
- In accordance with the PRMMP, a paleontological monitor shall be on site to monitor ground-disturbing construction activities.

Sincerely,



John Forsythe  
CPUC Environmental Project Manager

cc: V. Strong, Aspen