

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



November 20, 2023

Sylvia Granados
Southern California Edison
8631 Rush St, General Office 4 – 235E
Rosemead, CA, 91770

RE: West of Devers Upgrade Project: Minor Project Refinement #55

Dear Ms. Granados,

On November 1, 2023, Southern California Edison (SCE) submitted a request for Minor Project Refinement (MPR) #55 to update the habitat restoration success criteria in the West of Devers Habitat Restoration and Revegetation Plan (HRRP) and the Invasive Weed Management Plan (IWMP) for the West of Devers Upgrade Project. Specifically, the success criteria listed in HRRP Section 4.2.2 and IWMP Section 4.3.2 refers to relative amounts of native and non-native cover within a given restoration area. SCE states, that while the success criteria has good merit, the goal is not achievable, given pre-construction site conditions exceed the criteria, high levels of ambient weed levels of surrounding areas influence the restoration sites, and the sites cannot support the maximum density of native plants required to meet the criteria.

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 #55 to update the habitat restoration success criteria in the West of Devers HRRP and the IWMP is granted by CPUC based on the factors described below.

SCE MPR Request. Excerpts from the SCE MPR request are presented below (indented):

ISSUE

The success criteria refers to relative amounts of native and non-native cover within a given revegetation area. The criteria requires that native species make up the majority (80 percent) of vegetation cover, while recognizing the fact that non-native species will invade the site and will realistically comprise a portion (limited to 20 percent or less) of the total cover. This criterion compares native and non-native cover within a site, but it does not compare a revegetation site to reference sites or pre-disturbance condition.

ANALYSIS

Pre-project conditions are not consistent with the HRRP and IWMP success criteria and would not meet the success criteria prior to disturbance.

Pre-project native and non-native vegetation cover was collected for each restoration area. This pre-project data also reflects the native and non-native cover of areas surrounding the restoration areas (reference sites) both pre- and post-project. Analysis of pre-project restoration area conditions indicates only 10 percent (27 of 268) of the restoration areas would meet the 80 percent relative native to 20 percent nonnative cover success criteria. This shortfall is largely due to temporarily impacted project areas (restoration areas) including disturbed habitats with higher non-native cover. When grouped into vegetation types, pre-project native plant cover averages 53 percent- Coastal sage scrub vegetation types, 50 percent- Chaparral habitat types, and 32 percent- Desert vegetation types, with non-native plant cover averaging 33 percent, 38 percent, and 30 percent, respectively (See Table 1 below). On average, bare ground in these habitat types accounts for 14 percent- Coastal sage scrub vegetation types, 13 percent- Chaparral habitat types, and 39 percent- Desert vegetation types.

Table 1. Pre-Project Native: Non-Native Cover by Vegetation Type

Vegetation Type	Native Cover	Non-Native Cover	Relative Cover
Coastal Sage Scrub	53	33	62:38
Chaparral	50	38	57:43
Desert	32	30	52:48

As a result, if the 80:20 success criteria were to be applied, restoration areas would, on average, need to have a post-restoration reduction in absolute non-native cover of 25 percent- coastal sage scrub vegetation types, 30.5 percent- chaparral habitat types, and 25.2 percent- desert vegetation types when compared to pre-project conditions and adjacent non-native plant cover (see Table 2 below). Because of the high nonnative cover and constant influence of non-native species encroachment into the revegetation areas, this success criterion is likely not achievable.

Table 2. Non-Native Cover Reduction Required by Habitat Type

Vegetation Type	Native Cover Success Criteria (60% of Pre-Project Native Cover)	Non-Native Cover Maximum Tolerance with 80:20 Success Criteria	Reduction in Non-Native Cover compared to Pre-Project Conditions
Coastal Sage Scrub	31.8	8	-25%
Chaparral	30	7.5	-30.5
Desert	19.2	4.8	-25.2

PROPOSED REVISION

SCE proposes adjusting the success criteria to have the restoration areas relative native cover to non-native cover ratio equivalent or better than pre-project site conditions, on a site-by-site basis. Under this criterion, habitats with higher native cover and lower non-native cover pre-project, will be restored to similar or better conditions. For example, sites with 70 percent native cover and 10 percent non-native cover would be restored to a relative cover of 87.5:12.5 or better, while areas with high non-native cover would have a greater tolerance for non-native species and be restored to similar or better conditions compared to pre-project. Further, sites with 30 percent native cover and 20 percent non-native cover would be restored to a relative cover of 60:40 or better, which is lower than the current criteria.

Specifically, restoration site M12-T2, classified pre-project as *Acacia greggii* shrubland had 42 percent native cover and 28 percent non-native cover; a native to non-native ratio of 60:40 (see Table 3 below). To meet

success criteria, the restoration site would need to have a minimum of 25.2 percent native cover (60% native cover compared to pre-project conditions) and 16.8 percent non-native cover to meet the 60:40 native to non-native cover ratio, an 11.2 percent reduction in non-native cover compared to pre-project conditions.

Table 3. Restoration Area M12-T2

Site ID	Vegetation Type	Pre-Project Conditions			Restoration Site Criteria	
		Native Cover (%)	Non-Native Cover (%)	Native: Non-Native Ratio	Native Cover (%)	Maximum Non-Native Cover (%)
M12-T2	Acacia greggii shrubland	42	28	60:40	25.2	16.8

Revised Success Criteria

Table 4. Revised Success Criteria from HRRP Table 4-3

Vegetation Type	Success Criteria Native Vegetation
Alluvial Scrub	Relative native cover to non-native cover ratio must be equivalent or better than pre-project site conditions, on a site-by-site basis.
Coast Live Oak Woodland	
Coastal Sage Scrub	
Chaparral	
Desert Scrub	
Riparian Woodland	

The success criteria refers to relative amounts of native and non-native cover within a given revegetation area. The criteria requires that native species make up a similar or greater proportion of vegetation cover than was present prior to the project disturbance. For example, if a revegetation site has an absolute native vegetation cover of 60 percent, and non-native vegetation cover of 10 percent; a relative vegetation cover of 86 percent native to 14 percent non-native cover or greater must be achieved to meet the success criteria.

Detailed Revision

Table 5. Success Criteria from HRRP Table 4-3

Vegetation Type	Success Criteria Native Vegetation
Alluvial Scrub	Relative native cover to non-native cover ratio must be equivalent or better than pre-project site conditions, on a site-by-site basis. 80 percent of vegetation cover or equivalent to predisturbance or reference cover, whichever is greater, shall be native species that occur naturally in local native habitats.
Coast Live Oak Woodland	
Coastal Sage Scrub	
Chaparral	
Desert Scrub	
Riparian Woodland	

The success criteria refers to relative amounts of native and non-native cover within a given revegetation area. The criteria requires that native species make up a similar or greater proportion ~~the majority (80 percent)~~ of vegetation cover than was present prior to the project disturbance, ~~while recognizing the fact that non-native species will invade the site and will realistically comprise a portion (limited to 20 percent or less) of the total cover. This criteria compares native and non-native cover within a site but it does not compare a revegetation site to reference sites or pre-disturbance condition.~~

For example, if a ~~10,000 square foot~~ revegetation site has an ~~total (i.e., absolute)~~ native vegetation cover of 60 percent, and non-native vegetation cover of 10 percent; a relative vegetation cover of 86 percent native to 14

~~percent non-native cover or greater must be achieved to meet the success criteria. (i.e., 6,000 square feet of the site covered by plants), comprising 4,800 square feet of native plants and 1,200 square feet of nonnative plants, this criteria would be met.~~

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. The proposed change in the subject HRRP success criterion will not result in any additional impacts in the areas of 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; therefore, no additional conditions are required.

Sincerely,

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

John Forsythe
CPUC Environmental Project Manager

cc: V. Strong, Aspen