

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



March 18, 2014

Ryan Stevenson  
Regulatory Policy & Affairs  
Southern California Edison  
8631 Rush Street, General Office 4 - G100  
Rosemead, CA 91770

**Re: Data Request #2 for the SCE West of Devers Upgrade Project - Application No. A.13-10-020**

Dear Mr. Stevenson:

The California Public Utilities Commission's (CPUC) Energy Division has reviewed all of the documents and materials that PG&E has provided, including the Application and Proponent's Environmental Assessment (PEA; dated October 25, 2013), the PEA deficiency response items submitted in late 2013 and early 2014, and SCE's data responses to date. During the analysis of the aforementioned materials, we have identified additional information items needed from SCE. Attached please find Data Request No. 2, which defines the additional questions we have at this time for biological resources. Additional data requests may be necessary to address other CEQA or NEPA topics as we move forward with EIR/EIS preparation.

We would appreciate your prompt responses to these data requests, which will allow us to maintain our current schedule. We request that responses be provided to us within two weeks (by April 2, 2014). We understand that some of these requests may require more time; however, we request that information be provided to us as soon as each response is available, along with an estimated response date for any information that can't be provided within two weeks.

Please submit one set of responses to me and one to Susan Lee at Aspen Environmental Group in San Francisco, in both hard copy and electronic format. Any questions on this data request should be directed to me at (415) 703-2068.

Sincerely,

*Billie Blanchard*

Billie Blanchard  
Project Manager for West of Devers Upgrade Project  
Energy Division CEQA Unit

Attachment

cc: Mary Jo Borak, CPUC Supervisor CEQA Unit  
Brian Paul, Bureau of Land Management  
Holly Roberts, Bureau of Land Management  
Lynette Elser, Bureau of Land Management  
Susan Lee & Hedy Koczwar, Aspen Environmental Group  
Nicholas Sher, CPUC Legal Division

# SCE West of Devers Upgrade Project

## Data Request No. 2

West of Devers Upgrade Project Data Request No. 2, includes requests related to the following issue area:

- Biological Resources

### Biological Resources

- BIO-1** The Proponents Environmental Assessment (PEA) states that aeolian sand habitat was mapped and surveyed for Coachella Valley Jerusalem cricket and Coachella giant sand treader cricket on the right-of-way (ROW), but the cricket survey report was not included in the appendices to the Biological Resources Technical Report (BRTR).
- Please provide the survey report for Coachella Valley Jerusalem cricket and Coachella giant sand treader cricket (AMEC 2012).
  - Please provide the focused survey report for sensitive herpetofauna (AMEC 2012). It is our understanding that surveys for Coachella Valley fringe-toed lizard (CVFTL) were not done in aeolian sand habitat. If not included in the AMEC reports, please provide an explanation for not surveying for CVFTL in aeolian sand habitat.
  - Additionally, if not included in the AMEC reports, please provide a map that shows the aeolian sand habitat and its relationship to the ROW. Please provide the total acreage of the aeolian sand habitat on the ROW and the acreage of temporary and permanent project impacts in this habitat.
- BIO-2** The ROW passes through four Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) conservation areas. Conservation objectives for each of them include sand source, sand transport, or both. Please indicate how the project could affect sand source and sand transport and any measures that will be taken to avoid or mitigate impacts.
- BIO-3** Please provide details on the use of drilling fluids, including storage and disposal, and any measures that will be taken to avoid or mitigate impacts to habitat, wildlife, and jurisdictional wetland and water resources.
- BIO-4** Please provide details of wire removal in special-status species habitat, critical habitat, and riparian or stream channel habitat.
- For instance, will conductor or line be allowed to contact or drag on the ground or sag down onto or drag through vegetation? If so, please provide details. Will personnel or equipment traverse drainages during wire removal?
  - Please describe anticipated impacts of wire removal on special-status species habitat, critical habitat, and riparian or stream channel habitat and any measures that will be taken to avoid or mitigate impacts.
- BIO-5** Please provide details of wire installation across riparian or stream channel habitat. Will wire installation across drainages be accomplished entirely by helicopter, or will other methods be used? Will personnel or equipment traverse drainages during wire installation? Please describe anticipated impacts of wire installation on

riparian/drainage habitat and any measures that will be taken to avoid or mitigate impacts.

**BIO-6** Botanical Resources survey report (BRC 2013).

- a. The Botanical Resources survey report states that LSA performed botanical surveys of the ten staging yards, rather than BRC. It is not clear if the LSA data is included in the BRC report. Please verify that the botanical survey results for the staging yards are included in the BRC report, or provide these results.
- b. Please provide more detailed information on the CNDDDB occurrences of Nevin's barberry on and adjacent to the ROW to support the determination that these occurrences are all extirpated and this species is not expected to be found on the project alignment.
- c. Please provide resumes of all field staff involved in botanical surveys.
- d. Please provide the 2011 GANDA vegetation survey report.
- e. Please indicate if botanical surveys will be done to determine if any rare fire-followers are found in the recent Summit Fire burn area.

**BIO-7** The BRTR lists effects by habitat or land cover (pp. F-12, F-13) with total permanent impacts of 372.5 acres and total temporary impacts of 3,180.2 acres. In contrast, the PEA (p. 3-153) lists total permanent impacts of 648 acres and total temporary impacts of 5,098 acres. Please explain the discrepancy and clarify which of the impact totals is accurate. Please provide an updated list of impacts by habitat or land cover if needed, and verify that the BRTR analyzed all disturbance areas on the project.

**BIO-8** Impact areas.

- a. Please verify that 97-98% of the total area of crane pads, walls, and cut slopes will be temporary impacts, as stated. If not, please provide revised acreages of temporary and permanent impacts for crane pads, walls, and cut slopes.
- b. Temporary construction roads are listed as a permanent disturbance. According to APM-BIO-1 (revised), only temporary disturbance areas will be revegetated. Please verify and explain why temporary construction roads will not be revegetated.
- c. Please indicate if existing access roads have been analyzed for suitability for construction use and verify that the access road impact acreages provided are accurate. The PEA does not discuss road turnouts, turnarounds, or parking areas. Are these areas included in the impact acreages provided? Are curves that need to be widened to accommodate construction vehicle access included in the impact acreages provided?
- d. In Table 3.2-F, the disturbance area for underground cable trenching is listed as 24 inches wide, but impact calculations indicate a value of 24 feet was used. Please verify which is correct. In either case, please indicate whether the reported disturbance area includes all project-related ground disturbance along the underground route, include new access route (if any), staging, parking, and laydown areas, temporary storage of excavated spoils, and any other ground disturbance.

- e. In Table 3.2-F, the total disturbance area of guy structures is shown as 1.4 acres, but temporary and permanent impact acreages are both listed as 0. Please provide values for temporary and permanent impacts for guy structures.
- f. Foot trails are not listed in impact acreages. The text on page 3-87 states that foot travel would only occur in areas already identified for temporary or permanent disturbance. If crews or monitors are moving from tower to tower, they might not always be within disturbance areas. Please indicate if there are any sites where access restrictions would make routine foot travel between disturbance areas required or likely. If so, please indicate if foot paths would require removal or trimming of vegetation or ground disturbance and provide temporary and permanent impact acreages.
- g. No impact acreage is provided for snub sites. Please verify that no additional disturbance areas will be required for snubs.

**BIO-9**

Survey areas, PEA pp. 4.4-16 and 17

- a. The maps show that the width of the right-of-way (ROW) varies across the project. Will the existing ROW be adequate to accommodate the project throughout, or will the ROW be widened in any areas?
- b. The Botanical Resources Assessment Report (BRC 2012) states on page 3 that the buffer is 500 feet; the same report states on page 4 that the buffer is 100 feet. Please indicate which is correct.
- c. The Botanical Resources Assessment Report (BRC 2013) states that the buffer used was 200-250 feet rather than 100 feet as stated in the PEA. Please indicate which is correct.
- d. The Botanical Resources Assessment Report (BRC 2013) does not provide the buffer used for survey of the transmission line alternative. Please provide this information.
- e. The Botanical Resources Assessment Report (BRC 2013) states that the 2013 survey only covered areas outside of the 2012 survey buffer of 500 feet. If the buffer was actually 100 feet for the surveys in 2012 (as stated in the 2012 report; see question b), then a portion of the areas added to the project footprint in 2013 would not have been surveyed. Please indicate whether all areas added in 2013 and appropriate buffer areas were surveyed.
- f. The 2013 California gnatcatcher (CAGN) report states that areas surveyed in 2013 included the same areas surveyed in 2012. Page 4.4-17 in the PEA, sixth bullet on the page, states "...the coastal California gnatcatcher survey included the areas surveyed in 2012, which included most of the suitable habitat within the additional identified disturbance areas." This seems to imply that the CAGN survey area was not expanded to cover the new disturbance areas added to the project in 2013, and some of these areas may have suitable habitat that has not been surveyed. Please indicate whether all areas of suitable habitat have been surveyed.
- g. The small mammal report (2012) states that the buffer is 100 feet, but the PEA says 100 to 500 feet. Please indicate which is correct.

- BIO-10** The 2012 and 2013 small mammal reports do not discuss the criteria for determining suitable habitat or selection of trapping sites for target species. Please provide this information.
- BIO-11**
- a. Please provide information on the existing transmission lines (height, configuration, etc.) and compare with the new transmission lines, in terms of potential collision hazards for birds.
  - b. SCE indicates that it will analyze avian collision risk (p. 4.4-114). Has the analysis been completed? If not, when will this analysis be conducted? Does SCE propose to install bird flight diverters?
- BIO-12** Desert kit fox is protected under California Fish and Game code, is a species of public interest, and has recently suffered losses due to distemper. The eastern part of the route is in kit fox range, but the PEA does not address this species. Please estimate the number of desert kit fox pairs that may occur on the project alignment.
- BIO-13** Has SCE initiated its permitting processes with the California Department of Fish and Wildlife (CDFW; Lake and Streambed Alteration Agreement and California Endangered Species Act Incidental Take Permit), Regional Water Quality Control Board (Clean Water Act [CWA] Section 401), U.S. Army Corps of Engineers (CWA Section 404) or Bureau of Land Management and U.S. Fish and Wildlife Service (Endangered Species Act Section 7)? Please provide copies of project-related correspondence with each agency.
- BIO-14** Has SCE initiated its Participating Special Entity (PSE) application processes with the administrators of the Western Riverside County Multiple Species Habitat Conservation Plan (WRCMSHCP) and Coachella Valley MSHCP? Please provide copies of project-related correspondence with each agency.
- BIO-15** Staging yards (p. 4.4-97). Is SCE considering any additional or alternate staging or equipment yard locations? The EIR/EIS will describe potential impacts and recommend mitigation as appropriate (dependent on whether an alternate location is ultimately used). Even if specific sites have not been identified, please provide any guidance that could help with the analysis.
- BIO-16** Tree Preservation (p. 4.4-115). Riverside County and San Bernardino County each have tree preservation policies or ordinances applicable on unincorporated lands. Please identify the portions of the project route where those policies or ordinances would apply.
- We recognize that tree inventories are not yet complete and additional data on tree removal will be submitted in June 2014. To further support the environmental analysis, please provide estimates of the number of native trees that may be removed or damaged when the data is submitted.
- BIO-17** Surveys for CAGN in 2012 and 2013 were negative and Table 4.4-6 in the PEA does not indicate that CAGN were observed on the project route. However, CAGN appears on the list of wildlife species detected in Appendix Q of Appendix F. Please provide the location and other pertinent information regarding the detection of CAGN.
- BIO-18** Page F-156 of the BRTR provides a list of species for which surveys are required by the WRCMSHCP. CAGN does not appear on this list. Please indicate if there is suitable habitat or occupied habitat for CAGN within 500 feet of the ROW in the WRCMSHCP

area. If so, please provide the acreage of temporary and permanent project impacts in this habitat.