

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



February 12, 2018

Ryan Stevenson
Principal Advisor
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 #6

Dear Mr. Stevenson,

On February 8, 2018, Southern California Edison (SCE) submitted Minor Project Refinement #6 request for the use of ten water sources to support construction activities. The various hydrants or wells are located in the cities of Colton, Redlands, Beaumont, Banning, and Whitewater, and in unincorporated areas of Riverside County. Additional information was provided by SCE on February 9 and 12, 2018.

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 a Minor Project Refinement request would be required for these activities. This letter documents the CPUC's thorough evaluation of all activities covered in this Minor Project Refinement, and that no new impacts or increase in impact severity would result from the requested Minor Project Refinement activities.

Minor Project Refinements are reviewed for consistency with CEQA requirements and are located within the geographic boundary of the project study area. Minor Project Refinements 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.

Minor Project Refinement #6 for the use of ten water sources is granted by CPUC based on the factors described below.

SCE Minor Project Refinement Request. Excerpts from the SCE Revised Minor Project Refinement request, received February 8, 2018, including the additional information provided by SCE on February 9 and 12, 2018, is presented below (indented):

SCE is requesting use of ten water sources located in various areas to be used by construction operations for the West of Devers Project. Water trucks will park adjacent to the existing water source locations, on disturbed/developed roads. Only occasional short-term filling of water trucks will occur, while allowing access to

local land uses. No ground disturbance will occur at the water source locations. No impacts to regulated trees, jurisdictional waters, biological, or cultural resources are required for the use of the water sources. The following water sources are requested for use under MPR #6:

Location	Source Type	Owner/Provider
11717 Reche Canyon Road, Colton	Potable Hydrant	City of Colton
3201 Utility Access Road, Colton	Potable Hydrant	City of Colton
34105 Ogrady Court, Beaumont	Potable Hydrant	Beaumont-Cherry Valley Water District
1721 N. Deodor, Beaumont	Potable Hydrant	Beaumont-Cherry Valley Water District
6298 San Gorgonio Ave, Banning	Potable Hydrant	Banning Water District
55898 Amethyst Drive, Whitewater	Potable Hydrant	Mission Springs Water District
Oak View Drive and Parkview St., Beaumont	Potable Hydrant	Beaumont-Cherry Valley Water District
Oak View Drive, north of Parkview St., Beaumont	Potable Hydrant (Purple)	Beaumont-Cherry Valley Water District
Poultry Material Yard Well, Riverside County	Non-potable water well	Private
1493 Research Drive, Redlands	Non-potable hydrant	Redlands

Biological Resources

The proposed water sources are existing wells and hydrants located within existing disturbed or developed areas. Only occasional short-term filling of a water truck will occur at each location, while allowing access to local land uses. Water trucks will park immediately adjacent to the water sources to fill using equipped hoses and on-board pumps. No additional ground disturbance will occur.

All ten of the water sources are located within the biological study area for the project. A desktop analysis was conducted for each water source using aerial imagery and project biological data. Some water sources are located adjacent to habitats that may support special-status plants and terrestrial wildlife. All water sources are located adjacent to suitable habitats for nesting birds, including trees, shrubs, man-made structures, and the ground surface. The water sources on Reche Canyon Road (Figure 1, page 2), Ogrady Lane (Figure 1, page 11), and Oak View Drive/Parkview Street (Figure 1, page 15) are located within 500 feet of suitable riparian bird habitat. However, the water source locations are situated such that the proposed activities would be conducted from existing disturbed/developed areas. In addition, the act of filling water trucks would be of short duration and similar to baseline conditions (e.g., public traffic, residences). No ground disturbance will occur. Due to the nature of the construction activity and absence of suitable habitats for special-status plants and special-status terrestrial wildlife, no impacts to these species are anticipated.

To mitigate potential impacts to special-status species, SCE will conduct pre-construction surveys prior the start of construction, including surveys for nesting birds from January 1 to August 31. If special-status resources are identified, SCE will implement the applicable mitigation measures and/or permit conditions, as determined in coordination with the CPUC, BLM, CDFW, USFWS, or other applicable regulatory agencies. In addition, a Biological Monitor will conduct spot check sweeps weekly thereafter. Therefore, no impacts to sensitive biological resources are anticipated.

Jurisdictional Waters

The proposed activities will avoid jurisdictional areas.

Cultural Resources

The ten proposed water sources are existing wells and hydrants located within existing disturbed and/or developed areas. Only occasional short-term filling of a water truck will occur at each location. Water trucks will park immediately adjacent to the water sources using rubber tired water trucks, and fill using equipped hoses and on-board pumps. No additional ground disturbance will occur. No impacts to cultural resources are required during water truck filling.

The ten existing water source locations were covered during previous cultural surveys. Results were negative, as reported in: ARU, UCR. 1975 Archaeological Impact Evaluation: Archaeology of Proposed Additions to the Grand Terrace Sanitary Sewer System, Grand Terrace, California. Consulting Archaeologist. 1978 An Archaeological Survey of Tentative Tract 11817 Riverside County, California. Unlisted. 1978 An Archaeological Survey of Tentative Tract 11817 Riverside County, California. San Bernardino County Museum Association. 1979 Paleontological, Archaeologic, Historic, and Biologic Resources Assessment Tract 10272 San Timoteo Canyon Area, San Bernardino County, California. American Indian Resource Organization, Inc. 1982 Cultural Resources Investigations, Morongo Indian Reservation, California. Research Associates. 1988 Cultural Resources Survey of Tract 13943, 30 Acres in Loma Linda, San Bernardino County, California. RECON. 1990 Cultural Resource Survey of the 110-Acre Pacific Hills Project Area, Loma Linda, California. Lerch & Assoc. 1992 Cultural Resources Assessment of the Barton Center of Redlands, Marigold Farms, City of Redlands, San Bernardino County, California. McKenna. 1999 A Phase I Cultural Resources Investigation for the Oak Valley Estates Project Area, Beaumont, Riverside County, California. Unlisted. 2018 Copper Butte Mine (AKA Cooper's Butte Remediation). McLean, Roderic, Natalie Brodie, and Jacqueline Hall. 2013 Cultural Resources Assessment and Class III Inventory, West of Devers Project, San Bernardino and Riverside Counties, California. LSA Associates, Inc. for Southern California Edison. DeCarlo, Matthew M., Scott C. Justus, and William T. Eckhardt. 2013. Summary Class III Cultural Resource Inventory, Proposed Southern California Edison Devers-Palo Verde 2 500kV Transmission Line Project, Riverside County, California. LSA 2013. West of Devers Yards. DeCarlo and Winslow. 2015c Cultural Resources Impact Assessment and Evaluation Status for the Southern California Edison Company's West of Devers Upgrade Project, Riverside and San Bernardino Counties, California. ASM Affiliates for Southern California Edison and Department of the Interior, Bureau of Land Management. Mengers, Doug. 2016. Cultural Resources Survey of Engineering Revision Areas for the Southern California Company's West of Devers Upgrade Project, Riverside and San Bernardino Counties, California. PanGIS, Inc., for Southern California Edison. Letter report on file at Eastern Information Center, Riverside, CA.

CPUC Evaluation of Minor Project Refinement Request

In accordance with the MMCRP, the subject Minor Project Refinement request was reviewed by CPUC to confirm that no new impacts or increase in impact severity would result from the requested Minor Project Refinement activities and that the subject request was within the geographic boundary of the Project study area. The following discussion summarizes this analysis for biological resources, cultural resources, and water resources/utilities and public services. 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.

Biological Resources: All ten of the water sources are located within the biological study area for the project. A desktop analysis was conducted for each water source using aerial imagery and project biological data. Some water sources are located adjacent to habitats that may support special-status plants and terrestrial wildlife. All water sources are located adjacent to suitable habitats for nesting birds, including trees, shrubs, man-made structures, and the ground surface. The water sources on Reche Canyon Road, Ogrady Lane, and Oak View Drive/Parkview Street are located within 500 feet of suitable riparian bird habitat. However, the

water source locations are situated such that the proposed activities would be conducted from existing disturbed/developed areas. In addition, the act of filling water trucks would be of short duration and similar to baseline conditions (e.g., public traffic, residences). No ground disturbance will occur. Due to the nature of the construction activity and absence of suitable habitats for special-status plants and special-status terrestrial wildlife, no impacts to these species are anticipated.

To mitigate potential impacts to special-status species, SCE will conduct pre-construction surveys prior to construction, including surveys for nesting birds from January 1 to August 31. If special-status resources are identified, SCE will implement the applicable mitigation measures and/or permit conditions, as determined in coordination with the CPUC, BLM, CDFW, USFWS, or other applicable regulatory agencies. In addition, a Biological Monitor will conduct spot check sweeps weekly thereafter. Therefore, no impacts to sensitive biologic resources are anticipated.

Cultural Resources: The ten proposed water sources are existing wells and hydrants located within existing disturbed and/or developed areas. The ten existing water source locations were covered during previous cultural surveys for which results were negative for all ten locations.

Only occasional short-term filling of a water truck will occur at each location. Water trucks will park immediately adjacent to the water sources using rubber tired water trucks, and fill using equipped hoses and on-board pumps. No additional ground disturbance will occur. No impacts to cultural resources are required during water truck filling.

Water Resources/Utilities & Public Services: Mitigation Measure UPS-1a requires the use of non-potable water when feasible. All Water Districts/Agencies listed in the FEIR were contacted by SCE to determine the availability of non-potable water within each district. Only the City of Redlands provides non-potable water service within the Project Study Area. Beaumont-Cherry Valley Water District is in the process of developing a non-potable water system; however, the purple hydrants within their system are currently supplied by water from their potable water system. In an effort to use non-potable water on the Project, SCE has identified one local non-potable water well and one non-potable hydrant for use on the Project.

The conditions noted below shall be met by SCE and its contractors:

- 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 Minor Project Refinement 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.
- SCE will conduct pre-construction surveys prior to construction, including surveys for nesting birds from January 1 to August 31. If special-status resources are identified, SCE will implement the applicable mitigation measures and/or permit conditions, as determined in coordination with the CPUC, BLM, CDFW, USFWS, or other applicable regulatory agencies. In addition, a Biological Monitor will conduct spot check sweeps weekly thereafter.
- 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, a Minor Project Refinement request shall be submitted for CPUC review.

Sincerely,

A handwritten signature in blue ink that reads "Billie Blanchard". The signature is written in a cursive, flowing style.

Billie Blanchard
CPUC Environmental Project Manager

cc: V. Strong, Aspen