

PUBLIC UTILITIES COMMISSION

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June 22, 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 #17

Dear Mr. Stevenson,

On June 20, 2018, Southern California Edison (SCE) submitted a request for Minor Project Refinement (MPR) #17 for additional work areas and location adjustments of the distribution and subtransmission alignment approved under the California Public Utilities Commission (CPUC) Notice to Proceed (NTP) #3, August 10, 2017, in support of the West of Devers Upgrade Project in the Cities of Loma Linda and Redlands, San Bernardino County, 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 a 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 #17 for additional work areas and location adjustments of the distribution and subtransmission alignment approved under NTP #3, is granted by CPUC based on the factors described below.

SCE MPR Request. Excerpts from the SCE MPR request, received June 20, 2018 is presented below (indented) [brackets for clarification]:

SCE is requesting approval for modification to NTP #3 for additional work areas and location adjustments of the distribution and subtransmission alignment in the Cities of Loma Linda and Redlands, in San Bernardino County.

Mission Road, California Street, and Barton Road in Loma Linda

The alignment of the distribution duct bank along Mission Road, California Street, and Barton Road has been adjusted to avoid permanent impacts to the jurisdictional wetland along Barton Road.

The temporary disturbance impacts to agricultural/developed/disturbed land associated with the redesign total 0.42 acre (0.31 agricultural/0.11 developed disturbed).

Mission Road in Loma Linda

Due to the distribution duct bank adjustment along Mission Road described above, three new temporary work areas are required to facilitate the installation of structures V5652226, M5652227, and M5652228.

The temporary impacts to developed/disturbed land associated with the redesign total 0.08 acre.

Lugonia Avenue and Bryn Mawr in Redlands

Due to underground utility conflicts encountered in the approved work area, the location of Subtransmission Pole 4795727E on Lugonia Avenue, along the San Bernardino-Redlands-Timoteo 66-kV subtransmission line, requires adjustment to the west.

The temporary impacts to developed/disturbed land associated with the redesign total 0.12 acre.

Nevada Street north of Lugonia Avenue in Redlands

Due to underground utility conflicts encountered in the approved work area, the location of Subtransmission Pole 4795729E was adjusted to the south along the San Bernardino-Redlands-Tennessee line, on Nevada Street north of Lugonia Avenue.

The temporary impacts to developed/disturbed land associated with the redesign total 0.04 acre.

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 June 21, 2018. 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 will be impacted with the implementation of this MPR.

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 MPR.

Biological Resources: SCE submitted biological resource survey information with the MPR #17 request. SCE conducted a desktop analysis of publicly available data and relevant project data to determine the potential

for special-status species to occur at the new work locations. These new work locations were included in the study area for previous biological surveys. In addition, preconstruction clearance surveys were conducted for the Subtransmission/Telecom route, including the new work areas. The work areas are developed and disturbed land, isolated from native habitats, and do not support special-status plants. No regulated trees will be impacted by this construction.

A jurisdictional wetland and jurisdictional water feature flow west along the south side of Barton Road at California Street. The distribution duct bank alignment has been shifted to avoid open cut construction within the jurisdictional wetland and connection to existing Pole 4290042E. Instead, the distribution duct bank will be installed outside the limits of the jurisdictional wetland, under an existing culvert to the west, and Pole 4448319E will be installed south of the culvert, to avoid impacts to the jurisdictional wetland and waters. The jurisdictional wetland will be conspicuously staked for avoidance during construction activities.

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, are located within the vicinity. Preconstruction surveys for nesting birds, and ongoing surveys and monitoring for nesting birds, will take place during the nesting season (January 1 – August 31).

No additional impacts to biological resources are anticipated with the implementation of this MPR.

Cultural Resources: SCE submitted cultural resource information with the MPR #17 request. A Cultural Resources Management Plan (CRMP) has been completed for the West of Devers Upgrade Project and was approved by the CPUC in October 2017. The new work areas are located within the Project Area of Potential Affect (APE) and were covered within the record search data that was conducted during previous surveys and studies. The record search and survey results for the area were negative for cultural resources (SCE 2016). In the event of unanticipated discoveries, MM CL-1b, MM CL-1c, MM CL-1d and the CRMP requirements would be implemented. No impacts to cultural resources are anticipated with the implementation of this MPR.

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 local jurisdiction. 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: A Paleontological Resource Mitigation and Monitoring Plan (PRMMP) has been completed for the West of Devers Upgrade Project and was approved by the CPUC on May 9, 2017. The use of additional work areas described in this MPR #17 are no different than what was described in NTP #3. In the event of unanticipated discoveries, MM PAL-1d and the PRMMP requirements would be implemented. No additional impacts to paleontological resources will occur with implementation of this MPR.

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 are no different than what was described in NTP #3 and are temporary. The location adjustments of the distribution and subtransmission line are very minor and do not change the visual character of what was described and analyzed in the FEIR/FEIS and approved under NTP #3. 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 will be 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. This Fire Management Plan has been submitted to local fire departments. The majority of the work areas in this MPR are located along developed and disturbed areas in the Cities of Loma Linda and Redlands. 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 in this MPR prior to the start of any construction activities.
- SCE shall use temporary orange pylons or cones to delineate the work limits each day since staking is not feasible and it is a high vehicular and pedestrian traffic area.
- 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.
- 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 MPR request shall be submitted for CPUC review.

Sincerely,



Billie Blanchard
CPUC Environmental Project Manager

cc: V. Strong, Aspen