

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



February 24, 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 #34

Dear Mr. Gutierrez,

On February 19, 2020, Southern California Edison (SCE) submitted a request for Minor Project Refinement (MPR) #34 for new work areas to facilitate wire stringing activities and wire wreck-out in several locations located in the City of Redlands, the City of Loma Linda, the County of San Bernardino, and the City of Banning; Segments 1, 3, and 4, and a new access road to the Matich Material Yard, Segment 5. These extra 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 #34 for the additional Segment 1, 3, and 4 work areas to support transmission line activities (approved under NTP #4) and new access road to the Matich Material Yard, Segment 5, is granted by CPUC based on the factors described below.

SCE MPR Request. Excerpts from the SCE MPR request, received February 19, 2020 are presented below (indented):

WSS-3-3X50-MPR-34: Expansion of Supersite PP123237 A new temporary 0.30-acre work area adjacent to the south side of Supersite PP123237 is required to provide adequate work space for material and equipment staging during construction, including wire stringing and wire wreck-out activities associated with Supersites 3X50 and 3X51.

The new work area consists of approximately 0.11-acre of developed/disturbed land, 0.15-acre grassland forbland, and 0.04-acre coastal sage scrub. The land is publicly owned and located within the SCE transmission line right-of-way.

WSS-4-4X15-4X16-MPR-34: Expansion of Supersite 4X15 A new temporary 2.18-acre work area adjacent to the west side of Supersite 4X15 is required to provide adequate work space for material and equipment staging during construction, including wire stringing and wire wreck-out activities associated with Supersites 4X15 and 4X16.

The new work area consists of approximately 0.30-acre developed/disturbed land and 1.88-acre grassland/forbland. The land is privately owned and located within the SCE transmission line right-of-way.

WA-4-4X34-MPR-34: Expansion of Supersite PP123311 A new temporary 0.09-acre work area is required along the northeast side of Supersite PP123311 to provide adequate work space for material and equipment staging during construction, including wire stringing and wire wreck-out activities associated with Supersites 4X32 and PP123310.

The total temporary disturbance area associated with the new work area consists of approximately 0.03 acre of developed/disturbed land and 0.06 acre of grassland/forbland. The land is privately owned and located within the SCE transmission line right-of-way.

WA-4-4X27-4X26-MPR-34: Expansion of Supersites 4X27-4X26 A new temporary 0.13-acre work area is required south of Supersite 4X27-4X26 to provide adequate work space for material and equipment staging during construction, including wire stringing and wire wreck-out activities associated with Supersites 4X26 and 4X27.

The total temporary disturbance space associated with the new work area consists of approximately 0.13-acre of developed/disturbed land. The work area is located within the SCE transmission line right-of-way.

WSS-4-4X08-MPR-34: Expansion of Supersite 4X08 A 0.92-acre temporary work area expansion immediately east of Supersite 4X08 is required to provide adequate work space for material and equipment staging during construction, including wire stringing and wire wreck-out activities associated with the adjacent supersites.

The new work area will require light grading to level out the areas in preparation for use. The total temporary disturbance area associated with the expanded work area is approximately 0.92-acre of grassland/forbland. The land is privately owned and located within the SCE transmission line right-of-way.

WSS-1-1X25-MPR-34: Work Area south of Supersite 1X25 A 0.56-acre temporary work area south of Supersite 1X25 is required to provide adequate work-space for material and equipment staging during construction, including wire stringing and wire wreck-out activities associated with the adjacent supersites.

The new work area will require non-native tree removal in preparation for use. The total temporary disturbance area associated with the expanded work area is approximately 0.56-acre

of developed/disturbed land. The land is privately owned and located within the SCE transmission line right-of-way.

Matich Yard: North Access Road The access road on the north side of the Matich Material Yard is required to provide ingress/egress to and from the north entrance gate.

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 February 21, 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 relevant Project data to determine the potential for special-status species to occur at the new work areas. The MPR work areas were also included in the study area for previous habitat assessments and focused surveys, as well as recent preconstruction surveys.

A preconstruction survey will be conducted prior to initiating work in each new work area. The new work areas were covered in FRED Preconstruction Survey IDs: 000121, 000186, 000177, 000178, 000189, 000068, and 000039.

Desert Tortoise (DETO): The new work areas are not located within the known range of this species; therefore, no impacts to DETO are anticipated at these locations.

Special-Status Terrestrial Herpetofauna: No special-status terrestrial herpetofauna have been observed within the new work areas during Project-related surveys. However, many species have the potential to occur throughout the Project area. For instance, a red diamond rattlesnake was observed approximately 600-feet west of WSS-4-4X08-MPR-34 during surveys conducted to support licensing, permitting, and preconstruction planning efforts for the Project. A preconstruction survey for each new work area will be conducted prior to use. With implementation of the mitigation measures and biological monitoring during construction, no significant impacts to special-status terrestrial herpetofauna are anticipated.

Burrowing Owl (*Athene cunicularia*): Burrowing owl habitat in the form of annual and perennial grasslands and scrublands characterized by low-growing vegetation is present throughout the Project

area. BUOW have been previously observed within Supersite 4X16, approximately 250-feet southwest of WSS-4-4X15-4X16-MPR-34 as well as approximately 650 feet northeast of WA-4-4X27-4X26-MPR-34. However, no burrows or sign have been observed near the new work areas. Active owl burrows observed during preconstruction surveys and during construction will be mitigated in accordance with the Burrowing Owl Management and Passive Relocation Plan. With implementation of the mitigation measures, including appropriate avoidance buffers and biological monitoring during construction, no impacts to burrowing owls 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. No active nest buffers intersect the work areas at this time. Preconstruction surveys, including surveys for nesting birds during the avian breeding season (Jan 1 – Aug 31), will be conducted prior to the initiation of construction use in each area. If active nests are identified, avoidance buffers will be established in accordance with the Nesting Bird Management Plan (NBMP). With implementation of the NBMP, no impacts are anticipated.

Observations of special-status bird species (e.g., Ferruginous Hawk; Osprey; Cooper's Hawk) have been made in the vicinity of the new work areas. However, the observations were ephemeral and are not associated with active nests. Therefore, no impacts are 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 new work areas. Therefore, no impacts are anticipated.

Coastal California Gnatcatcher (CAGN): Coastal California Gnatcatcher Suitable Habitat (CAGN) is mapped within 650-feet east of WSS-4-4X15-4X16-MPR-34 and within 250-feet southwest of WA-4-4X34-MPR-34. In the history (2014-2018) of protocol surveys conducted for the Project in this area, there have been no detections of CAGN. Results were also negative during June and July 2019 preconstruction surveys (FRED IDs 000177 and 000186). Preconstruction surveys, including surveys for nesting birds, will be conducted in the new work areas during the avian breeding season (Jan 1 – Aug 31). With monitoring and implementation of mitigation measures, no impacts to CAGN are anticipated.

Golden Eagle: Based on habitat assessments and protocol surveys conducted for the Project, no suitable nesting habitat for golden eagles is located within two miles of the new Segment 3 and 4 work areas. Protocol aerial surveys conducted for the Project in 2019 showed no golden eagle nests within 2 miles of the project right-of-way. With monitoring and implementation of mitigation measures, no impacts are anticipated.

Stephen's Kangaroo Rat: Areas of suitable habitat for Stephens' kangaroo rat (SKR) are mapped within the WSS-3-3X50- MPR-34, WSS-4-4X15-4X16-MPR-34, and WA-4-4X34-MPR-34 work areas. A habitat assessment, pedestrian surveys, and several consecutive years of trapping surveys have been conducted within suitable habitat areas of 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 WSS-3-3X50-MPR-34. Proposed work areas WSS-4-4X15-4X16-MPR-34 and WA-4-4X34-MPR-34 are located within the Western Riverside Multiple Species Habitat Conservation Plan (WR-MSHCP), where SKR are a covered species.

The other proposed work areas 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 new work areas; 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 new work areas.

A Los Angeles pocket mouse (LAPM) species event (FRED_000260) was observed approximately 580-feet southwest of WA-4-4X34-MPR-34 in August 2019. LAPM are a covered species in the WR-MSHCP. Occurrences of San Diego pocket mice were also documented approximately 670-feet southwest of WA-4-4X34-MPR-34 in August 2019.

Historical occurrences of San Diego pocket mice have also been documented approximately 730-feet west of WA-4-4X27-4X26-MPR-34; however, the work area is asphalt paved and therefore not suitable habitat for the species.

Little Pocket Mouse habitat is widespread to the east of the Matich Yard in Segment 5. The Matich Yard and new access road to the north in Segment 4 are isolated from native habitats and do not include suitable habitats supporting the species.

Potential impacts to these species will be addressed according to the Small Mammals Avoidance and Minimization Plan. With implementation of the plan, no significant impacts are anticipated.

Special-Status Plants: Plummer's mariposa lily (*Calochortus plummerae*; CRPR 4.2) plants have been historically identified within approximately 380-feet east of WSS-4-4X08-MPR-34; however, no special-status plants were documented within the new work area. The previously documented Plummer's mariposa lily locations were revisited but no individuals were observed during recent preconstruction surveys. If 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 new work areas or use of the Matich Material Yard access road. Therefore, no impacts are anticipated.

Jurisdictional Waters: Wetland and non-wetland jurisdictional features are located throughout the Project area. No jurisdictional features intersect the new work areas or access road. One non-wetland jurisdictional feature is located along the west side of WSS-4-4X15-4X16-MPR-34. Environmentally Sensitive Area (ESA) signs will be established at the edges of work areas and BMPs will be established in accordance with the Stormwater Pollution Prevention Plan (SWPPP). No impacts to jurisdictional features are expected to result from use of the new work areas.

Cultural Resources: The new work areas are located within the WOD Area of Potential Effect (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 were negative for cultural resources (Williams, Audry. 2016. Cultural Resources Management Plan for Southern California Edison Company's West of Devers Transmission Line Upgrade Project, Riverside and San Bernardino Counties, California. Prepared by Southern California Edison).

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.

The proposed work areas listed below are located in areas of low (PFYC 2) paleontological sensitivity; therefore, the sites may initially be spot checked by a qualified paleontological monitor to confirm the PFYC 2 classification:

- WSS-4-4X15-4X16-MPR-34
- WA-4-4X27-4X26-MPR-34
- WSS-1-1X25-MPR-34
- Matich Yard North Access Road

The proposed work areas listed below are located in areas of moderate (PFYC 3) paleontological sensitivity and require full time monitoring during ground-disturbing construction activities:

- WSS-3-3X50-MPR-34
- WA-4-4X34-MPR-34
- WSS-4-4X08-MPR-34

No proposed work areas are located in an area of very high (PFYC 5) paleontological sensitivity.

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 is no different than what was described in NTP #4 and is temporary. 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.

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.

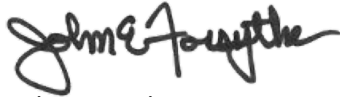
The conditions noted below shall be met by SCE and its contractors:

- SCE shall provide the CPUC with Collector data for the new work areas covered (and also for areas to be removed from Project data to Stephen's Kangaroo Rat habitat impacts) in this MPR prior to the start of construction activities.
- 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.

Alex Gutierrez
November 27, 2019
Page 8

- In accordance with the PRMP, a full-time paleontological monitor shall be on site to monitor ground-disturbing construction activities at WSS-3-3X50-MPR-34, WA-4-4X34-MPR-34, and WSS-4-4X08-MPR-34. WSS-4-4X15-4X16-MPR-34, WA-4-4X27-4X26-MPR-34, WSS-1-1X25-MPR-34, and Match Yard North Access Road shall be spot checked during excavation to confirm paleontological sensitivity.

Sincerely,

A handwritten signature in black ink, appearing to read "John Forsythe". The signature is written in a cursive, flowing style.

John Forsythe
CPUC Environmental Project Manager

cc: V. Strong, Aspen