

Southern California Edison
WODUP A.13-10-020

DATA REQUEST SET A.13-10-020 WODUP ED-SCE-01

To: ENERGY DIVISION
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Question PD-09 a:

Project Description

PD-9 a Response to Completeness Question #14d states that: “SCE conducts an environmental review for all operations and maintenance activities that involve *ground disturbance* ” (emphasis added).

a. Is any environmental review conducted for non-ground disturbing activities such as helicopter inspections, insulator washing, or tree trimming which could impact nesting birds?

Response to Question PD-09 a:

Activities that do not involve ground or vegetation disturbance such as aerial inspections, insulator washing, or pole top facility maintenance typically do not undergo specific environmental reviews. Instead, the SCE environmental team provides regular Environmental Awareness and Avian Protection Training to SCE Transmission and Distribution personnel.

Transmission field personnel who perform helicopter inspections and insulator washing receive annual compliance training related to protecting biological resources with an emphasis on nesting birds and to avoid working near active nests, unless they are under the guidance of and/or being monitored by a biologist. Helicopter inspections or insulator washing are short duration activities that would limit disturbance to an active nest. In addition, crews may have the option of skipping towers with an active nest if there are any concerns about affecting nests.

SCE vegetation management staff and contractors receive annual compliance training related to protecting biological resources. Particular emphasis is given to nesting birds and direction to avoid working near active nests unless they are under the guidance of and/or being monitored by a biologist. Staff and contractors are trained to search for nests and be aware of nesting behavior. When an active nest is discovered, crews will document and report the observation to the vegetation management biologist. The biologist provides instruction on when the crew can return to the location to complete tree trimming. In addition, SCE biologists have identified sensitive locations in riparian areas where tree trimming is required to occur outside of the nesting season and/or have a biological monitor present during the activity.

Field personnel training also includes communication protocols to notify SCE Environmental Staff if an environmental issue or potential issue arises in the field. SCE Environmental Staff are reachable 24 hours 7 days a week using an internal operator system.

As noted in SCE's response to Completeness Question No. 14.d, SCE performs these O&M non-ground disturbing activities for work on the existing lines and given that the WOD Upgrade Project is essentially replacing the existing facilities with new facilities, the O&M work (whether it be ground or non-ground disturbing) is not anticipated to change and should have no impact from a baseline perspective.