STATE OF CALIFORNIA
GAVIN NEWSOM, *Governor*

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

November 25, 2020

Michael Bass
Environmental Project Manager
Southern California Edison
2244 Walnut Grove Avenue
Rosemead, CA 91770

RE: Valley-Ivyglen 115kV Subtransmission Project (VIG) – Minor Project Refinement No. 3 Request: Notice to Proceed- (NTP-) 2 Supplemental Work Areas, Access Roads, and Gabion Structure

Dear Mr. Bass,

On October 1, 2020, Southern California Edison (SCE) submitted Minor Project Refinement (MPR) No. 3 Request to the California Public Utilities Commission (CPUC) for review. The proposed MPR would involve expanding the general disturbance area at several locations, work areas, or portions of work areas, so that the work described in Section 2.3.1.1 of the Final Environmental Impact Report (FEIR) can be performed within work areas of the size identified in Table 2-5 of the FEIR as being necessary to construct the project components. The primary activities to be conducted at the proposed work areas would include installation of Tubular Steel Poles (TSPs), Light-weight Steel (LWS) poles, wood poles, guard poles, guy poles, guy anchors. Conductor, fiber optic, a telecommunication vault, and the transfer of distribution conductor from existing poles to the new 115-kV structures.

Furthermore, work under MPR No. 3 includes a modification to a portion of the telecommunications fiber optic line for Segment VIG7 on De Palma Road, located in Riverside County. Currently, a portion of the telecommunications fiber optic line for segment VIG7 is licensed for installation underground along De Palma Road as described in the FEIR (Section 2.3.1.2). SCE is proposing to instead install 955 feet of fiber optic line overhead on existing electrical utility poles along the south side of De Palma Road, and across De Palma Road to an existing structure on the north side. The existing utility poles were not present at the time the FEIR was prepared. Approximately 430 feet of undergrounding would still be necessary to take the fiber optic line from the westernmost distribution pole on the north side of De Palma Road to the existing vault at the southern end of VIG 8. These activities would occur within the general disturbance area (see Attachment A, Figure 1).

The additional expansion of General Disturbance Area boundaries in this MPR is needed because according to Section 2.4.2.3 of the FEIR, the total general disturbance area analyzed for the Valley-Ivyglen 115-kV Project was intended to be large enough to ensure flexibility during construction and final siting of the proposed 115-kV facilities. Nevertheless, at several locations, work areas, or portions of work areas necessary to perform the work are outside of the general

disturbance area for the Project as depicted in the biological resource maps (Attachment B) and described in Tables 1–3 below. Additionally, the proposed overhead configuration portion of VIG7on De Palma Road is preferred by Riverside County because it eliminates the need to place the fiber optic line in/on the Indian Wash Bridge, thereby avoiding relocation of the line during future bridge widening.

Expanding Boundaries of General Disturbance Areas:
The expansion of the general disturbance area would encompass 6.32 acres of work area in Segments VIG4, VIG5, VIG6, VIG7, and VIG8. The locations, dimensions, and activities involved at each site is provided in Table 1 and 2 below and are also included in the biological resource maps (Attachment B). Most work areas would be used for the setup and operation of equipment, but would also include land disturbances for road improvements, guy anchor installations, and pole installation.

Table 1: VIG4–VIG8 Areas to be Added to General Disturbance Area

Segment	Pole / Feature Name	Nearest Structure	Latitude	Longitude	Description	Activity
VIG4	Access Road	360E	N/A	N/A	~1,150 square feet of permanent disturbance for an increase in width of a Level 5 road northwest of 360E.	Improvement of road for future SCE maintenance.
VIG4	Anchor Site	390E	33.69884	-117.35744	~265 square feet of temporary work area for pole 390E.	Installation of guy anchor for the stability of 390E.
VIG5	TBD Pole	419E	33.70572	-117.37086	~105' northeast of 419E. ~227 square feet of temporary work area for an existing wood pole.	Transfer distribution line to 115-kV pole and remove existing wood pole.
VIG5	Access Road	453E–456E	N/A	N/A	0.33 miles (1,745 feet) of Level 0 access roads on existing roads, to the west of the right-of-way, leading from 453E to 454E–456E.	Access to 454E–456E.
VIG5	453E	453E	33.71527	-117.38544	~17,000 square feet of temporary work area for 453E. Part of the West of the Lake Street Option described in FEIR.	Installation of structure 453E and 915' of conductor between 453E and 457E.
VIG5	454E	454E	33.71583	-117.38585	~11,500 square feet of temporary work area for 454E. 3.14 square feet of permanent disturbance for a LWS pole. Part of the West of Lake Street Option described in FEIR.	Installation of structure 454E and 915' of conductor between 453E and 457E.
VIG5	455E	455E	33.71639	-117.38626	~18,285 square feet of temporary work area for 455E. 3.14 square feet of permanent disturbance for a LWS pole. Part of the West of Lake Street Option described in FEIR.	Installation of structure 455E and 915' of conductor between 453E and 457E.
VIG5	456E	456E	33.71682	-117.38657	~27,175 square feet of temporary work area for 456E. 28.3 square feet of permanent disturbance for a TSP. Part of the West of Lake Street Option described in FEIR.	Installation of structure 456E and 915' of conductor between 453E and 457E.

VIG5	4106977E	481E	33.72759	-117.39497	~580' west of 481E. ~1,000 square feet of temporary work area for an existing wood pole.	Modification of existing wood pole.
VIG5	4106980E	481E	33.72759	-117.39497	~740' west of 481E. 2,500 square feet of temporary work area for an existing wood pole.	Modification of existing wood pole.
VIG5	2112520E	500E	33.7316	-117.40298	95 feet south of 500E. 2,500 square feet of temporary work area for an existing wood pole.	Modification of existing wood pole.
VIG5	Anchor Site	500E	33.73150	-117.40300	120 feet south of 500E. 625 square feet of temporary work area for a new guy anchor for 2112520E.	Installation of guy anchor for the stability of 2112520E.
VIG5	Access Road	500E	N/A	N/A	60 feet southeast of 500E. ~40 feet of Level 0 access road from Temescal Canyon Road to the existing wood pole, 2112520E.	Travel on an existing gravel access route.
VIG5	212317S	FIG 2185E	33.73403	-117.40630	87 feet north of FIG-2185E. 1,225 square feet of temporary work area for existing wood pole.	Modification of an existing wood pole.
VIG5	Anchor Site	FIG 2187E	33.73406	-117.40750	625 square feet of temporary work area for a new guy anchor for FIG-2187E.	Installation of guy anchor for stability of FIG 2187E.
VIG5	4065796E	FIG 2195E	33.73380	-117.41348	138 feet southwest of FIG-2195E. ~1,450 square feet of temporary work area for an existing wood pole and new guy anchor	Modification of an existing wood pole and installation of a guy anchor for pole stability.
VIG6	Access Road	533E	N/A	N/A	530 feet southwest of 533E. ~3,860 square feet of temporary disturbance associated with an existing Level 2 access road leading from Horse Thief Canyon Road to 531E-533E.	Improvement of road for future SCE maintenance.
VIG7	Access Road	535E	N/A	N/A	240 feet southwest of 535E. 41 linear feet and ~770 square feet of permanent disturbance for the construction of a Level 5 road to 534E and 535E.	Improvement of road for future SCE maintenance.
VIG7	Access Road	539E–540E	N/A	N/A	~2,060 square feet of permanent disturbance for the construction of a Level 5 road between 539E and 540E.	Improvement of road for future SCE maintenance.
VIG8	V5532167	V5532167	33.74748	-117.45506	At the corner of Indian Truck Trail and De Palma Road. ~380 square feet of temporary work area and 25 square feet of permanent disturbance for a telecommunication vault	Access to telecommunication vault during installation of fiber optic line in existing conduit.

Table 2: VIG4–VIG8 Additional Requested Work Areas Within the General Disturbance Area

Segment	Pole / Feature Name	Nearest Structure	Latitude	Longitude	Description	Activity
VIG4	TBD Pole	367E	33.69199	-117.34955	~60 feet southwest of 367E. ~475 square feet of temporary work area for an existing wood pole.	Transfer distribution line to 115-kV pole and remove existing wood pole.
VIG4	Access Road	390E	N/A	N/A	40 feet of Level 1 access road for overland travel from Baker St. to the guy anchor work area at 390E.	Access to anchor work area.

VIG4	TBD Pole	391E	33.69863	-117.37566	30 feet south of 391E. 1,225 square feet of temporary work area for an existing wood pole.	Transfer distribution line to 115-kV pole and remove existing wood pole.
VIG4	Access Road	391E	N/A	N/A	210 feet of Level 1 access road for travel on a driveway to an existing wood pole south of 391E.	Access to existing wood pole.
VIG4	Access Road	392E	N/A	N/A	48 feet of Level 1 access road to a guy anchor work area at 392E.	Access to anchor work area.
VIG4	TBD Pole	394E	33.70006	-117.35946	~110 feet northwest of 394E. 1,225 square feet of temporary work area for an existing wood pole.	Transfer distribution line to 115-kV pole and remove existing wood pole.
VIG4	4106903	405E	33.70433	-117.35247	530 feet northeast of 405E. 1,225 square feet of temporary work area for an existing wood pole.	Modification of an existing wood pole.
VIG4	4106904	405E	33.70400	-117.36298	333 feet northeast of 405E. 1,105 square feet of temporary work area for an existing wood pole and ~417 square feet of temporary work area for a new guy anchor for 4106904E.	Modification of an existing wood pole and installation of a guy anchor for pole stability.
VIG4	4106907	405E	33.70300	-117.36453	260 feet southwest of 405E. 1,225 square feet of temporary work area for an existing wood pole and 625 square feet of temporary work area for a guy anchor for 4106907E.	Modification of an existing wood pole and installation of a guy anchor for pole stability.
VIG4	4106908	405E	33.70266	-117.36505	460 feet southwest of 405E. 1,225 square feet of temporary work area for an existing wood pole.	Modification of an existing wood pole.
VIG4	Access Road	405E	N/A	N/A	170 feet of Level 0 access road from 4106907E to 4106908E.	Access along existing road to work area.
VIG5	Access Road	412E	N/A	N/A	110-foot long Level 1 overland travel route to reach an existing distribution pole.	Transfer distribution line to 115-kV pole and remove existing wood pole.
VIG5	Culvert	413E	N/A	N/A	~128 square feet of permanent ground disturbance for the installation of a 24” culvert and rip rap on the access road located northwest of 413E.	Installation of culvert and rip rap as part of road improvement for future SCE maintenance.
VIG5	Access Road	413E-422E	N/A	N/A	1,790 feet of Level 5 access road between 413E and 422E. ~21,480 square feet of permanent disturbance. 29,160 square feet of temporary disturbance.	Construction of road for access to 413E-422E and future SCE maintenance.
VIG5	Access Road	414E	N/A	N/A	45 feet northeast of 414E. 35-foot long Level 1 overland travel route to reach an existing distribution pole.	Access to an existing wood pole.
VIG5	Access Road	415E	N/A	N/A	60 feet northeast of 415E. 24-foot long Level 1 overland travel route to reach an existing distribution pole.	Access to an existing wood pole.
VIG5	Access Road	416E	N/A	N/A	80 feet northeast of 416E. 30-foot long Level 1 overland travel route to reach an existing distribution pole.	Access to an existing wood pole.
VIG5	Gabion Baskets	421E	N/A	N/A	~780 square feet of permanent disturbance for wet-crossing gabion baskets located east and north of 421E.	Installation of wet crossings as part of road improvements for future SCE maintenance.

VIG5	TBD Pole	422E	33.70573	-117.37260	40 feet north of 422E. ~ 500 square feet of temporary work area for an existing wood pole.	Modification of an existing wood pole.
VIG5	TBD Pole	422E	33.70573	-117.37282	70 feet northwest of 422E. ~ 820 square feet of temporary work area for an existing wood pole.	Transfer distribution line to 115-kV pole and remove existing wood pole.
VIG5	TBD Pole	423E	33.706011	-117.37330	70 feet northwest of 423E. 645 square feet of temporary work area for an existing wood pole.	Transfer distribution line to 115-kV pole and remove existing wood pole.
VIG5	TBD Pole	424E	33.70631	-117.37382	98 feet northwest of 424E. 1,115 square feet of temporary work area for an existing wood pole.	Transfer distribution line to 115-kV pole and remove existing wood pole.
VIG5	Access Road	425E-426E	N/A	N/A	An increase of 64 feet of Level 5 road from what was identified in Notice to Proceed Request-(NTPR-) 2. 768 square feet of permanent disturbance and ~1,920 square feet of temporary disturbance.	Improvement of road for future SCE maintenance.
VIG5	TBD Pole	427E	33.70692	-117.37485	98 feet southeast of 427E. 680 square feet of temporary work area for an existing wood pole.	Transfer distribution line to 115-kV pole and remove existing wood pole.
VIG5	Anchor Site	440E	33.71130	-117.38131	625 square feet of temporary work area for installation of a guy anchor for 440E.	Installation of guy anchor for stability of 440E.
VIG5	Access Road	440E	N/A	N/A	37 feet of Level 1 access road to a guy anchor work area for 440E.	Access to anchor work area at 440E.
VIG5	Access Road	441E	N/A	N/A	34 feet of Level 1 access road to a guy anchor work area for 441E.	Access to anchor work area at 441E.
VIG5	Guard Areas	483E	N/A	N/A	7500 square feet of temporary guard areas west of 483E and FIG-2163E	Installation of guards to protect public during wire stringing.
VIG5	STUB	483E	33.72870	-117.39345	160 feet northwest of 483E. 3.14 square feet of permanent disturbance for a new wood pole. 1,850 square feet of temporary work area for installation of a wood pole and anchor.	Installation of a stub pole and anchor for the stability of an existing wood pole.
VIG5	Access Road	488E	N/A	N/A	57 feet of Level 1 access road from Temescal Canyon Road to a guy anchor work area at 488E.	Access to anchor work area at 488E.
VIG5	FIG 2167 – FIG 2176	FIG 2167 – FIG 2176	N/A	N/A	The FIG 115-kV structures would each be shifted 15-91 feet from what was approved in NTP-2. An additional ~27,850 square feet of temporary work area from what was approved in NTP-2 would establish contiguous work areas from FIG-2167 to FIG-2176.	The overall shift of the line to the north would eliminate safety concern of crews working directly underneath the existing energized 115-kV line. The additional work area would also allow crews to avoid oak trees, eliminate the need for oak tree removal, and minimize the trimming of branches.
VIG5	491E – 493E	491E – 493E	N/A	N/A	The VIG 115-kV structures would be shifted south from what was approved in NTP-2. An additional ~46,500 square feet of temporary work area from what was approved in NTP-2 would	The VIG 115-kV structures would be shifted south to avoid conflicts with future road expansion and bridge building by the

					establish contiguous work areas from 491E to 493E.	City of Lake Elsinore. The additional work area would also allow crews to avoid oak trees, eliminate the need for oak tree removal, and minimize the trimming of branches
VIG5	FIG 2177E	FIG 2177E	33.73205	-117.40080	13,190 square feet of temporary work area for FIG-2177E. 28.3 square feet of permanent disturbance for a TSP.	Installation of FIG-2177E.
VIG5	Anchor Site	FIG 2183E	33.73367	-117.40509	280 square feet of temporary work area for installation of a guy anchor for FIG-2183E.	Installation of guy anchor for stability of FIG-2183E.
VIG5	Access Road	FIG 2187E	N/A	N/A	45 feet of Level 1 access road for overland travel from Concordia Ranch Road to the anchor work area for FIG-2187E.	Access to anchor work area for FIG-2187E.
VIG5	TBD Pole	FIG 2188E	33.73394	-117.40822	38 feet southwest of FIG-2188E. 1,075 square feet of temporary work area for an existing wood pole.	Transfer distribution line to 115-kV pole and remove existing wood pole.
VIG5	TBD Pole	FIG 2189E	33.73395	-117.40895	89 feet southwest of FIG-2189E. 1,125 square feet of temporary work area for an existing wood pole.	Transfer distribution line to 115-kV pole and remove existing wood pole.
VIG5	TBD Pole	FIG 2193E	33.73408	-117.41116	78 feet northeast of FIG2-2193E. 1,125 square feet of temporary work area for an existing wood pole.	Transfer distribution line to 115-kV pole and remove existing wood pole.
VIG5	TBD Pole	FIG 2194E	33.73417	-117.41188	110 feet northeast of FIG-2194E. 1,125 square feet of temporary work area for an existing wood pole.	Transfer distribution line to 115-kV pole and remove existing wood pole.
VIG5	TBD Pole	FIG 2194E	33.73427	-117.41260	172 feet northwest of FIG-2194E. 1,225 square feet of temporary work area for an existing wood pole.	Transfer distribution line to 115-kV pole and remove existing wood pole.
VIG5	TBD Pole	FIG 2195E	33.73415	-117.41312	76 feet northwest of FIG-2195E. 840 square feet of temporary work area for an existing wood pole.	Transfer distribution line to 115-kV pole and remove existing wood pole.
VIG5	TBD Pole	514E	33.73263	-117.41006	86 feet northwest of 514E. 934 square feet of temporary work area for an existing wood pole.	Transfer distribution line to 115-kV pole and remove existing wood pole.
VIG5	TBD Pole	519E	33.73264	-117.41312	80 feet southeast of 519E. 1,225 square feet of temporary work area for an existing wood pole.	Transfer distribution line to 115-kV pole and remove existing wood pole.
VIG6	Access Road	527E	N/A	N/A	96 feet and approximately 1,176 square feet of temporary disturbance for a Level 2 access road turn-around at 527E.	Temporary access road for a turn-around at 527E. Road to be restored after construction.
VIG6	TBD Pole	527E	33.73319	-117.41869	340 feet northwest of 527E. 1,028 square feet of temporary work area for an existing wood pole.	Transfer distribution line to 115-kV pole and remove existing wood pole.
VIG6	TBD Pole	528E	33.73341	-117.41953	363 feet southeast of 528E. 1,125 square feet of temporary work area for an existing wood pole.	Transfer distribution line to 115-kV pole and remove existing wood pole.
VIG6	Access Road	527E-528E	N/A	N/A	530 feet of Level 1 access road for overland travel from the I-15 shoulder to reach the two TBD poles between 527E and 528E.	Access to existing wood distribution poles.

VIG6	Access Road	534E	N/A	N/A	90 feet southeast of 534. 53 linear feet of Level 5 access road beyond what was included in NTPR-2. ~1,608 square feet of permanent disturbance.	Improvement of road for future SCE maintenance.
VIG7	TBD Pole	544E	33.741509	-117.43502	50 feet north of 544E. 1,125 square feet of temporary work area for an existing wood pole.	Transfer distribution line to 115-kV pole and remove existing wood pole.
VIG7	Access Road	560E	N/A	N/A	245 feet of Level 0 access road on Glen Eden Road to the work area for existing pole 4873280E.	Access to existing wood pole.
VIG7	Fiber Optic Line	565E	N/A	N/A	Instead of installing 1,330 feet of underground conduit for fiber optic line from 565E to V5548778 as proposed in NTPR-2, SCE would install 955 feet of fiber overhead on existing distribution poles and 430 feet underground to V5548778. The change would result in a decrease of 1,439 square feet of temporary disturbance.	Installation of fiber optic line overhead and underground.
VIG7	Pull Site	566E	N/A	N/A	Southeast of 566E. 4,450 square feet of additional pull site area with an overlapping Level 1 access road along an existing dirt road.	In response to the Western Riverside County Regional Conservation Authority's concern about impacts to a sensitive plant at this location, SCE would use the requested pull site area as the primary location for setting up pulling equipment in order to avoid the east side of the pull site where the sensitive plant population is most dense.
VIG7	TBD Pole	572E	33.74847	-117.44727	30 feet southeast of 572E. 385 square feet of temporary work area for an existing wood pole.	Transfer distribution line to 115-kV pole and remove existing wood pole.

The Valley-Ivyglen Subtransmission Line Project was evaluated in accordance with the California Environmental Quality Act (CEQA), and an Environmental Impact Report (EIR) was prepared by the CPUC. The CPUC issued a Permit to Construct the Project on April 2, 2013 (Decision 10-08-009). The mitigation measures (MMs) and project commitments (PCs) described in the EIR were adopted by the CPUC as conditions of Project approval. In May 2020 the CPUC adopted the Mitigation Monitoring, Compliance, and Reporting Plan (MMCRP) to ensure compliance with all PCs and MMs during project implementation.

This letter documents the CPUC's evaluation of all activities covered in the MPR No. 3 Request. The CPUC has carefully reviewed this MPR request and has verified that the proposed activities adhere to all applicable PCs and MM requirements. The evaluation process ensures that all PCs and MMs applicable to the location, and all activities covered in the MPR are implemented, as required in the CPUC's decision. The evaluation process further ensures that the following criteria are met:

- The proposed change does not trigger additional discretionary permit requirements that are not defined in the EIR or MMCRP.
- The proposed change does not increase the severity of an impact or create a new impact, based on the thresholds used in the EIR.
- The proposed change is within the geographic scope of the study area utilized in the EIR.
- The proposed change does not conflict with any PC or MM, and the refinements would not result in a new conflict with any applicable guideline, ordinance, code, rule, regulation, order, decision, statute, or policy not already identified within the EIR.

The CPUC has determined that MPR No. 3 meets the above criteria. MPR No. 3 is approved by the CPUC for the proposed activities based on the factors described below.

CPUC Evaluation of MPR No. 3 Request

The CPUC evaluated SCE's MPR Request No. 3 to verify that they fulfill the requirements of the MMCRP. In accordance with the MMCRP, the CPUC reviewed the request to confirm that no new impacts on sensitive resources, or increases in impact severity, would result from the requested MPR activities. The following discussion summarizes this analysis for biological, cultural, paleontological, aesthetics and visual resources, as well as other environmental resources.

Location of Ground Disturbance Areas

MPR No. 3 activities would occur at several locations, work areas, or portions of work areas, including along De Palma Road for the re-route of VIG7 fiber optic line from underground to overhead. The temporary and permanent disturbance areas associated with MPR No. 3 are shown in Table 3. The quantity and dimensions of MPR No. 3 disturbance areas are consistent with what is described in Table 2-5 of the FEIR. Section 2.4.2.1 of the FEIR, which states that construction of VIG would disturb approximately 633.7 acres of land, including approximately 141.5 acres of permanent disturbance. Total impacts for all VIG NTPRs/MPRs are anticipated to be below the quantities given in the FEIR. If quantities in future NTPRs/MPRs exceed the FEIR, an explanation of significance will be provided.

Table 3: Disturbances Associated with MPR No. 3

Feature	Number of Miles	Temporary Impact Total	Permanent Impact Total
Level 0 Road Improvement	0.42	--	--
Level 1 Road Improvement	0.23	--	--
Level 2 Road Improvement	0.10	0.089 ac (3,860 sq ft)	--
Level 5 Road Improvement	0.37	0.71 ac (31,080 sq ft)	0.64 ac (27,836 sq ft)
Temporary Work Areas	--	4.86 ac (211,566 sq ft)	--
LWS or Wood Pole, New	--	--	0.0002 ac (9.42 sq ft)
TSP, New		--	0.001 ac (56.6 sq ft)
Gabion Basket, New	--	--	0.02 ac (780 sq ft)
Rip Rap / Culvert	--	--	0.003 ac (128 sq ft)
Underground Trench	--	-0.03 ac (-1,439 sq ft)	--
Telecommunication vault	--	0.01 ac (380 sq feet)	0.0006 ac (25 sq ft)
Total	**1.12 miles**	**5.63 ac (245,447 sq ft)**	**0.67 ac (29,835 sq ft)**

Aesthetics/Visual Impacts

The proposed additional work areas and the work to be conducted are consistent with the descriptions of structures to be installed and disturbances to occur during construction provided

in Sections 2.3.1.1, 2.3.1.3, and Table 2-5 of the FEIR.

The proposed revision to the telecommunications fiber optic line in VIG7 (De Palma Road) from underground to overhead would place 955 feet of fiber optic line onto existing electrical utility poles currently supporting 33-kV and 12-kV distribution conductors. The overhead fiber optic line would span six poles and would be positioned approximately 26 feet above the ground and 17–30 feet below the 12-kv distribution conductor. The proposed fiber optic line would be visible to drivers travelling along De Palma Road and on the I-15 freeway located 115 feet to the north, as well as to residents in homes located approximately 450 feet to the southwest. The fiber optic line would be non-specular and smaller in diameter than the 33-kV and 12-kV conductors above it. The fiber optic line would be visually indistinct relative to these electrical conductors and would not have a substantial adverse effect to a scenic vista, scenic resources, or to the visual character of the location.

Aesthetic impacts associated with these refinements would not create a new significant impact or a substantial increase in the severity of a previously identified impact identified in Section 4.1.4.2 of the FEIR. Additionally, applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

Biological, Cultural, Paleontological Resources, and other Environmental Resources
The proposed work areas were included in previous biological surveys for the FEIR, as described in the biological report (Attachment B). The work areas do not overlap with wetlands or waterways; no amendments to the water permits would be needed.

Several proposed work areas in VIG5, VIG6, and VIG7 occur within Riversidean sage scrub (RSS)/disturbed Riversidean sage scrub, including an anchor worksite north of FIG-2187E (VIG5), existing wood poles between 527E and 528E (VIG6), and an access road between 539E and 540E (VIG7). In accordance with MM BR-5, removal of Riversidean sage scrub habitat would not occur during the coastal California gnatcatcher breeding season.

Furthermore, MPR No. 3 includes the expansion of work areas at 491E–493E and FIG-2167E–FIG-2176E in an area populated with oak trees. The work area expansion will allow crews flexibility in the setup of equipment in order to avoid oak tree removal and minimize trimming.

The proposed expansion of the pull site southeast of 566E is at a location with special-status plant species, including slender-horned spineflower, Robinson's peppergrass, peninsular spineflower, Coulter's matilija poppy. The proposed expansion will allow pulling and tensioning equipment to set up primarily from on the existing access road on the west side of the proposed area, thereby avoiding most of the special-status plant individuals.

Following the completion of all construction, the temporary work areas would be restored/reclaimed in accordance with the Project SWPPPs, Project Commitment D[1], and the VIG Habitat Restoration and Revegetation Plan (HRRP).

[1] [1] The applicant shall develop a Habitat Restoration and Revegetation Plan to address ground disturbance in all project areas. Per MM BR-7, the Habitat Restoration and Revegetation Plan shall detail topsoil segregation and conservation methodology; restoration of special status plant species habitat; vegetation removal and revegetation methods, including seed mixes, rates, and transplants, criteria to monitor and evaluate revegetation success, and alternative restoration and revegetation methods in the event that the revegetation success criteria are not initially reached.

The activities described in MPR No. 3 would not create a new significant impact or a substantial increase in the severity of an identified impact listed in Section 4.4.4.2 of the FEIR. Indirect impacts that may occur to sensitive species in the vicinity of the proposed work areas would be mitigated in accordance with the Project Commitments and Mitigation Measures.

All the proposed features have coverage under the WR-MSHCP Phase 2 certificate of inclusion (COI) except for the new access road between 413E and 422E. Based on the guidance provided by the RCA, construction of these features will not require notification and approval by the RCA prior to construction because the overall permanent disturbance to baseline vegetation of RCA concern does not exceed the acreage proposed in the MSHCP PSE application. The access road from 422E to 435E was proposed as a Level 5 road in the MSHCP PSE application but was approved in NTP-2 as primarily a Level 2 road. The change in permanent impacts to vegetation at 413E–436E results in a reduction of 0.22 acres of permanent disturbance (see Table 4). All temporary impacts to vegetation will be restored in accordance with the HRRP.

Table 4. Permanent Impacts to MSHCP Baseline Grasslands Between Poles 413E and 436E

MSHCP PSE Application	1.176 Acres
Currently Proposed Impacts (9/25/20)	0.949 Acres
Reduction in Grassland Impacts	**0.22 Acres**

The proposed work areas are covered under the Stephens' kangaroo rat Habitat Conservation Plan as depicted in the biological resource maps (Attachment B). Additionally, applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

The proposed work areas were surveyed and analyzed in the cultural and paleontological resources addendum reports (Attachments C and D respectively). The survey results indicate that there are no new sensitive archaeological or paleontological resources located at the proposed work areas. Cultural and tribal monitoring would be conducted in accordance with the Cultural Resources Monitoring and Treatment Plan (CRMTP). Paleontological monitoring, spot checking, and fossil recovery would be implemented for excavations at the proposed work areas in accordance with the Project's Paleontological Resource Monitoring Plan (PRMP). If a resource is found at the site, SCE would comply with the procedures for unanticipated discoveries provided in MMs CR-1b, CR-4, CR-5, CR-7, the CRMTP, and the PRMP. Impacts to cultural resources associated with this refinement would not create a new significant impact or a substantial increase in the severity of a previously identified impact identified in the FEIR (Attachment C, Cultural Resources Report and Attachment D, Paleontological Resources Report). All applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

MPR No. 3 work activities occurring at the proposed locations and the types of equipment used are consistent with the activities described in Sections 2.3.1.1 and 2.3.1.3 of the FEIR. Implementation of the Project Noise Control Plan would ensure noise reduction measures are performed as required. Blasting would not occur in Segments VIG4 and VIG7, and is not

anticipated during access road construction, site preparations, excavation work, or foundation work in Segments VIG5, VIG6, and VIG8, as described in the VIG FEIR Section 2.4.5.4. If blasting or fracturing is needed, a blasting plan would be submitted for CPUC review and approval in accordance with MMs WQ-1 and NV-2. Blasting would only be used in areas where subsurface obstructions reasonably preclude excavation using conventional construction equipment. Therefore, impacts to noise and vibration associated with this refinement would not create a new significant impact or a substantial increase in the severity of a previously identified impact identified in Section 4.11.4.2 of the FEIR. Additionally, all applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

Work activities occurring at the proposed locations and the types of equipment used are consistent with the activities described in Sections 2.3.1.1 and 2.3.1.3 of the FEIR. The type and quantity of construction equipment would be the same as identified in NTP-2; the areas requested would not require the use of additional equipment. In compliance with MM AQ-1, nitrogen oxide (NOx) and particulate matter (PM) emissions from off-road diesel-powered construction equipment would be minimized to the extent feasible by using Tier 4 interim or Tier 4 Standards for equipment with engines greater than 150 horsepower. Per MM AQ-2, daily emissions of equipment would be tracked to ensure NOx emissions stay within the NOx Regional Clean Air Incentive Market Trading Credits (RTCs) purchased for the Project.

Impacts to greenhouse gas emissions associated with MPR No. 3 would not create a new significant impact or a substantial increase in the severity of a previously identified impact identified in Section 4.7.4.2 FEIR. All applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

All proposed locations under MPR No. 3 are within the 1,000-foot corridor evaluated for solid waste disposal sites, Cease and Desist Orders, or Cleanup and Abatement orders per Section 4.8.1.1 of the FEIR. Planned ground-disturbing activities includes excavating, including drilling of holes for LWS pole installation. In the event of an inadvertent discovery, SCE would follow the procedures in Project's Contaminated Soil and Groundwater Contingency Plan. Proposed work areas in MPR No. 3 are located within a Very High Fire Hazard Zone. Fire danger mitigation would be implemented in accordance with the Project Emergency Action Plan and Fire Control and Emergency Response Plan. Impacts to hazards and hazardous materials associated with this refinement would not create a new significant impact or a substantial increase in the severity of a previously identified impact identified in Section 4.8.4.2 of the FEIR. All applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

Furthermore, the quantity of construction equipment and personnel would be the same as identified in NTP-2. Adherence to the Project Traffic Management and Control Plan would ensure compliance with traffic-related Project mitigation measures, TT-1, TT-2, and TT-7. There would be no change to the access routes identified in the Traffic Management and Control Plan. Impacts to transportation and traffic associated with this refinement would not create a new significant impact or a substantial increase in the severity of a previously identified impact identified in Section 4.15.4.2 of the FEIR. Additionally, all applicable avoidance/minimization

measures identified in FEIR Chapter 9 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

Permits
No additional permits or approvals are required for MPR No. 3 activities.

MPR No. 3 Conditions of Approval
MPR No. 3 is approved by the CPUC with conditions. The conditions presented below shall be met by SCE and its contractors:

1. All applicable Project MMs, PCs, 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.
2. Copies of all relevant permits, compliance plans, and this MPR, shall be available on site for the duration of construction activities.
3. SCE shall implement all appropriate erosion and sediment control best management practices (BMPs) for the MPR No. 3 additional disturbance areas, in compliance with the SWPPP and as specified by the Qualified SWPPP Practitioner. Sediment and erosion control BMPs shall be properly maintained throughout the duration of construction activities.
4. All activities (e.g., stabilizing construction entrance/ ground surface, fence installation, etc.) shall be monitored by CPUC-approved monitors in accordance with the MMCRP, where appropriate.
5. In the event that MPR No. 3activities require additional road improvement/ design, or vegetation clearing/ grubbing, SCE shall meet and confer with appropriate agencies and/or local jurisdictions as needed and notify the CPUC for concurrence and approval.
6. SCE shall ensure that construction equipment at the proposed locations will have adequate and properly placed secondary containment to avoid and minimize potential spills.
7. The work associated with MPR No. 3 shall occur within approved project workdays and hours. In the event that MPR No. 3 scheduling necessitates work outside of the hours permitted under local noise ordinances, SCE shall meet and confer with the local jurisdictions as needed and notify the CPUC for concurrence.
8. SCE and its contractors shall adhere to the WR-MSHCP terms and conditions, including but not limited to adherence to the Project Habitat Restoration and Revegetation Plan, adherence to the SWPPP, performance of preconstruction surveys for burrowing owls, and the use of biological monitors to record compliance with work area boundaries and compliance with the avoidance of environmentally sensitive areas (ESAs).
9. All complaints related to MPR No. 3 activities received by SCE shall be logged and reported immediately to the CPUC. This includes complaints relevant to traffic, as well as lighting, noise, vibration, dust, etc. Where feasible, complaints shall be resolved, depending on the nature of the complaint, through construction site or activity modifications. Complaints or disputes that cannot be modified through construction site or activity modifications shall be resolved through the dispute resolution communications processes described in the MMCRP.

10. SCE shall notify CPUC after completing MPR No. 3 work activities including use of access roads, installation of the gabion structure, and re-route of VIG7 fiber optic line from underground to overhead and provide photos of the restored additional work disturbance areas. In addition, in the event that new disturbance is foreseen, for maintenance or other activities, SCE shall notify CPUC for evaluation and approval.

Please contact me if you have any questions or concerns regarding this MPR approval.

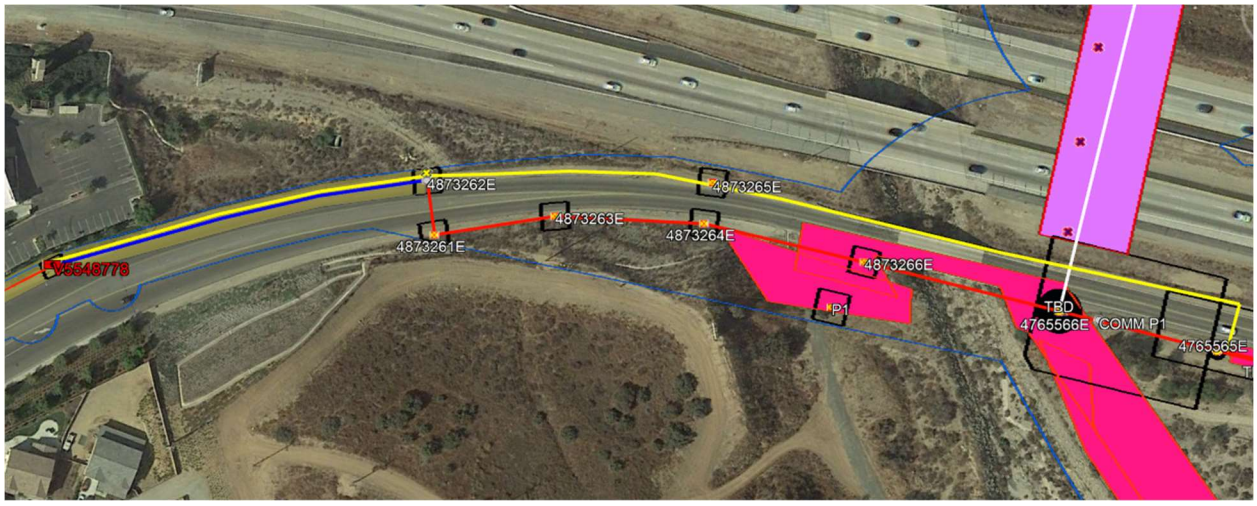
Sincerely,

Patricia Kelly
CPUC Project Manager

cc:
Chuck Cleeves, E & E Compliance Manager
Fernando Guzman, E & E Deputy Compliance Manager
Marcus Obregon, SCE Environmental Project Manager

Attachment A:
MPR No. 3 Request Work Figures

Figure 1. Proposed Re-route of VIG7 Fiber Optic Line from Underground to Overhead.


4873262E
4873265E
4873263E
4873264E
4873261E
4873266E
P1
TBD
4765566E
COMM P1
4765565E

Attachment B:
MPR No. 3 Biological Resources Report

Attachment C:
MPR No. 3 Cultural Resources Report

Attachment D:
MPR No. 3 Paleontological Resources Report