#### PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



May 5, 2021

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. 5 Request: Lake Elsinore Undergrounding throughout Segments VIG3 and VIG4.

Dear Mr. Bass,

On March 17, 2021, Southern California Edison (SCE) submitted Minor Project Refinement (MPR) No. 5 Request to the California Public Utilities Commission (CPUC) for review and approval. The proposed MPR would relocate the originally licensed overhead configuration to an underground configuration along Pasadena Street and Third Street, southwest of Interstate 15, in the City of Lake Elsinore (Figure 1).

The work proposed under MPR No. 5 is a result of discussions and negotiations between SCE and the City of Lake Elsinore. These discussions and negotiations were mandated by the CPUC President's direction to "...engage with all of the affected cities to address community concerns to find solutions and compromises that works in favor of everyone, even if it means alterations of the proposed project". The proposed alternations of the project were identified in a letter dated May 14, 2020 from the City of Lake Elsinore (Grant Yates, City Manager, City of Lake Elsinore) to SCE (Michael Bass, Senior Project Manager, SCE) (Attachment B.4 page 210).

Under MPR No. 5, SCE proposes to install the 115 kV line and telecom underground using 115-kV risers at poles 4765336E and 4765358E, and telecom risers at poles 4765604E and 4765615E to transition to the overhead position.

The proposed underground alignment is mostly within franchise areas and differs from the licensed overhead alignment only at the southeast corner of Third Street and Collier Avenue where an agreement would be necessary for work performed on private property for the installation of a 115-kV vault.

In addition to complying with the request of City officials to underground this portion of the Project, SCE recognizes the following benefits of undergrounding this segment:

• Reduce the likelihood of a single failure causing loss of all 115-kV power to Ivyglen and Fogarty Substations. Currently 115-kV power flows to these two substations through the Valley-Elsinore-Fogarty (VEF) 115-kV subtransmission line. The VEF line runs overhead along Collier Avenue. The licensed Project scope calls for the

- Valley-Ivyglen (VIG) 115-kV line to cross over the VEF line. If a VIG conductor drops onto the VEF line at this crossing point, both sources of 115-kV power to Ivyglen and Fogarty Substations could be lost. Placing the VIG line underground beneath the VEF line eliminates a single point of failure associated with a dropped conductor from the VIG circuit.
- Avoid potential impacts to the flood control channel along Third Street The licensed overhead alignment along Third Street (southwest of Collier Avenue) follows the right of way of an existing overhead distribution circuit pole line, installed on the slope of the flood control channel berm. Installing the VIG line overhead as licensed along this path would require boring deep holes into the sloped side of the flood control channel berm for the new VIG subtransmission poles, and then relocating the distribution circuit as underbuild onto the subtransmission poles. Installing the VIG line underground in the roadbed eliminates potential impacts to the flood control channel berm.
- Eliminate the need to relocate existing distribution infrastructure installed underground along Pasadena Street. The licensed overhead alignment follows the southwestern edge of Pasadena Street. Currently there is existing distribution infrastructure installed underground along portions of this side of the street which would have to be relocated to allow installation of subtransmission poles per the licensed alignment in this area. Relocating this underground distribution infrastructure would require extensive construction work in the roadbed of Pasadena Street. In this proposed Project change, the VIG 115- kV line would be routed to avoid this existing underground distribution infrastructure, thus avoiding the cost and impact of this distribution relocation and minimizing disruption of power service to customers fed via this distribution circuit.
- Eliminate the need for a separate underground trench for the VIG fiber optic cable at the Collier Avenue crossing. The licensed alignment includes installing the new fiber optic cable underground in a dedicated conduit bank for several hundred feet along Third Street at the Collier Avenue crossing. In the proposed change, the fiber would be collocated in the same conduit bank as the VIG 115-kV line, removing the impact of the separate conduit bank.
- Eliminate the need for approximately nine private property rights acquisitions The underground alignment would be constructed in franchise areas, eliminating the need to procure rights from property owners along the overhead alignment.
- <u>Increased reliability</u> As with any undergrounding, the risk of taking out the line from human interaction with an overhead structure or power line (e.g., car accident, vandalism, etc.) is reduced.

The proposed work areas are within the general disturbance area of the Valley-Ivyglen 115-kV Project and are consistent with the sizes described 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 conductor, fiber optic, and telecommunication pullboxes and subtransmission vaults. Construction of these components would be accomplished in a manner consistent with the descriptions contained in the following VIG FEIR Sections: 2.4.5.4, 115-kV Structure Construction; 2.4.5.6, Wire Stringing; and 2.4.7.1, Fiber Optic Line Installation.

The 115-kV and telecom ductbank would be placed underneath Temescal Channel at the intersection of Third Street and Pasadena Street using the Jack and Bore process. Jacking and receiving pits would be excavated in the roadway on either side of Temescal Channel. Trench boxes and steel plates would be placed in the excavations to provide shoring for the protection of workers and equipment in the pits. An auger boring machine placed in the jacking pit would cut a hole underneath the channel to the receiving pit; no disturbance would occur in the channel. Temporary 32" steel casing would be pushed from the jacking pit to the receiving pit before replacing it with permanent 30" HOBAS pipe (a centrifugally cast glassfiber reinforced pipe made of chopped glass fiber, thermosetting resins, minerals, and silica sand). Grout would be used to fill the annular space between the outside of the casing and the earth. Conduit placed inside the HOBAS pipe would be connected to the adjacent vaults and pullboxes before backfilling the jacking and receiving pits and repairing the overlying asphalt. Site preparation activities would include improvement of work areas, and installation of Stormwater Pollution Prevention Plan (SWPPP) best management practices (BMPs).

Following the completion of all construction, sites would be restored/reclaimed in accordance with the Project SWPPPs, Project Commitment D<sup>1</sup>, and the VIG Habitat Restoration and Revegetation Plan.

Environmental impact analysis for use of the above-described areas was conducted as part of this MPR and is provided in the attached biological (Attachments A.1, B.1), cultural (Attachments A.2, B.2), and paleontological reports (Attachments A.3, B.3).

#### Additional Work Areas within General Disturbance Areas:

The underground 115-kV and telecom ductbank and vaults would be installed primarily within the roadbeds of Third Street and Pasadena Street, essentially following the licensed overhead alignment. The proposed refinements would result in 0.001 acres of permanent and 2.57 acres of temporary disturbance in Segments VIG3 and VIG4. The locations, dimensions, and activities for each proposed refinement are provided in Table 1 and are visually shown in Figure 1 and the biological resources maps (Attachments A.1, B.1).

By contrast, the overhead configuration would have included disturbance areas associated with three tubular steel poles (TSPs) (each with an approximate temporary disturbance area of 15,000 square feet, and permanent disturbance area of 28.3 square feet), 17 light weight steel (LWS) poles (each with an approximate temporary disturbance area of 6,300 square feet, and permanent disturbance area of about 3.14 square feet), and wire pulling sites with approximately 76,500 square feet of temporary disturbance, for a total of 5.2 acres of temporary disturbance and 0.003 acres of permanent disturbance.

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<sup>&</sup>lt;sup>1</sup> With input from the appropriate resource agencies, the applicant would develop and implement a Habitat Restoration and Revegetation Plan to restore temporarily impacted areas where construction of the projects would be unable to avoid impacts on native vegetation and sensitive resources, such as wetlands, wetland buffer areas, riparian habitat, and other sensitive natural communities. The applicant would restore all temporarily impacted areas disturbed during construction of the projects, including staging areas and pull, tension, and splicing sites, to as close to preconstruction conditions as possible, or to the conditions agreed upon between the applicant and landowner. Replanting and reseeding would be conducted under the direction the applicant or contract biologists. If revegetation would occur on private property, revegetation conditions would be part of the agreement between the applicant and the landowner.

Table 1: VIG3-VIG4 Additional Requested Work Areas

Segment	Pole / Feature Name	Nearest Structure	Latitude	Longitude	Description	Activity
VIG3	4765604E	336E	33.68818	-117.33611	52 feet northeast of 336E. Installation of telecom riser on previously approved wood pole within previously approved work area.	Installation of telecom riser.
VIG3	5702897	336E	33.68812	-117.33617	21 feet northeast of 336E. Installation of a telecom pullbox and duct bank within a previously approved temporary work area. 25 square feet of permanent disturbance.	Installation of a telecom pullbox and underground duct bank.
VIG3	336E	336E	33.68808	-17.336223	Installation of 115 kV TSP riser, in place of the previously approved standard TSP, within a previously approved work area.	Installation of 115 kV riser.
VIG3	Subtrans Alignment / Telecom Alignment	336E – 358E	N/A	N/A	Between 4765604E and 4765615E. A 25-foot wide, and 4,270 foot long (106,750 square feet) temporary work area for the installation of underground 115 kV and telecom line duct bank.	Installation of underground duct bank
VIG3	M5702894	6001595	33.68759	-117.33654	26 feet northeast of vault 6001595. Installation of telecom pullbox within the asphalt roadway. No additional temporary or permanent disturbance.	Installation of a telecom pullbox.
VIG4	6001595	6001595	33.68753	-117.33655	148 square feet of temporary work area for installation of a 115 kV vault and duct bank. The vault lid will extend into the vegetated area southeast of the sidewalk with a permanent disturbance of 15 square feet.	Installation of vault 6001595 and underground duct bank.
VIG4	Guy Anchor	6001595	33.68750	-117.33685	50 feet southwest of 6001595.1,225 square feet of temporary work area, that overlaps a previously approved pull site, for access to 2357966E and installation of a guy anchor southeast of 2357966E.	Installation of a guy anchor for support of 2357966E.
VIG4	2357967E	6001595	33.68683	-117.33761	454 feet southwest of 6001595. 420 square feet of temporary work area for the replacement of an existing wood pole with new wood pole.	Replacement of an existing wood pole with a taller new wood pole.
VIG4	6001594	6001594	33.68499	-117.33953	550 square feet of temporary work area for installation of a 115 kV vault and duct bank.	Installation of vault 6001594 and underground duct bank.
VIG4	M5702893	6001594	33.68493	-117.33958	27 feet southwest of vault 6001594. 336 square feet temporary work area for installation of telecom pullbox and duct bank.	Installation of a telecom pullbox and underground duct bank.

VIG4	Receiving Pit	6001594	N/A	N/A	71 feet southwest of vault 6001594. 562 square feet of temporary work area for the receiving pit associated with the jack and bore operation.	Receiving pit for the jack and bore operation underneath the Temescal Channel.
VIG4	Jack and Bore	6001594	N/A	N/A	82 feet southwest of vault 6001594. 880 square feet of temporary work area for the jack and bore placement of underground 115 kV and telecom duct bank under Temescal Channel.	Installation of underground duct bank underneath the Temescal Channel.
VIG4	Jacking Pit	6001594	N/A	N/A	130 feet west of vault 6001594. Temporary work area for the jacking pit associated with the jack and bore operation. The jacking work area is within the temporary disturbance area for duct bank installation.	Jacking pit for the jack and bore operation underneath the Temescal Channel.
VIG4	M5702892	6001593	33.68712	-117.34243	36 feet southeast of vault 6001593. 432 square feet temporary work area for installation of telecom pullbox and duct bank.	Installation of a telecom pullbox and underground duct bank.
VIG4	6001593	6001593	33.68720	-117.34251	332 square feet of temporary work area for installation of a 115 kV vault and duct bank.	Installation of vault 6001593 and underground duct bank.
VIG4	M5702891	6001592	33.68712	-117.34243	14 feet northeast of vault 6001592. Installation of telecom pullbox and duct bank within the work area for vault 6001592.	Installation of a telecom pullbox and underground duct bank.
VIG4	6001592	6001592	33.68933	-117.34539	350 square feet of temporary work area for installation of a 115 kV vault and duct bank.	Installation of vault 6001592 and underground duct bank.
VIG4	358E	358E	33.68961	-117.3459	Installation of 115 kV TSP riser, instead of the previously approved LWS pole, within a previously approved work area. An increase of 25.16 square feet of permanent disturbance.	Installation of 115 kV riser.
VIG4	M5702890	358E	33.68967	-117.34594	24 feet northwest of 358E. Installation of telecom pullbox and duct bank within the work area for 358E.	Installation of a telecom pullbox and underground duct bank.
VIG4	4765615E	358E	33.68973	-117.34607	65 feet northwest of 358E. Installation of telecom riser on previously approved pole within the work area for 358E.	Installation of telecom riser.



Figure 1. Proposed Work Areas and Disturbances Associated with MPR No. 05.

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. 5 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. 5 meets the above criteria. MPR No. 5 is approved by the CPUC for the proposed activities based on the factors described below.

### **CPUC Evaluation of MPR No. 5 Request**

The CPUC evaluated SCE's MPR Request No. 5 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

Newly requested temporary and permanent disturbance areas associated with MPR No. 05 are shown in Table 2. Section 2.4.2.1 of the FEIR 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.

Feature	Number of Miles	Temporary Impact Total	Permanent Impact Total
Temporary Work Areas		2.57 ac (111,985 sq ft)	
Vaults/Pullboxes in non-asphalt locations			0.0009 ac (40 sq ft)
New TSP			0.0006 ac (25.2 sq ft)
Total	0.00 Miles	2.57 ac (111,985 sq ft)	0.001 ac (65.2 sq ft)

Table 2: Requested Disturbances Associated with MPR No. 05

### Aesthetics/Visual Impacts

The overhead to underground conversion proposed in MPR No. 05 would occur in a commercially developed area with visual sensitivity that is considered moderately low as analyzed in the Final EIR (Key Viewpoint 8). In the underground configuration, the line would not be visible, except for limited surface infrastructure such as vault manholes, and riser structures at each end where the line transitions from overhead to underground. The absence of poles and conductor would remove the possibility of glare from metal surfaces, thereby eliminating impact on motorists' views. The above-ground riser TSPs would be visually similar to standard TSPs in the previously proposed overhead configuration. Any impacts from increased nighttime construction activities would be mitigated by implementing MM-AES 5.

The proposed 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, 2.3.1.2, 2.3.1.3, and Table 2-5 of the FEIR.

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. All 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 (Attachments A.1, B.1); supplemental surveys were not necessary.

The overhead to underground conversion proposed in MPR No. 05 would not result in significant changes to biological resources as compared to the Final EIR. The alignment is the same as described in the Final EIR and the same species would be affected. The proposed refinement would be mostly within the roadway and minimal biological resources would be present within the alignment. During operation, the proposed alignment would avoid risk of avian electrocution because the electrical equipment would be underground.

The project alignment is adjacent to and crosses underneath the Temescal Channel, but the work would not impact jurisdictional elements of the channel. No amendments to the waters permits would be needed. The underground 115 kV line and telecom would cross underneath Temescal Channel at the intersection of Pasadena Street and Third Street using the Jack and Bore construction method. No disturbance areas, vehicle staging, or equipment/material storage would occur within Temescal Channel. Pressurized drilling fluids would not be used, which would avoid the potential for an unintentional release of drilling fluids into the channel via "frac-out" or spillage.

The 25-foot-wide work area for the underground ductbank trench overlaps with 273 square feet of mapped smooth tarplant in an empty commercial lot at the corner of Pasadena Street and Central Avenue. During construction, crews would implement avoidance and minimization measures to the extent possible in coordination with biological monitors and in compliance with Commitment k of the VIG MSHCP Phase 2 COI.

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

Several of the proposed features are outside of the WR-MSHCP Phase 2 certificate of inclusion (COI) coverage area due to the change from an overhead to underground configuration. 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. All the proposed features are mapped within MSHCP non-native grasslands, despite their position within asphalt roadways. The VIG Multiple Species Habitat Conservation Plan (MSHCP) Phase 2 certificate of inclusion (COI) included 0.26 acres of permanent impacts to grasslands of concern for TSP foundations along the proposed alignment (Table 3). MPR No. 5 refinements would include 0.03 acres of permanent impacts for vaults and pullboxes, resulting in a 0.23 acre decrease in permanent impacts to MSHCP grasslands (Table 3). All temporary impacts to vegetation will be restored in accordance with the Habitat Restoration and Revegetation Plan (HRRP).

Table 3. Permanent Impacts to MSHCP Baseline Grasslands Along the VIG4 Underground Alignment

Reduction in Grassland Impacts	0.18 acres
Currently Proposed Impacts (MPR No. 5)	0.08 acres
MSHCP PSE Application	0.26 acres

MPR No. 5 proposed work areas are covered under the Stephens' kangaroo rat (SKR) Habitat Conservation Plan. Although approximately 1.2 Acres of the proposed refinements are outside of the SKR buffer depicted in the COI, the Riverside County Habitat Conservation Agency has agreed that SCE may reconcile impacted acreage once the Project has reached final design. SCE will be responsible for identifying acreage not previously included in the COI (such as the acreage proposed here) as well as removing acreage that was included in the COI but not disturbed by construction activities.

The activities described in MPR No. 5 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 applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

The proposed alignment was included in the cultural and paleontological resource addendum reports (Attachments A.2, B.2, and A.3, B.3); no supplemental surveys were necessary. There are no new sensitive archaeological or paleontological resources located at the proposed work areas based on survey results. 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 Section 4.5.4.2 of the FEIR. All applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

The overhead to underground conversion proposed in MPR No. 05 would result in similar noise and vibration impacts as those described in the Final EIR. The duration of underground construction is expected to be similar and sensitive receptors would be the same distance from the construction activities as identified for overhead construction. The project route passes close to commercial properties but is not within 300 feet of residences or other sensitive receptors. The temporary noise levels associated with trenching activities may be higher than overhead line construction, but impacts would be reduced to less than significant by implementing Project Commitment H, Mitigation Measure NV-1, and the Project Noise Control Plan. Blasting would not occur at any of the proposed work areas.

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. 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 overhead to underground conversion proposed in MPR No. 5 is not expected to significantly change impacts to air quality. The construction duration for the underground configuration is expected to be two months; approximately one month longer than the overhead configuration. In compliance with MM AQ-1, NOx and 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. The jack and bore operation under the Temescal Channel would use an auger boring machine with a Tier 4 final engine. 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 this refinement would not create a new significant impact or a substantial increase in the severity of a previously identified impact identified in Section 4.7.4.2 of the FEIR. All applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

The proposed refinements are located within the San Jacinto Watershed and a portion of the work on Pasadena Street is within the Elsinore Groundwater Basin. The proposed work areas are located within a flood zone, as shown in Figure 4.9-4 of the FEIR; however, the proposed work is consistent with the work described in sections 2.3.1.1 and 2.3.1.3 of the FEIR and would not alter flood flows.

Work areas on Third Street are adjacent to Temescal Channel, and the underground 115 kV line and telecom would cross underneath Temescal Channel at the intersection of Pasadena Street and Third Street using the Jack and Bore method. No disturbance areas, vehicle staging, or equipment/material storage would occur within Temescal Channel. Pressurized drilling fluids would not be used, which would avoid the potential for the unintentional release of drilling fluids into the channel.

Erosion that could affect water quality would be controlled at locations of earth disturbance through the implementation and adherence to the Project linear SWPPP. If stained or odorous soil is found during excavating, SCE would follow the procedures in Project's Contaminated Soil and Groundwater Contingency Plan. Dewatering, if necessary, would be performed in conformance with the Project linear SWPPP. Groundwater pumped out of the jack and bore pits would be captured in receiving tanks and hauled to an approved location for recycling or disposal.

Impacts to hydrology and water quality 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 4.9.4.2 of the FEIR. All applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

Activities occurring at the proposed locations are consistent with the activities described in Sections 2.3.1.1 and 2.3.1.3 of the FEIR. All proposed locations 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 include pole installation, anchor installation, jack and bore construction, and installation of underground

vaults and duct bank. 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. 05 are located outside of the elevated and extreme fire threat areas. 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.

The proposed overhead to underground conversion may result in increased lane closures due to trenching in roadways, and the construction duration of two months is approximately one month longer than it would be for overhead construction. 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. The Project would obtain an encroachment permit from the City of Lake Elsinore and implement the necessary traffic control requirements.

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. All applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

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. 5 activities.

#### MPR No. 5 Conditions of Approval

MPR No. 5 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. 5 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. 5 activities 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. 5 shall occur within approved project workdays and hours. In the event that MPR No. 5 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, 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. 5 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. 5 work activities including use of access roads and temporary work areas 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** 

Catru a Kelly

cc:

Chuck Cleeves, E & E Compliance Manager

Fernando Guzman, E & E Deputy Compliance Manager

Marcus Obregon, SCE Environmental Project Manager

## Attachment A.1 and B.1: MPR No. 5 Biological Resources Report

# Attachment A.2 and B.2: MPR No. 5 Cultural Resources Report

# Attachment A.3 and B.3: MPR No. 5 Paleontological Resources Report