
PUBLIC UTILITIES COMMISSION

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August 14, 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. 2 Request: NTP-1 Supplemental Work Areas, Access Roads, and Gabion Structure

Dear Mr. Bass,

On July 16, 2020, Southern California Edison (SCE) submitted Minor Project Refinement (MPR) No. 2 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. Furthermore, additional access roads at Structures 129E and 131E (see Attachment A, Figures 2 and 3) are proposed to allow construction crews to access the site prior to the completion of the engineered access roads in order to facilitate structure installation. These access roads fall within the general disturbance area.

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. Furthermore, Notice to Proceed Request 1 (NTPR-1) proposed access roads to 129E and 131E that would provide long-term accessibility needed by SCE for maintenance of the structures. However, the proposed routes traverse rough terrain that is unpassable until the roads are constructed. The additional access routes would allow construction crews to access the site to facilitate completion of the engineered access roads, which would be utilized to complete structure installations.

Expanding Boundaries of General Disturbance Areas:

The expansion of the general disturbance area would encompass 6.23 acres of work area in Segments VIG1, VIG2, and VIG3. The locations, dimensions, and activities involved at each site is provided in Table 1-3 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.

Land disturbance would include approximately 510 square feet of permanent impacts and 394 square feet of temporary impacts for the installation of gabion basket wet-crossing in VIG1 (see Attachment A, Figure 1). Additionally, there would be approximately 37 square feet of temporary impacts for a new road in VIG2, and 47.1 square feet of permanent impacts for 14 light-weight steel (LWS) poles and one wood stub pole in VIG3 (see Table 4). Following the completion of all construction, sites would be restored/ reclaimed in accordance with the Project SWPPP's, Project Commitment D¹, and the VIG Habitat Restoration and Revegetation Plan.

An environmental impact analysis for use of the above described areas was conducted as part of this MPR and is provided in the attached biological, cultural, and paleontological reports (Attachments B, C, and D respectively).

Table 1: VIG1 Areas to be Added to General Disturbance Area

Segment	Pole / Feature Name	Nearest Structure	Latitude	Longitude	Description	Activity
VIG1	Gabion Basket	092E	33.73679	-117.2239	~100' northwest of 092E. ~930 square feet of ground disturbance associated with installation of an erosion control gabion basket wet-crossing on access road ~90' west of Goetz Road	Improvement of road for future SCE maintenance
VIG1	P1	160E	33.74142	-117.28207	~115 north of 160E. Wood pole with 35' X 35' Work Area along Hwy 74 and associated 25' X 25' anchor Work Area.	Reconductor distribution pole. New anchor for pole stability.

Table 2: VIG2 Areas to be Added to General Disturbance Area

Segment	Pole / Feature Name	Nearest Structure	Latitude	Longitude	Description	Activity
VIG2	2014507E	171E	33.73845	-117.28466	~110' northwest of 171E. Wood pole with an approximately 35' X 35' Work Area located northeast of an unnamed ephemeral stream and associated 25' X 25' anchor Work Area on south side of the unnamed ephemeral stream.	Reconductor distribution tap. New anchor for pole stability.
VIG2	4234540E	179E	33.73511	-117.28757	~395' west of 179E. Wood pole with 35' X 35' Work Area located at the west end of storage area for a commercial business and	Reconductor distribution tap. New anchor for pole stability.

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.

Segment	Pole / Feature Name	Nearest Structure	Latitude	Longitude	Description	Activity
					associated 25' X 25' anchor Work Area.	
VIG2	2206560E	181E	33.7342	-117.28539	~400' southeast of 181E. Wood pole with 35' X 35' Work Area and associated 25' X 25' anchor Work Area.	Reconductor distribution tap. New anchor for pole stability.
VIG2	STUB	188E	33.73189	-117.28974	~100' northwest of 188E. Wood pole with 35' X 35' Work Area and associated 25' X 25' anchor Work Area.	Support for reconductored tap line being upgraded. New anchor for pole stability.
VIG2	4469144E	188E	33.73146	-117.2887	~250' southwest of 188E. Wood pole with 35' X 35' Work Area.	Reconductor distribution tap.
VIG2	P1	189E	33.73193	-117.29036	~250' northwest of 189E. Wood pole with 35' X 35' Work Area and associated 25' X 25' anchor Work Area.	Reconductor distribution tap. New anchor for pole stability.
VIG2	SEC_CO MM	209E	33.7218	-117.29497	~100' northwest of 209E. Wood pole with 35' X 35' Work Area.	Intersect communication pole, to allow clearance for new telecom
VIG2	P1	212E	33.7212	-117.29577	~180' northwest of 212E. Wood pole with 35' X 35' Work Area and associated 25' X 25' anchor Work Area.	Reconductor distribution tap. New anchor for pole stability.
VIG2	4492456E	216E	33.71933	-117.29718	~110' northwest of 216E. Wood pole with 35' X 35' Work Area adjacent to Peach Street and associated 25' X 25' anchor Work Area.	Reconductor distribution tap. New anchor for pole stability.
VIG2	P2	234E	33.7151	-117.30494	~130' northwest of 234E. Wood pole with 35' X 35' Work Area.	Reconductor distribution tap.
VIG2	Access road disturbance area	236E	N/A	N/A	~37 square feet of ground disturbance area associated with the Level 2 road to 236E.	Improvement of road for future SCE maintenance
VIG2	4364262E	237E	33.71451	-117.30661	~170' northwest of 237E. Wood pole with 35' X 35' Work Area and associated 25' X 25' anchor Work Area.	Reconductor distribution tap. New anchor for pole stability.
VIG2	4648631E	242E	33.71306	-117.30925	~180' northwest of 242E. Wood pole with 35' X 35' Work Area and associated 25' X 25' anchor Work Area.	Reconductor distribution tap. New anchor for pole stability.

Table 3: VIG3 Areas to be Added to General Disturbance Area

Segment	Pole / Feature Name	Nearest Structure	Latitude	Longitude	Description	Activity
VIG3	302E	302E	33.69829	-117.33098	~1,245 square feet of Work Area for 302E.	Work area for 115 kV structure.
VIG3	305E	305E	33.69764	-117.33019	~6,259 square feet of Work Area for 305E.	Work area for 115 kV structure.
VIG3	Pull Site	305E	N/A	N/A	~275 square feet of Pull Site located southwest of 305E.	Wire pulling site.
VIG3	Guard Area	305E	N/A	N/A	~2,260 square feet of Guard Area located between 305E and 306E	Install guards to protect public during wire stringing.

Segment	Pole / Feature Name	Nearest Structure	Latitude	Longitude	Description	Activity
					at the intersection of Conard Avenue and Allan Street.	
VIG3	306E	306E	33.69736	-117.32983	~7,450 square feet of Work Area for 306E.	Work area for 115 kV structure.
VIG3	307E	307E	33.69709	-117.32949	~7,450 square feet of Work Area for 307E.	Work area for 115 kV structure.
VIG3	Guard Area	308E	N/A	N/A	~3,754 square feet of Guard Area located between 307E and 308E at the intersection of Conard Avenue and Welch Street.	Install guards to protect public during wire stringing.
VIG3	308E	308E	33.6968	-117.32911	~7,450 square feet of Work Area for 308E.	Work area for 115 kV structure.
VIG3	4523252E	308E	33.69648	-117.32894	~50' southwest of 308E. Wood pole with 35' X 35' Work Area and associated 25' X 25' anchor Work Area.	Reconductor Distribution Tap
VIG3	309E	309E	33.69658	-117.32883	~7,450 square feet of Work Area for 309E.	Work area for 115 kV structure.
VIG3	SERV	309E	33.69615	-117.32856	~80' south of 309E. Wood pole with 35' X 35' Work Area.	Reconductor Distribution Tap
VIG3	310E	310E	33.69635	-117.32854	~7,450 square feet of Work Area for 310E.	Work area for 115 kV structure.
VIG3	312E	312E	33.69592	-117.32799	~7,450 square feet of 70' X 150' Work Area for 312E.	Work area for 115 kV structure.
VIG3	SERV	312E	33.69576	-117.32807	~60' southwest of 312E. Wood pole with 35' X 35' Work Area and associated 25' X 25' anchor Work Area.	Reconductor Distribution Service
VIG3	Guard Area	313E	N/A	N/A	~940 square feet of Guard Area located between 312E and 313E at the intersection of Conard Avenue and 3rd Street.	Install guards to protect public during wire stringing.
VIG3	Pull Site	313E	N/A	N/A	~3,480 square feet of Pull Site located on 3rd Street near the intersection with Conard Avenue.	Wire pulling site.
VIG3	313E	313E	33.69557	-117.32754	~7,480 square feet of Work Area for 313E.	Work area for 115 kV structure.
VIG3	314E	314E	33.69525	-117.3279	~7,450 square feet of Work Area for 314E.	Work area for 115 kV structure. Install LWS pole.
VIG3	315E	315E	33.69491	-117.32828	~7,450 square feet of Work Area for 315E.	Work area for 115 kV structure. Install LWS pole.
VIG3	316E	316E	33.69459	-117.32864	~7,450 square feet of Work Area for 316E.	Work area for 115 kV structure. Install LWS pole.
VIG3	SERV	316E	33.69423	-117.32864	~140' south of 316E. Wood pole with 35' X 35' Work Area and associated 25' X 25' anchor Work Area.	Reconductor distribution tap.
VIG3	317E	317E	33.69422	-117.32905	~7,450 square feet of Work Area for 317E.	Work area for 115 kV structure. Install LWS pole.
VIG3	318E	318E	33.69391	-117.3294	~7,450 square feet of Work Area for 318E.	Work area for 115 kV structure. Install LWS pole.
VIG3	319E	319E	33.69356	-117.32979	~7,450 square feet of Work Area for 319E.	Work area for 115 kV structure. Install LWS pole.
VIG3	SERV	319E	33.69368	-117.32994	~65' northwest of 319E. Wood pole with 35' X 35' Work Area and associated 25' X 25' anchor Work Area.	Reconductor distribution tap.

Segment	Pole / Feature Name	Nearest Structure	Latitude	Longitude	Description	Activity
VIG3	320E	320E	33.69318	-117.33021	~7,450 square feet of Work Area for 3120.	Work area for 115 kV structure. Install LWS pole.
VIG3	STUB	321E	33.69298	-117.33063	~65' north of 321E. Wood pole with 35' X 35' Work Area and associated 25' X 25' anchor Work Area.	Install wood stub pole
VIG3	4114484E	321E	33.69297	-117.33095	~110' northwest of 321E. Wood pole with 35' X 35' Work Area and associated 25' X 25' anchor Work Area.	Reconductor distribution tap.
VIG3	211826S	321E	33.69247	-117.32997	~235' southeast of 321E. Wood pole with 35' X 35' Work Area and associated 25' X 25' anchor Work Area.	Reconductor distribution tap.
VIG3	321E	321E	33.69279	-117.33065	~7,450 square feet of Work Area for 321E.	Work area for 115 kV structure. Install LWS pole.
VIG3	322E	322E	33.69253	-117.33094	~7,450 square feet of Work Area for 322E.	Work area for 115 kV structure. Install LWS pole.
VIG3	323E	323E	33.69221	-117.33129	~7,450 square feet of Work Area for 323E.	Work area for 115 kV structure. Install LWS pole.
VIG3	SERV	323E	33.69207	-117.33098	~105' southeast of 323E. Wood pole with 35' X 35' Work Area and associated 25' X 25' anchor Work Area.	Reconductor distribution tap.
VIG3	324E	324E	33.69187	-117.33168	~7,450 square feet of Work Area for 324E.	Work area for 115 kV structure. Install LWS pole.
VIG3	325E	325E	33.69152	-117.33206	~7,450 square feet of Work Area for 325E.	Work area for 115 kV structure. Install LWS pole.
VIG3	326E	326E	33.6912	-117.33242	~7,450 square feet of Work Area for 326E.	Work area for 115 kV structure. Install LWS pole.
VIG3	327E	327E	33.6909	-117.33276	~7,450 square feet of Work Area for 327E.	Work area for 115 kV structure. Install LWS pole.
VIG3	328E	328E	33.69058	-117.33311	~1,830 square feet of Work Area for 328E.	Work area for 115 kV structure.
VIG3	330E	330E	33.69036	-117.33336	~5,430 square feet of Work Area for 330E.	Work area for 115 kV structure.
VIG3	Pull Site	331E	N/A	N/A	~6,290 square feet of Pull Site located on 3rd Street across the intersection with Dexter Avenue.	Wire pulling site.
VIG3	331E	331E	33.69017	-117.33387	~230 square feet of Work Area for 331E.	Work area for 115 kV structure.
VIG3	333E	333E	33.68965	-117.33446	~15,380 square feet of Work Area for 333E.	Work area for 115 kV structure.
VIG3	Guard Area	333E	N/A	N/A	~16,320 square feet of Guard Area located between 333E and 334E across the I-15 freeway.	Install guards to protect public during wire stringing.
VIG3	334E	334E	33.68884	-117.33541	~8,500 square feet of Work Area for 334E.	Work area for 115 kV structure.
VIG3	Pull Site	334E	N/A	N/A	~5470 square feet of Pull Site area located between 334E and 335E.	Wire pulling site.
VIG3	335E	335E	33.6885	-117.33577	~390 square feet of Work Area for 335E.	Work area for 115 kV structure.
VIG3	336E	336E	33.68813	-117.33615	~2,080 square feet of Work Area for 336E.	Work area for 115 kV structure.

Segment	Pole / Feature Name	Nearest Structure	Latitude	Longitude	Description	Activity
VIG3	Pull Site	336E	N/A	N/A	~5,875 square feet of Pull Site extending from the Work Area of 336E across Collier Avenue.	Wire pulling site.

Additional Access Roads to Structures 129E and 131E:

The additional access road for Structure 129E is located within the general disturbance area (see Attachment A, Figures 2 and 3). The proposed path would allow for construction equipment to back up approximately 297 feet on an existing two-track road to the east side and north of the work area for 129E and then move forward for approximately 45 feet of overland travel to re-enter the work area from the north. This road would consist of drive and crush only, resulting in 4,104 square feet of temporary ground disturbance. No road improvement or design is necessary, and no vegetation clearing, or grubbing would occur. Following the completion of all construction, the temporary access road would be restores/ reclaimed in accordance with the Project SWPPPs, Project Commitment D, and the VIG Habitat Restoration and Revegetation Plan.

The additional access road for Structure 131E is located within the general disturbance area. The proposed path would allow for construction equipment to back up approximately 353 feet on an existing access road to the east side and north of the work area for 131E, and the move forward for approximately 51 feet of overland travel to re-enter the work area from the north. This road would consist of drive and crush only, resulting in 4,848 square feet of temporary ground disturbance. No road improvement or design is necessary, and no vegetation clearing, or grubbing would occur. Following the completion of all construction, the temporary access road would be restores/ reclaimed in accordance with the Project SWPPPs, Project Commitment D, and the VIG Habitat Restoration and Revegetation Plan

The above-mentioned access roads are within the survey area included in the environment impact analyses in the attached biological, cultural, and paleontological reports (Attachments B, C, and D respectively). The activities under MPR No. 2 would occur during the Valley-Ivyglen 115kV Subtransmission Line Project (VIG) approved hours.

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. 2 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. 2 meets the above criteria. MPR No. 2 is approved by the CPUC for the proposed activities based on the factors described below.

CPUC Evaluation of MPR No. 2 Request

The CPUC evaluated SCE’s MPR Request No. 2 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. 2 activities would occur at several locations, work areas, or portions of work areas, and adjacent to Structures 129E and 131E. The temporary and permanent disturbance areas associated with MPR No. 2 are shown in Table 4, below. The quantity and dimensions of MPR No. 2 disturbance areas are consistent with what is described in Table 2-5 of the FEIR. 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.

Table 4: Disturbances Associated with MPR No. 2

Feature	Number of Miles	Temporary Impact Total	Permanent Impact Total
Level 1 Road Improvement	0.14	0.21 ac (8,952 sq ft)	--
Level 2 Road Improvement	0.0	0.0008 (37 sq ft)	
Temporary Work Areas	--	6.23 ac (271,378 sq ft)	--
LWS or Wood Pole, New	--	--	0.0011 ac (47 sq ft)
Gabion Basket, New	--	0.0090 (394 sq ft)	0.0117 ac (510 sq ft)
Total	0.14	6.44 ac (280,761 sq ft)	0.0128 ac (557 sq ft)

Aesthetics/Visual Impacts

The proposed expanded general disturbance area and the work to be conducted within are consistent with the description provided in Sections 2.3.1.1, 2.3.1.3, and Table 2-5 of the FEIR. The addition of access roads to Structures 129E and 131E is consistent with Section 2.3.1.3 of the FEIR, which states that “The new access roads could be located anywhere within the Valley-Ivyglen 115-kV General Disturbance Area...”.

Aesthetic impacts associated with these refinements do 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 (Attachment B). The work areas do not overlap with wetlands or waterways; no amendments to the water permits would be needed. Five of the proposed VIG2 work areas occur within or partially within Riversidean sage scrub (RSS)/disturbed Riversidean sage scrub: Guy anchor work area for 2014507E, Stub pole near 188E, P1 pole and guy anchor work area near 189E, Guy anchor work area for 4492456E, and pole work area and guy anchor area for 4648646E. In accordance with MM BR-5, removal of Riversidean sage scrub habitat would not occur during the coastal California gnatcatcher breeding season. Following the completion of all construction, the temporary access road would be restored/reclaimed in accordance with the Project SWPPPs, Project Commitment D, and the VIG Habitat Restoration and Revegetation Plan.

Additionally, if active nests are observed within the additional general disturbance areas, SCE must avoid impacts to the nests by implementing the relevant protection measures of the MMCRP. These include surveying for and monitoring of active nests and other sensitive biological resources (MM BR-3) and implementing disturbance buffers and other measures in the Nesting Bird Management Plan (MM BR-11).

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 included in the VIG MMCRP. The proposed work areas have coverage under the WR-MSHCP certificate of inclusion for Phase 1. The proposed work areas are covered under the Stephens' kangaroo rat Habitat Conservation Plan as depicted in the biological resources report (Attachment B). All 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 do 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. 2 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 at the proposed locations. The impacts to noise and vibration associated with this refinement do 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 type and quantity of construction equipment would be the same as identified in NTP-1; the areas requested do not require the use of additional equipment. In compliance with MM AQ-1, nitrogen oxide (NO_x) 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 NO_x emissions stay within the NO_x Regional Clean Air Incentive Market Trading Credits (RTCs) purchased for the Project.

Impacts to greenhouse gas emissions associated with MPR No. 2 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. 2 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 VIG2 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 do 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 NTPR-1. 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 do 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.

Permits

No additional permits or approvals are required for MPR No. 2 activities.

MPR No. 2 Conditions of Approval

MPR No. 2 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. 2 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. No road improvement or design, and no vegetation clearing, or grubbing should occur. In the event that MPR No. 2 activities require 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. 2 shall occur within approved project workdays and hours. In the event that MPR No. 2 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. 2 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. Per NTP-1, all proposed work areas with planned Project impacts to jurisdictional waters, Riparian/Riverine resources or otherwise protected aquatic features within VIG 1, 2, or 3 are excluded. Additionally, any work areas that intersect protected aquatic features are areas

that shall be planned for avoidance and will not be permitted. Furthermore, the excluded sites requiring jurisdictional waters permits are adjacent to sites under NTP-1. To ensure that construction activities do not inadvertently occur within the excluded work areas, MM BR-1 protective measures shall be implemented.

11. SCE shall notify CPUC after completing MPR No. 2 work activities including use of access roads and installation of the gabion structure 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,

A handwritten signature in blue ink that reads "Patricia Kelly". The signature is written in a cursive, flowing style.

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

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