Dustin Joseph
Director of Environmental Permitting
LS Power Grid California, LLC
DJoseph@lspower.com

June 7, 2024

Boris Sanchez
Project Manager
California Public Utilities Commission
505 Van Ness Avenue, 4th floor
San Francisco, CA 94102

Re: Minor Project Refinement No. 3 for the Round Mountain 500 kV Dynamic Reactive Support Project

Mr. Sanchez:

LS Power Grid California, LLC (LSPGC) is hereby requesting approval of Minor Project Refinement No. 3 (MPR-3) from the California Public Utilities Commission (CPUC) for the Round Mountain 500 kilovolt (kV) Dynamic Reactive Support Project (Fern Road Substation or Project). Approval of MPR-3 would authorize the expansion of the existing staging area approved in Notice to Proceed No. 1 (NTP-1) by approximately 4.3 acres to accommodate worker parking, construction trailers and additional staging. The expanded staging area would be cleared of vegetation (including trees), graded, and gravel would be placed for stabilization as needed.

In addition, MPR-3 would authorize two new materials storage areas (totaling approximately 4.2-acres) located south of the existing staging area. LSPGC proposes to utilize an approximately 3.1-acre portion of the previously approved MPR-2 area for temporary overflow materials storage and laydown (see pink area in **Attachment B, MPR-3 Figure**). LSPGC also proposes to utilize an additional, approximately 1.1-acre area, for extra temporary materials storage (see black hatched area in **Attachment B, MPR-3 Figure**). This area contains existing trees and vegetation that will not be removed. Instead, construction will utilize existing clearings within this area as needed. There is no grading or ground disturbance anticipated within the materials storage areas. Please refer to **Attachment B, MPR-3 Figure** and **Attachment C, MPR-3 Photograph Log** to view the Project components discussed within MPR-3.

Attachment A: MPR-3 Form
Attachment B: MPR-3 Figure
Attachment C: MPR-3 Photograph Log

Preconstruction Requirements and Permit/Approvals

Approval of MPR-3 will not change the conditions set forth in the Final Initial Study/Mitigated Negative Declaration, nor will it change the type of equipment, number of construction personnel, or the status of any Mitigation Monitoring Compliance and Reporting Plan pre-construction or construction requirements. Furthermore, no new permits are required for activities that will be performed within the MPR-3 work areas.

MPR-3 Request for Approval

LSPGC respectfully requests approval of MPR-3 for the expansion of the existing staging area by 4.3 acres and the use of the proposed materials storage areas totaling 4.2 acres as described within this request by June 14, 2024. Should you have any questions or need additional information, please do not hesitate to contact me at djoseph@lspower.com.

Sincerely,

Dustin Joseph
Director of Environmental Permitting

cc: Matthew Fagundes, ESA
Maria Hensel, ESA
David Wilson, LSPGC
Mark Milburn, LSPGC
Emily Critchfield, KPE

ATTACHMENT A
MPR-3 Form

Round Mountain 500 kilovolt (kV) Dynamic Reactive Support Fern Road Substation Project CPUC Minor Project Refinement Form

Minor project refinements *are strictly limited to changes that will not trigger an additional permit requirement, do not substantially increase the severity of a previously identified significant impact, create a new significant impact, would clearly and strictly comply with the intent of the IS/MND mitigation measures, and that don't conflict with any applicable law or policy.*

Date Requested: June 07, 2024

Report No.: 3

Date Approved: TBD

Approval Agency: California Public Utilities Commission (CPUC).

Property Owner(s): The proposed Minor Project Refinement No. 3 (MPR-3) areas are located within LS Power Grid California, LLC (LSPGC)-owned property.

Location/Milepost: The proposed MPR-3 work areas are contiguous with the planned Fern Road Substation location and associated work areas previously approved east of Fern Road in Shasta County, California.

Land Use/Vegetative Cover: The MPR-3 work areas total approximately 8.5 acres. A summary of size and vegetative cover for each work area is summarized below:

- Expanded Staging Area: approximately 4.3 acres of oak woodland.
- Materials Storage within previously approved MPR-2 Work Area: approximately 3.1 acres of non-native grassland.
- Materials Storage – No Tree Removal: approximately 1.1 acres of oak woodland.

Sensitive Resources: The MPR-3 work areas are located in an area with undetermined and high paleontological potential. See resource discussions below.

Modification From: ☐ **Permit** ☐ **Plan/Procedure** ☐ **Specification** ☐ **Drawing** ☐ **Mitigation Measure** ☒ **Other:**

LSPGC is requesting approval of MPR-3 for the use of three temporary work areas for the Round Mountain 500 kilovolt (kV) Dynamic Reactive Support Project (Fern Road Substation or Project), as described below and shown in **Attachment B, MPR-3 Figure**.

- **Expanded Staging Area (4.3 Acres):** This temporary area shown in green in **Attachment B** is proposed for use as an extension to the existing staging area approved

in Notice to Proceed No. 1 (NTP-1). The area will be used for parking for Project personnel, construction trailers, equipment storage, as well as laydown and storage of materials and substation components. Trees and vegetation would be cleared from the area. Tree removal would be completed utilizing mechanized removal equipment or by hand using chain saws. Excess soils from construction of the substation pad would be utilized within this area to fill in low spots and create a level surface. Gravel may be placed throughout the area for stabilization if needed to provide a stable surface. Security fencing is not anticipated to be installed around the expanded staging area.

- **Materials Storage within MPR-2 Work Area (3.1 Acres)**: This area shown in pink in **Attachment B** has been previously cleared of trees and large shrubs in accordance with the approved scope of MPR-2. MPR-3 is proposing an additional use of this area for laydown and overflow materials storage such as steel beams, anchor bolt cages, and other components or equipment as needed. There is no grading or gravel placement proposed within this area. As discussed in MPR-2, this area will be permanently maintained and kept clear of trees or tall shrubbery.
- **Materials Storage – No Tree Removal (1.1 Acres):** This temporary area shown in black hatching in **Attachment B** has not been previously disturbed by the Project. Existing vegetation and trees would remain in place and no ground disturbance or grading is anticipated. This area would be utilized as overflow materials storage for substation components or other materials within the existing clearings as needed.

These areas will be accessed via the existing Project access road approved in NTP-1 and overland travel. Following completion of Project construction, the MPR-3 work areas would be stabilized as needed in accordance with the Project's Stormwater Pollution Prevention Plan (SWPPP). The temporary MPR-3 work areas (expanded staging area and hatched portion of materials storage area as shown in **Attachment B**) will also be restored in accordance with APM BIO-10 and the Project's approved Restoration Plan. The area previously approved in MPR-2 (shown in pink in **Attachment B**) will be permanently maintained and kept free of trees or tall shrubbery in accordance with the Pacific Gas & Electric Company (PG&E) and LSPGC Wildfire Mitigation Plans (WMPs) as approved by the California Office of Energy Infrastructure Safety, and as described in MPR-2.

Describe how project refinement deviates from current project. Include photos.

Original Condition: The MPR-3 work areas are part of the approved Fern Road Substation site and are within the geographic study area of the Final Initial Study Mitigated Negative Declaration (Final IS/MND); therefore, they have been previously analyzed.

Justification for Change: LSPGC has identified the need for the use of the MPR-3 work areas for additional space for staging, laydown, parking, and materials storage to facilitate construction of the Fern Road Substation. Deliveries of construction equipment have been ongoing during site development, and the construction contractor has reviewed the size of the staging area approved in NTP-1 and concluded they will quickly run out of space once substation components and materials are delivered. Expansion of the staging area as well as the ability to utilize the pink and hatched areas shown in **Attachment B** as overflow materials storage will prevent congestion and inefficiency within the staging area during construction. The proposed expansion will help keep the staging area as clear as practicable to support the safe and efficient operation of vehicles of equipment within the Project site. Therefore, MPR-3 is proposing the utilization of the MPR-3 work areas as described herein which are necessary to construct the Project as described in Section 2.0 of the Final IS/MND.

Maps & Figures: Refer to **Attachment B, MPR-3 Figure,** for a map of the proposed MPR-3 work areas. Refer to **Attachment C, MPR-3 Photograph Log**, for pictures of the current conditions within the proposed MPR-3 work areas.

Environmental Impact: Utilization of the MPR-3 work areas would not change the nature or substantially increase the severity of any impacts disclosed within the Final IS/MND; would not result in alteration to Applicant Proposed Measures (APMs) or existing Mitigation Measures (MMs); would not require new mitigation measures; and would not require new permits or new regulatory approval. The MPR-3 work areas total approximately 8.5 acres within oak woodland and non-native grassland. The MPR-3 areas will be stabilized as needed in accordance with the SWPPP during construction. The temporary MPR-3 work areas (expanded staging area and hatched portion of materials storage area as shown in **Attachment B**) will also be restored in accordance with APM BIO-10 and the Project's approved Restoration Plan. The area previously approved in MPR-2 (shown in pink in **Attachment B**) will be permanently maintained and kept free of trees or tall shrubbery in perpetuity in adherence with PG&E and LSPGC WMPs. Specific discussions for each resource area are provided below.

Concurrence (if appropriate): Concurrence is not required as the proposed MPR-3 work areas are located immediately adjacent to the previously approved Fern Road Substation within the overall site boundary and are therefore within the geographic study area analyzed in the California Environmental Quality Act (CEQA) review process.

Resources:

Biological	☐	No Resources Present	☒	Resources Present	☐ N/A, Change would not affect resources

Previous Biological Survey Report Reference:
Biological resources within the Project site boundary were studied, reviewed, and documented as part of LSPGC's application for a Permit to Construct (PTC) for the Project and Proponent's Environmental Assessment (PEA). Biological resources were also discussed within the CPUC-conducted CEQA review process (see Final IS/MND Section 3.4). An additional biological survey was performed on June 4, 2024, in which a qualified biologist verified the current conditions of the proposed MPR-3 work areas. There were no special-status plant or wildlife species identified within the MPR-3 work areas during the field survey. Current conditions for the MPR-3 work areas are described as follows:

- **Expanded Staging Area**: This area shown in green in **Attachment B** is located within oak woodland habitat that has been previously disturbed by cattle grazing from Stronghold Ranch. The overstory is dominated by blue oak (*Quercus douglasii*) with gray pine (*Pinus sabiniana*), California black oak (*Quercus kelloggii*), and manzanita (*Arctostaphylos*). The Understory has some poison oak (*Toxicodendron pubescens*), and ground cover is brome grasses (*Bromus*), wild oat (*Avena fatua*), rabbits foot grass *(Polypogon monspeliensis)*, harvest brodiaea (*Brodiaea elegans)*, and other native wildflowers.
- **Materials Storage within MPR-2 Work Area**: This area shown in pink in **Attachment B** was previously oak woodland habitat, but the trees have been removed in the scope for MPR-2, and this area is now non-native grassland with a ground cover of brome grasses, wild oat, rabbits foot grass, harvest brodiaea, and other native wildflowers.
- **Materials Storage – No Tree Removal:** This area shown in black hatching in **Attachment B** is located within oak woodland habitat that has been previously

disturbed by cattle grazing from Stronghold Ranch. The overstory is dominated by blue oak with gray pine, with an understory of pink honeysuckle (*Lonicera hispidula*), and whiteleaf manzanita (*Arctostaphylos viscida*), and ground cover of brome grasses, wild oat, rabbits foot grass, harvest brodiaea, and other native wildflowers.

The number of trees and species proposed for removal within the expanded staging area are identified in **Table 1, Tree Survey Data**. Photographs of the proposed MPR-3 work areas are available in **Attachment C, MPR-3 Photograph Log**.

Table 1: Tree Survey Data

Tree Type	Number of Trees Proposed for Removal in MPR-3	Number of Trees Removed for MPR-2	Number of Trees previously approved for removal in Final IS/MND	Total
Blue oak	84	223	727	1,034
Gray Pine	4	4	12	20
Manzanita	1	-	-	1
California Black Oak	1	-	-	1
Total:	**90**	**227**	**739**	**1,056**

In compliance with Applicant Proposed Measure (APM) GEO-1 and Project SWPPP, removed vegetation will be disposed of off-site to an appropriate licensed facility or chipped on-site and used as mulch during site stabilization and restoration of temporary work areas. Streams and wetlands onsite have been flagged for protection and do not intersect the MPR-3 work areas.

Cultural ☒ No Resources Present ☐ Resources Present ☐ N/A, changes would not affect resources

Previous Cultural Survey Report Reference:
Cultural resources within the Project's study area (including the proposed MPR-3 work areas) were studied, reviewed, and documented as part of LSPGC's application for a Permit to Construct (PTC) for the Project and PEA. These resources were also discussed within the CPUC-conducted CEQA review process (see the Project's Final IS/MND, Sections 3.5 and 3.18). The potential for the presence of unrecorded archaeological resources in the proposed MPR-3 work areas is low. Though no cultural resources have been identified by previous surveys and a discovery is unlikely, the potential remains for unrecorded subsurface archaeological material to be uncovered during ground disturbing activities. Therefore, LSPGC would implement APMs CUL-1 and CUL-3 during MPR-3 activities if needed to reduce potential impacts on archaeological resources.

Paleontological ☐ No Resources Present ☒ Resources Present ☐ N/A, Change would not affect resources

Previous Paleontological Survey Report Reference:
Paleontological resources within the Project's study area (including the proposed MPR-3 work areas) were studied, reviewed, and documented as part of LSPGC's application for a PTC for the Project and PEA. These resources were also discussed within the CPUC-conducted CEQA review process (see the Project's IS/MND, Section 3.7). No records of paleontological resources were identified within the Project site in the records search

performed by San Diego Natural History Museum (SDNHM) and the University of California Museum of Paleontology (UCMP), nor have any resources been discovered during ongoing monitoring of excavations of the substation pad; however, the presence of nearby fossil discoveries listed within the Project's Paleontological Resources Technical Report for the PEA indicates that the potential exists to encounter paleontological resources. The sedimentary deposits of the Tuscan Formation and the Montgomery Formation located beneath the alluvial deposits of the Project area have an undetermined and high potential to contain paleontological resources, respectively.

Trees proposed for removal within the expanded staging area will either be "flush cut" near ground level (no ground disturbance) or completely removed (including base and roots), depending on site needs. In accordance with APM PALEO-1 within the Mitigation Monitoring Compliance and Report Program (MMCRP) and requirements in the Paleontological Resources Monitoring and Mitigation Plan (PRMMP), paleontological monitoring will take place during ground disturbing activities exceeding two feet below ground surface (bgs). Due to the minimal ground disturbance associated with tree removal (typically less than 2 feet bgs), and since there is no excavation anticipated for grading of the expanded staging area (nor ground disturbance proposed within the other two MPR-3 work areas), paleontological monitoring is not anticipated to be required within the MPR-3 work areas.

Disturbance Acreage Changes: ☒ Yes ☐ No

The additional temporary disturbance resulting from the proposed MPR-3 work areas is 5.4 acres. This does not include the 3.1-acre materials storage area shown in pink in **Attachment B** which was previously accounted for in MPR-2.

The following table includes environmental analysis representative of the CEQA Appendix G Checklist Sections addressed in the IS/MND as it relates to MPR-3. MPR-3 would have no potential to impact the following environmental resource areas, and therefore are not included in the table below: Energy, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Land Use and Planning, Mineral Resources, Population and Housing, Public Services, Recreation, Traffic and Transportation, and Utilities and Service Systems.

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
Aesthetics	☒ Y ☐ N	The MPR-3 work areas are located out of the public's view in an unpopulated area and no change in impacts to aesthetics/visual resources would result from utilization of the MPR-3 work areas. Existing trees in the immediate foreground of potential receptors along Fern Road would not be affected as the visual setting would remain largely intact and any changes as a result of the additional tree removal within the expanded staging area would be visually negligible. MPR-3 activities would adhere to the requirements in APM AES-1, including ensuring all work sites are maintained in a clean and orderly state. Therefore, impacts would remain similar to those addressed in the Project's Final IS/MND, Section 3.1.

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
		No new or altered APMs or Mitigation Measures (MMs) would be required.
Agency Consultation?	☐ Y ☒ N	MPR-3 activities would not require agency consultation relating to aesthetics or visual resources.
Agriculture and Forestry Resources	☒ Y ☐ N	The MPR-3 work areas are located within the Project site boundary previously assessed in Section 3.2 if the IS/MND. These areas are within a livestock-grazing area of Stronghold Ranch zoned as Habitat Protection, 80-Acre Minimum Lot Area (HP-BA-80) and its zoning designation would not change. Use of the MPR-3 work areas would not conflict with existing zoning designations, nor result in the conversion of Farmland to non-agricultural use. Grazing within this area would continue to occur once construction is complete. Additionally, all activities conducted within the MPR-3 work areas would occur in a manner that protects adjacent agricultural uses as discussed in the Project's Final IS/MND. Although there are 90 trees proposed for removal in MPR-3, as discussed in Section 3.2 of the IS/MND, the Project area does not contain any land defined as forest land, timberland, or timberland production. Therefore, impacts would remain similar to those addressed in the Project's Final IS/MND, Section 3.2.
Agency Consultation?	☐ Y ☒ N	MPR-3 activities would not require agency consultation relating to agriculture and forestry resources.
Air Quality	☒ Y ☐ N	The use of the MPR-3 work areas would not result in new construction activities that have not previously analyzed and disclosed within the Project's IS/MND. There is no change to the overall construction schedule or equipment used that will result from the modifications proposed in MPR-3. Additionally, all MPR-3 activities would take place in accordance with air quality APMs in the MMCRP, which include the implementation of Shasta County Standard Mitigation Measures (SMMs) defined in APM AQ-1 and Dust Control Plan measures defined in APM AQ-2. These measures include but are not limited to: • AQ-SMM-1: Maintain all construction equipment in proper tune according to manufacturer specifications, • AQ-SMM-2: Fuel all off-road and portable diesel-powered equipment with California Air

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
		Resources Board (CARB)-certified motor vehicle diesel fuel, • AQ-SMM-3: Use diesel construction equipment meeting ARB's Tier 2 certified engines or cleaner off-road heavy-duty diesel engines and comply with the State Off-Road Regulation. • AQ-SMM-4: Use on-road heavy-duty trucks that meet the ARB's 2007 or cleaner certification standard for on-road heavy-duty diesel engines and comply with the State on-road regulation. • AQ-SMM-5: All on and off-road diesel equipment shall not idle for more than five minutes. • AQ-SMM-6: Diesel idling within 1,000 feet of sensitive receptors is not permitted. • Dust Control Plan measure: Use water trucks or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site, and • Dust Control Plan measure: All dirt stock-pile areas should be sprayed daily as needed. Therefore, the use of the MPR-3 work areas as proposed herein would not result in new significant impacts or a substantial increase in the severity of impacts analyzed and disclosed within the Project's Final IS/MND, Section 3.3. No new or altered APMs or MMs would be required.
Agency Consultation?	☐ Y ☒ N	The modifications proposed within MPR-3 would not require agency consultation relating to air quality.
Biological Resources	☒ Y ☐ N	A biological field survey of the proposed MPR-3 work areas was performed on June 4, 2024. The area proposed for materials storage within MPR-3 that was previously approved for tree clearing in MPR-2 currently contains non-native grassland habitat whereas the other two MPR-3 work areas contain oak woodland as described in the biological resources section above. No state or federally listed species or rare plants were observed during the biological survey. In addition, the MPR-3 work areas are more than five feet from the streams and wetlands onsite, which have been

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
		flagged for avoidance as required by APM BIO-10. Photographs of the proposed MPR-3 work areas are available in **Attachment C, MPR-3 Photograph Log.** Tree removal is proposed within the expanded staging area (shown in green in **Attachment B**) as described herein. In compliance with APM GEO-1 and Project SWPPP, removed vegetation will be disposed of off-site to an appropriate licensed facility or chipped on-site and used as mulch during site stabilization and restoration of temporary work areas. There is no ground disturbance or tree removal proposed within the other two MPR-3 work areas. In compliance with APM BIO-5, if a nest is observed onsite and the nest is determined to be active, a biological monitor would monitor the nest to ensure that avian nesting or breeding activities are not substantially adversely affected by construction activities. If the biological monitor determines that activities associated with the Project are disturbing or disrupting nesting or breeding activities, the monitor would make recommendations to reduce noise or disturbance in the vicinity of the nest, such as temporarily suspending work in the area. Indirect impacts are not anticipated, but to the extent that any indirect impacts may occur to sensitive species in the vicinity of the MPR-3 work areas, those impacts will be mitigated in accordance with biological APMs and MMs in the MMCRP. Therefore, impacts to biological resources would remain similar to those addressed in the Project's Final IS/MND, Section 3.4. No new or altered APMs or MMs would be required.
Agency Consultation?	☐ Y ☒ N	MPR-3 activities would not require agency consultation relating to biological resources.
Cultural and Tribal Cultural Resources	☒ Y ☐ N	As described in Sections 3.5 and 3.18 of the Project's Final IS/MND, there are no known cultural or tribal cultural resources within the Project site, including the proposed MPR-3 work areas. As such, cultural and tribal monitoring is not anticipated to be required for MPR-3 activities. Although no direct impacts to cultural or tribal cultural resources are anticipated as a result of the use of the MPR-3 activities, any indirect impacts that may occur will be mitigated in

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
		accordance with cultural APMs in the MMCRP. Therefore, impacts to cultural and tribal cultural resources would remain similar to those addressed within the Project's Final IS/MND, Sections 3.5 and 3.18. No new or altered APMs or MMs would be required.
Agency Consultation?	☐ Y ☒ N	MPR-3 activities would not require agency consultation relating to cultural or tribal cultural resources.
Geology and Soils	☒ Y ☐ N	MPR-3 activities do not involve the installation of any new permanent facilities, nor performance of any new activities. Accordingly, approval of MPR-3 would not create any new geological related hazard not previously disclosed in the Project's Final IS/MND, Section 3.7. Trees proposed for removal within the expanded staging area will be "flush cut" near ground level (no ground disturbance) or completely removed (including base and roots) depending on site needs. Excess soil from the substation pad excavation would be utilized to fill in and create a level surface within the expanded staging area. Gravel would also be placed within the area for stabilization if needed to maintain a stable surface. The SWPPP would be amended as needed to include the MPR-3 work areas, and all MPR-3 construction activities will adhere to requirements in the SWPPP, including the implementation of erosion control BMPs. In compliance with APM GEO-1 and Project SWPPP, removed vegetation within the proposed expanded staging area would be disposed of off-site to an appropriate licensed facility or chipped on-site and used as mulch during site stabilization and restoration of temporary work areas. No new significant impacts or a substantial increase in the severity of any previously identified impacts to paleontological resources are anticipated to occur as a result of the proposed MPR-3 work areas. The MPR-3 work areas are located in an area with high and undetermined paleontological potential that requires monitoring for ground disturbing activities below two feet per APM PALEO-1 and the Project's PRMMP. Although not anticipated, if ground disturbance below two feet is required for any tree

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
		removals or grading activities within the expanded staging area, paleontological monitoring would take place. No impacts to paleontological resources are anticipated beyond what was disclosed within the Project's Final IS/MND, Section 3.7. Therefore, impacts to geology, soils, and paleontological resources would remain similar to those addressed within the Project's Final IS/MND, Section 3.7. No new or altered APMs or MMs would be required.
Agency Consultation?	☐ Y ☒ N	MPR-3 activities would not require agency consultation relating to geology, soils, or paleontological resources.
Hydrology and Water Quality	☒ Y ☐ N	There are no jurisdictional aquatic features within the MPR-3 work areas and MPR-3 activities do not involve the installation of any new permanent facilities. The Project SWPPP will be amended to include the MPR-3 work areas, and all Project activities would adhere to requirements and BMPs within the SWPPP. Although impacts to hydrology and water quality are not anticipated, any indirect impacts that might occur would be mitigated in accordance with the implementation of APM WQ-1 and the Project SWPPP, which contains measures to reduce or eliminate pollutants in storm water discharges from the site during construction that may otherwise violate water quality standards. MPR-3 activities would therefore not impede or redirect flood flow, alter the existing drainage pattern of the area, or otherwise result in hydrology and water quality impacts that would be different from the impacts addressed in the Project's Final IS/MND, Section 3.10. No new or altered APMs or MMs would be required.
Agency Consultation?	☐ Y ☒ N	MPR-3 activities would not require agency consultation relating to hydrology or water quality.
Noise and Vibration	☒ Y	With the addition of the temporary staging area extension, the closest sensitive receptors to the Project site would be approximately 670 feet northwest of the staging area. Table 3.13-6 in the

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
	☐ N	Project's Final IS/MND, Section 3.13, provides an estimate of maximum construction noise at the nearest sensitive receptor (previously 1,500 feet) as 48.1 dBa. Assuming an attenuation rate of 7.5 dBA per doubling of distance from the source as provided in the Final IS/MND analysis, a proximity of 750 feet would be expected to result in an increased maximum estimated construction noise level at the nearest sensitive receptor of approximately 56.4 dBa. The attenuated noise level at the nearest sensitive receptor is conservative as it assumes that the construction equipment used in the estimate would operate consistently at the points closest to the sensitive receptor. In reality, construction equipment operation during each phase will be distributed both temporally and spatially. Once the staging area is established, the majority of construction equipment operation will take place at the substation site, which is approximately 1,500 feet from the closest sensitive receptor. As discussed in the Final IS/MND, Section 3.13, noise impacts from construction activities would not be considered significant unless attenuated noise levels at the nearest sensitive receptors exceeded the outdoor daytime and nighttime thresholds of 70 dBA and 60 dBA, respectively. In addition, MPR-3 does not propose any activities outside of the Project site boundary, nor would it involve the performance of any new activities. Therefore, impacts would remain similar to those addressed in the Project's Final IS/MND, Section 3.13. No new or altered APMs or MMs would be required.
Agency Consultation?	☐ Y ☒ N	MPR-3 activities would not require agency consultation relating to noise and vibration.
Wildfire	☒ Y ☐ N	LSPGC and its contractors will conduct all activities in accordance with the Project's Construction Fire Prevention Plan (CFPP), APMs FIRE-1 through FIRE-5, and APM HAZ-4. The Project's Worker's Environmental Awareness Program (WEAP) training will be provided throughout construction, as needed, to accommodate new Project personnel per the Project's CFPP. Although vegetation within the expanded staging area would be restored following construction (in accordance with

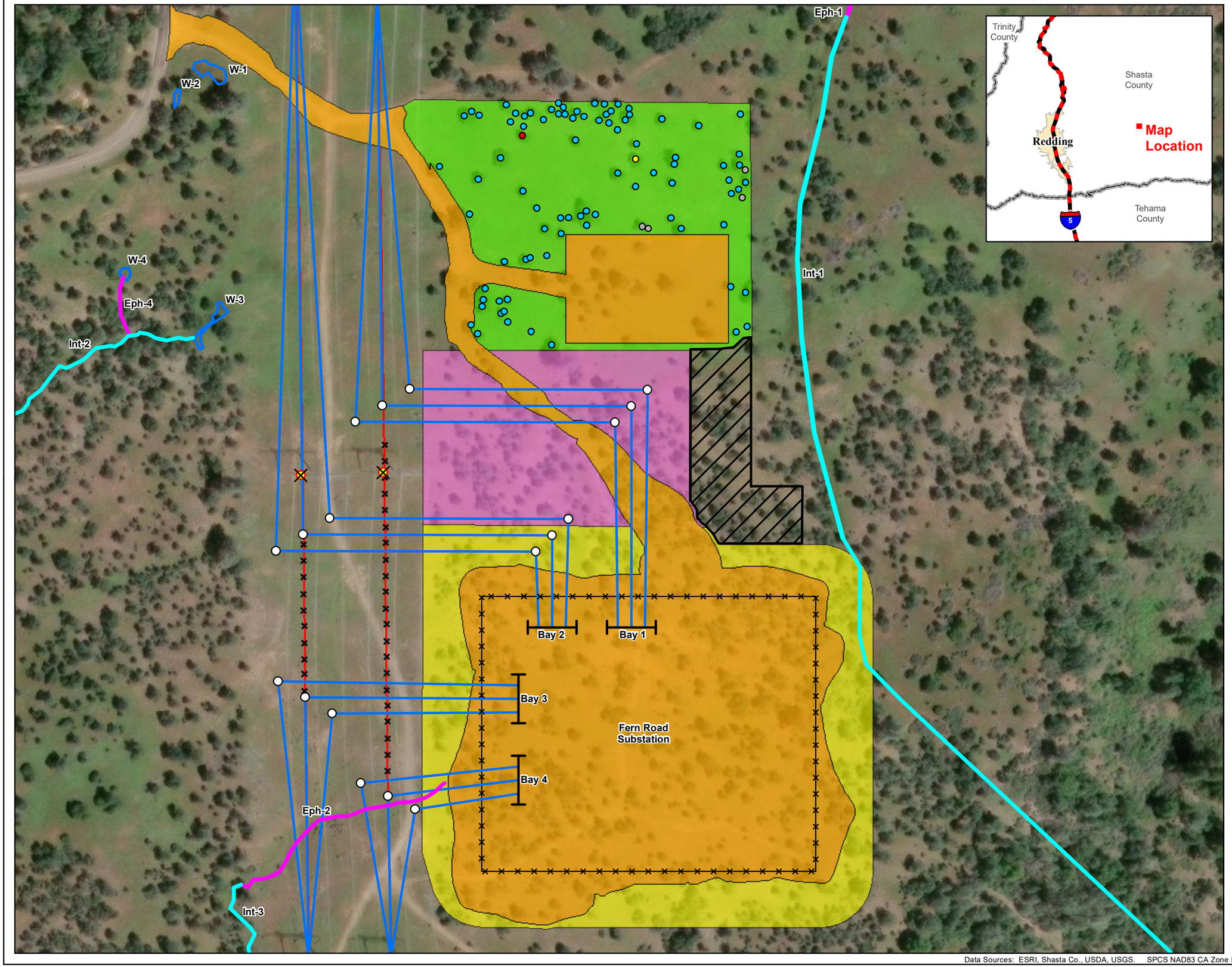
CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
		APM BIO-12 and the Project's Restoration Plan), proposed tree clearing will provide temporary benefits in terms of wildfire protection and defensible space in the event of a fire. Therefore, potential impacts related to wildfire resulting from MPR-3 would be similar to those disclosed in the Final IS/MND, Section 3.20. No new or altered APMs or MMs would be required.
Agency Consultation?	☒ Y	As needed, LSPGC will coordinate with local emergency response agencies such as fire departments and police during Project construction. Emergency access will be maintained throughout construction.
	☐ N	

ATTACHMENT B
MPR-3 Figure

FERN ROAD SUBSTATION

MPR-3
Figure 1 Work Areas

Shasta County, CA



LEGEND

Tree Species

- Blue Oak *(Q. Douglasii)*
- California Black Oak *(Q. Kelloggii)*
- Gray Pine *(P. Sabiniana)*
- Manzanita *(Arctostaphylos)*

MPR-3 Components

- Expanded Staging Area
- Materials Storage within MPR-2 Work Area
- Materials Storage - No Tree Removal

Project Components

- Tree Clearing Area Previously Approved in MPR-2
- Project Area Previously Approved in NTP-1
- New 3-Pole Dead-End Pole
- Existing Structure to be Removed
- Project Tie Line
- Existing 500kV Transmission Line to be Removed
- Fern Road Substation Bay
- Substation Fence

Aquatic Resources

- Eph - Ephemeral Stream
- Int - Imittent Stream
- W - Seasonal Wetland

General Features

- Interstate
- County Boundary
- Municipal Boundary

0 50 100 150 200 250
Feet

Data Sources: ESRI, Shasta Co., USDA, USGS. SPCS NAD83 CA Zone I Feet. F:...\PEA\MPR-3 Figure 1 Work Areas 053024.mxd SJW 6-05-2024

ATTACHMENT C
MPR-3 Photograph Log

Fern Road Substation
MPR-3 Photo Log

Photograph 1:

West-facing view of southwest portion of the expanded staging area (green area in **Attachment B, MPR-3 Figure**) from the existing staging area pad.

Photograph 2:

North-facing view of the east side of the expanded staging area (green area in **Attachment B MPR-3 Figure**).

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Photograph 3:

West-facing view of the northeast portion of the expanded staging area (green area in **Attachment B MPR-3 Figure**).

Photograph 4:

Southwest-facing view of the northern portion of the expanded staging area (green area in **Attachment B MPR-3 Figure**).

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Photograph 5:

Southwest-facing view of northwestern portion of the expanded staging area (green area in **Attachment B MPR-3 Figure**) (photo caption in lower left is incorrect).

Photograph 6:

West-facing view of northeastern half of the materials storage area (pink area in **Attachment B MPR-3 Figure**).

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Photograph 7:

Northwest-facing view of northeastern half of the materials storage area (pink area in **Attachment B MPR-3 Figure**).

Photograph 8:

West-facing view of southwestern half of the materials storage area (pink area in **Attachment B MPR-3 Figure**).

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Photograph 9:

South-facing view of the northeastern portion of the materials storage area (hatched area in **Attachment B MPR-3 Figure**).

Photograph 10:

Southeast-facing view of northwestern portion of the materials storage area (hatched area in **Attachment B MPR-3 Figure**).

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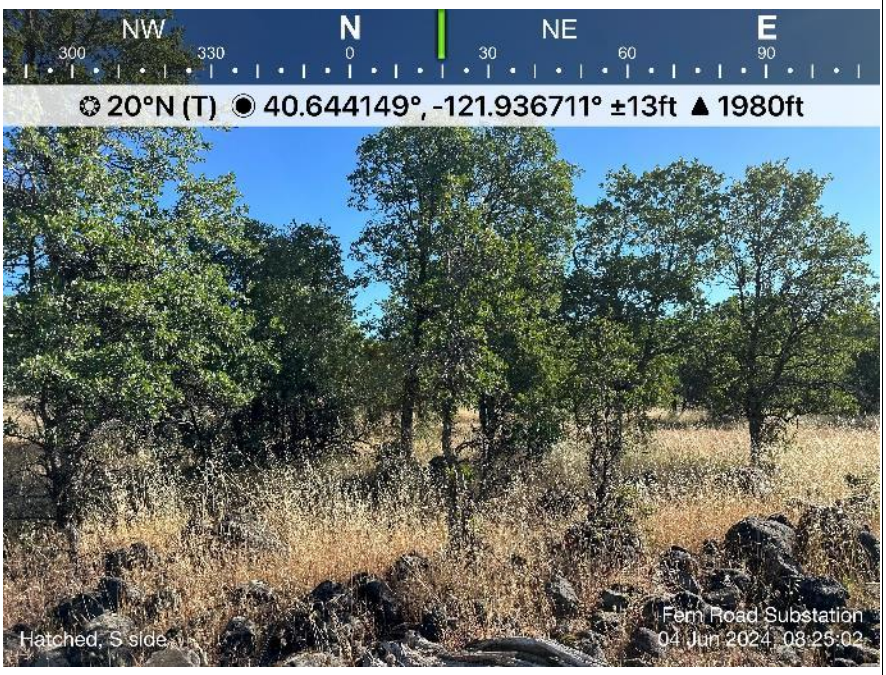

Photograph 11:

North-facing view of the southern portion of the storage (hatched area in **Attachment B MPR-3 Figure**).

Photograph 12:

Northeast-facing view of middle portion of the storage area (hatched area in **Attachment B MPR-3 Figure**).