Question PD-3:

The application gives an estimate of 16 miles of new road work (unpaved) needed for access. The application states that the specific location of new access roads and spur roads would be determined after completion of final engineering. However, this defers analysis of potential biological and cultural resources impacts and possibly other impacts. There needs to be some way of either identifying access road locations before the EIR is prepared so that analysis can be performed or there needs to be strict performance based standards included in the mitigation plan to avoid potential impacts from the road. Please provide your preferred approach that would comply with CEQA.

Response to Question PD-3:

Although the exact location of new roads would not be determined until final engineering is completed, a general area is known for most new roads. These new roads would be constructed within a corridor generally delineated for each respective route segment identified in the PEA.

Initial environmental surveys for both biological and cultural resources were conducted within corridors along each proposed route segment. These corridors were 200 feet wide (100 feet along each side of projected center line) for biological resources and 400 feet wide (200 feet along each side of projected center line) for cultural resources. Surveying corridors instead of proposed road alignments allows SCE to identify potential impacts within these corridors, thus providing an opportunity to avoid sensitive areas during project design. By avoiding sensitive resources during final engineering, potential impacts would be less than significant. Additional surveys would be conducted along route segment or road adjustments, resulting from final engineering, that extend outside the original survey corridors.

**Biological Resources**

Project design includes several avoidance and protective measures that are set forth on pages 4.5-38 and 4.5-39. Avoidance and protective measures include compliance with the Riverside County Multiple Species Habitat Conservation Plan (MSHCP). These measures
also provide water quality and erosion protection (see BIO-SCE-2, -4, -6, and -7 on page 4.5-38). MSHCP compliance also requires pre-construction surveys, along final route segment and road alignments, to identify special-status and non-special-status migratory birds that may be present.

Additional mitigation measures are provided on pages 4.5-40 and 4.5-21 to avoid or reduce the significance of potential impacts to biological resources. These mitigation measures also include BMPs to minimize hydrologic impacts.

**Cultural Resources**

Project design includes several avoidance and protective measures that are set forth on pages 4.6-8. These measures are incorporated into SCE standard construction and operation protocols. Avoidance and protective measures include monitoring during construction.