PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



February 8, 2021

Lori Rangel Environmental Project Manager Southern California Edison 2244 Walnut Grove Avenue Rosemead, CA 91770

RE: Mesa 500-kV Substation Project – Minor Project Change No. 13 Request: Transmission tower relocation

Dear Ms. Rangel,

On December 15, 2020, Southern California Edison (SCE) submitted Minor Project Change (MPC) No. 13 Request to the California Public Utilities Commission (CPUC) for review. Responses to CPUC's questions and technical clarifications to the proposed MPC were sent on February 1, 2021. The proposed MPC would involve repositioning a 500-kV lattice steel tower (LST) at Construction 5001 approximately 135 feet north. The position of the LST at Construct 5002 would remain unchanged, however, the span between LSTs at Constructs 5001 and 5002 would be slightly angled to the north, resulting in the need to reserve an extended area on either side of Marketplace Drive for guard structures. Furthermore, the span between 5001 and 5002 would only be fractionally longer than previously proposed.

As previously approved for the project, the construction of the LST at Construct 5001 would utilize a 4-5 person crew. The work associated with the construction of structure 5001, which includes foundation, tower assembly and construction, and conductor stringing, would take approximately 20 non-consecutive working days. The occur during would utilize mobile guard structures (i.e., truck with boom). All construction is planned to occur during previously approved construction hours. The heights of the LSTs at Constructs 5001 and 5002 would not be changed as part of this MPC. Additionally, the contractor would procure the appropriate permit from the City of Monterey Park prior to performing the work over Market Place Drive. The stringing activities across Market Place Drive will be in franchise city street, therefore, no landowner agreement or acquisition is required.

The relocation of the 500-kV LST and span described above is proposed to allow for the rack spans to be relocated from the new 500-kV switchrack positions 5 and 6, as currently designed, into positions 3 and 4, if that relocation ever becomes necessary.

The Mesa 500-kV Substation 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 February 9, 2017 (Decision 17-02-015). The mitigation measures (MMs) and applicant proposed measures (APMs) described in the EIR were adopted by the CPUC as conditions of Project approval. In August 2017 the CPUC adopted the Mitigation Monitoring, Compliance, and Reporting Plan (MMCRP) to ensure compliance with all APMs and MMs during project implementation.

This letter documents the CPUC's evaluation of all activities covered in the MPC No. 13Request. The CPUC has carefully reviewed this MPC request and has verified that the proposed activities adhere to all applicable APM and MM requirements. The evaluation process ensures that all APMs and MMs applicable to the location, and all activities covered in the MPC 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 APM 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 IS/MND.

The CPUC has determined that MPC No. 13 meets the above criteria. MPC No. 13 is approved by the CPUC for the proposed activities based on the factors described below.

CPUC Evaluation of MPC No. 13 Request

The CPUC evaluated SCE's MPC Request No. 13 to verify that it fulfills 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 MPC activities. The following discussion summarizes this analysis for biological, cultural, paleontological, and other environmental resources, areas as well as aesthetics and visual resources.

Location of Ground Disturbance Areas

All work areas associated with MPC No. 13 activities fall within the Final EIR Study Area. MPC No. 13 would occur entirely within approved temporary work areas for Construct 5001. Therefore, no change to the ground disturbance than previously considered and approved as part of the original location of Construct 5001 would occur.

Aesthetics/Visual Impacts

MPC No. 13 would occur in an existing SCE right-of-way (ROW), with the same conduit spanning a stretch of Marketplace Avenue. Therefore, the potential additional impacts associated with construction would be negligible when compared to pre-project conditions.

Biological, Cultural, Paleontological Resources, and other Environmental Resources

As identified in the Final EIR, MPC No. 13 would occur in areas covered with bare earth that provide no useful habitat for any wildlife or botanical species. If active nests are observed within the vicinity of Constructs 5001 and 5002, 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-9) and implementing disturbance buffers and other measures in the Nesting Bird Management Plan (MM BR-11).

The construction of the LST at Construct 5001 and wire stringing activities would not be installed in suitable natural habitat for any special status species, and the work areas do not overlap with USFWS Critical Habitat for any species. The ground disturbance areas for relocating the LST at Construct 5001 is located within the applicable Final EIR study areas for sensitive resources, including special status animals and plants, wetlands, and other waters, and cultural and paleontological resources.

No cultural or paleontological resources have been identified within MPC No. 13 work areas. However, potential impacts to buried resources during trenching activities will be mitigated with implementation of the project's Cultural Resources Management Plan (CRMP). Furthermore, this location is mapped as high paleontological potential Fernando Formation, so there is potential for buried paleontological resources to be encountered if excavation impacts native sediments. However, potential impacts resulting from excavations in the Fernando Formation were previously analyzed and will be mitigated by implementing the project's Paleontological Resources Management Plan (PRMP). This area is currently used as a project access road. Using this area to reposition the LST at Construct would not be a significant additional project impact.

The Final EIR documents numerous ephemeral drainages (jurisdictional and non-jurisdictional) in a highly disturbed landscape. These drainages were identified in the Final EIR as experiencing temporary impacts related to project activities. Temporary impacts on these ephemeral drainages associated by MPC No. 13 activities would be consistent with the type and extent of impacts analyzed in the Final EIR. These drainages were identified in the Final EIR as being subject to temporary project-related impacts. The permanent LST installation footprint at Construct 5001 would not fall within the drainage areas, so permanent impacts are not anticipated. Regardless, SCE would be required to adhere to all measures and strategies described in their Stormwater Pollution Prevention Plan (SWPPP) and Streambed Alteration Agreement (SAA) to minimize impacts to water features site-wide.

Permits

Encroachment permit from the City of Monterey Park.

MPC No. 13 Conditions of Approval

MPC No. 13 is approved by the CPUC with conditions. The conditions presented below shall be met by SCE and its contractors:

- 1. All applicable Project MMs, APMs, 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 MPC, shall be available on site for the duration of construction activities.
- 3. SCE shall implement all appropriate erosion and sediment control BMPs for the MPC No. 13 refinement area as defined in 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., grading, trenching, etc.) shall be monitored by CPUC-approved monitors in accordance with the MMCRP, where appropriate.
- 5. SCE shall ensure that construction equipment at the proposed locations will have adequate and properly placed secondary containment to avoid and minimize potential spills.
- 6. SCE and or its contractor shall procure all necessary permits, including but not limited to an encroachment permit from the City of Monterey Park prior to performing work over Market Place Drive. Additionally, SCE shall submit the permits to the CPUC for verification prior to performing work over Market Place Drive.
- 7. The work associated with MPC No. 13 shall occur within approved project workdays and hours. In the event that MPC No. 13 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. All complaints related to MPC No. 13 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 processes described in the MMCRP.

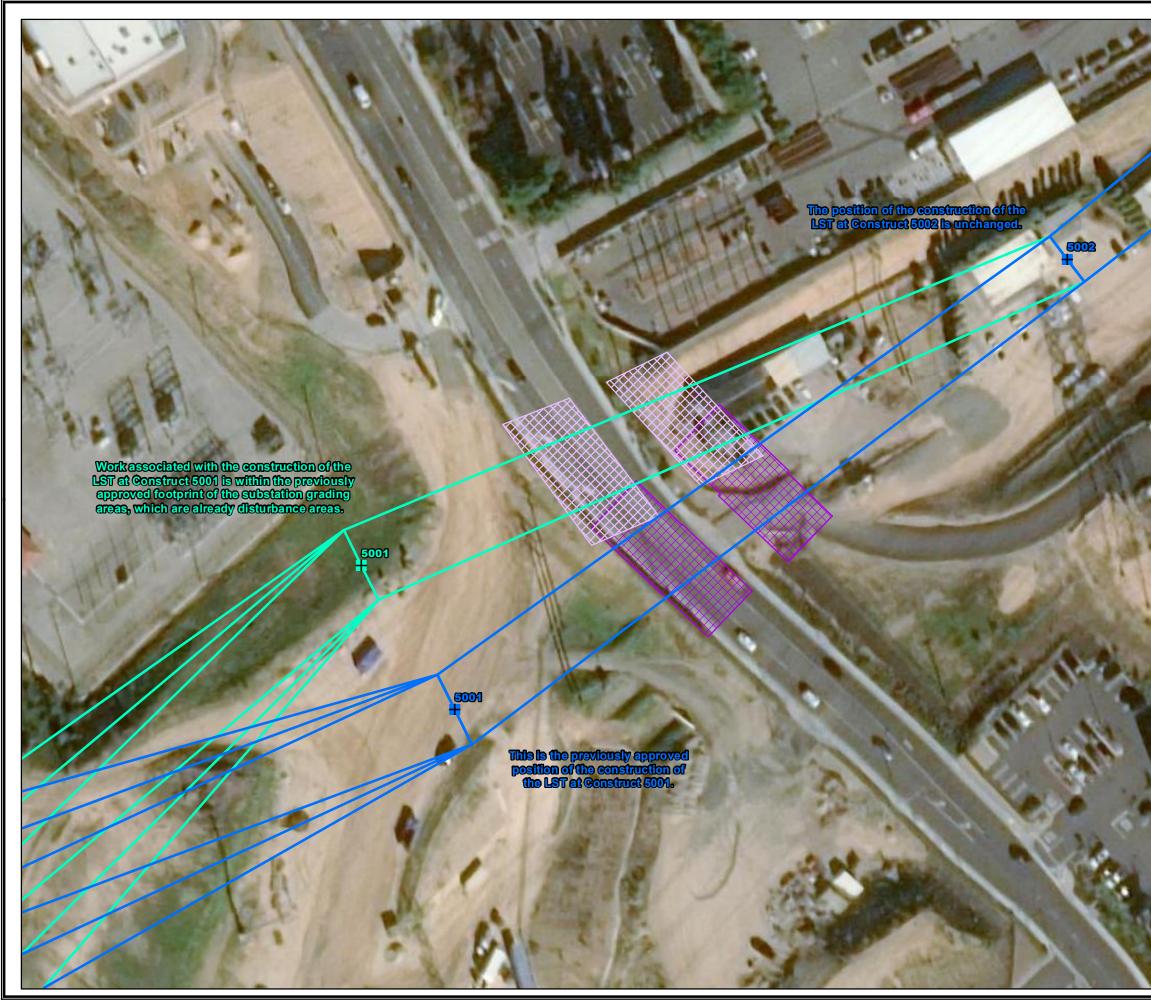
Please contact me if you have any questions or concerns regarding this MPC approval.

Sincerely,

Connie Chen Connie Chen CPUC Project Manager

cc: Silvia Yanez, WSP (formerly E & E) Compliance Manager Fernando Guzman, WSP (fprmerly E & E) Deputy Compliance Manager Don Dow, SCE Project Manager

Attachment A: MPC No. 13 Request Figures and Work Area Photos



MESA 500KV SUBSTATION FIGURE 1 MINOR PROJECT CHANGE 13

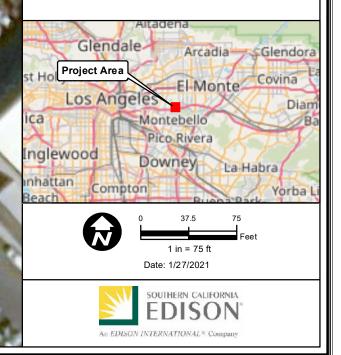
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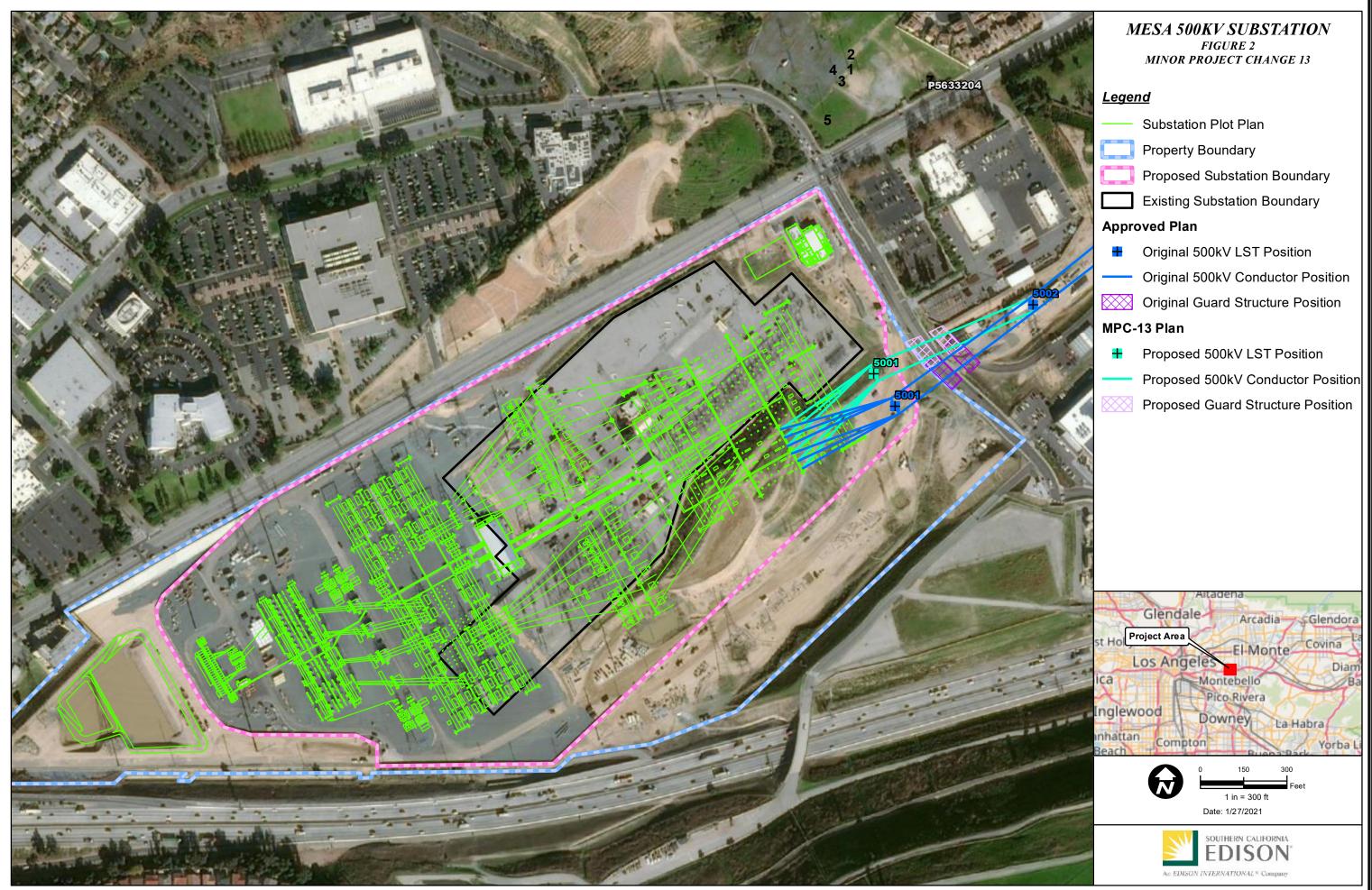
Approved Plan

- Original 500kV LST Position
- Original 500kV Conductor Position
- Original Guard Structure Position

MPC-13 Plan

- Proposed 500kV LST Position
 - Proposed 500kV Conductor Position
 - Proposed Guard Structure Position





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