

Mesa 500-kV Substation Project CPUC Minor Project Change Form

Date Requested: July 2, 2019 Date Approved: Property Owner(s): SCE			Report No.: 06 Approval Agency: CPUC			
			•	tative Cover: Bare ear rbed non-native grasse		04.4
Modification From:	Permit	☐ Plan/Pro	ocedure 🗵	Specification	Drawing	
i iuii.	☐ Mitigation Measure	Other:				

This activity is described Notice to Proceed Request–2 for Initial Project-Related Activities for the Mesa 500-Kv Substation Project, Section 2.4 Subtransmission Line Relocations Section 11 Figure 6B, and Final Environmental Impact Report, Mesa 500-kV Substation Project, Section 2.2.1.4.

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

Original Condition: The original, approved project includes the removal of three existing poles, 4007027E, 1551705E, and 4017002E, which will be replaced by new poles 6613, 6617, and 6618. These poles support both 66kV subtransmission conduit at the top of the poles, and 16kV distribution conduit at the approximate midpoint of the poles (see figure and photographs). In the area of approved construction, 16kV distribution conduit is directly beneath 66kV subtransmission conduit in the spans from pole 4017003E to pole 4017002E to pole 4017001E. In addition, 16kV distribution conduit passes perpendicularly beneath 66kV subtransmission conduit, where the spans from pole 4017002E to pole 1551705E to pole 4007027E pass beneath the spans from pole 1551704E to pole 1551705E to pole 1551706E, and the spans from pole 4017003E to pole 4017002E to pole 4017001E. These conduit span circumstances make the retirement of poles 4007027E, 1551705E, and 4017002E, and the construction of poles 6613, 6617, and 6618, a visually congested and complex process, which raises safety concerns, and may cause unintentional construction errors.

For these reasons, SCE proposes to relocate the 16kV conduit underground (turquoise line on figure) for the spans from pole 4017003E to pole 4017002E to pole 4017001E, and from 4017002E to pole 1551705E to pole 4007027E, prior to the retirement of existing poles 4007027E, 1551705E, and 4017002E, and prior to the construction of previously approved new poles 6613, 6617, and 6618 (yellow dots on figure). The trenches for this undergrounding will be approximately 2 feet wide and approximately 5 feet deep. Soil will be stockpiled adjacent to the trenching, and the trenches will be backfilled with the soil when the construction is complete.

At present, the 16kV conduit at 4017001E goes underground at X5633205. Under the proposed undergrounding, the underground stretch will continue approximately 315 feet to the northeast at pole 4017003E. At present, the 16kV conduit at 4007027E goes underground in the position of the proposed new padmounted switch P5633204 (hot pink dot on figure). Under the proposed undergrounding, the underground stretch will continue approximately 340 feet to the northwest. The intersection of the two 16kV stretches, which currently intersect at pole 4017002E, will now intersect at the proposed new subsurface manhole M5717392 (hot pink dot on figure).

- Justification for change: The relocation of the 16kV conduit described above is proposed so the project will reduce construction complexity, reduce visual congestion, enhance project safety, and potentially avoid unintentional errors. Removing the 16kV conduit from the process allows the retirement of poles 4007027E, 1551705E, and 4017002E, and the construction of poles 6613, 6617, and 6618, to proceed without the complexity of simultaneously relocating subtransmission and distribution conduit which currently pass beneath and cross each other. Proceeding with this change allows the project to avoid the installation of unnecessary replacement down guys and anchors, and to safely construct the foundations of new poles 6613 and 6617.
- Figure and Photos: Attached to this document.
 - o Figure. Distribution Conduit Undergrounding in the Area North of Potrero Grande Avenue at Saturn Street
 - o Numbered photos attached with position information on the Figure.

Environmental Impact:

This bare earth, compacted gravel, and heavily disturbed non-native grasses area provides no useful habitat for any wildlife or botanical species, and all nesting birds in the vicinity of this location have fledged. Further, this location does not host cultural resources or paleontological resources at the surface. No archaeological sites or historic-age (i.e., 50 years old or older) structures or features have been identified in the project location as a result of previous investigations. Potential impacts to buried resources will be mitigated with implementation of the project's Cultural Resources Management Plan (CRMP). 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 staging area. Using this area to relocate subtransmission conduit underground will not be a significant additional project impact.

Concurrence: the Final Environmental Impact Report, Mesa 500-kV Substation Project was consulted, as was the USACE Section 404 Permit (SPL-2015-0324), USFWS Biological Opinion (FWS-LA-15B0327-17F1426), CDFW Streambed Alteration Agreement (1600-2016-0034-R5), SWRCB Section 401 Permit (16-019), NTPR-1 Biological Review, Cultural Resources Management Plan for the Mesa Substation Project, and Paleontological Resources Management Plan for the Southern California Edison Mesa 500 Kilovolt Substation Project to determine whether other agencies, municipalities, utilities, etc. would need to provide concurrence with this MPC. For this situation, no project measures or plans stipulate consultation with agencies other than the CPUC.

Biological Resources:

Bare earth, compacted gravel, and disturbed non-native grasses

Biological		No Resources Present		Resources Present		N/A
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Previous Biological Survey Report Reference:

AMEC Earth & Environmental, Inc. (AMEC). 2009a. Final Special Status Plant Species Survey Report for the Southern California Edison Tehachapi Renewable Transmission Project, Segments 7 and 8. Prepared for Southern California Edison. December.

AMEC. 2009b. Final 2009 Burrowing Owl Focused Survey Report for Segments 7 and 8 of the Southern California Edison Tehachapi Renewable Transmission Project. Submitted to Southern California Edison. October.

Aspen. 2009. Revised Biological Resources Specialist Report for the Tehachapi Renewable Transmission Project. Prepared for the California Public Utilities Commission and the USDA Forest Service. September.

Aspen. 2010. Final Environmental Impact Statement, Southern California Edison's Application for the Tehachapi Renewable Transmission Project. Prepared for the California Public Utilities Commission and the USDA Forest Service. September.

- Ecology and Environment, Inc. (Ecology and Environment). 2016. Final Environmental Impact Report, Southern California Edison's Application for the Mesa 500-kV Substation Project. Prepared for the California Public Utilities Commission. October.
- ICF. 2010a. Jurisdictional Delineation Report for the Tehachapi Renewable Transmission Project: Segments 7 and 8. Prepared for Southern California Edison.
- ICF. 2010b. Focused Survey Report Special-Status Plant Species Segments 7 and 8. Tehachapi Renewable Transmission Project. Prepared for Southern California Edison.
- ICF. 2010c. Focused Survey Report for Burrowing Owl Segments 7 and 8. August. (ICF 00133.10.) Irvine, CA. Prepared for Southern California Edison, Rosemead, California.
- ICF. 2010d. Focused Survey Report for Coastal California Gnatcatcher Segments 7 and 8. August. (ICF 00133.10.) Irvine, CA. Prepared for Southern California Edison, Rosemead, California.
- ICF. 2011a. TRTP: Segment 11A Goodrich to Mesa Transmission Line Jurisdictional Delineation and Impact Analysis Report. July 13. Prepared for Southern California Edison, Brea, California.
- ICF. 2011b. 2011 Focused Survey Report Coastal California Gnatcatcher Segments 7 and 8, Tehachapi Renewable Transmission Project Component. September. Prepared for Southern California Edison, Brea, California.
- ICF. 2011c. Preconstruction Biological Survey and Clearance Sweep Report for Southern California Edison's WP3 Transmission Line Work Segment 7 Transmission Line (M40-T1, M42-T6, WSS 7-7.62, WSS 7-7.63, WSS 7-7.64, WSS 7-7.75), and 66kV Relocation (4774404E to 4774410E, M7-T1) Los Angeles County, California. September. Prepared for Southern California Edison.
- ICF. 2011d. 2011 Tree Inventory Report Segments 7 and 8. October 2012. Prepared for Southern California Edison, Brea, California.
- ICF. 2017a. Mesa 500kV Substation Project 45-day Report for Protocol Coastal California Gnatcatcher Surveys. Prepared for Southern California Edison, Brea, California. July.
- ICF. 2017b. Mesa 500kV Substation Habitat Assessment for Western Spadefoot. Prepared for Southern California Edison, Brea, California. September.
- Insignia Environmental (Insignia). 2015a. Biological Resources Technical Report for the Mesa 500 kV Substation Project. Prepared for Southern California Edison. February.
- Insignia. 2015b. Supplemental Jurisdictional Delineation Report for the Mesa 500 kV Substation Project. Prepared for Southern California Edison.
- Insignia. 2015c. Biological Assessment, Mesa 500 kilovolt Substation Project, Los Angeles, California. Prepared for U.S. Army Corps of Engineers. June.
- Noreas Environmental Engineering and Science (Noreas). 2015. Mesa Substation Project Plant Survey Report. Prepared for Southern California Edison. July.
- Noreas Environmental Engineering and Science (Noreas). 2017a. Mesa Substation Project Pre-construction Special-Status Plant Survey Report. Prepared for Southern California Edison. September.
- Noreas Environmental Engineering and Science (Noreas). 2017b. Mesa Substation Project Pre-construction Take Avoidance Burrowing Owl Survey. Prepared for Southern California Edison. September.
- Rocks Biological Consulting (RBC). 2015. 45-day Report for Protocol Coastal California Gnatcatcher Surveys for the Proposed Southern California Edison Mesa 500 kilovolt Substation Project, Los Angeles County, California. Prepared for Insignia Environmental.

Cultural Resources:

The location has been subject to a previous cultural resources records search and previous field surveys. No archaeological sites or historic-age structures or features were identified in the project location as a result of those investigations. Implementation of the CRMP will reduce any potential impacts to unknown buried resources to a less than significant level pursuant to CEQA.

Previously completed surveys of this area were negative for paleontological resources at the surface, and there were no known paleontological resources reported from this area in the literature or museum records searches. However, the area is mapped as high paleontological potential Fernando Formation, so there is the potential for buried paleontological resources to be encountered if native sediments are impacted. Impacts related to excavation into the

Fernando Formation were previously analyzed for the project; therefore, using this area to relocate subtransmission conduit underground does not represent an additional project impact. Implementation of paleontological monitoring and mitigation in accordance with the PRMP will reduce any potential impacts to paleontological resources to a less than significant level pursuant to CEQA.

Cultural	No Resources Present	Resources Present	Within Project Component Area	N/A (paved/graveled area or no ground disturbance)

Previous Cultural Survey Report Reference:

California Public Utilities Commission (CPUC). 2016. *Mesa 500-kV Substation Project Environmental Impact Report.*Davis, Shannon. 2017. *Evaluation of Historical Significance for the Mesa Substation Project.* Prepared by ASM Affiliates, Inc., Pasadena, California. Prepared for Southern California Edison.

- McLeod, S.A. 2014. *Paleontological Resources for the proposed Southern California Edison Mesa Substation Project*, Project # 061014, Los Angeles County, project area. Unpublished letter report by the Natural History Museum of Los Angeles Count, dated 30 June 2014.
- Miller, D.M., S.A. Siren, G.L. Aron. 2015. *Paleontological Resource Survey Report: Southern California Edison Mesa 500 Kilovolt Substation Project*, Los Angeles County, California. Prepared by Paleo Solutions, Inc. on behalf of SCE. Original dated July 22, 2014 and revised September 2014, November 2014, and January 2015.
- Ninyo and Moore. 2015. *Geotechnical Evaluation, Mesa 500kV Substation Phase 1*, 700 East Potrero Grande Drive, Monterey Park, California, dated August 27.
- Ninyo and Moore. 2016. *Geotechnical Evaluation, Mesa 500kV Substation Phase 2*, 700 East Potrero Grande Drive, Monterey Park, California, dated May 6.
- Raum, J. and G.L. Aron. 2015. *Paleontological Survey Summary for the Mesa Substation Project- Staging Yards 6 &* 7, cities of Rosemond and South El Monte, Los Angeles County, California. Report prepared by Paleo Solutions, Inc. on behalf of SCE. Dated August 13, 2015.
- Richards, C.D., and G.L. Aron. 2015. *Paleontological Monitoring, SCE Mesa 500 kV Substation Project*, Los Angeles County, California. Prepared by Paleo Solutions, Inc. on behalf of SCE. Dated February 16, 2015.
- Williams, Audry. 2014. *Historical Resource Analysis Report/Historic Property Survey Report Southern California Edison Company Mesa 500kV Substation Project*. Prepared by Southern California Edison.
- Williams, Brian, Sherri Andrews, and Shannon Davis. 2014. Cultural Resources Inventory of the Southern California Edison Company Mesa Substation 200 Kilovolt Project, Los Angeles, County, California. Prepared by ASM Affiliates, Inc. on behalf of SCE. Dated November 2014.

<u>Disturbance Acreage Changes:</u>	Yes	⊠ No
Original disturbance acreage: N/A		New disturbance acreage: N/A
	AA Define notes	sticl improct or (N) briefly compain why CEOA coction ion/t

CEQA		(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and
Section	Applicable	avoidance/minimization measures to be taken.
Geology, Soils, and Seismicity	□Y⊠N	No potential additional impacts.

CEQA		(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and
Section	Applicable	avoidance/minimization measures to be taken.
Agency Consultation?	□Y⊠N	Agency consultation is not necessary.
Hazardous Materials and Waste	□Y⊠N	No potential additional impacts.
Agency Consultation?	□Y⊠N	Agency consultation is not necessary.
Hydrology	□Y⊠N	No potential additional impacts.
Agency Consultation?	□Y⊠N	Agency consultation is not necessary.
Cultural Resources	□Y⊠N	No potential additional impacts.
Agency Consultation?	□Y⊠N	Agency consultation is not necessary.
Traffic and Circulation	□Y⊠N	No potential additional impacts.
Agency Consultation?	□Y⊠N	Agency consultation is not necessary.
Air Quality	□Y⊠N	No potential additional impacts.
Agency Consultation?	□Y⊠N	Agency consultation is not necessary.
Noise and Vibration	□Y⊠N	No potential additional impacts.
Agency Consultation?	□Y⊠N	Agency consultation is not necessary.
Visual Resources	□Y⊠N	No potential additional impacts.
Agency Consultation?	□Y⊠N	Agency consultation is not necessary.

CEQA Section Vegetation and Wildlife	Applicable Y N		(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 potential additional impacts.			
Agency Consultation?	? □Y⊠N		Agency consultation is not necessary.			
Approvals		Date	Name (print)	Signature		
Southern Californi Edison Environmental Project Manager	а	7/17/19	Lori Iles-Rangel		Reviewed	
CPUC Project Manager			Connie Chen		Approved Approved with conditions (see below) Denied	
For CPUC Compliance Manager Use Only						
Refinement Approved Refinement Denied Beyond Authority						
Conditions of Approval or Reason for Denial:						
Prepared by:				Date:		

Figure.



Photo 1. Looking north with, from left to right, poles 4017002E, 1551705E, and 4017003E (transmission towers not included).



Photo 2. Looking south with, from left to right, poles 1551705E, 4017002E, and 4017003E (distant poles not included).



Photo 3. Looking NNE with, from left to right, poles 4017002E, 1551705E, and 1551704E (distant poles and transmission towers not included).



Photo 4. Looking ENE with, from left to right, poles 4017003E, 1551704E, 4017002E, 1551705E, and 4017001E (distant poles and transmission towers not included).



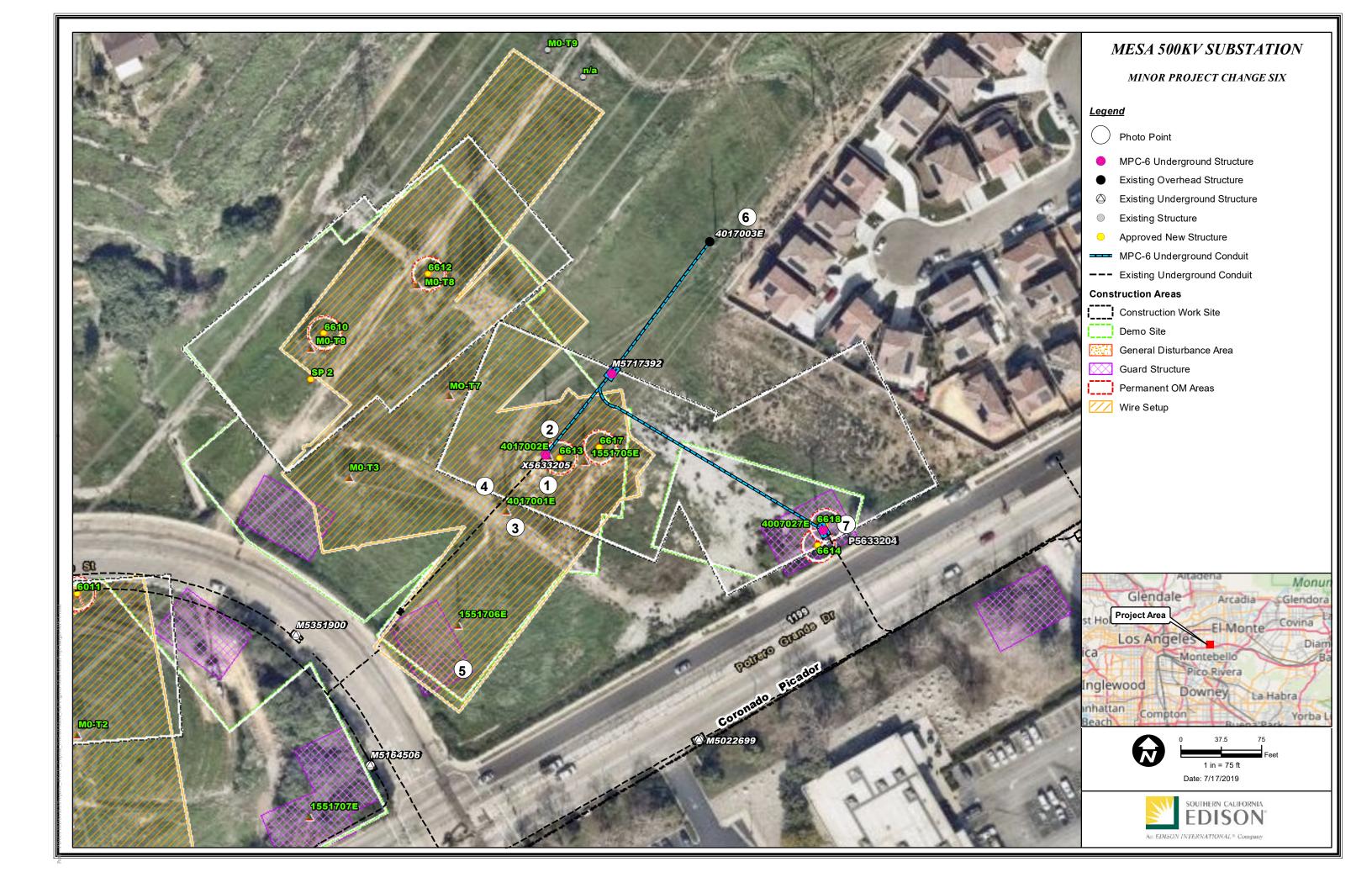
Photo 5. Looking NNE with, from left to right, poles 1551706E 4017001E, 4017002E, 1551705E, 4017003E, and 1551704E (distant poles and transmission towers not included).



Photo 6. Looking SSW with, from left to right, poles 1551704E, 4017003E, 1551705E 4017001E, and 4017002E (distant poles and transmission towers not included).



Photo 7.



PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



August 9, 2019

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. 6 Request: Telecom Changes from above ground to underground

Dear Ms. Rangel,

On July 17, 2019, Southern California Edison (SCE) submitted Minor Project Change (MPC) No. 6 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 July 30, 2019. The proposed MPC would involve relocating the 16kV conduit underground for the spans from pole 4017003E to pole 4017002E to pole 4017001E, and from 4017002E to pole 1551705E to pole 4007027E, prior to the retirement of existing poles 4007027E, 1551705E, and 4017002E, and prior to the construction of previously approved new poles 6613, 6617, and 6618. Under the proposed undergrounding, the underground stretch will continue approximately 315 feet to the northeast at pole 4017003E. In addition, under the proposed undergrounding, the underground stretch will continue approximately 340 feet to the northwest. The intersection of the two 16kV stretches, which currently intersect at pole 4017002E, will now intersect at the proposed new subsurface manhole M5717392.

The relocation of the 16kV conduit described above is proposed so the project will reduce construction complexity, reduce visual congestion, enhance project safety, and potentially avoid unintentional errors. Removing the 16kV conduit from the process allows the retirement of poles 4007027E, 1551705E, and 4017002E, and the construction of poles 6613, 6617, and 6618, to proceed without the complexity of simultaneously relocating subtransmission and distribution conduit which currently pass beneath and cross each other. Proceeding with this change allows the project to avoid the installation of unnecessary replacement down guys and anchors, and to safely construct the foundations of new poles 6613 and 6617.

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. 6 Request. 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. 6 meets the above criteria. MPC No. 6 is approved by the CPUC for the proposed activities based on the factors described below.

CPUC Evaluation of MPC No. 6 Request

The CPUC evaluated SCE's MPC Request No. 6 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. 6 activities fall within the Final EIR Study Area. MPC No. 6 would occur entirely within approved temporary work areas north of Potrero Grande Drive and northeast of Saturn Street. Furthermore, relocation of 16kV conduit underground and installation of poles 6613, 6617, and 6618 would be located within Staging Yard 1.

Aesthetics/Visual Impacts

MPC No. 6 does not include additional aboveground structures. Therefore, work under MPC No. 6 would not be expected to substantially degrade the surrounding viewshed. Conversely, the relocation of the 16kV conduit below ground would reduce visual congestion and avoid the installation of unnecessary down guys and anchors.

Biological, Cultural, Paleontological Resources, and other Environmental Resources
As identified in the Final EIR, MPC No. 6 would be occur in areas with non-native vegetation and all nesting birds in the vicinity of this location have fledged. However, if active nests are observed within the vicinity of the 16kV undergrounding or 6613, 6617, 6618 poles, 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 undergrounding of the 16kV conduit and construction of poles 6613,6617, and 6618 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 16kV conduit underground and the construction of poles 6613, 6617, and 6618 are 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. 6 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 staging area. Using this area to relocate subtransmission conduit underground will not be a significant additional project impact.

The Final EIR documents numerous ephemeral drainages (jurisdictional and non-jurisdictional) near Staging Yard 1 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. 6 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 switch installation footprints 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

No additional permits or approvals are required for MPC No. 6 activities.

MPC No. 6 Conditions of Approval

MPC No. 6 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.

- 5. SCE shall implement all appropriate erosion and sediment control BMPs for the MPC No. 6 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.
- 6. All activities (e.g., grading, trenching, etc.) shall be monitored by CPUC-approved monitors in accordance with the MMCRP, where appropriate.
- 7. All complaints related to MPC No. 6 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.

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, E & E Compliance Manager Fernando Guzman, E & E Deputy Compliance Manager Don Dow, SCE Project Manager