

ENVIRONMENTAL MINOR PROJECT CHANGE FORMProject Name: Banducci Substation Request Prepared By: TRCDate Approval Required: 8/10/17 Variance Request No: Minor Project Change No. 2Date Submitted: 8/8/17 Location: East side of Pellisier Rd. ROW near Dale Rd.Landowner: Public ROW and SCE land right¹ Landowner Parcel Number: N/A¹Current Vegetative Cover/Land Use: Unvegetated/Road ShoulderExisting Sensitive Resource? No Yes Specify: _____

Modifying (Check as many as apply):

- | | | |
|---|---|--|
| <input type="checkbox"/> Mitigation Measure | <input type="checkbox"/> Plan/Procedure | <input type="checkbox"/> Specification |
| <input checked="" type="checkbox"/> Drawing | <input type="checkbox"/> Permit Condition | <input type="checkbox"/> Other |

Specify Source (e.g., Mitigation Measure B.5): NTP-3

Description of Change and Justification: (Attach additional sheets if needed.)Attachments: Photo Construction Drawing Additional Environmental Analysis Correspondence Other

Refer to Exhibit A: Minor Project Change Description, Justification, and Analysis.

Resources:Biological No Sensitive Resources Present Sensitive Resources Present OtherNew Survey Report Attached: Yes NoIf No, Previous Biological Survey Reference: Refer to Exhibit B: List of Prior StudiesCultural No Resources Present Resources Present within Project APE Paved/Gravel Area and No Ground DisturbanceIf in APE, Previous Cultural Survey Report Reference: Refer to Exhibit B: List of Prior Studies

If not in APE, attach new survey report.

¹ Proposed Minor Project Change will occur within the same permitted limits of disturbance and SCE land right area as the approved project design. The new alignment would be located one foot inside the Pellisier Road ROW.

Other Potential Impacts: (Check any potential changes to permitted impacts and provide details below. Attach additional sheets if needed.)

- | | | |
|---|--|--|
| <input type="checkbox"/> AIR QUALITY | <input type="checkbox"/> LAND USE | <input type="checkbox"/> TRAFFIC |
| <input type="checkbox"/> BIOLOGICAL RESOURCES | <input type="checkbox"/> NOISE | <input type="checkbox"/> VISUAL |
| <input type="checkbox"/> CONTAMINATED SOILS | <input type="checkbox"/> PALEO RESOURCES | <input type="checkbox"/> WATER RESOURCES |
| <input type="checkbox"/> CULTURAL RESOURCES | <input type="checkbox"/> SOCIOECONOMIC | <input type="checkbox"/> WETLANDS |
| <input type="checkbox"/> HAZARDOUS MATERIALS | <input type="checkbox"/> STORM WATER (SWPPP) | |

There will be no change in project impacts. Refer to Exhibit A: Minor Project Change Description, Justification, and Analysis.

CEQA and Permitting: (Provide details for any "Yes" answer and attach additional information if needed.)

1. Will modification involve substantial changes that will require major changes to the CEQA document?
 Yes No
 2. Will modification result in new significant environmental effects or a substantial increase in the severity of previously identified impacts? Yes No
 3. Additional agency notifications and/or permit modifications required? Yes No
- Refer to Exhibit A: Minor Project Change Description, Justification, and Analysis.

CPUC Project Manager: APPROVED DENIED

Name: Jensen Uchida Signature: *Jensen Uchida* Date: 8/11/17

SCE Required Signatures: (Attached email approvals may be used in lieu of signatures)

SCE Chief Construction Inspector or Foreman: VARIANCE MODIFICATION IS NEEDED FOR SAFE AND EFFICIENT CONSTRUCTION

Name: _____ Signature: _____ Date: _____

Environmental Inspector: FIELD REVIEW COMPLETE

Name: _____ Signature: _____ Date: _____

SCE Land Ag CONSISTENT WITH EXISTING RIGHTS NEW RIGHTS OBTAINED

Name: _____ Signature: _____ Date: _____

SCE Environmental Compliance Lead: APPROVED APPROVED WITH CONDITIONS (SEE CONDITIONS ABOVE) DENIED

Name: Joseph Stenger Signature: *Joseph Stenger* Date: 8/8/17

MPC Request No. 2
Exhibit A: Minor Project Change
Description, Justification, and Analysis

Exhibit A

Minor Project Change Description, Justification and Analysis

Banducci Substation Project

Minor Project Change Request No. 2

Based on the results of final transmission telecommunication engineering, Southern California Edison (SCE) has identified the need for a minor project change (MPC) to the approved Banducci Substation Project. The needed MPC consists of a minor adjustment to the proposed location of the distribution line alignment, including vault and transformer pad locations and one bore receiving pit location along the distribution alignment in various locations as approved by the CPUC as part of the Banducci Project Permit to Construct (PTC) and released for construction by Notice to Proceed No. 3. The adjusted location would remain within the permitted limits of disturbance (LOD). As further discussed below, the proposed MPC would not result in any new significant environmental effects or a substantial increase the severity of previously identified impacts as identified in the Final Initial Study/ Mitigated Negative Declaration (IS/MND). As a result, SCE does not believe that any of the conditions described under CEQA Guidelines Section 15162 would occur. In addition, the changes would not conflict with any mitigation measure, applicable law, or policy, or trigger an additional permit requirement, as further described below.

Description and Need for the Request Minor Project Change

As part of pre-construction preparation, TRC identified the proposed distribution line alignment along Pellisier Road to have an unanticipated conflict with a preexisting buried AT&T telecommunication utility line. It was discovered that the AT&T utility line occurs within the same alignment proposed for the Banducci Substation Project distribution line segments that parallel Pellisier Road. As such, SCE proposes to modify the placement of the new distribution alignment, shifting the alignment approximately eight feet to the east of the approved alignment in order to avoid the potential for impact (e.g., damage or relocation) to the existing AT&T line. The adjusted relocation of the distribution line would remain on the east of Pellisier Road within the previously approved project LOD identified in the Final IS/MND and Notice to Proceed (NTP) Request No. 3. As described in the Final IS/MND, the distribution alignment would still parallel Pellisier Road from south of Dale road until terminating north of Highline Road. New vaults, pads, and required bore pits along the alignment would also be moved east, to be in line with the adjusted distribution line location, and vaults would be rotated 180 degrees at those locations where rotation would minimize the eastward shift in location. One bore receiving pit adjacent to Highline Road would be shifted both southward and eastward. Please refer to Attachment A: Distribution Redline Drawing, for a drawing showing the original and proposed distribution alignments. Attachment B contains site photographs that depict the locations of the AT&T utility, the approved distribution alignment, the proposed MPC alignment, and the approved LOD. The redlined location of the proposed alignment would be 19 feet from the Pellisier Road ROW centerline, which is one foot inside of the east edge of the Pellisier Road ROW.

Minimum Requirements for a Minor Project Change Request

Location of Change

The proposed MPC is located within the approved LOD, and is therefore within the geographic study boundary of the study area for all CEQA resource area topics.

Consistency with Determinations Made Under CEQA

The proposed MPC would not create any new significant impact or substantially increase the severity of any previously identified impact. Additional information is provided below for each CEQA resource area.

Consistency with APMs and Mitigation Measures

The proposed MPC is consistent with all project Mitigation Measures (MMs¹). Additional detail is provided below.

Other Regulatory Approvals and Compliance with Applicable Laws and Regulations

The proposed MPC is located within the approved LOD, within areas of the same existing land rights for SCE as the approved project. No additional permits or other regulatory approvals are required.

The MPC will comply with all applicable laws and regulations, including encroachment into Kern County jurisdiction and Eastern Kern Air Pollution Control District (EKAPCD) Rule 402 (dust control).

Informational Requirements for All Requests for Minor Project Change

- Photos, Maps, & Other Supplemental Information: refer to Attachments A and B.
- Anticipated Start: August 10, 2017 or otherwise following the approval of this MPC request.

Effects of the Minor Project Change on the Final MND Impact Determinations

Aesthetics – Less than Significant

The proposed MPC would not change project aesthetics impacts compared to those addressed in the Final IS/MND. The proposed MPC would re-locate proposed underground distribution line segments, and only minor aboveground fixtures such as manhole covers would be visible along Pellisier Road. Minor changes in the placement of aboveground features would not be noticeable to the casual viewer, or be different than those aesthetic impacts described in the Final IS/MND. The proposed distribution line alignment with the MPC would remain within the project LOD and existing SCE ROW, and no other changes to the approved project are proposed. Therefore, the proposed MPC would not result in a new potentially significant impact or substantially increase the severity of a previously identified impact to aesthetic resources as disclosed in the Final IS/MND.

Agriculture and Forestry Resources – Less than Significant with Mitigation

The proposed MPC would occur within same existing SCE land rights as the approved project, within the approved project LOD, and would not change the existing use of the land along the shifted alignment. Therefore, the proposed MPC would not result in a new potentially significant impact or substantially

¹ Project mitigation measures supersede the APMs that were included with the project PTC application.

increase the severity of a previously identified impact to agricultural or forestry resources as disclosed in the Final IS/MND. There would be no impact to forestry resources since none occur in the area.

The proposed MPC would comply, and be consistent with, the intent of MMs AG-1 and AG-2. Specifically, the proposed MPC would affect the same agricultural operations (MM AG-1) and would similarly avoid conversion of Prime Farmland (MM AG-2) as the proposed shifted distribution line alignment would be located outside of existing agricultural operations, within the disturbed unpaved shoulder of Pellisier Road.

Air Quality – Less than Significant with Mitigation

Construction activities for the proposed MPC would not change from those analyzed in the Final IS/MND. The proposed MPC would not result in increases in construction duration, numbers or usage rates of equipment, or area of impact. In addition, the proposed MPC would require the same types of equipment as described in Table 4-4 of the Final MND and June 4, 2014 Air Quality Report. Therefore, the proposed MPC would not result in any new potentially significant impact or substantially increase the severity of a previously identified impact to air quality as disclosed in the Final IS/MND.

The proposed MPC would comply, and be consistent with, the intent of MM AQ-1. Specifically, SCE would implement the same required dust control measures during construction (MM AQ-1) as would be required for the approved project.

Biological Resources – Less than Significant with Mitigation

The proposed MPC would not result in changes to biological resource impacts as compared to those addressed in the Final MND because the MPC would not change the project LOD. The approved LOD were completely analyzed within the IS/MND (see Section 5.4 and Figure 5.4-1a). No sensitive biological resource are located within the distribution line LOD (refer to the Final IS/MND and pre-construction surveys completed by Chambers Group on July 7, 2017). Therefore, the proposed MPC would not result in any new potentially significant impact or substantially increase the severity of a previously identified impact to biological resources as disclosed in the Final IS/MND.

The proposed MPC would comply, and be consistent with, the intent of MMs B-1 through B-13. Specifically, SCE would implement the biological resource MMs in the same manner as was described for the approved project in the Final IS/MND.

Cultural Resources – Less than Significant with Mitigation

The proposed MPC would not result in changes to cultural resources impacts compared to those addressed in the Final IS/MND because the MPC would utilize the same LOD (i.e., area of direct impact or ADI) as the approved project. The proposed MPC would require substantially similar excavation depths, volumes, and other ground disturbing activities to those disclosed in the Final IS/MND (refer to Section 5.5). Therefore, the proposed MPC would not result in any new potentially significant impact or substantially increase the severity of a previously identified impact to cultural resources as disclosed in the Final IS/MND.

The proposed MPC would comply, and be consistent with, the intent of MMs C-1 through C-8. Specifically, SCE would implement the cultural resource MMs (such as avoidance of known resources [MM C-1] and construction monitoring [MMs C-1 and C-6] in the same manner as was described for the approved project in the Final IS/MND. In addition, the proposed MPC would not require revision of the

Cultural Resources Construction Phase Management Plan (MM C-3) or the Paleontological Resources Management Plan (MM C-5).

Geology and Soils – Less than Significant with Mitigation

The proposed MPC would not result in changes to geology and soils impacts as compared to those addressed in the Final IS/MND. The proposed MPC would shift the distribution line alignment approximately eight feet to the east of the approved alignment, within the approved LOD. The MPC alignment would be expected to encounter the same subsurface conditions and potential geologic hazards (e.g., liquefaction, seismic shaking, landslide potential) as described in the Final IS/MND for the approved project. Excavation and trenching activities would be identical to those described in the Final IS/MND and would not extend deeper or further than those previously described. Therefore, the proposed MPC would not result in any new potentially significant impact or substantially increase the severity of a previously identified impact to geologic or soil resources as disclosed in the Final IS/MND.

The proposed MPC would comply, and be consistent with, the intent of MM G-1. Specifically, the SCE-prepared Geotechnical Investigation Report (approved by the CPUC on February 17, 2016) and all applicable engineering design measures would be implemented for the shifted distribution line alignment, which is only proposed to be shifted approximately 8 feet from the approved alignment. No new geologic or soil units or geologic conditions would be encountered.

Greenhouse Gas Emissions – Less than Significant

Construction activities for the proposed MPC would be the same as those analyzed in the Final IS/MND. The proposed MPC would not increase the construction duration or intensity and would not require any changes in equipment type or size. Therefore, the proposed MPC would not result in any new potentially significant impact or substantially increase the severity of a previously identified impact to greenhouse gases as disclosed in the Final IS/MND.

Hazards and Hazardous Materials – Less than Significant with Mitigation

The proposed MPC would include usage of the same types and quantities of hazardous materials and substances during construction that were described in the Final IS/MND for the approved project. Fuels and lubricants inside vehicles and equipment would be the most common types of hazardous materials. Consistent with the Final IS/MND, all construction workers would receive training according to the Worker Environmental Awareness Program (MM H-1), which provides instructions for implementing site-specific Best Management Practices (BMPs), the location of the Safety Data Sheets, and notification procedures in the event of a spill, leak, or discovery of soil contamination. The proposed MPC would shift the distribution alignment approximately eight feet to the east of the approved alignment, but would still be within the SCE ROW and the approved LOD. The BMPs provided in the Final IS/MND would remain valid for the proposed MPC, and hazards analyzed in the Final IS/MND would remain the same. Therefore, the proposed MPC would not result in any new potentially significant impact or substantially increase the severity of a previously identified impact relating to hazards or hazardous materials as disclosed in the Final IS/MND.

The proposed MPC would comply, and be consistent with, the intent of MMs H-1 through H-4. Specifically, the project WEAP (MM H-1) would not require revision due to the proposed MPC; soil sampling for herbicide/pesticide presence will adequately address soil conditions along the shifted alignment; soils observations requirements (MM H-3) will be the same for the MPC alignment as the

approved project; and the SCE-prepared Fire Management Plan (MM H-4) does not require revision in order to apply to the proposed MPC.

Hydrology and Water Quality – Less than Significant with Mitigation

Construction activities for the proposed MPC would be the same as the construction activities analyzed in the Final IS/MND for the approved project. No jurisdictional waters would be affected. Consistent with the Final IS/MND, a Stormwater Pollution Prevention Plan (SWPPP) would be implemented (MM HYD-1), and would include best management practices (BMPs) to reduce construction-related water quality impacts to a less-than-significant level. Therefore, the proposed MPC would not result in any new potentially significant impact or substantially increase the severity of a previously identified impact relating to hydrology or water quality as disclosed in the Final IS/MND.

The proposed MPC would comply, and be consistent with, the intent of MMs HYD-1 through HYD-3. Specifically, the MPC would utilize the same water source (MM HYD-2) and because the proposed MPC only shifts the distribution line alignment approximately 8 feet, within the approved LOD, updates to the SWPPP (MM HYD-1) are not required. Finally, the relatively small shift for vault locations (approximately 8 feet) would not change the potential requirement/potential for dewatering (MM HYD-3).

Land Use and Planning – No Impacts

The proposed project change would not result in changes to land use impacts as compared to the Final IS/MND. The proposed alignment change would remain within the approved LOD and within areas of the same existing land rights for SCE as the approved project. Therefore, the proposed MPC would not result in any new potentially significant or less-than-significant impact relating to land use and planning as compared to the determinations found in the Final IS/MND.

Mineral Resources – No Impacts

Implementation of the proposed MPC would move the distribution alignment approximately eight feet to the east of the approved alignment, but would remain within the approved LOD and within areas of the same existing land rights for SCE as the approved project. Therefore, the MPC alignment would encounter the same subsurface conditions as described in the Final IS/MND for the approved project. Similar to the approved project, the MPC alignment would not be located in a designated Mineral Resource Zone or result in any impact to existing mines within the general project vicinity. Therefore, the proposed MPC would not result in any new potentially significant or less-than-significant impact to mineral resources as compared to the determinations found in the Final IS/MND.

Noise – Less than Significant with Mitigation

The proposed MPC would utilize the same types of construction equipment as those described in the Final IS/MND (refer to Table 4-4) and would not expand the LOD (where such equipment would be used). The proposed MPC would not result in any increased exposure of sensitive receptors to construction-related noise or vibration, including residences located along Dale and Highline Roads. In addition, the proposed MPC would adhere to allowed construction working hours (MM N-1). Therefore, the proposed MPC would not result in any new potentially significant impact or substantially increase the severity of a previously identified impact relating to noise and vibration as disclosed in the Final IS/MND.

The proposed MPC would comply, and be consistent with, the intent of MMs N-1 and N-2. Specifically, the MPC would utilize the working house (MM N-1), equipment would be properly maintained in the same manner as required for the approved project, and construction traffic would not change (MM N-2).

Population and Housing – No Impact

The proposed project change would require the same size construction crew as described in the Final IS/MND and would not include or induce population growth in the project area. Therefore, the proposed MPC would not result in any new potentially significant or less-than-significant impact relating to population and housing compared to the determinations found in the Final IS/MND.

Public Services – Less than Significant

The proposed MPC would adjust the trench location to be approximately eight feet further from Pellisier Road and would not require new lane closures or impact emergency or fire response services. The proposed MPC is not located near schools, within a park, or other public facilities, similar to the approved project. Therefore, the proposed MPC would not result in any new potentially significant impact or substantially increase the severity of a previously identified impact relating to public services as disclosed in the Final IS/MND.

Recreation – No Impact

The proposed MPC would remain within the existing SCE ROW and approved project LOD. Therefore, the proposed MPC would not affect any recreational facilities. The proposed MPC would not result in any new impacts related to recreation as compared to the determinations found within the Final IS/MND.

Transportation/Traffic – Less than Significant with Mitigation

The proposed MPC would require the same size construction crew as described in the Final IS/MND and would not increase the number of truck trips described therein (see page 5-242 of the Final IS/MND). The proposed MPC would move the alignment approximately eight feet east of the approved alignment, and further out of the roadway, resulting in less impact to traffic flow along Pellisier Road. Therefore, the proposed MPC would not result in any new potentially significant impact or substantially increase the severity of a previously identified impact relating to traffic or transportation as disclosed in the Final IS/MND. In addition, the proposed MPC would provide a traffic safety benefit to the public and workers by shifting construction activities further off of the paved roadway.

The proposed MPC would comply, and be consistent with, the intent of MMs T-1 through T-3. Specifically, the proposed MPC would implement appropriate traffic controls as recommended in the California Joint Utility Traffic Control Manual (MM T-3), and SCE would implement other required traffic reduction measures, including restricting lane closures during certain time periods (MM T-1) and coordinating with Kern County and emergency service providers in advance of construction (MM T-2).

Utilities and Service Systems – Less than Significant with Mitigation

The proposed MPC would generate the same amounts of wastewater, stormwater runoff, and solid waste as those described in the Final IS/MND because the required construction activities (equipment, excavation, disturbance area, work force) would be the same as for the approved project. The proposed MPC would also require a similar amount of water for dust suppression. The proposed MPC would remain within the existing SCE ROW and LOD, and would result in the added benefit of avoiding

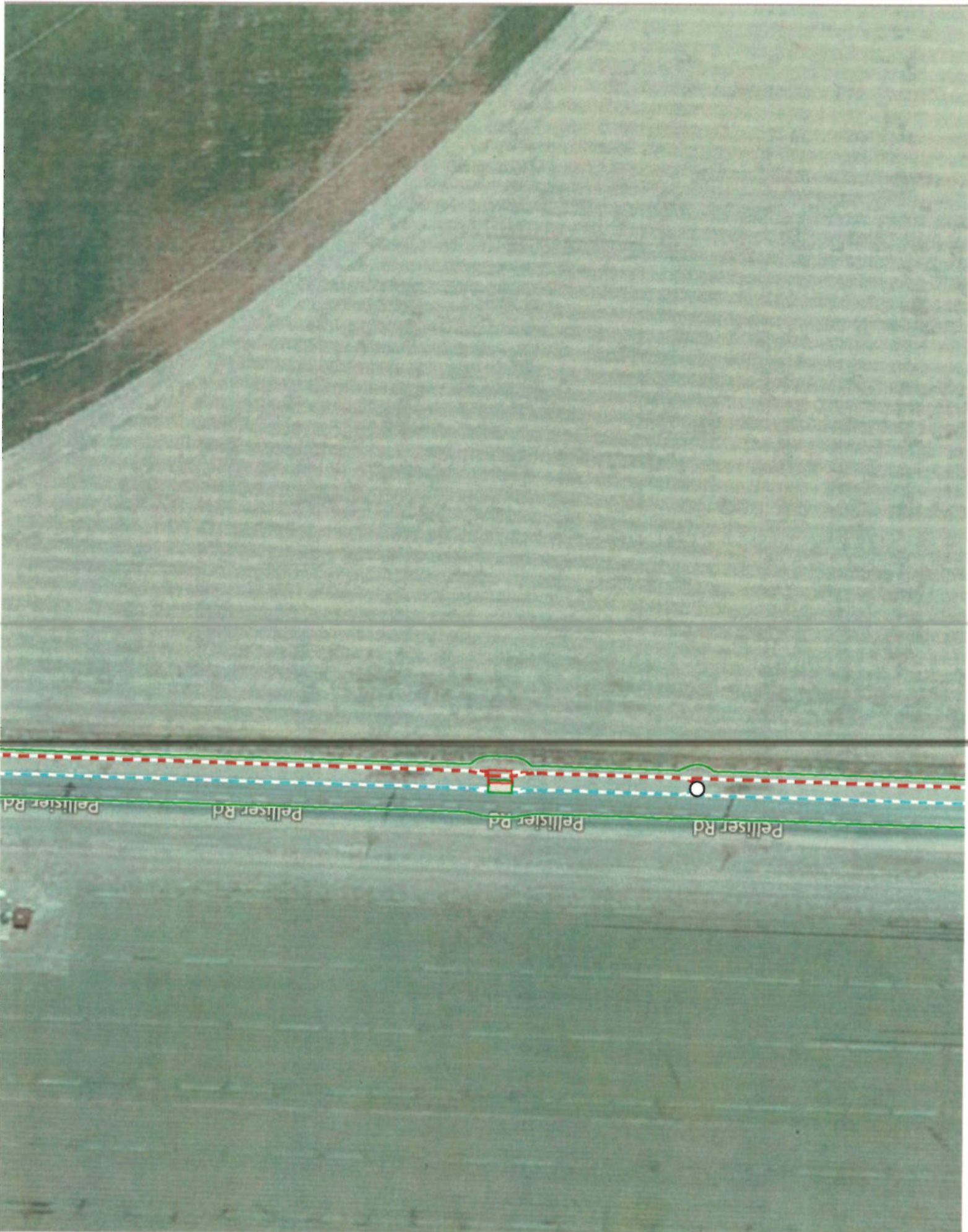
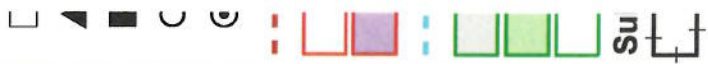
disturbance and/or relocation of an existing buried AT&T utility line. Therefore, the proposed MPC would not result in a new potentially significant impact or substantially increase the severity of a previously identified impact relating to utilities and service systems as disclosed in the Final IS/MND.

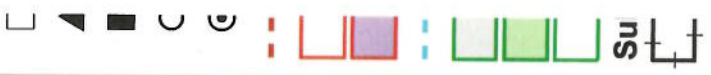
As discussed above for hydrology and water quality, the proposed MPC would be comply, and be consistent with, the intent of MMs HYD-1 (SWPPP) and HYD-2 (use of non-potable water for dust control).

Attachment A

Distribution Redline Drawing











Attachment B

Photo Log

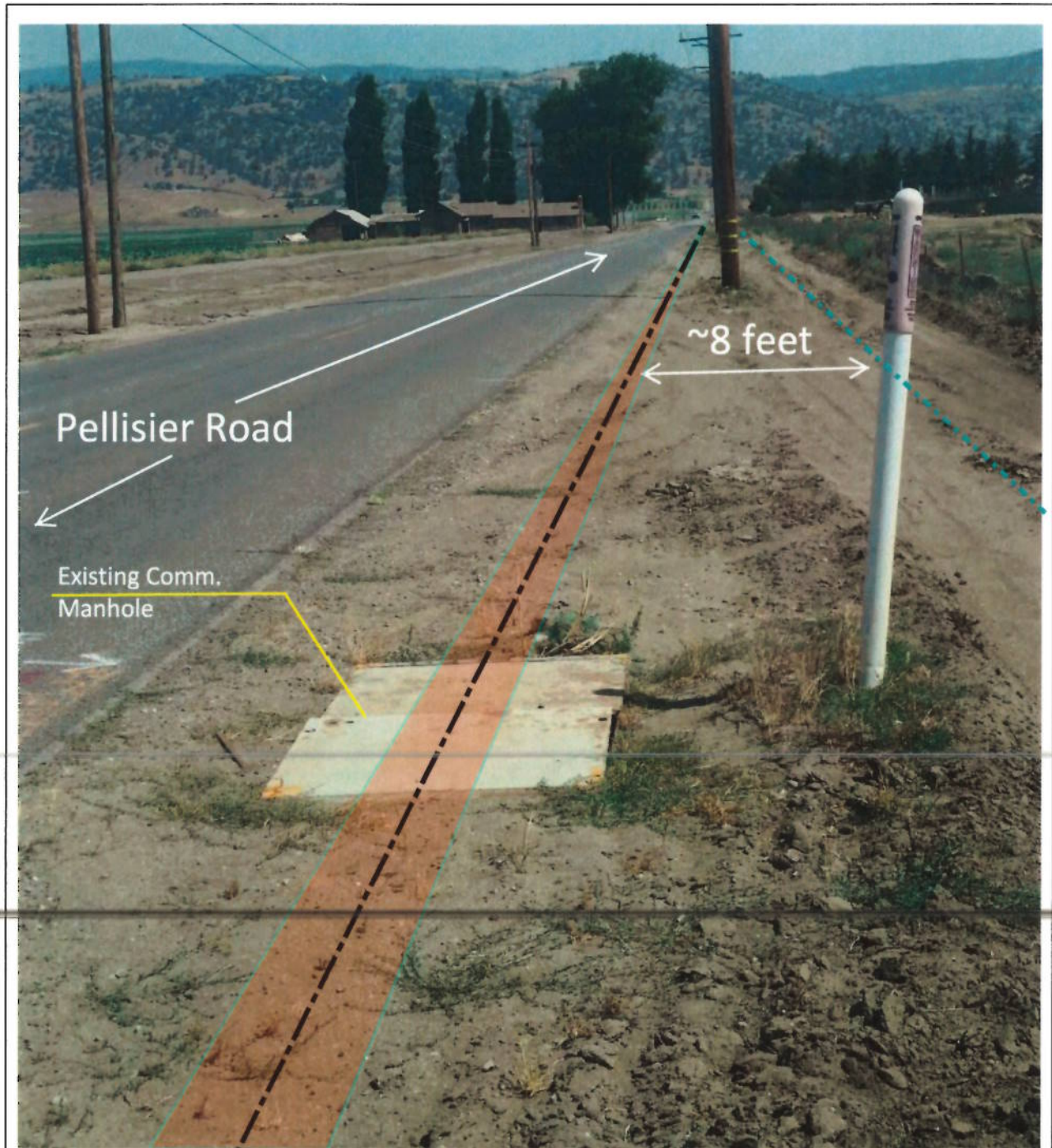
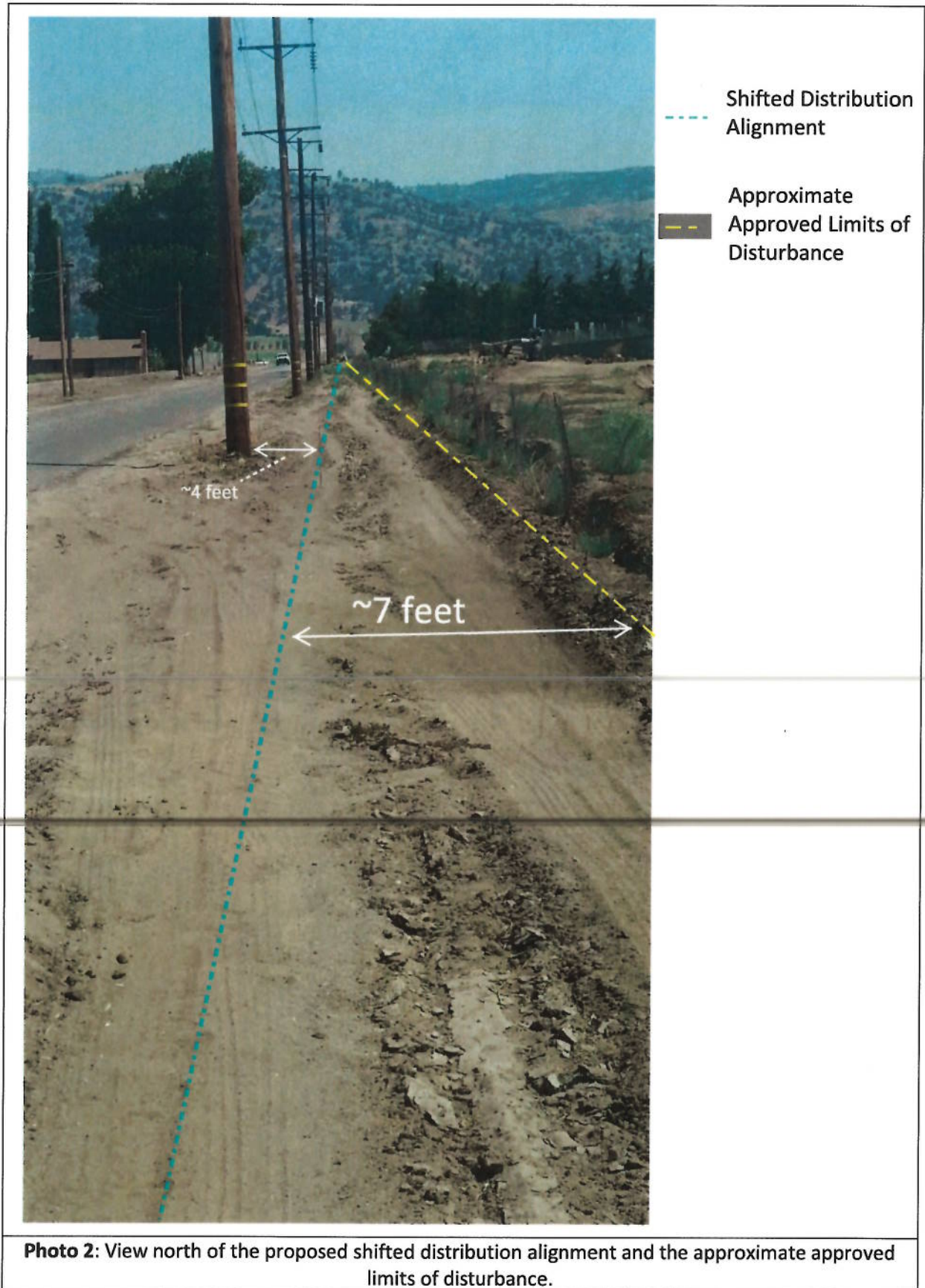


Photo 1: View north along Pellisier Road, showing approximate locations of the approved distribution alignment, the existing AT&T buried utility, and the proposed shifted distribution alignment.

-  Approximate Approved Distribution Trench Line
-  Approximate Existing Comm. Line Alignment
-  Proposed Shifted Distribution Alignment



MPC Request No. 2
Exhibit B: List of Prior Studies

Exhibit B
List of Prior Studies
Banducci Substation Project

Minor Project Change Request No. 2

Prior studies relevant to Minor Project Change Request No. 1 are identified below.

Banducci Substation Project Biological Resources Survey within 7 days prior to construction conducted on July 26, 2017 by Brant Primrose (Upload to SCE's FRED reporting system is pending; no sensitive resources identified near MPC area).

Banducci Substation Project Biological Resources Survey within 7 days prior to construction conducted on July 19, 2017 by Heather Franklin (Uploaded to SCE's FRED reporting system and verified by CPUC).

Banducci Substation Project Biological Resources Survey within 30 days prior to construction conducted on July 7, 2017 by Paul Morrissey (Uploaded to SCE's FRED reporting system and verified by CPUC).

Jurisdictional Delineation – Portions of the Banducci Substation Project (A.12-11-011). Environmental Intelligence, LLC. February 1, 2017.

Results of 2016 Tehachapi Slender Salamander Habitat Assessment for the Banducci Substation Project Located in Kern County, California. Environmental Intelligence, LLC. August 11, 2016.

Banducci Substation Project – Final Botanical Survey Report. Environmental Intelligence, LLC. August 2016.

Banducci Substation Project - Cultural Resources Construction Phase Management Plan. Rincon Consultants. October 2016.