



February 26, 2020

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. 10 Request: Temporary Wood Pole/ Nest Platform

Dear Ms. Rangel,

On February 24, 2020, Southern California Edison (SCE) submitted Minor Project Change (MPC) No. 10 Request to the California Public Utilities Commission (CPUC) for review. The proposed MPC would involve the installation of raptor nest platform atop temporary wood pole in previously approved work area. The work area was previously approved on September 27, 2017, under SCE's Notice to proceed Request-1 (NTPR-1). The temporary wood pole would be installed adjacent to former location of pole 1455143E and current location of Construct 1601, approximately 75 feet south of State Route-60 (see Attachment 1, Request Figures). Utilizing a low drill, construction crews would drill a hole 36-inches wide by 11 feet deep to set the temporary wood pole. This hole would be drilled using a 36-inch auger bit. The 100-foot temporary wood pole would be placed into the 11-inch foot deep hole using a crane and the pole would be trued up and compacted. Once set, the platform would be installed on the top of the pole as an alternative nest location. The pole location is accessible by truck from State Route-60.

Work under MPC No. 10 would occur during the daytime, within the Mesa 500-kV Substation project approved hours and should take approximately 4-hours to complete. SCE anticipates that installation of the raptor nest platform atop a temporary wood pole would be placed at least throughout the 2020 bird nesting season, however, depending on bird activity, it is possible that the pole and platform would be in place for subsequent nesting seasons through the end of construction at the Mesa 500-kV Substation Project.

During 2018 and 2019, a red-tailed hawk pair nested atop former existing wood pole 1455143E (Nest Event 000183). Nest Event 000183 was vacated on 06/04/2019, and the nest was removed on 09/19/2019 in anticipation of the next breeding season. Given the 1,600-foot proximity of a current nest identified in structure M13-T4 (Nest Event 000250) to the former Nest Event 000183 location, the strong fidelity a red-tailed hawk pair have for nest locations year over year, and the relatively atypical location of nest construction, on deterrent balls, SCE presumes that the same red-tailed hawk pair is responsible for both nests. The nest was discovered as part of regular monitoring by SCE's lead avian biologists, conducted in the interest of observing and deterring nesting early in the process in compliance with MM BR-9 and MM BR-11. For these

reasons, SCE expects that this red-tailed hawk pair may favor positioning closer in proximity to the former Nest Event 000183 location.

SCE proposes the installation of a raptor nest platform atop a temporary wood pole within the approved work area described above because the probable self-relocation of the red-tailed hawk pair from pole 1455143E to tower M13-T4 would significantly impact the Mesa 500-kV Substation project schedule. The proposed raptor platform atop the temporary wood pole within the approved work area (as displayed in Attachment 1) is expected to entice the red-tailed hawk pair to utilize this nest structure rather than tower M13-T4.

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. 10 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. 10 meets the above criteria. MPC No. 10 is approved by the CPUC for the proposed activities based on the factors described below.

CPUC Evaluation of MPC No. 10 Request

The CPUC evaluated SCE's MPC Request No. 10 to verify that they fulfill 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. 10 activities fall within the Final EIR Study Area. MPC No. 10 would occur entirely within approved temporary work areas, adjacent to former location of pole 1455143E, and current location of Construct 1601, approximately 75 feet south of State Route-60 (Attachment 1). Because the proposed wood pole and nest platform are temporary and would not result in any permanent ground disturbance, the activities associated with MPC No. 10 would not result in any changes to temporary or permanent impacts acreage and would not require any additional work area approvals.

Aesthetics/Visual Impacts

The raptor nest platform atop a temporary wood pole installed as part of MPC No. 10 activities would be constructed adjacent to the former position of pole 1455143E. Therefore, the proposed pole installation would not be expected to substantially degrade the surrounding viewshed when compared to pre-existing conditions. Additionally, because the pole and nest platform would be installed only temporarily, it would not result in any permanent changes to the viewshed.

Biological, Cultural, Paleontological Resources, and other Environmental Resources

As identified in the Final EIR, MPC No. 10 would 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 temporary wood pole (near Construct 1601, approximately 75 feet south of State Route-60) or the former location of pole 1455143E, 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 installation of a raptor nest platform atop a temporary wood pole, adjacent to former location of pole 1455143E, 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 installing the new raptor nest platform atop a temporary wood pole 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. In addition, no native vegetation or tree removal would occur under MPC No. 10.

No cultural or paleontological resources have been identified within MPC No. 10 work areas. However, potential impacts to buried resources during drilling 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 drilling 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). Using this area to install a temporary wood pole adjacent to a former location of pole 1455143E would not be a significant additional project impact.

Construction activities under MPC No. 10 would be performed during daylight hours. The work area for MPC No. 10 would be accessible via State Route-60 and away from any public roadway; therefore, no traffic control would be necessary through the work zone during

construction. Furthermore, MPC No. 10 would not require intense excavation activities. Drilling of the proposed 36-inches wide by 11 feet deep hole and installation of the temporary wood pole during 4-hours would not substantially increase air quality impacts through implementation of APM AIR-1, APM AIR-2, and MM AIR-1.

Construction activities under MPC No. 10 would not cause a substantial increased level of impact to noise and vibration through the implementation of MM NV-02 and adherence with the Mesa 500-kV Substation Project Noise Control Plan. Additionally, the noise generated from the installation of the temporary pole would be short-termed and intermittent in the proximity of State Route 60 (existing source of traffic noise); therefore, the proposed activities would not result in any permanent changes to noise levels in the surrounding areas.

Permits

No additional permits or approvals are required for MPC No. 10 activities.

MPC No. 10 Conditions of Approval

MPC No. 10 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. 10 temporary pole installation area, in compliance with 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., drilling, pole and nest platform installation, etc.) shall be monitored by CPUC-approved monitors in accordance with the MMCRP, where appropriate.
7. All complaints related to MPC No. 10 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

**Attachment 1:
MPC No. 10 Request Figures**

MESA 500KV SUBSTATION

MINOR PROJECT CHANGE 10

Legend

Distribution Structure Proposed/Existing

- Existing Structures
- Proposed, Pole
- ▲ Remove, Pole

Distribution Lines Proposed/Existing

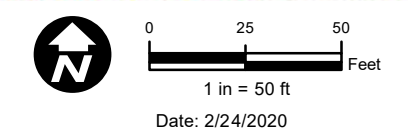
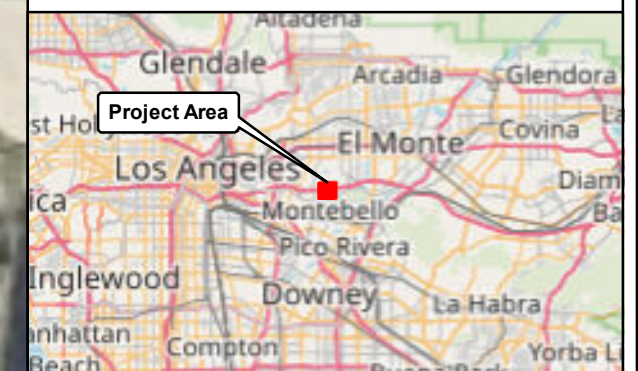
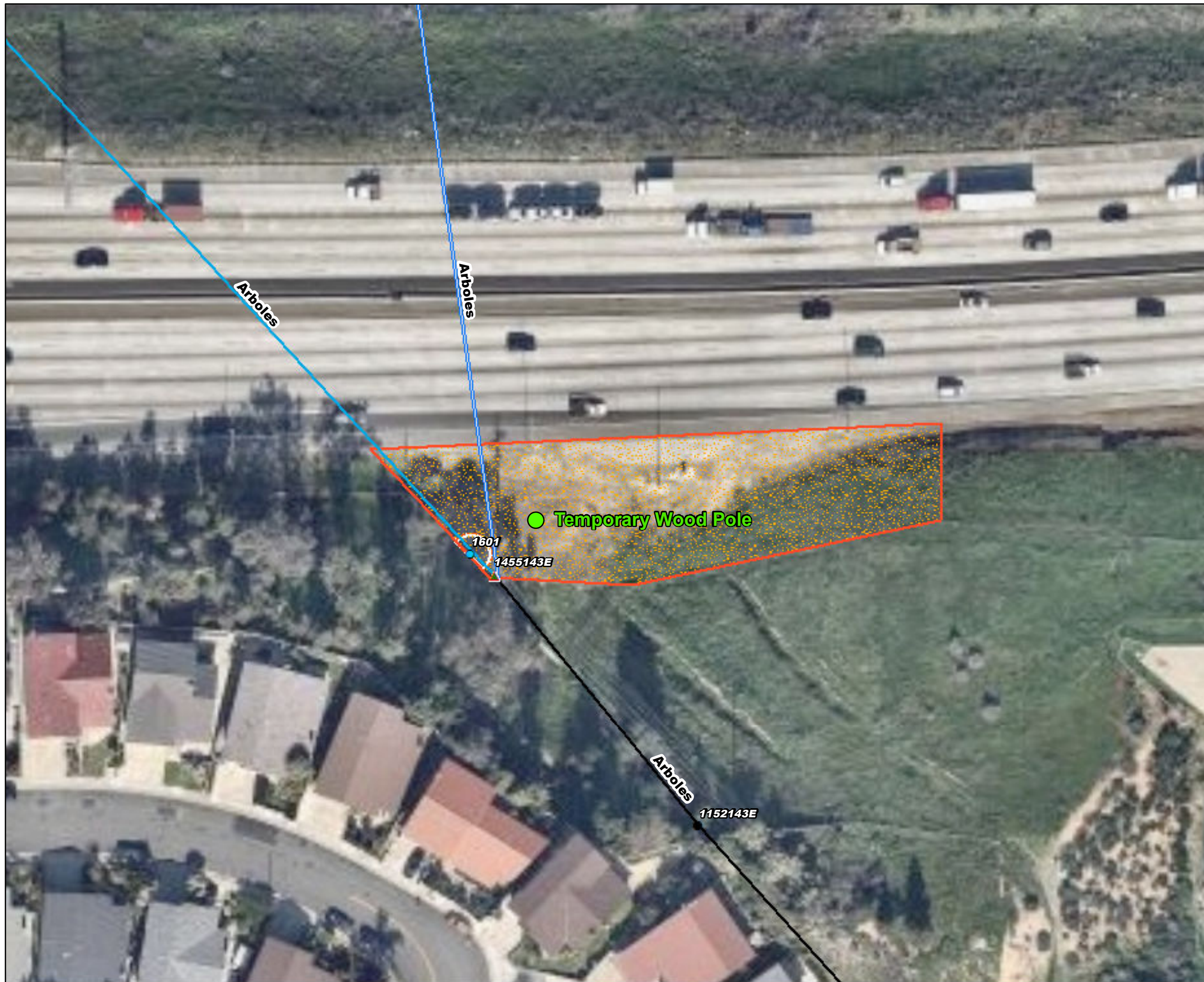
- Existing, OH
- Proposed, OH

Distribution Lines Remove

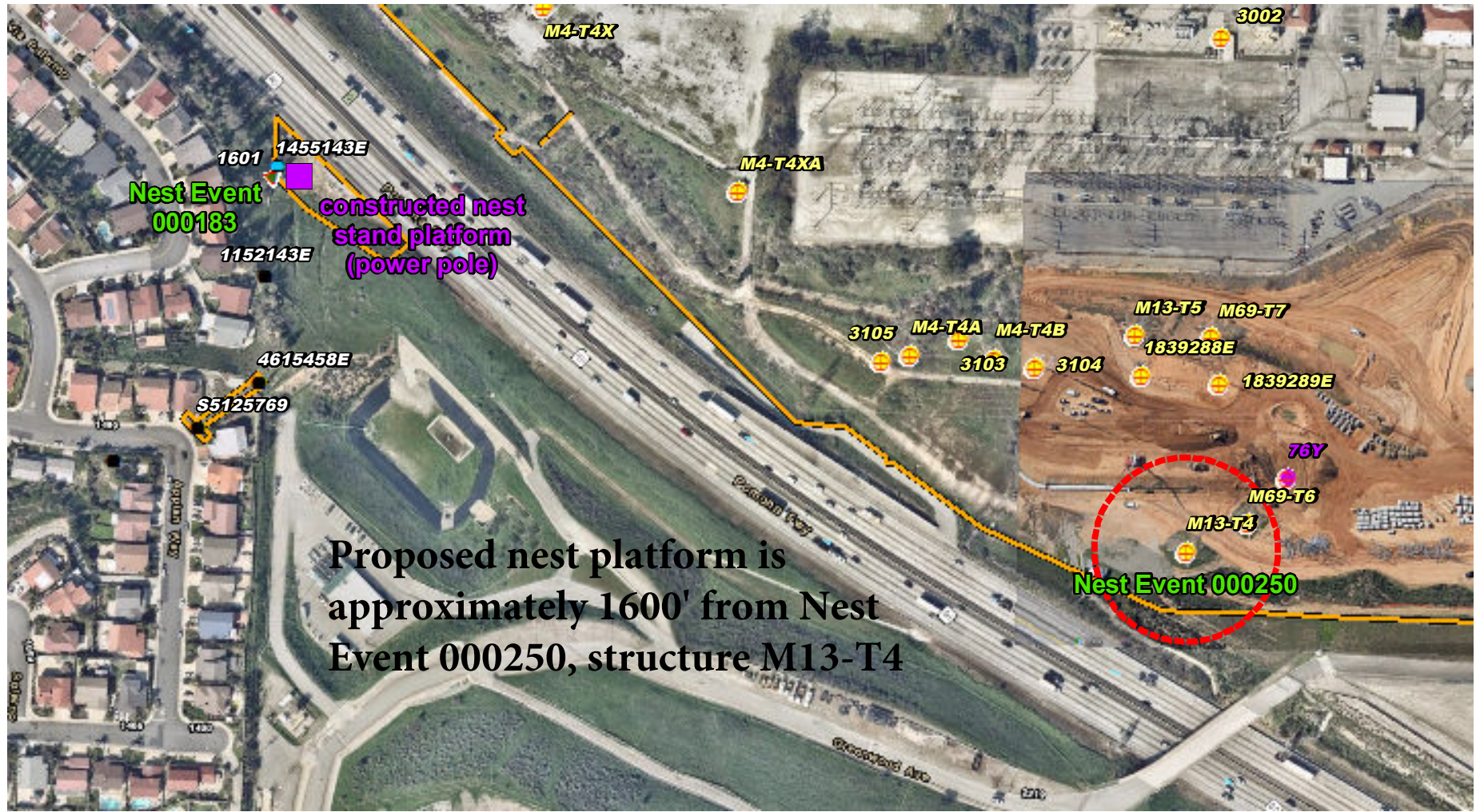
- Remove, OH




Distribution Construction Areas

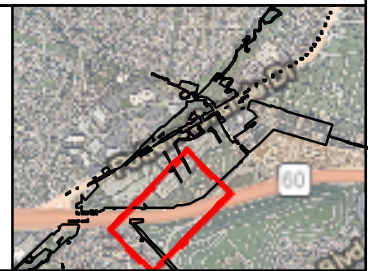
- ▨ Previously Approved General Disturbance Area
- ▨ Previously Approved Permanent OM Areas



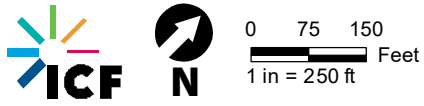
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-  constructed nest stand platform (power pole)
-  150 Foot Buffer
-  Mesa Substation Footprint



Source: Imagery-GoogleEarth, 2018; SCE, 2017.



Avian/Nest Issue Elevation Information - M13-T4 Mesa 500-kV Substation Project