

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 22, 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. 9 Request: Telecom Conduit Undergrounding

Dear Ms. Rangel,

On October 8, 2019, Southern California Edison (SCE) submitted Minor Project Change (MPC) No. 9 Request to the California Public Utilities Commission (CPUC) for review. The proposed MPC would involve installation of approximately 600-feet of two new 5-inch conduits between the existing manhole on the east side of the Service Center wall (M5654776) and the existing vault on the south side of Potrero Grande Dr. (V502272); adjacent to the Service Center driveway.

Approximately 500-feet of this underground infrastructure would be installed via horizontal directional drilling (HDD) to minimize potential disturbance to the surrounding landscape and to facilitate ease of construction. One bore pit would be established at the vault location adjacent to the Service Center Driveway V5022702; with a receiving bore pit at the existing manhole M5654776. The vault tie-ins would be installed via an open trench method. The remaining trench for this undergrounding would be approximately 2 feet wide and approximately 5-feet deep and 50 feet-long at each end of the vault and manhole locations. Soil would be stockpiled adjacent to the trenching, and the trenches would be partially backfilled with 2-sack concrete slurry and topped off with native soil when construction is complete. All unused soil would be transported to the Mesa expansion site. Equipment used to install these conduits would be similar to equipment that has already been utilized for similar activities on the Project (e.g., one small backhoe for the duration of the work, etc.) After these conduits are installed, the existing cables in the constrained conduit path route would be removed and rerouted through this new conduit path. The removal involves pulling the cables from the existing structure and would not require any trenching.

The installation of approximately 600-feet of two new 5-inch conduits described above is proposed because SCE's information technology department's cable requirements became more defined as the Mesa 500-kV Substation Project construction progressed, and the existing 1-4-inch conduit path along the existing telecommunications route would be too small to support the necessary number and sizes of cables required with the current design. Therefore, an additional

conduit path would be necessary. Based on the probable negative impacts of cutting through the parking lot pavement, SCE assessed that it would be more efficient, and provide additional future flexibility, if two new 5-inch conduits were installed in the dirt area just outside of the Service Center's eastern perimeter wall, and bypass the constrained conduit system altogether. SCE has determined that work under MPC No. 9 is critical so the Project would be able to establish redundant and diverse paths for communications cables to be installed to the newly constructed Operations Building from their source locations across the street near the SCE Service Center.

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. 9 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. 9 meets the above criteria. MPC No. 9 is approved by the CPUC for the proposed activities based on the factors described below.

CPUC Evaluation of MPC No. 9 Request

The CPUC evaluated SCE's MPC Request No. 9 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. 9 activities fall within the Final EIR Study Area. MPC No. 9 would occur entirely within approved temporary work areas approximately 600-feet south of Potrero Grande Avenue and 700-feet east of Marketplace Drive (aka Greenwood avenue).

Aesthetics/Visual Impacts

MPC No. 9 does not include additional aboveground structures. Therefore, work under MPC No. 9 would not be expected to substantially degrade the surrounding viewshed. In addition, construction activities under MPC No. 9 would be temporary (approximately four working days to complete), and, therefore would not cause a permanent significant impact to visual resources.

Biological, Cultural, Paleontological Resources, and other Environmental Resources

As identified in the Final EIR, MPC No. 9 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 existing vault on the South side of Potrero Grande Drive (V5022702; adjacent to the Service Center driveway) and the existing manhole on the east side of the Service Center wall (M5654776), 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 approximately 600-feet of two new 5-inch conduits between the existing manhole M5654776 and the existing vault V5022702 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 manhole and conduits underground 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. In addition, no native vegetation or tree removal would occur under MPC No. 9. Potential impacts to the existing small section of surrounding ornamental vegetation would also be minimized by HDD.

No cultural or paleontological resources have been identified within MPC No. 9 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 predominantly as a storage area for the nursery with plants in temporary containers, and a small section of ornamental vegetation which is an existing entrance to the SCE service center. Using this area to install new telecommunications conduit underground would not be a significant additional project impact.

Construction activities under MPC No. 9 would be performed during daylight hours. The work area for MPC No. 9 would be away from any public roadway, therefore, no traffic control would be necessary through the work zone during construction.

The work activities under MPC No. 9 would not result in new significant air quality impacts or a substantial increase in the severity of impacts as analyzed and disclosed in the Project's FEIR, Section 4.2. Furthermore, SCE and their contractors would be required to implement best management practices as outlined in SCE's APM-AIR-01 for dust control, such as using water or chemical stabilizer/suppressant during excavation or stockpiling activities.

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. 9 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. 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. 9 activities.

MPC No. 9 Conditions of Approval

MPC No. 9 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. 9 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. All complaints related to MPC No. 9 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. 9 Request Figure and Work Area Photos

MESA 500KV SUBSTATION

MINOR PROJECT CHANGE NINE

Legend

- MPC#9 New Area
- Existing, Manhole
- Existing, Vault
- Proposed, Manhole
- New Underground
- Proposed Underground
- Vault

Construction Areas

- Construction Work Site
- Demo Site
- General Disturbance Area
- Guard Structure
- Permanent OM Areas
- Wire Setup

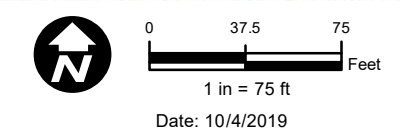
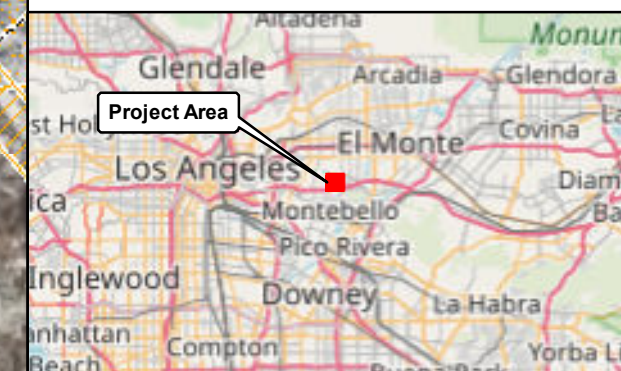




Photo 1. Looking north from M5654776 with the service center to the left and the nursery to the right.



Photo 2. Looking south from V5022702 toward the nursery (behind the trees).



Photo 3. Looking northwest at M5654776 toward the Service Center.