

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



February 5, 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. 3 Request: lines over Potrero Grande Drive

Dear Ms. Rangel,

On December 20, 2018, Southern California Edison (SCE) submitted Minor Project Change (MPC) No. 3 Request to the California Public Utilities Commission (CPUC) for review. The proposed MPC would include bypassing the circuits in one of the three sets of underground casings beneath Potrero Grande Drive by re-orienting these lines to an overhead configuration. On January 7, 2019, the CPUC submitted a formal Data Request (*Minor Project Change No. 3 Request, CPUC Data Request Memorandum*) to SCE to resolve outstanding questions regarding the requested changes. On January 17, 2019, CPUC submitted a second Data Request (*Minor Project Change No. 3 Request, CPUC Data Request # 2 Memorandum*) to SCE to resolve additional outstanding questions. On February 1, 2019, SCE provided a formal response to the CPUC's data requests.

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. 3 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. 3 meets the above criteria. MPC No. 3 is approved by the CPUC for the proposed activities based on the factors described below.

SCE's MPC No. 3 Request

Descriptions derived from SCE's MPC No. 3 Request, received December 20, 2018, and from SCE's formal response to the CPUC's two formal Data Requests, received February 1, 2019, are presented below (indented):

- MPC Request No. 3 addresses design issues associated with two of the 13 subtransmission circuits approved for one of the three underground casings already installed under Potrero Grande Drive. Specifically, SCE has calculated that two of the 13 circuits will exceed their 100 percent rating for soil heat dissipation capability by 2024. To alleviate this potential exceedance, SCE's requested modification will bypass the circuits in one of the three sets of underground casings beneath Potrero Grande Drive by re-orienting these lines to an overhead configuration.
- For this project modification, SCE would install two new 80-foot-tall tubular steel riser poles (TSPs) and one new 85-foot-tall lightweight steel (LWS) pole. One TSP would be located within the substation perimeter wall and the other would be installed approximately 800 feet to the northeast, within SCE's fee-owned transmission line corridor property on the north side of Potrero Grande Drive. The LWS pole would be installed in between the two TSPs, approximately 230 feet from the southernmost TSP, on the south side of Potrero Grande Drive, between the sidewalk and the substation perimeter wall and within the franchise area of the street.
- MPC No. 3 includes three construction work areas to install the three new poles. The work areas range in size from about 2,500-2,600 square feet each (see Table 1). The construction work area for the TSP within the substation perimeter wall south of Potrero Grande Drive is entirely within a previously approved work area. Combined, about 50 percent of the work areas for the three poles would be in previously approved work areas. However, all MPC No. 3 activity areas fall the within Study Areas defined in the EIR, and were analyzed in the EIR for their potential to contain sensitive resources.
- SCE anticipates that sidewalk repairs will not be needed as part of MPC No. 3 activities. Encroachment permits from the City of Monterey Park may be required for some MPC No. 3 activities that would require temporary lane closures.
- In total, SCE expects that it will take approximately two days to install each pole and an additional day to string overhead conductor across Potrero Grande Drive.

Table 1: Total MPC No. 3 Temporary Disturbance Acreage

| Associated Work Area | Proposed MPC Disturbance Footprint (square feet) | | Overlap of Proposed MPC Disturbance Footprint with Previously Approved Work Areas (square feet) | | Total New MPC Disturbance Footprint (square feet) | |
|---|--|-----------|---|-----------|---|--------------|
| | Permanent | Temporary | Permanent | Temporary | Permanent | Temporary |
| TSP south of Potrero Grande Drive (within substation perimeter wall) | 707 | 1,794 | 707 | 1,794 | 0 | 0 |
| LWS south of Potrero Grande Drive | 707 | 1,895 | 0 | 0 | 707 | 1,895 |
| TSP north of Potrero Grande Drive | 707 | 1,794 | 324 | 874 | 383 | 920 |
| Total | | | | | 1,090 | 2,815 |

Key: TSP =Tubular steel riser pole, LWS = Lightweight steel pole

CPUC Evaluation of MPC No. 3 Request

The CPUC evaluated SCE’s MPC Request No. 3 to verify that it fulfills the requirements of the MMCRP, and 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, environmental, cultural, and paleontological resources, areas as well as aesthetics and visual resources.

Location of Ground Disturbance Areas

Although MPC No. 3 would require a total of 2,121 square feet (approximately 0.049 acres) of permanent ground disturbance and 5,483 square feet (approximately 0.126 acres) of temporary ground disturbance in construction work areas, about 50 percent of this would be in areas that were previously approved for project disturbance. As a result, MPC No. 3 would require 1,090 square feet (approximately 0.025 acres) of new permanent ground disturbance and 2,815 square feet (approximately 0.065 acres) of new temporary ground disturbance (see Table 1). New permanent ground disturbance footprints for the TSP north of Potrero Grande Drive and the LWS south of Potrero Grande Drive would occur on unpaved ground adjacent to the sidewalks and ornamental vegetation (see Figure 1). All ground disturbance areas all three work areas are fully within the Study Area evaluated in the EIR.

Aesthetics/Visual Impacts

Although the two new proposed TSPs and one new proposed LWS pole along Potrero Grande Drive would add three more poles than were originally anticipated during project design, as well as 800 feet of associated overhead wires that were intended to be routed in an underground

alignment, the proposed changes would still result in a net reduction of overall project structures upon project completion, as described in the Final EIR. Furthermore, the installation of the three new structures and associated overhead lines are consistent with the surrounding viewscape at this location, which already includes multiple overhead lines on steel lattice towers of similar height. The Final EIR identifies the existing pre-project viewscales in the vicinity of the new installations (see EIR KOP 1 and KOP 2) as being of low scenic quality. Addition of the three new structures and the associated overhead lines would not further degrade the viewscape values to below this level.

Biological/Environmental, Cultural, and Paleontological Resources

The ground disturbance areas for all three poles 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 sensitive biological resources were detected in these locations. SCE is required to implement all applicable MMCRP measures in the locations of the three new poles, including conducting seasonal nest surveys or other pre-construction surveys for special status species. There are two existing ephemeral man-made ditches west of the TSP that would be installed immediately north of Potrero Grande Drive, but neither feature would be affected by installation of this pole. SCE is required to implement sediment and erosion control measures in all project work areas, as described in the MMCRP. In addition, the project has an SPCC that includes measures to prevent the spill of hazardous materials into waterways. Although surveys did not identify cultural or paleontological resources in the locations of these three poles, SCE is required to implement measures to address unanticipated finds of such resources in all project work areas.

Permits

No additional discretionary permits or approvals are required for the MPC No. 3 activities; however, a local ministerial encroachment permit will be required for some activities that would require lane closures (see “MPC No. 3 Request” section above). In total, installation is expected to take approximately two days for each pole, and an additional day to string overhead conductor across Potrero Grande Drive.

Coordination with City of Monterey Park

The CPUC requested that SCE contact the City of Monterey Park to notify them of MPC No. 3 request. On February 1, 2019, the SCE provided the CPUC with documentation that SCE notified the City of Monterey Park of the proposed MPC No. 3 activities, and that the City of Monterey Park did not oppose the MPC No. 3 design changes.

Conditions of MPC No. 3 Approval

MPC No. 3 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. 3 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 a CPUC-approved monitors in accordance with the MMCRP, where appropriate.
7. All complaints related to MPC No. 3 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,



Lisa Orsaba
CPUC Project Manager

cc:

Ilja Nieuwenhuizen, E & E Compliance Manager
Aileen Cole, E & E Deputy Compliance Manager
Don Dow, SCE Environmental Project Manager

FIGURE 1
MESA 500KV SUBSTATION
 REVISED KOP, NEW POLE, AND
 LINE LOCATIONS
 FOR MINOR PROJECT CHANGE THREE

Legend

- KOP

Major Trans Structure Proposed/Existing

Status, kV

- Existing, 220; 500
- Proposed, 220
- Temporary, 220

Major Trans Line Proposed/Existing

STATUS, kV_ENERGIZED_CKT1

- Existing, 220; 500
- Proposed, 220
- Temporary, 220

Transmission Construction Areas for Structures

Type

- ▭ Construction Work Site
- ▭ Demo Site
- ▭ Guard Structure
- ▭ Permanent OM Areas
- ▭ Wire Setup

Structures

- Minor Project Change #3 Proposed, 66
- Existing, 66
- Proposed, 66
- Temporary, 66
- ▭ Vault

Conductors

- Minor Project Change #3 Proposed, OH
- Existing, OH
- Proposed, OH
- Proposed, UG
- Temporary, OH

Construction Areas

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

