

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

SDG&E Moreno Compressor Modernization Project: SCE Component

Addendum to the November 2019 Final Subsequent Environmental Assessment for Proposed Amended Rule 1110.2 and Proposed Amended Rule 1100, the April 2019 Final Subsequent Environmental Assessment for Proposed Amended Rule 1134, and the March 2017 Final Program Environmental Impact Report for the 2016 Air Quality Management Plan

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[March 2017 Final Program Environmental Impact Report for the 2016 Air Quality Management Plan, Certified on March 3, 2017]

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1.0 INTRODUCTION

San Diego Gas & Electric (SDG&E) and Southern California Gas Company (SoCalGas), wholly owned subsidiaries of Sempra, respectively own and operate the Moreno Compressor Station (MCS), a 13.76-acre natural gas compressor station located within the SDG&E Moreno Compressor Station Facility (Facility¹), a 190.56-acre property. The MCS, located at 14601 Virginia Street in Moreno Valley, California, operates pursuant to South Coast Air Quality Management District (South Coast AQMD) air permits issued under South Coast AQMD Facility ID 004242. The proposed Moreno Compressor Modernization Project (MCM Project) will affect the MCS, other areas within the Facility, and nearby areas in the City of Moreno Valley (City).

1.1 Overview of Integrated Natural Gas Transmission System and Moreno Compressor Station

SDG&E owns and SoCalGas operates an integrated natural gas transmission system regulated by the California Public Utilities Commission (CPUC) designed to provide natural gas service to millions of customers. The SDG&E and SoCalGas gas transmission systems are integrated, meaning their pipelines, storage fields, compressor stations, and regulator stations are interconnected and jointly managed as a single system that transports and distributes natural gas throughout their respective service territories. The service territory encompasses approximately 28,100 square miles throughout Central and Southern California, from Visalia to the United States/Mexico border. Within these 28,100 square miles, the SDG&E utility spans 4,100 square miles and maintains more than 840,000 natural gas meters. A system map of the SDG&E/SoCalGas integrated natural gas transmission system is depicted in Figure 1-1.

SDG&E and SoCalGas utilize compressor stations to maintain pressure and provide a reliable flow of natural gas to their customers. Compressor stations boost gas pressure, allowing gas to reach customers efficiently, especially during peak demand. These compressor stations are strategically placed to address fluctuating demand and system needs. Each station, including the MCS, is situated along pipelines and feeds into the SDG&E and SoCalGas transmission pipelines. The MCS, with a total compressor capacity of 16,585 horsepower (HP), boosts pressure within the SDG&E/SoCalGas integrated natural gas transmission pipelines. The MCS delivers natural gas into portions of Riverside County and the majority of San Diego County. Specifically, the MCS facilitates delivery of more than 95 percent of the natural gas that is consumed in San Diego County, including delivery to residents, hospitals, schools, and power plants.

¹ In this Addendum, the abbreviation “Facility” refers to the 190.56-acre property owned by SDG&E. It is differentiated from the South Coast AQMD term “facility” which is defined in South Coast AQMD Rule 1401(c)(5) and refers to “any permit unit or grouping of permit units or other air contaminant-emitting activities which are located on one or more contiguous properties within the District...owned or operated by the same person”.
<https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>

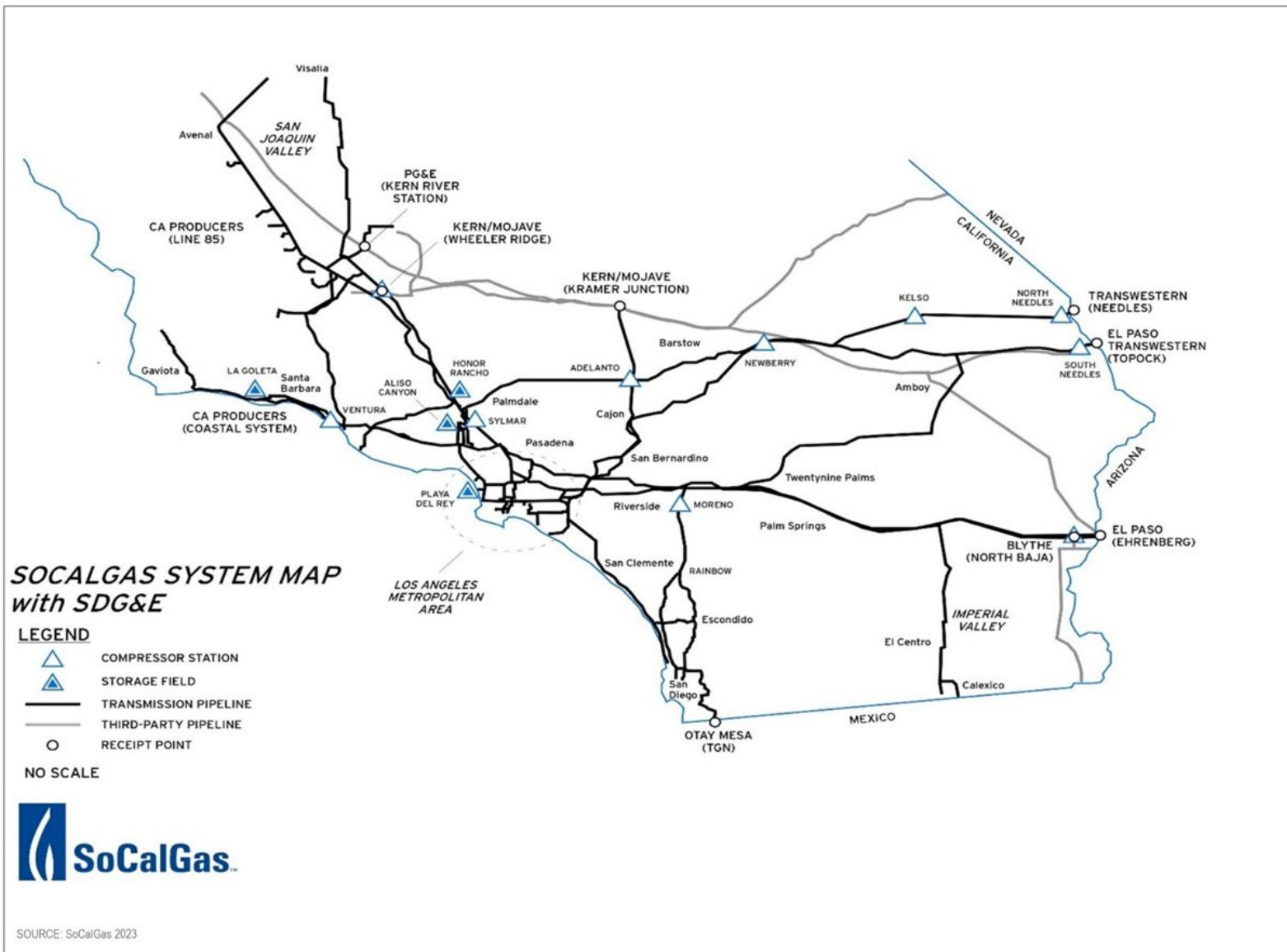


Figure 1-1
SDG&E/SoCalGas Integrated Natural Gas Transmission System

The MCS, located approximately 35 miles north of San Diego County, in Riverside County which is within South Coast AQMD jurisdiction, occupies approximately 13.76 acres or approximately seven percent of the 190.56-acre Facility. The MCS includes the existing fenced-in area west of Virginia Street, developed/paved access areas directly adjacent to the fenced-in area, and a fenced-in area east of Virginia Street. The existing MCS includes: 1) three compressor plants (Clark Plant, Solar Plant, and Cooper Plant) which are enclosed by a metal fence; 2) one 5,400-square-foot warehouse; 3) one 6,500-square-foot administrative building; 4) two lined process water evaporation ponds; 5) one aqueous ammonia storage tank; 6) four natural gas-fired emergency engines; 7) pipeline infrastructure; and 8) other ancillary support facilities. Access to the MCS is available via a gated, security-accessed road (Virginia Street). Once modernized, the footprint of the MCS area is proposed to increase by approximately 5.79 acres, for a total of approximately 19.55 acres or 10 percent of the Facility.

1.2 Overview of Moreno Compressor Modernization Project

The MCM Project seeks to modernize the MCS in accordance with the requirements in the following South Coast AQMD rules: Rule 1110.2 – Emissions from Gaseous and Liquid-Fueled Engines; and Rule 1100 – Implementation Schedule for NO_x Facilities; and Rule 1134 – Emissions of Oxides of Nitrogen from Stationary Gas Turbines. The equipment modifications proposed in the MCM Project require a South Coast AQMD Permit to Construct (PTC). South Coast AQMD’s review and approval of the MCM Project and corresponding issuance of a permit are a discretionary action that requires review pursuant to California Environmental Quality Act (CEQA).

The MCM Project consists of a SDG&E Component to implement upgrades to the existing compressor system and to make other ancillary improvements primarily located within the MCS that will be constructed and operated by SDG&E, and a Southern California Edison (SCE) Component to make improvements to the electric utilities located within the Facility and in nearby areas in the City of Moreno Valley that will be constructed and operated by SCE.

SDG&E Component

The SDG&E Component of the MCM Project seeks the following upgrades to the compressor system which would increase the footprint of the MCS by approximately 5.79 acres:

A. Construct new Plant 4 to be comprised of:

1. New compressor building to house: a) two new compressor gas turbines (CGTs), each rated at 5,825 HP (South Coast AQMD Application Numbers (A/Ns) 629922 and 629924); b) two Selective Catalytic Reduction (SCR) systems with oxidation catalyst, and a Continuous Emissions Monitoring System (CEMS) for NO_x (A/Ns 629923 and 629925); and c) new connections to an existing storage tank under South Coast AQMD Permit Number (P/N) G73134 to supply aqueous ammonia to the new SCR systems.
2. New compressor building to house two new electric-motor-driven reciprocating compressors (EDCs), each rated at 4,250 HP, which do not require South Coast AQMD permits because no emissions are expected.
3. A concrete pad adjacent to New Compressor Building with: a) two new natural gas-fired emergency engines, each rated at 824 HP (A/Ns 629926 and 629928); and b) each with a Non-Selective Catalytic Reduction (NSCR) system (A/Ns 629927 and 629929).

- B. Decommission nine existing compressors (Units D1 to D4 under P/N E03678, Unit D5 under P/N G21244, Unit D6 under P/N G21245, Unit D7 under P/N G21246, Unit D8 under P/N G21247, and Unit D9 under P/N G21248) and four existing natural gas-fired emergency engines (Unit D12 under P/N D41508, Unit D13 under P/N G32495, Unit D14 under P/N D41509, and Unit D15 under P/N G35582). All decommissioned equipment will be abandoned in place.
- C. Other ancillary improvements.

SCE Component

The SCE Component of the MCM Project seeks the following modifications to the existing Ginger 12 kilovolt (kV) circuit:

- A. **Temporary construction power:** Extend the existing Ginger 12-kV circuit from the existing electrical poles on Virginia Street to specifically provide electricity to the temporary construction laydown areas in support of the construction of the MCM Project. Temporary construction power will be located completely within the Facility and will involve: 1) less than 50 feet of underground trenching; 2) installation of temporary power poles, metering equipment, and a step-down transformer to be located adjacent to the eastern boundary of the MCS; 3) removal and replacement of one existing distribution pole; 4) installation of one new permanent distribution pole; and 5) installation of one temporary distribution pole that will be removed after construction is complete. Temporary construction power would be installed over approximately two working days at the beginning of Project construction in the third quarter of 2026.
- B. **Ginger 12-kV super circuit:** Upgrade/enhance the existing Ginger 12-kV circuit to a 12-kV “super circuit”² to increase the reliability and resilience of the electrical supply to the MCS by: 1) installing approximately three miles of additional 12-kV circuit along portions of an approximately six-mile segment of the existing 12-kV circuit; 2) installing approximately eight new wood or composite fiberglass distribution poles; and 3) replacing approximately 50 distribution poles, and replacement of approximately five existing joint distribution/subtransmission poles with five wood joint distribution/subtransmission poles. Additionally, the Ginger 12-kV super circuit includes making additional circuit improvements along an approximately three-mile portion of the existing Ginger 12-kV circuit which include: 1) installation of a new conductor outside of SCE’s existing Moreno Substation; 2) installation of new cable within new and existing ducts along Ironwood Avenue; 3) installation of new overhead conductors; 4) replacing a switch along Ironwood Avenue; and 5) installing a voltage regulator south of Ironwood Avenue. In total, the additional circuit improvements involve replacing two existing joint distribution/subtransmission poles and installing three new wood or composite distribution poles along Ironwood Avenue. The Ginger 12-kV super circuit is targeted for completion by approximately August 2027.
- C. **Permanent circuit upgrades:** Install approximately 4,800 feet of new overhead conductor on up to 35 poles that currently carry one 115-kV circuit and one 12-kV circuit; potentially replace all 35 poles depending on their condition; and install one new 12-kV rated switch on one of the poles. SCE will also make minor circuit configuration adjustments, as needed, to integrate the Ginger 12-kV super circuit into the final grid configuration. The permanent circuit upgrades will occur

² Super circuit is a descriptive term used for SCE’s upgraded or enhanced circuits designed for increased reliability and resilience.

subsequent to the Ginger 12-kV super circuit upgrades described in Section B. Completion and energization of the permanent circuit upgrades are targeted to occur by June 1, 2029.

SoCalGas and SDG&E jointly applied for the permits from South Coast AQMD; however, SDG&E will implement the SDG&E Component of the MCM Project and SDG&E will continue to own and operate the MCS. Table 1-1 summarizes the South Coast AQMD application numbers associated with the proposed project.

Table 1-1
South Coast AQMD Application Numbers

Application Number(s)	Equipment Description
629922, 629924	Two new Compressor Gas Turbines (CGTs) (No. 1 and No. 2)
629923, 629925	Two new Selective Catalytic Reduction (SCR) systems with oxidation catalysts
629926, 629928	Two new natural Gas-fired Emergency Engines
629927, 629929	Two new Non-Selective Catalytic Reduction (NSCR) systems
629930	Significant Title V Permit Revision
629931	Retirement Plan for Compressor Gas Lean-Burn Engine Replacement with Compressor Gas Turbines per Rule 1100(d)(4)
629932	Minor Title V Permit Revision for Rule 1100 Retirement Plan

After the new equipment is installed and performance testing is conducted, several equipment as summarized in Table 1-2 will be shut down, isolated, decommissioned, and removed.

Table 1-2
Existing Equipment Proposed for Decommissioning and Removal

Application (Permit) Number	Equipment Description
01302E (E03678)	Four Solar Plant, Natural Gas Turbines, Model Saturn 1000, 1,100 HP each, including the following: Solar Plant No. 4; Solar Plant No. 5; Solar Plant No. 6; and Solar Plant No. 7 (Units: D1, D2, D3, and D4)
500090 (G21244)	Clark Plant West Engine No. 1, ICE, Natural Gas, Model HRSA-8LEC, 2-Stroke Lean-Burn, 995 HP, Turbocharged and Aftercooled, with Staged Combustion, Insulated Exhaust Ducts and with two Carbon Monoxide (CO) Oxidation Catalysts (Unit: D5)
500091 (G21245)	Clark Plant Middle Engine No. 2, ICE, Natural Gas, Model HRSA-8LEC, 2-Stroke Lean-Burn, 995 HP, Turbocharged and Aftercooled, with Staged Combustion, Insulated Exhaust Ducts and with two CO Oxidation Catalysts (Unit: D6)
500092 (G21246)	Clark Plant East Engine No. 3, ICE, Natural Gas, Model HRSA-8LEC, 2-Stroke Lean-Burn, 995 HP, Turbocharged and Aftercooled, with Staged Combustion, Insulated Exhaust Ducts and with two CO Oxidation Catalysts (Unit: D7)
539440 (G21247)	Cooper Plant Engine No. 8, ICE, Natural Gas, Cooper Bessemer, Model 8Q155HC2, 2-Stroke Lean-Burn, 3,000 HP, Turbocharged and Aftercooled, with Insulated Exhaust Ducts, and with CO Oxidation Catalyst (Unit: D8)
539326 (G21248)	Cooper Plant Engine No. 9, ICE, Natural Gas, Cooper Bessemer, Model 8Q155HC2, 2-Stroke Lean-Burn, 3,000 HP, Turbocharged and Aftercooled, with Insulated Exhaust Ducts, and with CO Oxidation Catalyst (Unit: D9)
195313 (D41508)	Clarck Plant, Engine No. 2 ICE, Emergency Power, Waukesha, Natural Gas, 200 HP (Unit: D12)
195314 (D41509)	Clarck Plant, Engine No. 4, ICE, Emergency Power, Waukesha, Natural Gas, 200 HP (Unit: D14)
544981 (G32495)	Engine No. 3, ICE, Emergency Power, Caterpillar, Natural Gas, 329 HP, Inside the Admin Building and Operation Room (Unit: D13)
568799 (G35582)	Engine No. 1, ICE, Emergency Power, Caterpillar, Natural Gas, 400 HP, Turbocharger, Aftercooled, with NSCR, 270 kW Generator, Inside the Admin Building and Operation Room (Unit: D15)

1.3 Environmental Documentation Overview

SDG&E was identified by South Coast AQMD as having engines and turbines at the MCS that are subject to the NO_x emission reduction requirements in Rule 1110.2 and Rule 1134, respectively, and that the NO_x emission reduction efforts under Rule 1110.2 need to occur according to the implementation schedule in Rule 1100. As such, SDG&E proposed the MCM Project, which is a discretionary permitting action that requires South Coast AQMD review conducted pursuant to the California Environmental Quality Act (CEQA).

In November 2019, South Coast AQMD amended Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Engines and Rule 1100 – Implementation Schedule for NO_x Facilities to further reduce NO_x emissions from stationary engines originally subject to Regulation XX – Regional Clean Air Incentives Market (RECLAIM) as part of implementing two control measures that were adopted as part of the 2016 Air Quality Management Plan (AQMP): Control Measure CMB-01 – Transition to Zero and Near-Zero Emission Technologies for Stationary Sources, and Control Measure CMB-05 – Further NO_x Reductions from RECLAIM Assessment.

Rule 1110.2 applies to RECLAIM and non-RECLAIM stationary and portable engines rated greater than 50 brake horsepower (bhp). Amended Rule 1110.2: 1) requires Best Available Retrofit Control Technology (BARCT) for internal combustion engines that are operated at current and former RECLAIM facilities that were not previously subject to Rule 1110.2 ; 2) exempts non-emergency engines operated at remote two-way radio transmission towers; 3) contains an interim limit for electric generating units that do not have ammonia (NH₃) emissions from add-on control equipment; and 4) exempts Tier 4 – Final diesel engines powering cranes operated in the Southern California Coastal Waters or Outer Continental Shelf.

In addition, amendments to Rule 1100 were adopted that: 1) required two- and four-stroke lean-burn compressor gas engines to comply with the NO_x emission limits in Amended Rule 1110.2 within 24 months after a permit to construct is issued and require the permit application be submitted by July 1, 2021; 2) required all other qualifying engines to meet the NO_x emission limits by December 31, 2023; 3) extended the compliance dates for achieving the emission limits specified in the rule and adding interim emission limits for compressor gas lean-burn engines if the owners or operators submit a request for a time extension; 4) added alternative emission limits for compressor gas lean-burn engines; 5) extended the compliance date for achieving the emission limits for compressor gas lean-burn engines undergoing a facility-wide engine modernization; 6) added a requirement for permit applications to be submitted by July 1, 2021; and 7) added low-use criteria for diesel engines operated at ski resorts.

At the time amendments to Rule 1110.2 and Rule 1110 were proposed, South Coast AQMD staff determined these rules contained new information of substantial importance that was not known and could not have been known at the time the March 2017 Final Program Environmental Impact Report (EIR) for the 2016 AQMP (March 2017 Final Program EIR for the 2106 AQMP) was certified. Therefore, South Coast AQMD prepared a Subsequent Environmental Assessment (SEA) for Proposed Amended Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Engines, and Proposed Amended Rule 1100 – Implementation Schedule for NO_x Facilities, and the Governing Board certified the Final SEA for this project in November 2019 (November 2019 Final SEA for PAR 1110.2 and PAR 1100). The November 2019 Final SEA for PAR 1110.2 and PAR 1100 tiered off the March 2017 Final Program EIR for the 2016 AQMP to facilitate the transition of affected equipment subject to the NO_x RECLAIM program to a

command-and-control regulatory structure and to implement Control Measure CMB-05 (South Coast AQMD 2019b).

In April 2019, South Coast AQMD amended Rule 1134 – Emissions of Oxides of Nitrogen from Stationary Gas Turbines, to further reduce emissions of NO_x from stationary gas turbines and to facilitate the transition of affected equipment subject to the NO_x RECLAIM program to a command-and-control regulatory structure and to implement 2016 AQMP Control Measure CMB-05. Rule 1134 applies to RECLAIM and non-RECLAIM stationary gas turbines that are not otherwise subject to Rule 1135 – Emissions of Oxides of Nitrogen from Electricity Generating Facilities, or located at petroleum refineries, landfills, or publicly owned treatment works. Amendments to Rule 1134: 1) expanded its applicability to include stationary gas turbines that were not previously required to comply with Rule 1134; 2) updated the NO_x and ammonia emission limits for stationary gas turbines to comply with Best Available Retrofit Control Technology (BARCT); 3) established new exemptions for low-use equipment, certain existing combined-cycle gas turbines, and emergency standby gas turbines; 4) provided relief from having to comply with ammonia requirements for turbines that do not use ammonia for controlling NO_x emissions; and 5) revised existing exemptions to remove obsolete provisions.

At the time amendments to Rule 1134 were proposed, South Coast AQMD staff determined the proposal contained new information of substantial importance that was not known and could not have been known at the time the March 2017 Final Program Environmental Impact Report (EIR) for the 2016 AQMP (March 2017 Final Program EIR for the 2106 AQMP) was certified. Therefore, South Coast AQMD prepared a Subsequent Environmental Assessment (SEA) for Proposed Amended Rule 1134 – Emissions of Oxides of Nitrogen from Stationary Gas Turbines, and the Governing Board certified the Final SEA for this project in April 2019 (April 2019 Final SEA for PAR 1134).

The April 2019 Final SEA for PAR 1134 tiered off the March 2017 Final Program EIR for the 2016 AQMP to reduce NO_x emissions from stationary gas turbines and transition these equipment that are currently permitted under the NO_x RECLAIM program to a command-and-control regulatory structure; and 2) implement Control Measure CMB-05 by updating the NO_x limits and incorporating new ammonia (NH₃) emission limits to reflect current BARCT (South Coast AQMD 2019a).

In response to these amended rules, SoCalGas and SDG&E jointly submitted applications to South Coast AQMD seeking install new equipment and modify existing equipment at the MCS, as listed in Table 1-1 and described in Section 1.2 of this Addendum. The purpose of the new CGTs and EDCs is to facilitate compression of natural gas by replacing aging equipment to comply with the aforementioned South Coast AQMD rules while controlling emissions of NO_x, CO, and volatile organic compounds (VOC).

The proposed MCM Project also includes the SCE Component which seeks to upgrade the existing Ginger 12-kV electricity supply. The SCE Component does not require air permits issued by South Coast AQMD.

The construction and operation activities associated with the SDG&E Component of the MCM Project were previously analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 – both of which tiered off of the March 2017 Final Program EIR for the 2016 AQMP. However, the construction and operation activities associated with the SCE Component were not previously analyzed in these prior CEQA documents.

Therefore, this Addendum analyzes the potential impacts from the SCE Component that were not previously analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. The purpose of this Addendum is to determine if implementation of the SCE Component would result in any new significant adverse environmental impacts not identified or analyzed in the previously certified the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. This Addendum also analyzes if any previously identified significant impacts would be substantially more severe with the SCE Component. Lastly, this Addendum analyzes whether implementation of the SCE Component would require new or modified mitigation measures or alternatives to be studied that were not previously analyzed in the analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP.

This Addendum provides a comprehensive analysis of the SCE Component in relationship to the previous South Coast AQMD CEQA documents and assesses the potential for the SCE Component as currently proposed to result in new or substantially more severe significant environmental impacts than were previously analyzed. This Addendum concludes that the SCE Component would not result in new significant impacts not previously identified or make any previously identified significant impacts substantially more severe. This Addendum further concludes that implementation of the SCE Component would not require new or modified mitigation measures or alternatives that were not previously analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. Thus, the SCE Component is consistent with, and would not alter the conclusions in the previous CEQA reviews conducted and conclusions reached by South Coast AQMD, such that a supplemental or subsequent EIR is not required pursuant to the conditions set forth in CEQA Guidelines Section 15162. As such, an addendum is appropriate type of CEQA document to evaluate the SCE Component of the MCM Project in accordance with CEQA Guidelines Section 15164.

1.4 Addendum Organization

This Addendum is organized as follows:

- Chapter 1.0: Introduction. This chapter provides an overview of the SDG&E/SoCalGas integrated natural gas transmission system and operations, the MCS, the MCM Project, and previous CEQA documents relevant to the MCM Project; and a discussion of the organization of this Addendum.
- Chapter 2.0: California Environmental Quality Act and Basis for Decision to Prepare an Addendum. This chapter describes the previous project approvals, the physical modifications required for control measures, the requirements according to CEQA for the preparation of an Addendum, and the applicable CEQA Guidelines requirements. The chapter also discusses recent updates to the CEQA Guidelines in the context of the SCE Component.
- Chapter 3.0: Previous CEQA Documents Applicable to the MCM Project. This chapter provides a summary of the previous CEQA documents that are applicable to this Addendum, which include the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. This chapter also provides a summary discussion of how the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the

April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP are used to support the evaluation of environmental impacts of the SCE Component.

- Chapter 4.0: Project Location. This chapter describes the location of the MCM Project, including the SCE Component.
- Chapter 5.0: Background and Project Description. This chapter provides a detailed description of the SCE Component of the MCM Project for the environmental impact analysis. The chapter includes the purpose, need, and objectives of the proposed MCM Project; a detailed description of both the SDG&E Component and the SCE Component of the MCM Project; and a description of proposed SCE Component activities. Project activities for the SCE Component outlined in this chapter include pre-construction activities, the construction schedule, and construction activities.
- Chapter 6.0: MCM Project Setting. This chapter provides an overview of the environmental setting for the MCM Project, including the SCE Component. The chapter includes the Facility location and operations. It outlines the regulatory setting for the MCM Project, the intended uses of the Addendum, and the agency approvals required for MCM Project implementation, including discretionary actions and ministerial permits.
- Chapter 7.0: Impact Analysis. Section 7.1 summarizes the environmental impacts that were found to be significant in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP, and provides a table that summarizes which parts of the SDG&E Component and the SCE Component are covered under the previous CEQA documents. The construction and operation activities associated with the SDG&E Component of the MCM Project were previously analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 – both of which tiered off of the March 2017 Final Program EIR for the 2016 AQMP. However, the construction and operation activities associated with the SCE Component were not previously analyzed in these prior CEQA documents. Section 7.2 presents the analysis of the environmental topic areas that the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP evaluated and sets forth an assessment of the potential environmental impacts from the proposed SCE Component of the MCM Project. This section also provides a discussion of the cumulative impacts found in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP, as well as a cumulative impact analysis for the proposed SCE Component of the MCM Project.
- Chapter 8.0: Potential Environmental Impacts in the Previous CEQA Documents Found Not to Be Significant. Section 8.1 addresses the environmental topic areas that were found to not have significant environmental impacts in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. Section 8.2 addresses the environmental topic area of wildfire, which was not analyzed as a separate environmental topic area in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP.
- Chapter 9.0: Conclusions. This chapter concludes that the SCE Component of the MCM Project would not result in new potentially significant impacts, nor would it substantially increase the

severity of significant impacts identified in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. This chapter further concludes that the SCE Component would not require new mitigation measures or alternatives to be studied that were not already analyzed under the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. This chapter therefore concludes that implementation of the SCE Component would not change the conclusions reached in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP.

- Chapter 10: References. This chapter provides a list of references cited in the document.

2.0 CALIFORNIA ENVIRONMENTAL QUALITY ACT AND BASIS FOR DECISION TO PREPARE AN ADDENDUM

2.1 CEQA and Summary of Previous Approvals

South Coast AQMD review and approval of the MCM Project requires a discretionary permitting action subject to CEQA. When the MCM Project was proposed, South Coast AQMD was identified as the CEQA lead agency because it was the public agency with the principal responsibility for approving: 1) the amendments to Rule 1110.2 and Rule 1100, and Rule 1134; and 2) the future anticipated equipment modifications that all facilities, including the MCS, would undergo in order to achieve the required NOx emission reductions [Public Resources Code Section 21067].

The potential environmental impacts associated with the construction and operation of the various components that implement the 2019 amendments to Rule 1134, Rule 1110.2, and Rule 1100 were evaluated in the April 2019 Final SEA for PAR 1134 and the November 2019 Final SEA for PAR 1110.2 and PAR 1100 which were certified by the South Coast AQMD Governing Board on April 5, 2019 and November 1, 2019, respectively. Both the April 2019 Final SEA for PAR 1134 and the November 2019 Final SEA for PAR 1110.2 and PAR 1100 included feasible mitigation measures to address the potentially significant adverse impacts; these mitigation measures were also made a condition of approval. As such, a Mitigation Monitoring and Reporting Plan (MMRP) was adopted for the April 2019 Final SEA for PAR 1134 and the November 2019 Final SEA for PAR 1110.2 and PAR 1100. Findings were made and Statements of Overriding Considerations were also adopted for both projects.

The April 2019 Final SEA for PAR 1134 and the November 2019 Final SEA for PAR 1110.2 and PAR 1100 both tiered off of the Final Program EIR for the 2016 AQMP, because the amendments to Rule 1134, Rule 1110.2, and Rule 1100 were implementing Control Measures CMB-01 and CMB-05 from the 2016 AQMP. The March 2017 Final Program EIR for the 2016 AQMP evaluated the potential environmental impacts associated with the construction and operation of the various components of implementing all of the control measures in the 2016 AQMP, including Control Measures CMB-01 and CMB-05. The March 2017 Final Program EIR for the 2016 AQMP identified potentially significant adverse impacts for the environmental topic areas of aesthetics, air quality, energy, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, noise, solid/hazardous waste, and transportation and traffic. The March 2017 Final Program EIR for the 2016 AQMP, which was certified by the South Coast AQMD Governing Board on March 3, 2017, also included feasible mitigation measures to address these potentially significant adverse impacts. These mitigation measures were made a condition of approval and an MMRP was adopted for the 2016 AQMP. Findings were made and a Statement of Overriding Considerations was adopted by South Coast AQMD for the 2016 AQMP.

The April 2019 amendments to Rule 1134 and its corresponding Final SEA, MMRP, Findings and Statement of Overriding Considerations; the November 2019 amendments to Rule 1110.2 and Rule 1000 and its corresponding Final SEA, MMRP, Findings and Statement of Overriding Considerations; and the 2016 AQMP along with the March 2017 Final Program EIR for the 2016 AQMP (State Clearinghouse No. 2016071006) and its corresponding Findings, Statement of Overriding Considerations, and MMRP, upon which the analysis of the SCE Component of the MCM Project relies, are incorporated by reference pursuant to CEQA Guidelines Section 15150 and are available from the South Coast AQMD's website at:

- The April 2019 Final SEA for PAR 1134 is accessible at:

https://www.aqmd.gov/docs/default-source/ceqa/documents/aqmd-projects/2019/par-1134---final-sea_with_appdx.pdf, and

The MMRP, Findings and Statement of Overriding Considerations for the April 2019 Final SEA for PAR 1134, are identified as Attachment F of Agenda 24 in the April 5, 2019 Governing Board package is accessible at:

<https://www.aqmd.gov/docs/default-source/agendas/governing-board/2019/2019-apr5-024.pdf>.

- The November 2019 Final SEA for PAR 1110.2 and PAR 1100 is accessible at: https://www.aqmd.gov/docs/default-source/ceqa/documents/aqmd-projects/2019/par-1110-2_final-sea_with-appx.pdf, and

The MMRP, Findings and Statement of Overriding Considerations for the November 2019 Final SEA for PAR 1110.2 and PAR 1100, are identified as Attachment F of Agenda 28 in the November 1, 2019 to the Governing Board package is accessible at:

<https://www.aqmd.gov/docs/default-source/agendas/governing-board/2019/2019-nov1-028.pdf>.

- The March 2017 Final Program EIR for the 2016 AQMP is accessible at: <https://www.aqmd.gov/docs/default-source/agendas/governing-board/2017/2017-mar3-035.pdf>, and

The MMRP, Findings and Statement of Overriding Considerations for the March 2017 Final Program EIR for the 2016 AQMP are accessible at:

<https://www.aqmd.gov/docs/default-source/ceqa/documents/aqmd-projects/2017/att2toresolutionfor-2016aqmp.pdf>.

Copies of these documents may also be obtained from:

Lisa Tanaka, Deputy Executive Officer/Public Advisor
South Coast AQMD 21865 Copley Drive
Diamond Bar, CA 91765
Phone: (909) 396-2432
Email: publicadvisor@aqmd.gov

2.2 Physical Modifications Required for Applicable Control Measures in 2016 AQMP

The 2016 AQMP is implemented through a series of control measures and strategies that vary by source type (i.e., mobile or stationary) as well as by the pollutant that is being addressed. Control Measure CMB-01 prescribes emission reductions of NO_x from traditional combustion sources by replacement with zero- and near-zero-emission technologies, including low NO_x emitting equipment, electrification, alternative process changes, efficiency measures, or fuel cells for combined heating and power. Replacing older, higher-emitting equipment with newer, lower- or zero-emitting equipment could apply to a single source or an entire facility. These sources include engines, turbines, microturbines, and boilers that generate power for electricity for distributed generation, facility power, process heating, and/or steam production. Additionally, fuel cells may be implemented as an alternative to traditional combustion

methods. Control Measure CMB-01 seeks energy storage system and smart-grid control technologies that provide a flexible and dispatchable resource with zero emissions. Control Measure CMB-05 prescribes an orderly sunset of the RECLAIM program and identifies a series of approaches, assessments, and analyses that make the program more effective to ensure equivalency with command-and-control regulations implementing BARCT (South Coast AQMD 2017b).

The March 2017 Final Program EIR for the 2016 AQMP assessed potential environmental impacts as a result of implementing the control measures due to short-term construction activities, such as installation of new equipment, disposal of old equipment, and additional vehicle/truck trips to transport materials. Environmental impacts were also concluded to occur from long-term operational activities, such as increased electrical demand and emissions from power plants that would need to expand to produce additional electricity to operate zero- and near-zero-emission technologies, increased ammonia use for reformulated products, and increased waste from spent catalysts.

Subsequently, the April 2019 amendments to Rule 1134 and November 2019 amendments to Rule 1110.2 and Rule 1100 contemplated more refined and defined projects than what was previously analyzed in the Final Program EIR for the 2016 AQMP. Rule 1134, Rule 1110.2, and Rule 1100 were amended to facilitate the transition of affected equipment subject to the NO_x RECLAIM program to a command-and-control regulatory structure and to implement Control Measure CMB-05. The amendments to Rule 1134 required BARCT for stationary gas turbines operating at current and former RECLAIM facilities, which were not previously subject to Rule 1134, and updated the NO_x and ammonia emission limits for compliance with BARCT. Implementation of Amended Rule 1134 was estimated to reduce NO_x emissions by 2.8 tons per day by retrofitting stationary gas turbines with air pollution control equipment (e.g., SCR technology/systems), or by repowering or replacing existing stationary gas turbines. While impacts associated with hazards and hazardous materials were determined to be significant and unavoidable, the April 2019 Final SEA for PAR 1134 determined that air quality and GHG emissions impacts would be less than significant. Even though implementation of Amended Rule 1134 would cause a temporary, less than significant increase in air quality and GHG emissions during construction, the temporary increase in air quality and GHG emissions during construction combined with the total permanent emission reductions projected overall during operation would not interfere with the expected overall NO_x reductions (South Coast AQMD 2019a).

Similarly, the amendments to Rule 1110.2 required BARCT for internal combustion engines operating at current and former RECLAIM facilities, which were not previously subject to Rule 1110.2. Amendments to Rule 1100 were administrative and as such, were not expected to require any physical modifications. Implementation of the amended rules was estimated to reduce NO_x emissions by 0.29 ton per day by retrofitting existing ICEs with air pollution control equipment (e.g., SCR technology/systems), or by repowering or replacing existing ICEs. While impacts associated with hazards were determined to be significant and unavoidable, the November 2019 Final SEA for PAR 1110.2 and PAR 1100 determined that air quality and GHG emissions impacts would be less than significant. Even though the analysis concluded that implementation of PAR 1110.2 and PAR 1100 would cause a temporary, less than significant increase in air quality and GHG emissions during construction, the temporary increase in air quality and GHG emissions during construction combined with the total permanent emission reductions projected overall during operation would not interfere with the expected overall NO_x reductions (South Coast AQMD 2019b).

2.3 Basis for Decision to Prepare an Addendum

SDG&E is proposing the MCM Project, which includes the installation of new equipment as well as other modifications to implement the requirements of Rule 1134, Rule 1110.2, and Rule 1100. Because the SCE Component, which is necessary to provide electricity to the expanded MCS was not specifically contemplated in the prior CEQA analyses for these rules or the 2016 AQMP, the Addendum evaluates the SCE Component as a modification to the MCM Project.

The SCE Component is considered a modification to the MCM Project, which was within the scope of: 1) the previously approved 2016 AQMP that was evaluated in the March 2017 Final Program EIR; 2) the previously approved April 2019 amendments to Rule 1134 that was evaluated in the April 2019 Final SEA for PAR 1134; and 3) the previously approved November 2019 amendments to Rule 1110.2 and Rule 1100 that were evaluated in the November 2019 Final SEA for PAR 1110.2 and PAR 1100; and is a “project” subject to CEQA. CEQA requires evaluation of the potential adverse environmental impacts of proposed projects with discretionary approvals and identification of feasible methods to reduce or avoid identified significant adverse environmental impacts of the project. However, CEQA Guidelines Section 15164(a) states a lead agency shall prepare an Addendum to a previously certified CEQA document if some changes or additions are necessary but none of the following conditions as described in CEQA Guidelines Section 15162 occur:

- Substantial changes that will require major revisions of the previous CEQA document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- Substantial changes occur with respect to the circumstances under which the project is undertaken, that will require major revisions of the previous CEQA document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- New information of substantial importance that was not known and could not have been known with the exercise of reasonable diligence at the time the previous CEQA document was certified as complete or adopted, such as:
 - The project will have one or more significant effects not discussed in the previous CEQA document
 - Significant effects previously examined will be substantially more severe than shown in the previous CEQA document;
 - Mitigation measures or alternatives are identified that were previously found not to be feasible but that would in fact be feasible, and would substantially reduce one or more significant effects, but the project proponent declines to adopt the mitigation measure or alternatives; or
 - Mitigation measures or alternatives are identified that are considerably different from those analyzed in the previous CEQA document and that would substantially reduce one or more significant effects on the environment, but the project proponent declines to adopt the mitigation measure or alternative

Further, CEQA Guidelines Section 15168(c)(2) states that later activities that were addressed in a “program EIR”, such as the March 2017 Final Program EIR for the 2016 AQMP, can be approved as being within the scope of a project covered by the program EIR if the agency finds that no subsequent

EIR is required. Factors that a lead agency may consider in making that determination include, but are not limited to, consistency of the later activity with the type of allowable land use, overall planned density and building intensity, geographic area analyzed for environmental impacts, and covered infrastructure, as described in the program EIR.

To determine if the conditions described in CEQA Guidelines Section 15162 have occurred, the effects of the SCE Component were compared to the baseline, or the existing setting, of the environmental impacts from the adoption of Control Measures CMB-01 and CMB-05 as initially reviewed in the March 2017 Final Program EIR for the 2016 AQMP and the implementation of these control measures through the April 2019 amendments to Rule 1134 and November 2019 amendments to Rule 1110.2 and Rule 1100, as initially reviewed and approved in the respective April 2019 Final SEA for PAR 1134, and November 2019 Final SEA for PAR 1110.2 and PAR 1100. After comparing the effects of the SCE Component to the baseline, the analysis indicates in Section 7.2, Analysis of Proposed MCM Project, and Chapter 8.0, Potential Environmental Impacts Found Not to Be Significant in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP, that the environmental topics of aesthetics, air quality and GHG emissions, energy, hazards and hazardous materials, hydrology and water quality, noise, solid/hazardous waste, and transportation and traffic would be potentially affected by the SCE Component. For Control Measures CMB-01 and CMB-05, which are the basis for the requirements later incorporated into the April 2019 amendments to Rule 1134 and November 2019 amendments to Rule 1110.2 and Rule 1100, the March 2017 Final Program EIR for the 2016 AQMP identified: 1) significant adverse impacts for the topics of aesthetics, air quality and GHG emissions, energy, hazards and hazardous materials, hydrology and water quality, noise, solid and hazardous waste, and transportation and traffic; and 2) less than significant impacts for the topics of agriculture and forestry resources, biological resources, cultural resources, geology and soils, land use and planning, mineral resources, population and housing, public services, and recreation. In addition, the April 2019 Final SEA for PAR 1134 and November 2019 Final SEA for PAR 1110.2 and PAR 1100 independently identified: 1) significant adverse impacts for the topic of hazards and hazardous materials; and 2) less than significant impacts for the topics of air quality and GHG emissions. Impacts to the remainder of the topics (aesthetics, agriculture and forestry resources, biological resources, cultural resources, energy, geology and soils, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, solid and hazardous waste, and transportation and traffic) were found to have no significant or less than significant direct or indirect adverse effects and were not discussed in detail in the April 2019 Final SEA for PAR 1134 and November 2019 Final SEA for PAR 1110.2 and PAR 1100.

As concluded in Chapter 9.0 in this Addendum, the SCE Component would not result in new significant impacts, substantial increases in the severity of previously identified significant impacts, and would not require new or modified mitigation measures or alternatives to be studied that were not already previously analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. In addition, implementation of the SCE Component would not change the conclusions reached in the March 2017 Final Program EIR for the 2016 AQMP, the April 2019 Final SEA for PAR 1134, and the November 2019 Final SEA for PAR 1110.2 and PAR 1100 for the aforementioned impact areas. Thus, there are no substantial changes to the MCM Project that would require major revisions to the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP due to the MCM Project's lack of new significant environmental effects and no substantial increase in the severity of previously identified significant effects. Implementation of the SCE Component would

not change the conclusions reached in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP.

The analysis in Section 7.2 and Chapter 8.0 of this Addendum confirms that the SCE Component is not expected to trigger any conditions identified in CEQA Guidelines Section 15162 that would require the preparation of a subsequent EIR because: 1) the proposed revisions do not create any new significant adverse environmental impacts; 2) the proposed revisions do not make substantially worse any existing significant adverse environmental impacts; and 3) the proposed revisions would only require minor additions or changes to make adequate the environmental analyses of the MCM Project in the previous CEQA documents (i.e., the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP). Therefore, when considering the effects of the MCM Project, South Coast AQMD has determined that: 1) the SDG&E Component of the MCM Project is within the scope of what was previously analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP; and 2) an Addendum is the appropriate CEQA document to be prepared for evaluating potential environmental impacts of the SCE Component's potential environmental impacts that were not previously analyzed.

The prior discussion provides the rationale to comply with CEQA Guidelines Section 15164(e), which requires a brief explanation supported by substantial evidence to be included in the Addendum about the reasoning behind the decision to not prepare a Subsequent EIR based on the criteria set forth in CEQA Guidelines Section 15162. Finally, as set forth in CEQA Guidelines Section 15164(c), this Addendum is not required to be circulated for public review, but it will be included as an attachment to the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP.

2.4 CEQA Guidelines Revisions

Since the certification of the March 2017 Final Program EIR for the 2016 AQMP, a series of updates were adopted in the CEQA Guidelines to incorporate new case law and legislation and other clarifications. The updates included revisions to Appendix G of the CEQA Guidelines, which consists of environmental checklist questions that are used by many lead agencies as the framework for environmental documents prepared pursuant to CEQA. The most recent and comprehensive revisions to the CEQA Guidelines were adopted on December 28, 2018.³

When conducting CEQA analyses, the South Coast AQMD uses a customized environmental checklist with questions that are primarily based on the environmental checklist found in Appendix G of the CEQA Guidelines, but which are organized differently. The Initial Study of the March 2017 Final Program EIR

³ The 2018 updates to Appendix G can be generally summarized as follows: narrowing the scope of aesthetic impacts; moving the topic of paleontology from the cultural resources section to the geology section; adding threshold questions to address the topic of energy; expanding wildfire issues; combining airport safety and noise into one threshold question; deleting the reference to private airstrips; incorporating vehicle miles traveled (VMT) analysis into the transportation section; making the hydrology and utilities questions more concise and applicable to modern issues; clarifying that land use conflicts must relate to a physical impact; and adding "unplanned" to the population growth question, so that the question now focuses only on unplanned growth. In addition to these revisions, a prior revision was made that involved the addition of the topic of tribal cultural resources (TCRs) as a separate section in Appendix G. The TCRs section was added to Appendix G after passage of Assembly Bill (AB) 52, which required an update to the CEQA Guidelines to ensure that the topic of TCRs was addressed in CEQA documents.

for the 2016 AQMP relied on the South Coast AQMD's customized checklist that was developed from a previous, now outdated version of Appendix G before it was amended in 2018.

CEQA Guidelines Section 15007(c) states that "if a document meets the content requirements in effect when the document is sent out for public review, the document shall not need to be revised to conform to any new content requirements in Guideline amendments taking effect before the document is finally approved." Thus, even though the March 2017 Final Program EIR for the 2016 AQMP was released for public review and certified prior to the 2018 amendments to the CEQA Guidelines and its environmental checklist in Appendix G, the March 2017 Final Program EIR for the 2016 AQMP met the CEQA Guidelines' content requirements that were in effect at the time. Therefore, the analysis for the proposed SCE Component does not need to be retrospectively updated to conform with the latest version of the CEQA Guidelines. As such, changes pertaining to more recent updates to the CEQA Guidelines than what was in effect at that time the March 2017 Final Program EIR for the 2016 AQMP was certified do not need to be addressed in this Addendum. The adoption of any updates to the CEQA Guidelines does not constitute a substantial change with respect to the circumstances under which the whole of the MCM Project would be undertaken, nor does it constitute new information of substantial importance that would change the conclusions reached in the certified March 2017 Final Program EIR for the 2016 AQMP.

Further, because the April 2019 Final SEA for PAR 1134, and the November 2019 Final SEA for PAR 1110.2 and PAR 1100 are subsequent CEQA documents to the March 2017 Final Program EIR for the 2016 AQMP, these two documents relied on the conclusions reached in the March 2017 Final Program EIR for the 2016 AQMP as evidence for why the environmental topic areas were found to have no impacts or less than significant impacts. Because the environmental topic areas of air quality, and hazards and hazardous materials were the only environmental topic areas that would be affected by the amendments proposed for Rule 1134, Rule 1110.2 and Rule 1100, no other environmental topic areas were evaluated in the April 2019 Final SEA for PAR 1134, and November 2019 Final SEA for PAR 1110.2 and PAR 1100, respectively.

This Addendum includes South Coast AQMD's significance criteria (herein referred to as significance criteria or significance thresholds) included in the March 2017 Final Program EIR for the 2016 AQMP. At the time the Notice of Preparation/Initial Study for the Draft Program EIR for the 2016 AQMP was circulated for public review and comment, and following the certification of the March 2017 Final Program EIR for the 2016 AQMP, South Coast AQMD's customized environmental checklist in the Initial Study did not include the topics of Tribal Cultural Resources (TCRs) or wildfire. As such, these two topic areas were not evaluated at that time. However, in the interest of providing the public and decision makers with as much relevant information on the SCE Component's potential environmental impacts as possible, this Addendum includes discussions of the SCE Component's potential effects on TCRs in Section 8.1.3 - Cultural Resources, and on wildfire in Section 8.2.1 - Wildfire for informational purposes only.

3.0 PREVIOUS CEQA DOCUMENTS APPLICABLE TO THE MCM PROJECT

As one of its obligations under the federal Clean Air Act, South Coast AQMD prepares AQMPs that identify the emissions reductions and control measures needed to attain the health-based ambient air quality standards for which the region is not in attainment. South Coast AQMD's 2016 AQMP identified the quantity of NO_x emissions reductions that were needed to attain the ozone and fine particulate matter (PM_{2.5}) ambient air quality standards, and included Control Measure CMB-05 – Further NO_x Reductions from RECLAIM Assessment, which committed to additional NO_x emission reductions of five tons per day to occur by 2025 (South Coast AQMD 2017a). The South Coast AQMD Governing Board directed staff to implement the sunset of the RECLAIM program to achieve the additional five tons per day. Thus, Control Measure CMB-05 committed to a process of transitioning NO_x RECLAIM facilities to a command-and-control regulatory structure and ensuring that the applicable equipment meets BARCT-level equivalency.⁴

To analyze the potential environmental effects of the 2016 AQMP, a programmatic EIR was prepared pursuant to CEQA Guidelines Section 15168 which disclosed the potential for significant impacts that could occur as a result of implementing the proposed strategies and various control measures (South Coast AQMD 2017b). South Coast AQMD released a Draft EIR that included an analysis of potential adverse environmental impacts, mitigation measures, project alternatives, and other topics required by CEQA. A Notice of Determination for the March 2017 Final Program EIR for the 2016 AQMP was filed for posting on March 3, 2017. At the time of the proposed amendments to Rule 1134, Rule 1110.2, and Rule 1100 in 2019, which implemented Control Measure CMB-05 of the 2016 AQMP, the analysis indicated that these rule development projects contained new information of substantial importance that was not known and could not have been known at the time the March 2017 Final Program EIR for the 2016 AQMP was certified. South Coast AQMD determined that the criteria for triggering subsequent CEQA analyses per CEQA Guidelines Section 15162 and tiering off of a programmatic analysis conducted pursuant to CEQA Guidelines Section 15168 were met for these rule development projects, and prepared a Subsequent Environmental Analysis for each of the projects which tiered off the March 2017 Final Program EIR for the 2016 AQMP (South Coast AQMD 2019a, 2019b). The Draft SEA for PAR 1134 was circulated for a 45-day public review period from January 29, 2019, to March 15, 2019, and was certified on April 5, 2019, while the Draft SEA for PAR 1110.2 and PAR 1100 was circulated for a 46-day public review period from July 26, 2019 to September 10, 2019, and was certified on November 1, 2019.

Therefore, South Coast AQMD has completed its CEQA review of the potential environmental impacts associated with implementing the adopted strategies and control measures in the 2016 AQMP, and the amendments to Rule 1134, Rule 1110.2, and Rule 1100 which were intended to specifically implement Control Measures CMB-01 and CMB-05 from the 2016 AQMP. Summaries of the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP are provided in Sections 3.1, 3.2, and 3.3, respectively. Copies of these documents can be obtained by contacting the South Coast AQMD's Public Information Center at 909.396.2039, or the documents can be downloaded from the South Coast AQMD's CEQA webpages at the following websites:

⁴ RECLAIM was a market incentive program that is transitioning to a command-and-control regulatory structure requiring BARCT. The shift from this market-based air pollution reduction strategy is a result of the control measure (CMB-05) that was included in the 2016 AQMP. The 2016 AQMP proposes the path to help attain federal public health standards for air quality (South Coast AQMD 2017a, 2018).

- March 2017 Final Program EIR for the 2016 AQMP
<http://www.aqmd.gov/docs/default-source/ceqa/documents/aqmd-projects/2016/2016aqmpfpeir.pdf>
- April 2019 Final SEA for PAR 1134
https://www.aqmd.gov/docs/default-source/ceqa/documents/aqmd-projects/2019/par-1134---final-sea_with_appdx.pdf
- November 2019 Final SEA for PAR 1110.2 and PAR 1100
http://www.aqmd.gov/docs/default-source/ceqa/documents/aqmd-projects/2019/par-1110-2_final-sea_with-appx.pdf

3.1 March 2017 Final Program EIR for the 2016 AQMP

The 2016 AQMP identified 75 control measures and strategies to demonstrate how the region would attain various ambient air quality standards. Control Measures CMB-01 – Transition to Zero and Near-Zero Emission Technologies for Stationary Sources, and CMB-05 – Further Reductions from RECLAIM Assessment, are relevant to the MCM Project. The March 2017 Final Program EIR for the 2016 AQMP addressed the 2016 AQMP strategies and control measures needed to attain the standards for which the South Coast Air Basin is not in attainment (i.e., ozone and PM_{2.5} National Ambient Air Quality Standards and ozone, PM₁₀, and PM_{2.5} California Ambient Air Quality Standards).

The 2016 AQMP identified the quantity of NO_x emissions reductions needed to reduce the formation of ozone. One of the strategies to attain NO_x emissions reductions is to implement BARCT on existing combustion equipment. Although BARCT rules are intended to reduce emissions and hence have a beneficial impact on air quality, the March 2017 Final Program EIR for the 2016 AQMP indicated that some of the control measures could result in environmental impacts as a result of the following: construction needed to implement the proposed control measures; operation of power plants that would need to expand to produce additional electricity to operate zero- and near-zero-emission technologies; use, storage, and/or transportation of ammonia; additional toxic air contaminants (TACs) (e.g., increased ammonia use for emissions control equipment); and additional vehicle trips to transport materials.

The March 2017 Final Program EIR for the 2016 AQMP identified stationary source control measures that further reduce emissions from both point sources (permitted facilities) and area sources (generally small and non-permitted sources). These measures target numerous source categories, including Energy and Climate Change Programs, Combustion Sources, Petroleum Operations and Fugitive Volatile Organic Compounds (VOC) Emissions, Coatings and Solvents, Multiple Component Sources, Best Control Measures, and Compliance Flexibility Programs. Each control measure may rely on numerous control methods (South Coast AQMD 2017b). Table 2.8-1 on page 2-15 in the March 2017 Final Program EIR for the 2016 AQMP provides a list of the proposed ozone measures for stationary sources along with the anticipated adoption date, implementation period, and emissions reductions.

The following text summarizes Control Measures CMB-01 and CMB-05 from the 2016 AQMP that are relevant to the MCM Project (South Coast AQMD 2017b):

CMB-01 – Transition to Zero and Near-Zero Emission Technologies for Stationary Sources: This control measure was intended to realize NOx emission reductions through the replacement of traditional combustion sources with zero- and near-zero-emission technologies, including low-NOx-emitting equipment, electrification, alternative process changes, efficiency measures, or fuel cells for combined heating and power. Replacement of older, higher-emitting equipment with newer lower- or zero-emitting equipment can occur at a single source or an entire facility. Potential sources to be replaced include engines, turbines, microturbines, and boilers that generate power for electricity for distributed generation, facility power, process heating, and/or steam production. New businesses can be required or incentivized to install and operate zero-emission equipment, technology, and processes beyond the current best available control technology (BACT) requirements. Fuel cells are also an alternative to traditional combustion methods, resulting in a reduction of NOx emissions with the co-benefit of reducing other criteria air pollutants and GHGs. This control measure is also intended to seek energy storage systems and smart grid control technologies that provide a flexible and dispatchable resource with zero emissions. Grid-based storage systems can replace the need for new peaking generation, can be coupled with renewable energy generation, and can reduce the need for additional energy infrastructure. Mechanisms will be explored to incentivize businesses to choose the cleanest technologies as they replace equipment and upgrade facilities and to provide incentives to encourage businesses to move into these zero- and near-zero-emission technologies sooner.

CMB-05 – Further NOx Reductions from RECLAIM Assessment: The Health and Safety Code requires the South Coast AQMD's RECLAIM program as well as other stationary sources to implement BARCT. If advances to BARCT are achieved in practice, the South Coast AQMD is required to periodically re-assess the overall facility caps and reduce the RECLAIM Trading Credit (RTC) holdings to a level equivalent to command-and-control BARCT levels. The emission reductions resulting from the programmatic RTC reductions will help the South Coast Air Basin attain the National Ambient Air Quality Standards (NAAQS) for ozone and PM2.5 as expeditiously as practicable. When considering future emission reductions for AQMP purposes, the NOx RECLAIM program works differently than traditional command-and-control regulations. When projecting future emissions for State Implementation Plan (SIP) purposes, all RECLAIM holdings must be assumed to be emitted in the air. Under command-and-control regulations, future year emissions estimates for many sources are based on actual emissions in a base year which are then projected into the future using the best available estimates of economic growth for a particular industry. The RECLAIM program has traditionally, and perhaps necessarily, included more RTCs than actual emissions. This margin may be needed for market liquidity, but also precludes taking future year SIP credit for these unused credits. For attainment demonstration purposes, these emission reductions would then need to be achieved from non-RECLAIM sources. This control measure identifies a series of approaches, assessments, and analyses that can be explored to make the program more effective in ensuring equivalency with command-and-control regulations implementing BARCT, and to potentially generate further NOx emission reductions at RECLAIM facilities.

All control measures were analyzed to identify the potentially adverse impacts of implementing the 2016 AQMP. Specific to Control Measure CMB-01, the analysis identified potential impacts related to air quality and GHG emissions, noise, solid and hazardous waste, and transportation and traffic. Similarly for Control Measure CMB-05, the analysis identified potential impacts related to air quality and GHG emissions, energy, hazards and hazardous materials, hydrology and water quality, noise, solid and hazardous waste, and transportation and traffic.

For the entire 2016 AQMP (e.g., all control measures and strategies combined), the analysis in the March 2017 Final Program EIR for the 2016 AQMP concluded that significant and unavoidable adverse environmental impacts were expected to occur, even after mitigation measures were applied, for the following environmental topics: aesthetics, construction-related air quality emissions, energy, hazards and hazardous materials, hydrology and water quality, construction noise and vibration, solid construction waste and waste from vehicle and equipment scrapping, and transportation and traffic during construction and operation. As such, mitigation measures were made a condition of project approval and an MMRP was adopted. Findings were made and a Statement of Overriding Considerations was adopted (South Coast AQMD 2017b).

3.2 April 2019 Final SEA for PAR 1134

As part of implementing Control Measure CMB-05 from the 2016 AQMP, South Coast AQMD amended Rule 1134. Rule 1134 applies to RECLAIM and non-RECLAIM stationary gas turbines that are not subject to South Coast AQMD Rule 1135 – Emissions of Oxides of Nitrogen from Electricity Generating Facilities, or that are located at petroleum refineries, landfills, or publicly owned treatment works. Rule 1134 requires these stationary gas turbines to comply with BARCT and establishes new exemptions for low-use equipment, certain existing combined cycle gas turbines, and emergency standby gas turbines. Implementation of Amended Rule 1134 was estimated to reduce NO_x emissions by 2.8 tons per day and is expected to be achieved by retrofitting existing stationary gas turbines with air pollution control equipment or repowering or replacing existing stationary gas turbines (South Coast AQMD 2019a).

In analyzing the potential environmental impacts of Amended Rule 1134 which was designed to facilitate the transition of affected equipment subject to the NO_x RECLAIM program to a command-and-control regulatory structure and to implement Control Measure CMB-05 (South Coast AQMD 2019a), South Coast AQMD staff determined that the proposal contained new information of substantial importance that was not known and could not have been known at the time the March 2017 Final Program EIR for the 2016 AQMP was certified. South Coast AQMD prepared a Final SEA for PAR 1134 which tiered off the March 2017 Final Program EIR for the 2016 AQMP. South Coast AQMD analyzed the environmental impacts of regulated entities complying with Amended Rule 1134 and identified facilities, which included MCS, that would be subject to the requirements in Amended Rule 1134. While physical modifications to facilities were expected to occur as a result of Amended Rule 1134, only the environmental topic areas of air quality and GHG emissions, and hazards and hazardous materials were identified as having potentially adverse impacts.

The analysis in the April 2019 Final SEA for PAR 1134 concluded less than significant air quality and greenhouse gas emissions impacts and significant adverse hazards and hazardous materials impacts due to the potential for a catastrophic failure of an aqueous ammonia tank. No other potentially significant adverse impacts were identified in the April 2019 Final SEA for PAR 1134 (South Coast AQMD 2019a).

3.3 November 2019 Final SEA for PAR 1110.2 and PAR 1100

As part of implementing Control Measure CMB-05 from the 2016 AQMP, South Coast AQMD amended Rule 1110.2 and its companion rule, Rule 1100. Rule 1110.2 applies to stationary and portable gaseous- and liquid-fueled engines with a rating greater than 50 brake horsepower operated at RECLAIM and non-RECLAIM facilities; applies to internal combustion engines operated at current and former RECLAIM facilities that were not previously subject to Rule 1110.2 and requires them to comply with BARCT; and exempts non-emergency engines operated at remote two-way radio transmission towers. Implementation of Rule 1110.2 is estimated to reduce NO_x emissions by 0.29 ton per day by retrofitting existing internal combustion engines with air pollution control equipment. Amended Rule 1100 provides the implementation schedule for RECLAIM facilities to meet the NO_x emission limits under Amended Rule 1110.2, establishing a compliance date of December 31, 2023 with alternative implementation schedules for unique classes and categories of engines, including those that undergo replacement and facility modernization that result in additional emission reductions.

In analyzing the potential environmental impacts of Amended Rule 1110.2 and Rule 1100, South Coast AQMD staff determined that the proposal contained new information of substantial importance that was not known and could not have been known at the time the March 2017 Final Program EIR for the 2016 AQMP was certified. South Coast AQMD prepared the November 2019 Final SEA for PAR 1110.2 and PAR 1100 which tiered off the March 2017 Final Program EIR for the 2016 AQMP to facilitate the transition of affected equipment subject to the NO_x RECLAIM program to a command-and-control regulatory structure and to implement Control Measure CMB-05 (South Coast AQMD 2019b). South Coast AQMD analyzed the environmental impacts of implementing the amendments to Rule 1110.2 and Rule 1100 and identified 21 facilities, which included MCS, that would be subject to the requirements in Rule 1110.2 and Rule 1100. While physical modifications to facilities were expected to occur as a result of implementing Amended Rule 1110.2 and Rule 1100, only the environmental topic areas of air quality and GHG emissions, and hazards and hazardous materials were identified as having potentially adverse impacts.

The analysis in the November 2019 Final SEA for PAR 1110.2 and PAR 1100 concluded less than significant air quality and greenhouse gas emissions impacts and significant adverse hazards and hazardous materials impacts due to the potential for a catastrophic failure of an aqueous ammonia tank. No other potentially significant adverse impacts were identified in the November 2019 Final SEA for PAR 1110.2 and PAR 1100 (South Coast AQMD 2019b).

3.4 Relationship of the MCM Project and its SCE Component to the Projects Analyzed in the Previous CEQA Documents

As discussed in Section 3.1, South Coast AQMD, as the CEQA lead agency, prepared the March 2017 Final Program EIR for the 2016 AQMP, which contemplated the impacts of Control Measures CMB-01 and CMB-05. After the 2016 AQMP was adopted, amendments to Rule 1134, Rule 1110.2, and Rule 1100 were adopted which implemented Control Measure CMB-05. The environmental impacts from implementing these rule amendments were analyzed in the April 2019 Final SEA for PAR 1134, and the November 2019 Final SEA for PAR 1110.2 and PAR 1100. As described in the April 2019 Final SEA for PAR 1134, 73 turbines at 35 facilities were identified as being subject to the rule requirements with approximately 33 turbines at 19 facilities needing to be replaced, repowered, or retrofitted. Among these

33 turbines, four were identified as compressor gas turbines located at the MCS as noted in Appendix D of the April 2019 Final SEA for PAR 1134 (PAR 1134 List of Affected Facilities) which identifies the MCS as “San Diego Gas & Electric.” In addition, in Appendix G of the April 2019 Final SEA for PAR 1134, Response 2-3 to bracketed comment 2-3 of Comment Letter 2 received relative to the Draft SEA for PAR 1134 confirms that four turbines at the MCS will need to be replaced, repowered, or retrofitted: “[t]he Final SEA provides a summary of the affected units analyzed in Table 4-2 and a list of the affected facilities in Appendix D, which identifies four stationary gas turbines for the facility located in Moreno Valley.” (April 2019 Final SEA for PAR 1134, p. G-6.)

Similarly, as described in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, 45 internal combustion engines at 21 RECLAIM facilities were identified as needing to be replaced, repowered, or retrofitted with air pollution control equipment in order to comply with the NOx emission limits in Rule 1110.2. In Appendix A of the Final Staff Report for PAR 1110.2 and PAR 1100, Table A-1: RECLAIM Facilities Affected by Rule 1110.2 lists the MCS as “San Diego Gas & Electric, Facility ID 4242” and Table A-2: Equipment at RECLAIM Facilities Affected by Rule 1110.2 identifies the following lean-burn 2-stroke engines at the MCS as needing to be retrofitted or replaced: Engines 3 through 5 (each rated at 995 brake horse-power), Engine 9-10 (each rated at 3,000 brake horse-power), and Engine 11 (rated at 3,200 brake horse-power).

As discussed further in Section 7.1.4 of this Addendum, the MCM project, with the inclusion of the SCE Component, differs from what was analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. As such, this Addendum evaluates the proposed SCE Component in relationship to those environmental topic areas as required by CEQA to determine whether the SCE Component would result in any new or substantially more severe significant environmental impacts than those in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP0, in accordance with CEQA Guidelines Section 15164.

Consistent with CEQA Guidelines Section 15164, the South Coast AQMD has determined that an addendum, rather than a subsequent EIR, is appropriate to satisfy CEQA because “some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.” Courts have reiterated this requirement, holding that “agencies are prohibited from requiring further environmental review unless the stated conditions [under Guideline 15162] are met.” See *Friends of the College of San Mateo Gardens v. San Mateo Community College District* (2016) 1 Cal.5th 937, 949-950 (“The event of a change in a project is not an occasion to revisit environmental concerns laid to rest in the original analysis. Only changed circumstances ... are at issue.”).

4.0 MCM PROJECT LOCATION

The MCS is located within South Coast AQMD jurisdiction at 14601 Virginia Street in the City of Moreno Valley, California, as depicted on Figure 4-1. The Facility is sited on 190.56 acres, generally bisected north to south by Virginia Street, and composed of seven Assessor's Parcel Numbers (APNs): 423-250-022, 423-260-012, 423-270-007, 423-270-008, 423-270-009, 423-270-020, and 423-280-010. The Facility includes the approximately 13.76-acre MCS as well as approximately 176.80 acres which surrounds the MCS. The MCS is located on four parcels of land, as follows: 5.96 acres on APN 423-270-007, 4.84 acres on APN 423-270-008, 2.80 acres on APN 423-270-009, and 0.17 acres on APN 423-280-010. Once modernized, the MCS will occur on the same parcels but increased by approximately 5.79 acres, for a total of approximately 19.55 acres or 10 percent of the Facility.

Aside from the proposed roadway improvements to Virginia Street east and southeast of the MCS, the majority of the SDG&E Component is located within the MCS. Temporary areas dedicated for construction staging and laydown of the SDG&E Component are located adjacent to the MCS and at the Moreno Buffer Yard located northeast of the MCS, as shown on Figure 5-1.

Relative to the SCE Component, while portions connect to the MCS within the Facility, including some temporary construction power activities and some of the upgrades to Ginger 12-kV circuit, the majority of the SCE Component will be located outside of the Facility, as depicted on Figure 4-1. Temporary construction power activities will occur east of the MCS within the Facility. The Ginger 12-kV super circuit will connect to the MCS, and its southernmost extent will be located within the Facility. The Ginger 12-kV super circuit will be located along an approximately six-mile segment along the existing 12-kV circuit from the existing SCE Moreno Substation at Ironwood Avenue, northwest of the Facility to the MCS (see Figure 4-1). The Ginger 12-kV super circuit and permanent circuit upgrades will be located on the following roadways north and northwest of the Facility: Virginia Street, Alessandro Boulevard, World Logistics Center Parkway, Theodore Street, and Ironwood Avenue. Roads in the vicinity of the MCS include Virginia Street to the east, Gato Del Sol Avenue and Alessandro Boulevard to the north, and Davis Road to the west. Primary access to the MCS is from the entrance on Virginia Street, which is a gated security access road that connects to Alessandro Boulevard.

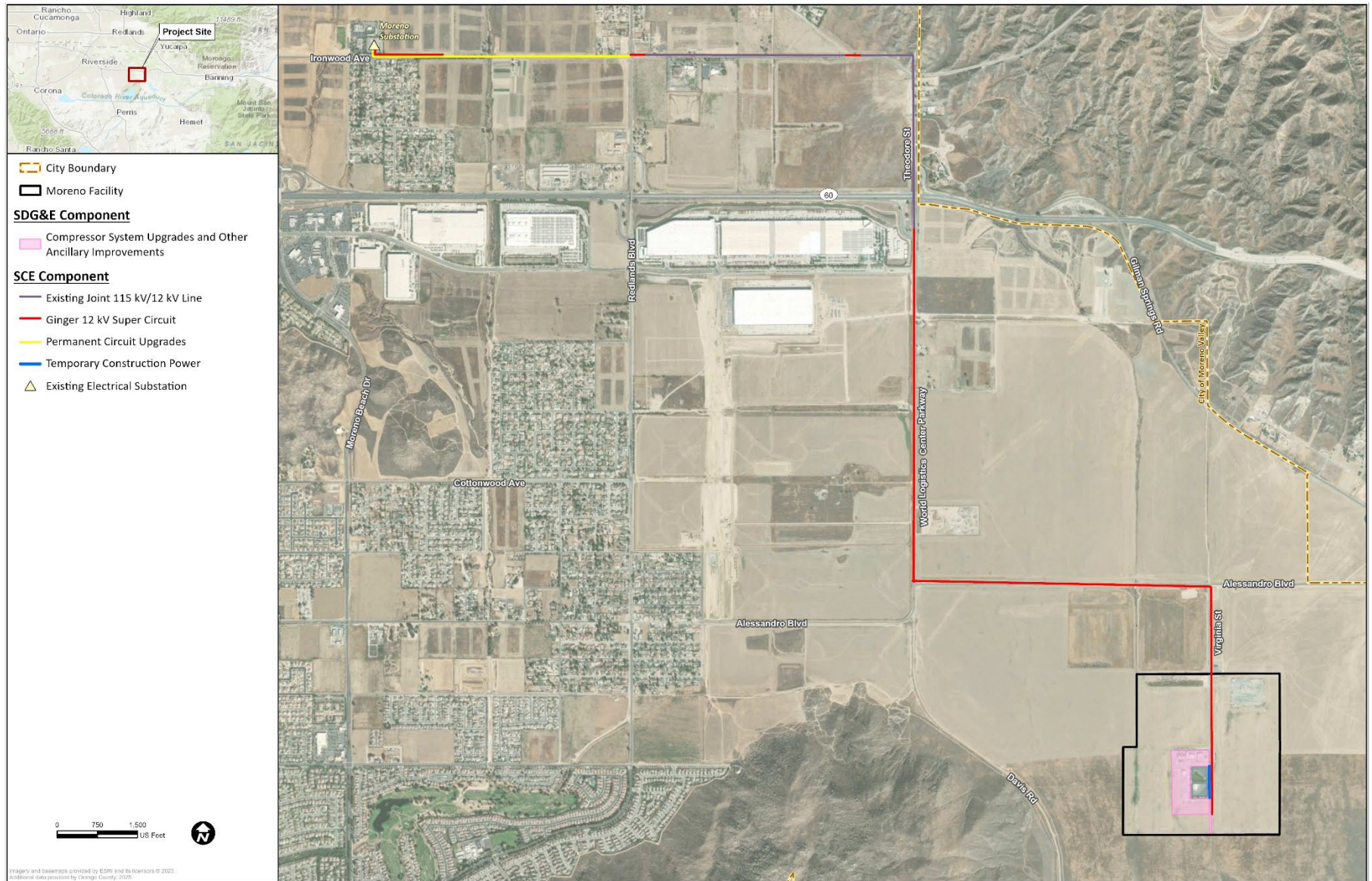


Figure 4-1
Regional and Local Vicinity Map

5.0 BACKGROUND AND PROJECT DESCRIPTION

5.1 Purpose, Need, and Objectives of the MCM Project

The purpose and necessity of the MCM Project is to comply with the NO_x emission limits and other requirements in recently amended Rule 1134, Rule 1110.2, and Rule 1100. Without modernization, the existing compressor equipment (except for the Cooper No. 10 Unit, an existing permitted compressor in the Cooper Plant under P/N G73135) at the MCS will not comply with these rules.

The objectives of the MCM Project are as follows:

- Comply with Rule 1134 for the identified turbines;
- Comply with Rules 1110.2 and 1100 for the stationary engines; and
- Enhance reliability by modernizing aging equipment and ancillary systems.

5.2 MCM Project Components

The MCM Project consists of the SDG&E Component, which is comprised of compressor system upgrades and other ancillary improvements, and the SCE Component, which is comprised of electrical infrastructure upgrades. The MCM Project is required for compliance with South Coast AQMD Rule 1134, Rule 1110.2, and Rule 1100. As previously described in Section 1.3 and Table 1-1 of this Addendum, the MCM Project includes the following equipment that are subject to South Coast AQMD permitting requirements:

Compressor System Upgrades and Other Ancillary Improvements

- In a new compressor building, install two new CGTs, each rated at 5,825 HP (A/Ns 629922 and 629924)
 - Install two new post-combustion emission control systems for the CGTs, each consisting of an SCR system and an oxidation catalyst (A/Ns 629923 and 629925)
 - Install two new Continuous Emissions Monitoring Systems (CEMS)
 - Add connection to existing ammonia storage tank under P/N G73134
- On a concrete pad, install two natural gas emergency generators (A/Ns 629926 and 629928), each with a NSCR system (A/Ns 629927 and 629929)
- Decommission and remove nine existing compressors (Units D1 to D4 under P/N E03678, Unit D5 under P/N G21244, Unit D6 under P/N G21245, Unit D7 under P/N G21246, Unit D8 under P/N G21247, and Unit D9 under P/N G21248) and four existing natural gas-fired emergency engines (Unit D12 under P/N D41508, Unit D13 under P/N G32495, Unit D14 under P/N D41509, and Unit D15 under P/N G35582), all of which will be abandoned in place.

The following equipment, which is not subject to permitting by the South Coast AQMD, will also be installed in a new compressor building:

- Equipment included in compressor system upgrades component:
 - Two electric-motor-driven reciprocating compressors (EDCs), each rated at 4,250 HP
 - Compression support equipment, including cooling towers; lube oil system; tanks; filters/separators; and control, electrical, and instrumentation equipment
- Other ancillary improvements, including a storage shelter, stormwater management, expanded high-security fencing, and roadway/circulation improvements
- The SCE Component temporary construction power and a Ginger 12-kV super circuit

Figure 4-1 depicts the locations of the SDG&E Component and the SCE Component of the MCM Project. Figure 5-1 shows the staging/laydown areas and construction workspace of the SDG&E Component and a portion of the staging/laydown areas and construction workspace of the SCE Component at the Facility. For the SDG&E Component, the black hatching on Figure 5-1 will be the construction workspace (subject to ground disturbance associated with construction and demolition of structures), while the orange hatching on Figure 5-1 will be used as staging/laydown, some of which will require earthwork/grading. The yellow area on Figure 5-1 identifies the construction workspace associated with the SCE Component. Figure 5-2 through Figure 5-5, provided later in this Chapter, depict the remainder of the SCE Component impact areas.

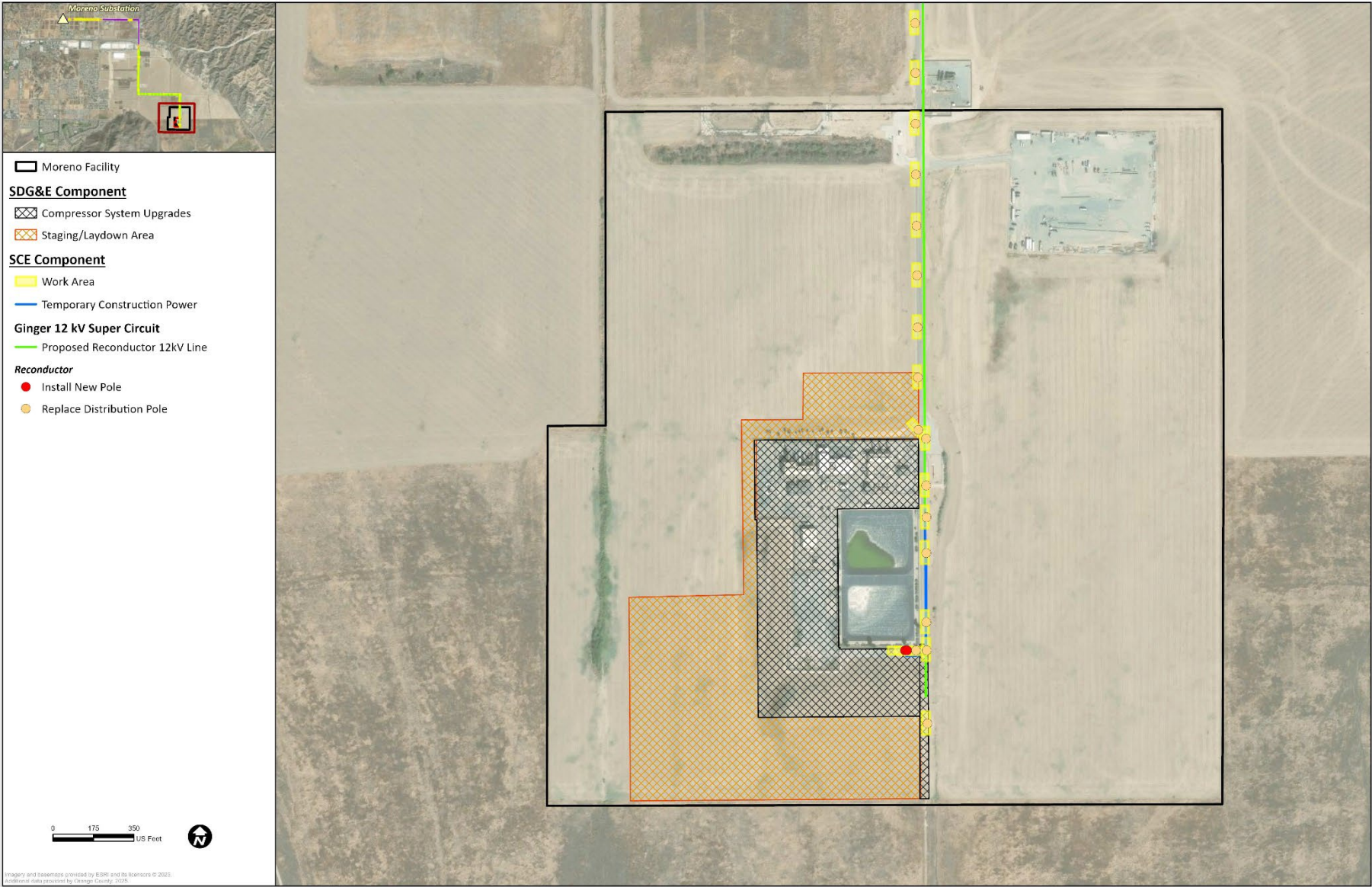


Figure 5-1
Facility Overview of Impacts

5.2.1 MCM Project Design Features Specific to the SCE Component

Specific design features and activities have been incorporated into the proposed SCE Component of the MCM Project to avoid or minimize potential environmental effects. Table 5-1 provides these project design features (PDFs).

Table 5-1
Project Design Features

No.	Project Design Feature Name	Description
PDF-1	Use of Tier 4 Final Engines on Construction Equipment	Construction contractors will use Tier 4 Final engines for off-road diesel-powered construction equipment with engines 50 horsepower or greater.
PDF-2	Pre-Construction Clearance Survey and Monitoring	Pre-construction surveys will be conducted prior to ground and/or vegetation-disturbing activities. Monitoring biologists will be on site during initial habitat-disturbing actions to support conformance with applicable biological resources permit conditions and avoid and minimize impacts to sensitive biological resources. If listed species are identified, appropriate avoidance and minimization measures established by a qualified biologist will be implemented. The monitor will have the ability to halt construction activities, if necessary, to avoid unanticipated impacts to sensitive resources.
PDF-3	Worker Environmental Awareness Program (WEAP)	All project personnel will undergo a WEAP to train them on specific environmental sensitivities pertinent to the areas of construction activity.
PDF-4	Inadvertent Discovery of Archaeological Resources	If archaeological resources are exposed during construction, construction work in the vicinity of the find shall stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether additional study is warranted (e.g., monitoring, testing, data recovery).

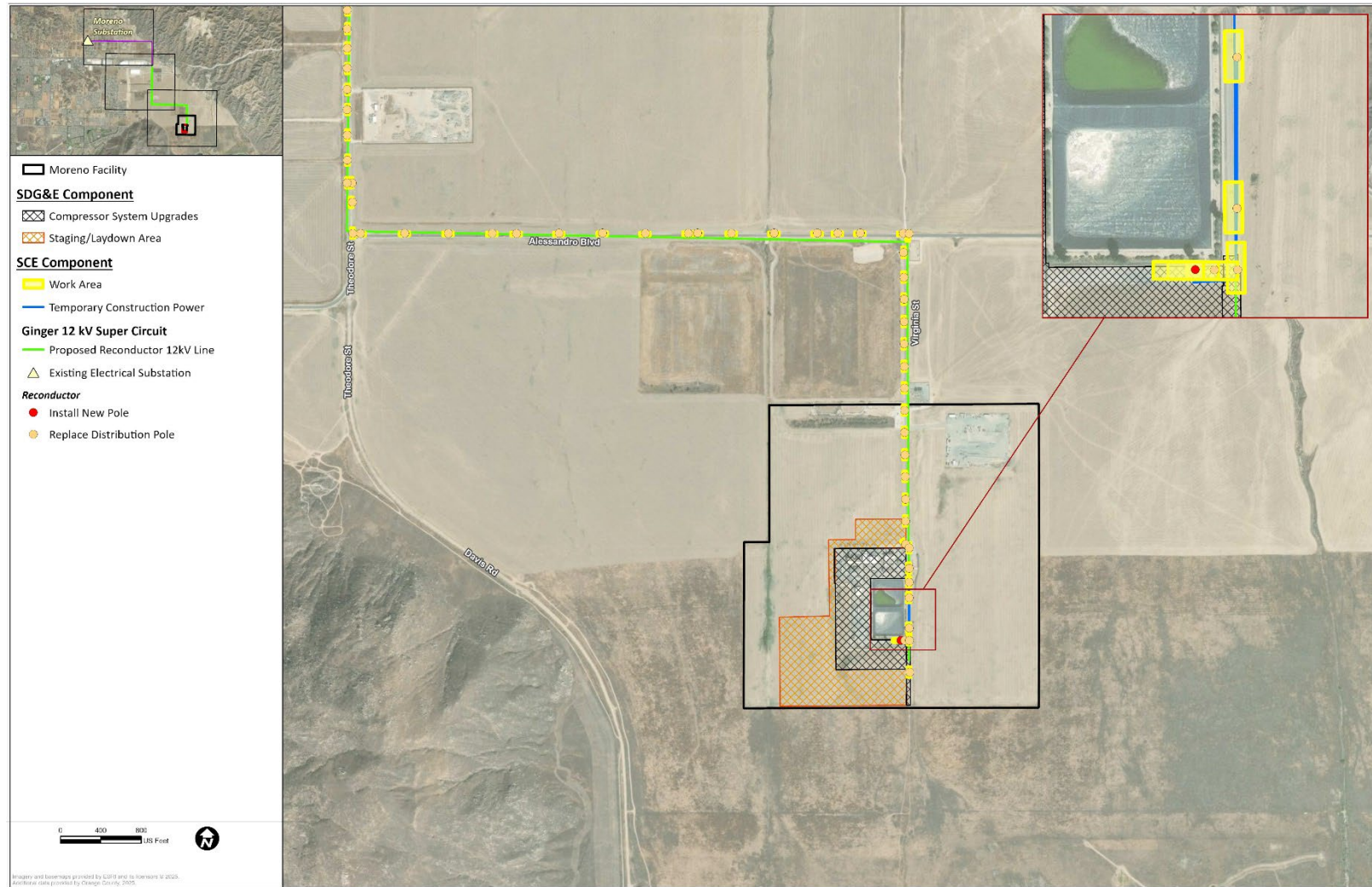


Figure 5-2
Temporary Construction Power and Super Circuit: Virginia St & Alessandro Blvd⁵

⁵ Structures may be micro-sited prior to construction. Micro-siting is the process of determining the exact and optimal placement of structures to avoid specific resources/constraints on the ground.

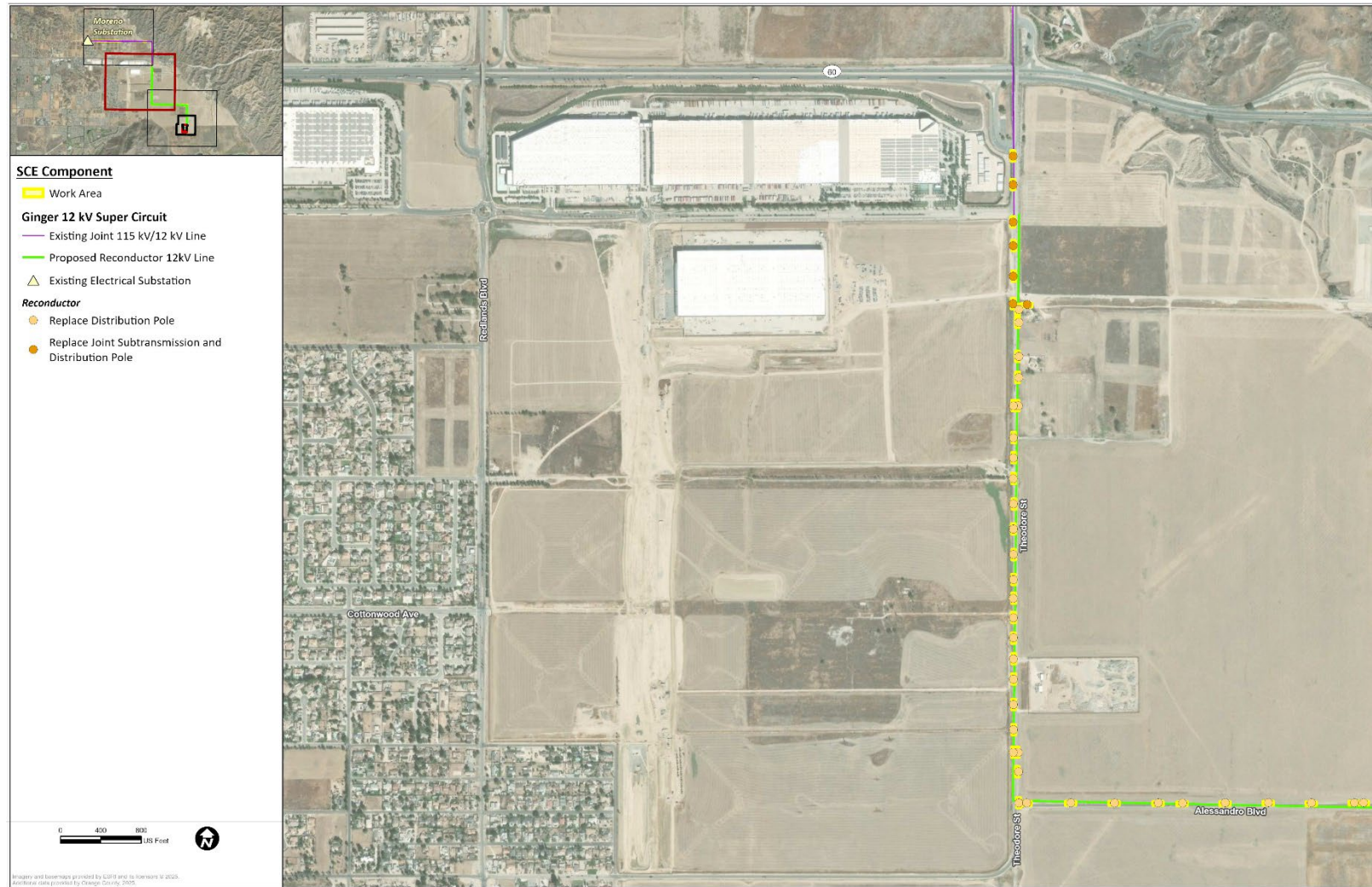


Figure 5-3
Super Circuit: World Logistics Center Pkwy⁶

⁶ World Logistics Center Parkway was formerly named Theodore Street. Structures may be micro-sited prior to construction. Micro-siting is the process of determining the exact and optimal placement of structures to avoid specific resources/constraints on the ground.

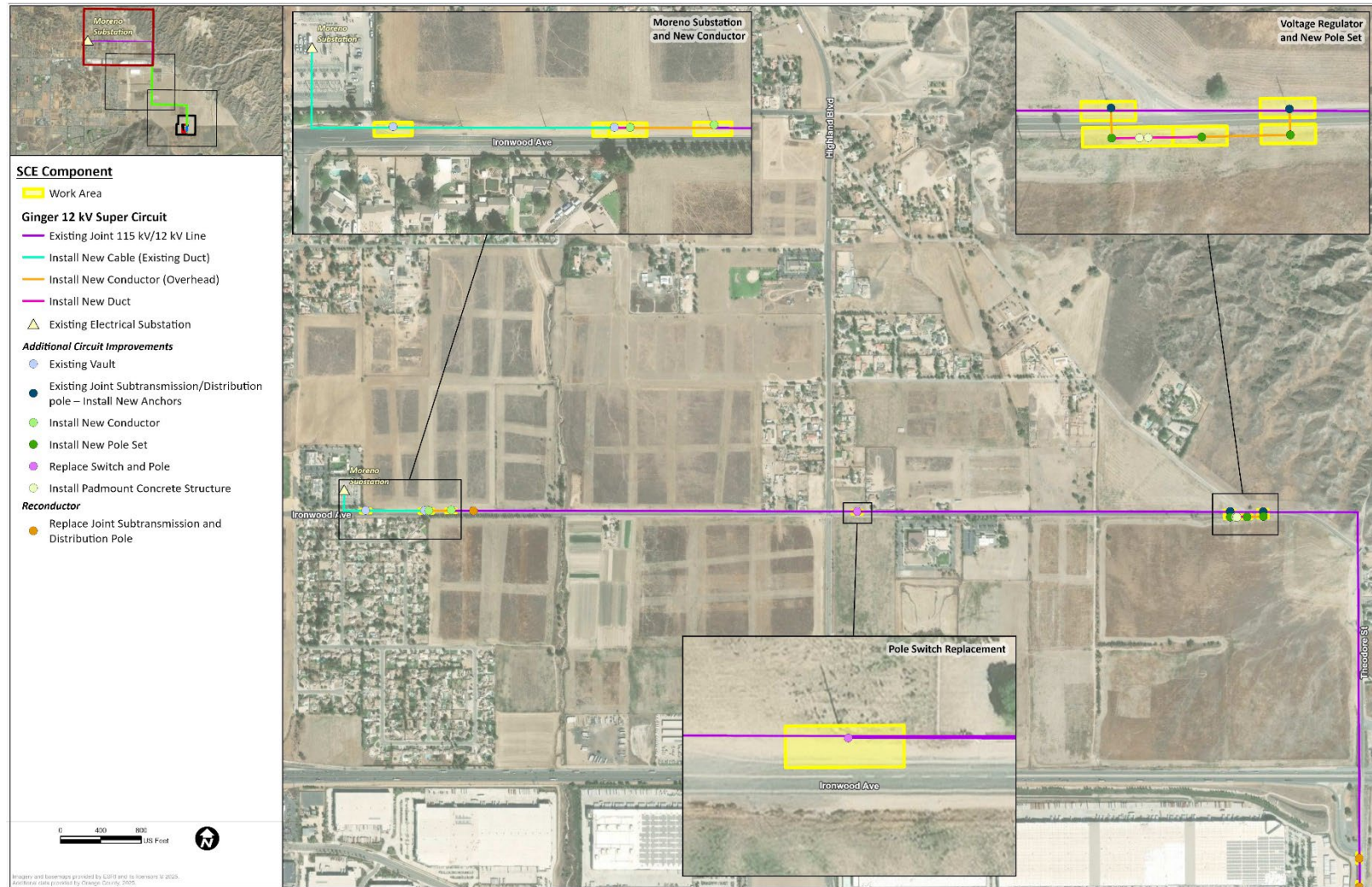


Figure 5-4
Super Circuit: Ironwood Ave⁷

⁷ Structures may be micro-sited prior to construction. Micro-siting is the process of determining the exact and optimal placement of structures to avoid specific resources/constraints on the ground.

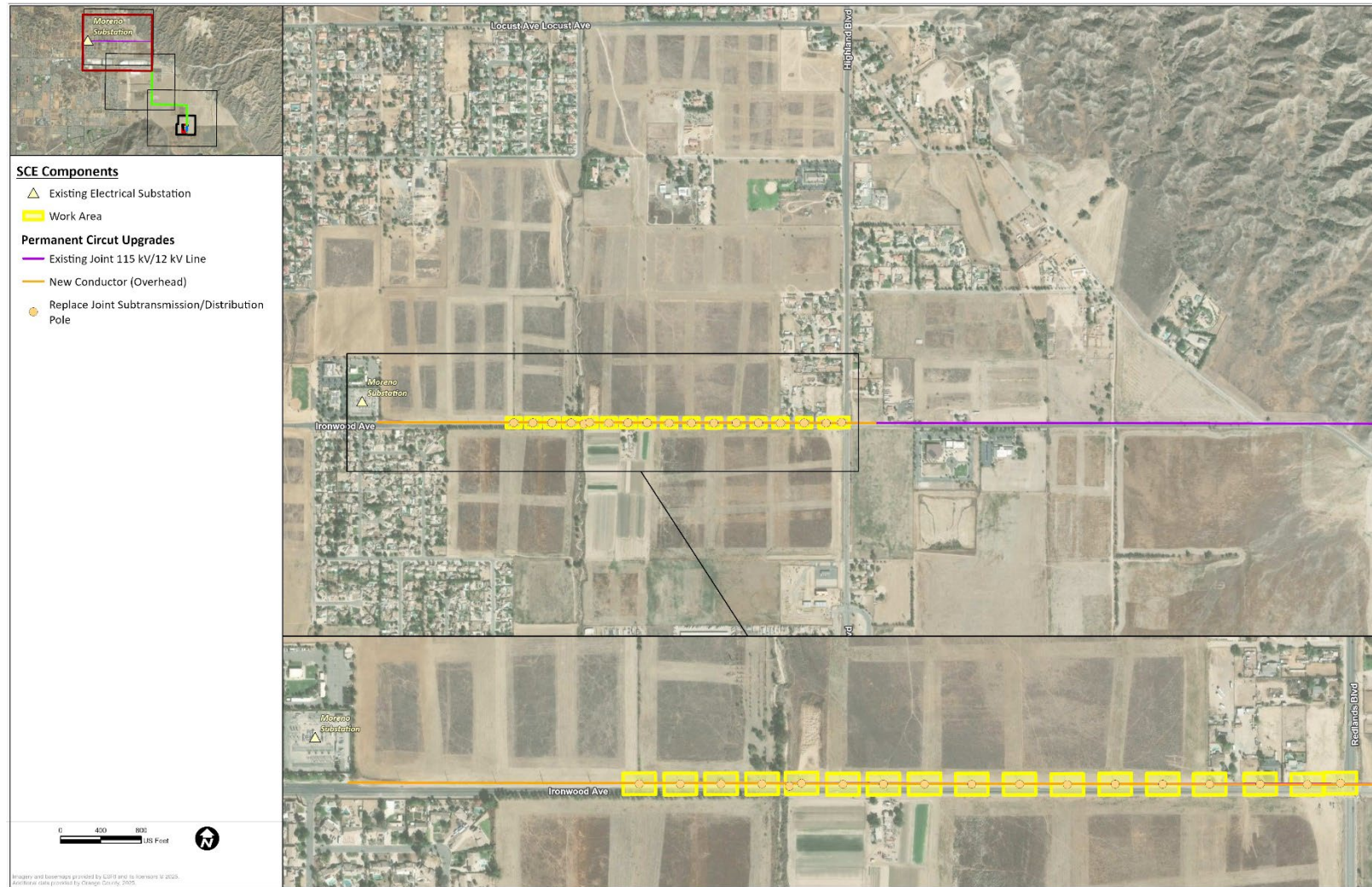


Figure 5-5
Permanent Circuit Upgrades⁸

⁸ Structures may be micro-sited prior to construction. Micro-siting is the process of determining the exact and optimal placement of structures to avoid specific resources/constraints on the ground.

5.2.2 SCE Component of the MCM Project

The SDG&E Component of the MCM Project requires power to operate the electric driven compressors, and the SCE Component of the Project consists of upgrades to meet the power demand. As shown on Figure 5-2 through Figure 5-5, the SCE component of the Project contains the following subcomponents:

- a. Temporary construction power (Figure 5-2)
- b. Ginger 12-kV super circuit (Figure 5-2 through Figure 5-4)
- c. Permanent circuit upgrades (Figure 5-5)

5.2.2.1 Temporary Construction Power

Temporary construction power refers to electricity specifically provided for the temporary construction laydown areas that will be established early on to support the execution of the Project. This electricity will be provided through the existing Ginger 12-kV circuit from existing poles on Virginia Street (see Figure 5-2) and located completely within the Facility. Temporary construction power includes underground trenching and installation of temporary power poles, metering equipment, and a step-down transformer adjacent to the eastern boundary of the MCS. The process requires removal and replacement of one existing distribution pole, the installation of one new permanent distribution pole, and installation of one temporary distribution pole to be removed after construction. Temporary construction power would be installed over approximately two working days at the beginning of Project construction in the third quarter of 2026.

5.2.2.2 Ginger 12-kV Super Circuit

To provide service for the MCM Project compressor system upgrades, SCE will modify portions of an approximately six-mile segment along the existing 12-kV circuit to create a super circuit from the existing SCE Moreno Substation (located on Ironwood Avenue, northwest of the Facility, see Figure 4-1) to the MCS. The existing SCE Moreno Substation will remain operational with implementation of the MCM Project. As described the following sections, this work includes reconductoring activities and additional circuit improvements and is depicted on Figure 5-2 through Figure 5-4. The Ginger 12-kV super circuit is targeted for completion by approximately August 2027.

Reconductor

Approximately three miles of the existing Ginger 12-kV circuit will require modifications for reconductoring (see Figure 5-2 through Figure 5-4). Reconductoring the distribution circuit involves restringing existing distribution poles with new cables, installing approximately eight new 50- to 55-foot-tall wood or composite fiberglass distribution poles, removing and replacing approximately 50 distribution poles, and removing and replacing up to five existing joint distribution/subtransmission poles with five wood joint distribution/subtransmission poles.

Reconductoring and pole-replacement activities will begin approximately 780 feet south of State Route 60 (SR-60) freeway and continue south along World Logistics Center Parkway to Alessandro Boulevard. At Alessandro Boulevard, the reconductoring and pole-replacement activities turn east on the north side to Virginia Street. At Virginia Street, the reconductoring and pole-replacement activities turn south to the

Facility, ending approximately 4,700 feet south of Alessandro Boulevard at the MCS. Approximately 16,000 linear feet (three miles) of cover conductor will be removed and 16,000 linear feet of three-strand Type W⁹ conductor (49,500 conductor feet) will be installed.

Additional Circuit Improvements

As shown on Figure 5-2 and Figure 5-4, approximately three miles of the existing Ginger 12-kV circuit will be modified with circuit improvements. A new conductor will be installed outside the existing SCE Moreno Substation and run approximately 250 feet to the east. The circuit improvements require installation of a new cable, a duct, conductors, and a replacement switch along the existing Ginger 12-kV circuit by Ironwood Avenue. A voltage regulator, consisting of a three-pole structure set inline with two padmount structures installed between the poles, will be installed on the south side of Ironwood Avenue approximately 1.6 miles east of the existing SCE Moreno Substation. In total, the additional circuit improvements involve installation of three new distribution poles and replacement of two joint distribution/subtransmission poles (including the switch replacement) along Ironwood Avenue.

5.2.2.3 Permanent Circuit Upgrades

The permanent circuit upgrades are shown on Figure 5-5 and involve installing approximately 4,800 feet of new overhead conductor on up to 35 poles extending along Ironwood Avenue from the Moreno Substation to east of Redlands Boulevard. Existing joint subtransmission/distribution poles along this alignment currently carry one 115-kV circuit and one 12-kV circuit. For the purposes of this analysis, it is conservatively assumed 35 poles will be replaced. Additionally, one new 12-kV rated switch will be installed on one of these poles. As part of the work, SCE will also make minor circuit configuration adjustments, as needed, to integrate the super circuit into the final grid configuration. Permanent circuit upgrades are targeted to be completed by June 1, 2029.

5.3 MCM Project Activities Specific to the SCE Component

This section describes pre-construction and construction elements of the SCE Component.

5.3.1 Pre-Construction Activities

Prior to undertaking construction of the SCE Component, construction-related ministerial permits required by local agencies will be obtained. Emergency response providers near the Facility and portions of the SCE Component outside the Facility will be notified in advance of construction locations. The selected contractor will work with local emergency responders and traffic engineers to plan appropriate access alternatives for temporary street closures and traffic disruptions, as necessary. Underground Service Alert of Southern California (DigAlert) will be notified prior to any ground-disturbing activity that could impact subsurface utilities. Pre-construction meetings with the affected entities and inspection personnel will be scheduled and completed.

Site preparation will begin with the removal of vegetation and topsoil, and rough grading, if required, will be completed. Exposed soil will be watered or covered as necessary to reduce potential emissions of fugitive dust. Temporary lighting will be utilized only at dusk and will not be left on overnight.

⁹ Type W is a type of durable, heavy-duty power cable.

Substructures will be identified and protected in place during construction activities. A thorough substructure review will be performed during the planning process. Identified substructures will be accurately shown on the construction drawings. Prior to excavation with equipment, crews will hand-dig (i.e., pothole) within construction workspaces to record the actual location and depth of substructures. Erosion and sediment control will be conducted in accordance with industry best management practices (BMPs) and a Construction Stormwater Pollution Prevention Plan (SWPPP) that will be filed with the Santa Ana Regional Water Quality Control Board (RWQCB).

The SCE Component includes restoration of all temporarily disturbed biological resource features to pre-Project conditions and contours. Prior to commencement of construction activities, work limits will be clearly demarcated (e.g., through installation of flagging or temporary high-visibility construction fences).

5.3.2 Construction Schedule

The estimated timeline of construction activities is shown in Table 5-2, which shows construction activities by phases and anticipated duration in workdays and months. Construction of the SCE Component of the MCM Project is anticipated to begin in the third quarter of 2026 (Q3 2026).

Table 5-2
Estimated Construction Schedule

Phase Name	Working Days ^(a)	Months											
		1	2	9	10	11	12	13	14	26	27	28	29
SCE Temporary Construction Power	2												
SCE Ginger 12 kV Super Circuit	82												
SCE Permanent Circuit Upgrades	44												
(a) Approximate workdays per phase													

5.3.3 Construction Activities

Construction activities include clearing and grading, excavating and recompact, installing temporary structures, replacing existing structures, and installing conductor. All construction equipment will be fitted with appropriate mufflers, and all engines will be regularly maintained. Generators will use diesel or unleaded fuel. Equipment will be mounted on 18-wheel trucks for delivery to the construction locations.

The on-road vehicle requirements consist of light-duty construction worker vehicles for commuting to the construction locations; medium- and heavy-duty trucks such as water trucks for dust control; and other trucks such as cement trucks, pump trucks, and flatbed trucks. The number of workers and types of trucks to be used on the peak day for each phase are provided in Appendix A from California Emissions Estimator Model inputs.

The proposed list of offroad equipment for each construction phase, including fuel type, engine tier, number per day of usage, hours per day of usage, and associated HP is shown in Table 5-3.

Table 5-3
Offroad Equipment Requirements for SCE Component Construction

Phase Name	Equipment Type	Fuel Type	Engine Tier ⁽¹⁾	Number Per Day	Hours Per Day	HP Rating
SCE Temporary Construction Power	Cranes	Diesel	Tier 4 Final	1	7	150
	Forklifts	Diesel	Tier 4 Final	1	4	180
	Generator sets	Diesel	Tier 4 Final	1	8	90
	Other construction equipment	Diesel	Tier 4 Final	1	4	75
SCE Ginger 12-kV Super Circuit	Cranes	Diesel	Tier 4 Final	2	8	300
	Crawler Tractors	Diesel	Tier 4 Final	1	8	300
	Excavators	Diesel	Tier 4 Final	1	8	160
	Generator Sets	Diesel	Average	1	8	45
	Other Construction Equipment	Diesel	Tier 4 Final	8	8	75
	Rollers	Diesel	Tier 4 Final	1	8	60
	Skid Steer Loaders	Diesel	Average	1	8	46
	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	1	8	270
SCE Permanent Circuit Upgrades	Crane	Diesel	Tier 4 Final	2	8	300
	Auger Truck/Drill Rig	Diesel	Tier 4 Final	2	6	83
	Skid Steer	Diesel	Average	2	8	46

Key: HP = horsepower; SCE = Southern California Edison; kV = kilovolt

⁽¹⁾ “Average” engine tier represents the California Emissions Estimator Model’s (CalEEMod) estimate of calendar year average equipment emission factors as opposed to tier-specific rates such as “Tier 4 Final” (CAPCOA 2022).

All diesel engines greater than 50 HP are required to be certified by the U.S. EPA as Tier 4 Final.

Engine load factors are CalEEMod default values (version 2022.1.1.41).

Additional construction activities details of the SCE Component are provided in the following section.

5.3.3.1 SCE Component Construction Activities

Temporary Construction Power

Temporary power will be required to support the temporary construction laydown areas and associated facilities. The temporary power line construction areas are depicted on Figure 5-2. Temporary power will be installed and includes temporary power poles, metering equipment, and a step-down transformer on a small concrete pad. SCE will provide and install an upgraded power feed line, two new poles, and a new linear power line to a new temporary transformer. Throughout the process, no equipment laydown is required. Work to install the upgraded power feed line will span approximately two days from start to finish. Starting with the northernmost pole (2361318E) along Virginia Street, SCE will retain the existing pole, remove the current anchor rod and guy wire (located approximately 20 feet south of the pole), and install a new anchor rod and guy wire approximately 20 feet north of the pole. Hand tools will be used to remove the existing anchor and excavate a new anchor hole to an estimated depth of eight feet. Overhead work will also be conducted at this location via Virginia Street using a line truck to install a third phase connected to the next pole south (316408S), which is across Virginia Street, near the MCS’s

southeastern boundary. Figure 5-6 presents a conceptual illustration depicting a pole, anchor rod, and guy wire.

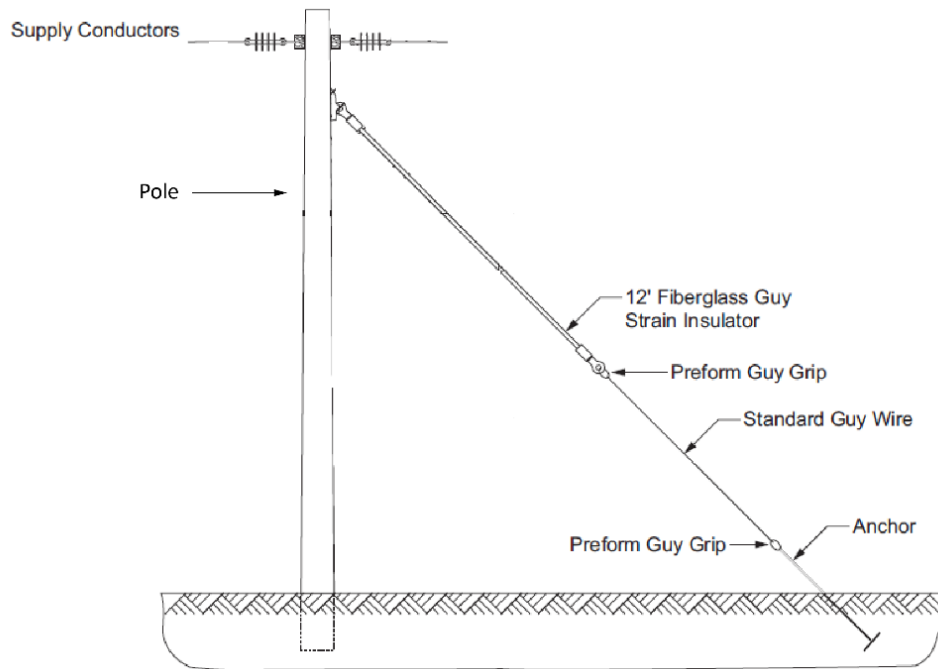


Figure 5-6
Conceptual Drawing of Pole, Anchor Rod, and Guy Wire

Moving south, the next SCE pole (316408S) will be removed and replaced with a new permanent pole. The old pole will be completely removed, and the new permanent pole will be placed adjacent to the old pole in a new hole excavated to an estimated depth of seven feet using hand tools. Pole replacement will be conducted from the existing, maintained portion of Virginia Street. Two line trucks will be used to remove and replace the pole. One new conductor will be installed to the north for approximately 300 feet (to connect with pole 2361318E) and one new conductor will be installed to the south for approximately 123 feet (to connect with new pole 4993888E). Overhead work will be conducted to install the new conductor.

Further south along Virginia Street, a new permanent pole (4993888E) will be installed. The new permanent pole will be set in a new hole excavated to an estimated depth of seven feet using hand tools on the east side of Virginia Street. An anchor rod and guy wire will be installed approximately 20 feet to the east of the new pole. Three new conductors (each approximately 46 feet in length) will be installed to the west, across Virginia Street, to connect with a new temporary pole (4993889E) to be installed at the eastern boundary of the MCS. Two line trucks will be used to install the new pole, and work is anticipated to be completed within one day with a four-person crew.

West of new pole (4993888E), a new temporary pole (4993889E) will be installed at the southeasternmost corner of the MCS. This temporary pole will also be set in a new hole excavated to an estimated depth of seven feet using hand tools. A new anchor rod and guy wire will be installed approximately 10 feet to the west with an anchor rod installation depth of roughly eight feet. Two line trucks will be used to install the new pole and conduct overhead work. Work is anticipated to be completed within one day with a four-person crew.

It is anticipated that all temporary construction power will be installed by four-person crews in approximately two days.

Ginger 12-kV Super Circuit

Reconductor

As depicted on Figure 5-2 through Figure 5-4, SCE will reconductor, that is, replace and upgrade electrical cables in, an existing 12-kV distribution line to provide service to the MCS. The work to “super circuit” the existing Ginger 12-kV circuit includes the installation of a new vault, replacement and insetting of multiple poles, overhead work, the installation of underground facilities, and the installation of a new voltage regulator south of Ironwood Avenue. SCE will install approximately eight new distribution poles, replace approximately 50 distribution poles, and replace approximately five existing joint distribution/subtransmission poles. The insetting of each power pole is expected to require a temporary construction workspace around each pole, which may result in temporary disturbances to the ground cover. For each replacement of a distribution pole, the temporary area of disturbance will be 25 feet by up to 100 feet. For each replacement of a subtransmission pole, the temporary area of disturbance will be 25 feet by 100 feet and will also require an anchor and down guy installation south of each pole within an area of disturbance of 10 feet by 10 feet. In addition, the line upgrade is anticipated to require wire stringing sites where equipment may be staged in the vicinity of the pole to allow crews to string the wire in a straight line on both sides of a turn in the alignment. Wire stringing sites may similarly result in the temporary disturbance of ground cover.

Reconductoring activities will begin south of State Route 60 and continue south, as depicted on Figure 5-2 through Figure 5-4 for a distance of approximately three miles. The current three-phase electrical system along this alignment includes three separate conductors mounted to the overhead pole line. SCE will remove these three existing 1/0-gauge bare wire conductors and replace them with three larger covered conductors with 653-gauge wire. The larger covered wires will both improve capacity and reduce wildfire risk. For purposes of this analysis, every distribution pole along the proposed reconductor 12-kV line (as shown on Figure 5-2 through Figure 5-4) will either need new anchors and guying, or a full pole replacement. The poles along the proposed reconductor 12-kV line are streetside and, thus, will not require overland travel. A digger truck will be used to dig the new pole holes and each pole has a setting depth ranging from seven feet to 10 feet. A backhoe will likely be used to replace or install the new anchors, at a depth of 10 feet with an excavation area of three feet by three feet.

Adjacent to the MCS, two new poles will be set, and the covered conductors with 653-gauge wire will be extended from temporary pole 4993888E (which is being installed for the Temporary Construction Power subcomponent of the SCE Component). Pole depths will range from seven feet to 10 feet, and new anchors will be set at depths of 10 feet, with an excavation area of three feet by three feet.

Additional Circuit Improvements

Circuit improvements along Ironwood Avenue will utilize temporary work areas of 100 feet by 35 feet, at each of the points shown on Figure 5-2 and Figure 5-4, in order to install new cable, a duct, conductors, set a set, and replace a switch.

Moreno Substation and New Conductor

From the existing SCE Moreno Substation, SCE will install a new, approximately 465-foot run of 1000 kilo-circular mil (kcmil) cable within an existing duct bank extending from the substation rack leading outside of the substation to the first underground vault (V5356963) then continuing within the existing underground duct to V5356964, for a length of approximately 580 additional feet. Existing vaults are depicted as gray points in Figure 5-4. From there, SCE will install a new five-inch duct approximately 40 feet to existing pole 4071984E; the new duct is depicted as a red line in Figure 5-4. A backhoe will be used to excavate a trench of three feet wide up to six feet in depth for the new duct. The existing pole 4071984E will be retained. SCE will install a new 221-foot span of overhead three covered conductors¹⁰ with 653-gauge wire between the existing pole 4071984E and existing pole 4071985E, depicted as an orange line in Figure 5-4. The temporary impact areas at these poles include wire pulling staging areas. Finally, one existing 75-foot joint subtransmission/distribution pole (4071986E) to the east will be replaced with an 80-foot pole in approximately the same location, depicted by an orange point in Figure 5-4.

Pole Switch Replacement

As shown on Figure 5-4, SCE will replace an existing overhead switch on existing pole 1975869E located approximately 0.7 mile to the east of the pole replacement at pole 4071986E. Replacement of the overhead pole switch will require replacing the existing 75-foot joint subtransmission/distribution pole 1975869E with an 80-foot standard wood pole. The anticipated pole depth is seven feet to 10 feet. The crew will use a truck-mounted augur to dig the pole hole and set the replacement pole.

Voltage Regulator and New Pole Set

SCE will install a new voltage regulator and a new pole set approximately 0.7 mile to the east of the proposed pole switch replacement described earlier. Beginning at existing pole 1975881E on the north side of Ironwood Avenue, SCE will install three new covered conductors with 653-gauge wire to span Ironwood Avenue to a new, 50-foot-tall composite pole (proposed structure number 5010303E) located approximately 60 feet to the south. From this pole, SCE will transition to an underground application, installing a five-inch polyvinyl chloride (PVC) conduit stretching approximately 50 feet to the east, at depth of 48 to 72 inches, to an eight-foot by 10-foot padmount concrete structure that has a four-foot by seven-foot by 3.5 foot- substructure for the four-way switch. SCE will also install two-inch to five-inch conduit stretching to the east approximately 16 feet within a new duct, at depth of four to six feet, to a 10-foot by 12-foot padmount concrete structure that has a five-foot by 8.5-foot by five-foot substructure for the padmount voltage regulator. From the 10-foot by 12-foot structure, SCE will install one-inch to five-inch PVC duct stretching to the east approximately 73 feet, at depth of four to six feet, to a new 55-foot composite pole (proposed structure number 5010304E). At the new pole, SCE will transition back to an overhead application. This new pole will likely be set using the digger truck, with a pole depth of seven to 10 feet. SCE will then install three new covered conductors with 653-gauge wire for approximately 207 feet to the east to a new 50-foot wood pole (proposed structure number 5010305E). This pole will likely be set using the digger truck, with a pole depth of seven to 10 feet. At this pole, SCE will install a new conductor located 60 feet to the north that will span Ironwood Avenue and attach at existing pole

¹⁰ “Covered conductors” refers to replacing three separate bare wires with three larger covered wires to improve capacity and reduce wildfire risk.

1975882E. On the south side of the road, each new pole will require guying and anchors to be installed. On the north side of the road, existing poles (1975881E and 1975882E) will require new anchors to be installed via the use of backhoes; each anchor will be at depth of 10 feet. The conduit trench and structure locations will be dug out using a backhoe. The structures themselves will be set using a small crane.

Permanent Circuit Upgrades

New Conductor

As shown on Figure 5-5, the permanent circuit upgrades, in combination with the Ginger 12-kV super circuit, will ultimately result in approximately 4,800-feet of overhead conductor installed on up to 35 existing wood poles currently carrying one 115 kV circuit and one 12-kV circuit along Ironwood Avenue between the Moreno Substation to near Redlands Boulevard. The existing 35 wood poles will be replaced, as needed, with light weight or tubular steel poles in approximately the same locations as they currently exist. The temporary impact areas at these poles will be approximately 100 feet by 150 feet, including wire pulling staging areas.

5.3.3.2 Water Use

Construction water use is estimated to be up to approximately 10,000 gallons per day for dust control, soil compaction, and equipment and roadway washdown. Reclaimed water will be used if available and practicable. Portable restroom facilities will be used during construction, which will require a negligible amount of water.

5.3.4 Construction and Demolition Materials Disposal

Table 5-4 estimates the weight of materials to be removed for the SCE Component. Materials to be disposed of may include electrical poles, conductor, and associated infrastructure. The construction and demolition debris may be sent to approved facilities to meet the required 65 percent diversion through reuse, composting, or recycling, and further information is provided in Section 7.2.7.2 later on; however, to provide a worst-case analysis of the potential impact to the environmental topic area of solid/hazardous waste, 100% of the construction debris will be assumed to go to landfills.

Table 5-4
SCE Component - Materials for Disposal

Summary	Actual Tons	Expanded Tons⁽³⁾	Truck Loads⁽⁴⁾
Miscellaneous electrical waste ⁽¹⁾	11	13	1
Wood disposal ⁽²⁾	92	106	8
Totals	103	119	9

⁽¹⁾ Includes one pole switch (approximately 1,000 pounds), approximately 92 insulators (approximately 30 pounds per pole), approximately 92 double crossarms (approximately 150 pounds), and approximately 92 pole anchors (approximately 50 pounds). Assumes all structures to be removed/replaced include insulators, double crossarms, and one pole anchor. Waste may include wood, metal, or insulator materials (e.g., glass, composite polymer materials, etc.).

⁽²⁾ Assumes removal of one distribution pole and one temporary pole for temporary power and removal of up to 55 poles for Ginger 12-kV super circuit activities, and removal of up to 35 poles for permanent circuit upgrades. Assumes weight of approximately one ton per pole.

⁽³⁾ Reflects estimated weight plus 15% to account for volume expansion. This adjustment helps estimate how much space the materials would occupy once loaded, considering air pockets and irregular shapes.

- ⁽⁴⁾ Assumes truck capacity of approximately 15 tons. Assumes miscellaneous electrical waste and pole disposals may be trucked separately. Therefore, total truck loads reflect the sum of miscellaneous electrical waste and pole disposal truck loads.

Source: SCE 2025

6.0 MCM PROJECT SETTING

6.1 Environmental Setting

The MCS is located at 14601 Virginia Street in the City of Moreno Valley, California. MCM Project components will be constructed within the Facility and areas outside the Facility but within the City, as depicted on Figure 4-1. The majority of SDG&E Component of the MCM Project will be included within the MCS, except for modifications to Virginia Street located south and southeast of the MCS. Most of the construction activities for the SCE Component of the MCM Project will occur outside the Facility. Installation of temporary construction power for staging/laydown areas and construction workspace of the SDG&E Component will occur directly adjacent to and will connect to the MCS.

While portions of the Ginger 12-kV super circuit will be located within the Facility, the majority of the improvements for the SCE Component will be constructed outside of the Facility along Virginia Street, Alessandro Boulevard, World Logistics Center Parkway, Theodore Street, and Ironwood Avenue.

Roads in the vicinity of the Facility include Alessandro Boulevard, World Logistics Center Parkway, Theodore Street, and Ironwood Avenue. Primary access to the MCS is from an entrance on Virginia Street through a gated security access road that connects to Alessandro Boulevard.

The City of Moreno Valley's 2006 General Plan designated the MCS as Public Facilities, with the remainder of the Facility designated as Open Space (City of Moreno Valley 2006). The City's 2040 General Plan Updates, also referred to as MoVal 2040 General Plan, continues to designate the MCS land use as Public, with the remainder of the Facility designated as Parks/Open Space (City of Moreno Valley 2026a)¹¹. Similarly, the MCS has a zoning designation of Public Facilities, with the remainder of the Facility zoned as Open Space/Park (City of Moreno Valley 2026b). Land uses in the vicinity of the Facility include both open space and agricultural land. Land uses in the area surrounding the Facility are designated as Open Space/Park with Industrial/Business Park uses to the north (City of Moreno Valley 2026a).

Existing electrical distribution lines currently run north–south along Virginia Street (within and adjacent to the Facility), along World Logistics Center Parkway and Theodore Street to the west and north of the Facility, and east–west along Alessandro Boulevard and Ironwood Avenue to the north and northwest of the Facility. The overhead electrical lines to be reconducted run within public rights-of-way.

The nearest sensitive receptors to the MCS and the proposed temporary construction power are residences located approximately 1.2 miles to the northeast along Gilman Springs Road. The nearest sensitive

¹¹ The City's 2040 General Plan Updates were effective immediately upon adoption in June 2021. However, an environmental group subsequently filed a lawsuit challenging its adoption (*Sierra Club v. City of Moreno Valley, et al.*, Riverside County Superior Court). In May 2024, the Riverside County Superior Court directed the City to set aside the 2040 General Plan Update, including related changes to the Zoning Ordinance, its Climate Action Plan (CAP), and certification of its EIR until errors identified in the EIR's analysis of air quality, greenhouse gas, and energy use impacts, and in its CAP, are rectified. Until the revisions were made, the 2006 General Plan was applicable to projects within the City. The Revised Draft Program EIR for the 2040 General Plan Update was certified on April 21, 2026 after the Revised Draft EIR was revised to memorialize negotiated mitigation measures as enhancements to an air quality mitigation measure. "The Court did not find any inadequacy in the 2021 GPU EIR's analysis of Aesthetics, Agriculture and Forestry Resources, Biological Resources, Hazards and Hazardous Materials, Hydrology/Water Quality, Land Use/Planning, Mineral Resources, Population/Housing, Public Services and Recreation, Utilities and Service Systems, and Wildfire Sections" (City of Moreno Valley 2026c)

receptors to the Ginger 12-kV super circuit include residences adjacent to the proposed construction activities along the eastern side of World Logistics Center Parkway near its intersection with Eucalyptus Avenue and along Ironwood Avenue. The nearest sensitive receptors to the permanent circuit upgrades include the same residences along Ironwood Avenue.

6.2 MCS Operations

6.2.1 MCS Overview

The MCS is currently composed of three existing compressor plants (Clark Plant, Solar Plant, and Cooper Plant) with supporting auxiliary equipment and buildings. These facilities have a total compressor capacity rating of 16,585 HP to compress natural gas for delivery into San Diego County served by SDG&E and into portions of Riverside County served by SoCalGas. The following summarizes the three existing compressor plant configurations:

Clark Plant: The Clark Plant began operation in 1955, occupies an area of approximately 3,000 square feet, and is approximately 26 feet in height. The building contains three reciprocating compressors rated at 995 HP each.

Solar Plant: The Solar Plant was constructed in the 1970s, occupies an area of approximately 936 square feet, and is approximately 17 feet in height. The Solar Plant is comprised of four skid-mounted, turbine-driven centrifugal compressors rated at 1,100 HP each.

Cooper Plant: The Cooper Plant was constructed in the 1990s, occupies an area of approximately 8,300 square feet, and is approximately 41 feet in height. The building contains two “Quad” reciprocating compressors rated at 3,000 HP each and one reciprocating compressor rated at 3,200 HP.

There are four natural-gas-fired emergency engine generators at the MCS, two of which are rated at 200 HP, one at 329 HP, and one at 400 HP.

6.2.2 Safety Features

The MCS is designed and operated in compliance with applicable federal, state, and local regulations, codes, and standards. These regulations establish criteria for seismic safety, emergency access, hazardous materials, emissions, and fire safety. Corrosion-control features such as protective coatings and cathodic protection are also employed to minimize potential corrosion damage. Compression equipment is continuously monitored by MCS personnel through a supervisory control and data acquisition (SCADA) system that conveys information to operations personnel in the operations office. The system monitors parameters such as vibration, pressure, and temperature in real time and triggers alarm notifications in the event equipment is operating outside acceptable parameters. Additionally, there are methane (CH₄) monitors at the MCS. The safety system is designed to automatically shut down equipment in the event of an emergency, but operators may also manually initiate system safety features, if needed. Staff members routinely and frequently perform inspections and patrols of equipment, pipelines, and vessels. The MCS is monitored remotely and in-person 24 hours per day, seven days per week, and can be controlled by SDG&E’s real-time control room. Routine inspections at the MCS are conducted by CPUC (annually), South Coast AQMD, Riverside County Fire Department and Fire Marshal, Riverside County Department

of Environmental Health (CUPA), and the RWQCB. Staff members at the MCS also perform preventative maintenance. Annual first responder training is provided to educate fire and law enforcement agencies and facilitate familiarity with the MCS.

The MCS is fenced and accessed via Virginia Street, a gated security access road. Security cameras enable monitoring both from staff, conducting inspections and patrolling the MCS, and by SDG&E's Corporate Security Department. Fencing is comprised of an approximately eight-foot-high chain-link fence topped with an additional two feet of razor wire. Security lighting is provided throughout the MCS, mounted on rooftops and on TSPs approximately 20 feet in height, to maintain safe operating conditions.

6.3 Regulatory Setting

6.3.1 South Coast Air Quality Management District

Pursuant to Public Resources Code Section 21067 and CEQA Guidelines Section 15367, South Coast AQMD is the lead agency for the MCM Project. A lead agency is a public agency that has the principal responsibility for approving a project that has the potential to have significant impacts on the environment.

South Coast AQMD's permitting program has been established to implement the requirements of the federal and state Clean Air Acts, the AQMP, and air quality rules and regulations by specifying operating and compliance requirements for stationary sources that emit air contaminants. Before installing new or relocated equipment and before modifying existing equipment that emits or controls air contaminants, SDG&E is required to obtain PTCs from South Coast AQMD unless deemed specifically exempt from the permit requirements.

SDG&E submitted PTC application packages and the Retirement Plan to South Coast AQMD in June 2021 (SDG&E 2021). SDG&E received approval of the Retirement Plan for compressor gas lean-burn engine replacement with CGTs in November 2021. The Retirement Plan specifies replacement of five existing compressor gas lean-burn engines with two new CGTs and two new EDCs.

6.3.2 California Public Utilities Commission

The overarching authority for natural gas and electric utility regulation is held by CPUC. Article XII, Section 8 of the California Constitution establishes CPUC's preemptive authority over matters for which the legislature has granted CPUC regulatory powers. The CPUC is authorized to "do all things, whether specifically designated in this part or in addition thereto, which are necessary and convenient in the exercise of such power and jurisdiction" (California Public Utilities Code Section 701). Other CPUC provisions generally authorize the CPUC to modify facilities, secure adequate service or facilities, and operate to promote health and safety. Based on that CPUC authority, local jurisdictions are preempted from requiring discretionary approvals for gas or electric utility facilities constructed by public utility companies subject to CPUC's jurisdiction. CPUC's authority, as summarized above, does not preempt South Coast AQMD's regulatory or permit authority for stationary sources of emissions (CPUC 2010).

6.3.2.1 General Order 131-E

SCE is an electric utility subject to the jurisdiction of the CPUC. The SCE Component of the MCM Project is subject to CPUC General Order (GO) 131-E, which relates to the construction or modification of electric

generating plants; transmission, power, and distribution line facilities; and substations and switchyards (CPUC 2025). Pursuant to Section III.B.1 of GO 131-E, the SCE Component of the MCM Project would be subject to issuance of a Permit to Construct (PTC) by CPUC. However, GO 131-E Section III.B.2 exempts “[p]ower lines, substations, or switchyards to be relocated or constructed which have undergone environmental review pursuant to CEQA as part of a larger project.” The SCE Component is part of the larger MCM Project and has undergone environmental review by South Coast AQMD pursuant to CEQA.

In the context of electric utility projects, CPUC GO 131-E Section XI also states that “local jurisdictions acting pursuant to local authority are preempted from regulating electric power line projects, distribution lines, substations, or electric facilities constructed by public utilities subject to the Commission’s jurisdiction” (CPUC 2025). However, in locating such projects, GO 131-E states that public utilities are required to consult with local agencies regarding land use matters (CPUC 2025). Because CPUC has preemptive jurisdiction over the construction, maintenance, and operation of electric utility facilities in the state, no local discretionary permits (e.g., conditional use permits) or local plan consistency evaluations are required for the SCE Component of the MCM Project. However, SCE would be required to obtain applicable ministerial permits.

6.3.2.2 General Order 177

GO 177 relates to the planning and construction of gas infrastructure. Section IV(A) of GO 177 requires a Certificate of Public Convenience and Necessity (CPCN) by CPUC for projects completed by gas corporations whose project cost exceeds \$75 million, or that are located within 1,000 feet of a sensitive receptor and require a permit from an air district for specified emission increases. The MCM Project would exceed \$75 million and, therefore, could trigger the CPCN requirement. However, in lieu of complying with GO 177 Section IV(A)’s requirement to obtain a CPCN, a gas corporation is authorized to claim an exemption under Section IV(B) if the specified requirements are met. The proposed MCM Project meets the requirements for an exemption pursuant to Section IV(B)(b), which states that compliance with Section IV(A) (requiring a CPCN) is not required for “projects that have a scheduled in-service date occurring before January 1, 2024 and projects for which an application for approval has been submitted to an air quality management district for compliance with an environmental rule prior to the effective date of this General Order” (CPUC 2022). The permit application package for the MCM Project was submitted to South Coast AQMD in accordance with the requirements in Rule 1134, Rule 1110.2, and Rule 1100 in June 2021, which is prior to December 1, 2022, the effective date of GO 177. Therefore, the MCM Project is exempt from the requirement to obtain a CPCN.

In the context of gas utility projects, CPUC GO 177 Section VII.B states that “local jurisdictions acting pursuant to local authority are preempted from regulating gas utility facilities constructed by public utilities subject to the Commission’s jurisdiction” (CPUC 2022). However, in locating such projects, GO 177 states that public utilities are required to consult with local agencies regarding land use matters (CPUC 2022). Because CPUC has preemptive jurisdiction over the construction, maintenance, and operation of gas utility facilities in the state, no local discretionary permits (e.g., conditional use permits) or local plan consistency evaluations are required for the SDG&E Component of the MCM Project. However, SDG&E would be required to obtain applicable ministerial permits from local jurisdictions for the MCM Project.

6.4 Intended Uses of This Addendum

This Addendum is the environmental documentation that evaluates the proposed SCE Component of the MCM Project in accordance with CEQA Guidelines Section 15164. In particular, CEQA Guidelines Section 15164(a) states that a lead agency shall prepare an Addendum to a previously certified CEQA document if some changes or additions are necessary but none of the conditions described in CEQA Guidelines Section 15162 regarding the need to prepare a Subsequent EIR have occurred. South Coast AQMD has determined that: 1) the SDG&E Component of the MCM Project is within the scope of what was previously analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP; and 2) an Addendum is the appropriate CEQA document to be prepared for evaluating the SCE Component's potential environmental impacts that were not previously analyzed. Therefore, this Addendum serves as the environmental documentation for issuance of the PTCs as well as of any applicable discretionary approvals and/or permits required by responsible and trustee agencies, as described in Section 6.4.2.

6.4.1 Lead Agency Approvals

The MCM Project requires multiple PTCs to be issued by South Coast AQMD as the CEQA lead agency pursuant to Public Resources Code Section 21067. A PTC application package was submitted to South Coast AQMD in June 2021. A draft PTC was issued by South Coast AQMD in June 2021 that provided a comment period for U.S. EPA and public review. Upon completion of this Addendum, South Coast AQMD will issue the PTCs. No air permits are required from South Coast AQMD for the SCE Component of the MCM Project.

6.4.2 Responsible and Trustee Agencies

CEQA Guidelines Section 15381 defines a "responsible agency" as "a public agency which proposes to carry out or approve a project, for which a Lead Agency is preparing or has prepared an EIR or Negative Declaration. For the purposes of CEQA, the term 'Responsible Agency' includes all public agencies other than the Lead Agency which have discretionary approval power over the project." As described in Section 6.3.2 of this Addendum, the SDG&E Component of the MCM Project qualifies for an exemption from the requirement to obtain a CPCN from the CPUC under Section IV(B) of GO 177 and the SCE Component qualifies for an exemption from the requirement to obtain a PTC from the CPUC. Therefore, CPUC has not been identified as a responsible agency.

As described further in Chapter 8.1.2 - Biological Resources, the SCE Component of the MCM Project may apply for coverage under existing programmatic conservation plans for potential impacts to species. Those programmatic conservation plans have previously undergone applicable environmental review, and seeking coverage under those programmatic plans are not discretionary approvals that trigger review under CEQA. Thus, no responsible agencies have been identified with respect to the MCM Project.

Trustee agencies as defined by CEQA Guidelines Section 15386 are public agencies having jurisdiction by law over natural resources affected by a project that are held in trust for the people of the State of California. No trustee agencies have been identified with respect to the MCM Project.

6.4.2.1 Discretionary Approvals

The following discretionary actions/approvals may be required:

- **Permit to Construct.** South Coast AQMD, as a lead agency, is responsible for the issuance of the PTCs for the proposed MCM Project. No other discretionary approvals are required.

6.4.2.2 Ministerial Approvals

The following ministerial approvals and/or permits for the MCM Project may be required:

- Coverage under the General NPDES Permit for Discharges of Storm Water Associated with Construction Activity (Order No. 2022-0057-DWQ, NPDES No. CAS000002), also known as the Construction General Permit (CGP), in accordance with the requirements of the State Water Resources Control Board.
- Fire suppression classification and issuance of an occupancy permit for Plant 4 by the County of Riverside.
- Issuance of applicable permits from the City of Moreno Valley.

7.0 IMPACT ANALYSIS

Section 7.1 of this Addendum presents a summary of the impact analyses contained in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP, including the MCM Project, and whether or not the SCE Component of the MCM Project would result in new significant impacts or impacts that are substantially more severe than those identified in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. Section 7.2 of this Addendum provides a summary of the impacts analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP to provide the relationship between those impact conclusions and the impact conclusions for the SCE Component. The analysis includes an evaluation of the SCE Component impacts as well as a determination of whether or not the SCE Component would result in a substantial increase in the severity of previously identified significant effects or one or more significant effects not previously identified, pursuant to CEQA Guidelines Section 15162.

This Addendum concludes that the SCE Component would not result in new significant effects or a substantial increase in the severity of significant effects identified in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. Furthermore, there is no new information of substantial importance that would affect the analysis contained in the March 2017 Final Program EIR for the 2016 AQMP, the April 2019 Final SEA for PAR 1134, and the November 2019 Final SEA for PAR 1110.2 and PAR 1100, including that pertaining to mitigation measures and alternatives for the MCM Project.

7.1 Summary of Environmental Impacts Identified in the Previous CEQA Documents

7.1.1 March 2017 Final Program EIR for the 2016 AQMP

In accordance with CEQA, the Initial Study prepared for the March 2017 Final Program EIR for the 2016 AQMP evaluated 17 environmental topics and determined that implementation of the 2016 AQMP control measures would result in less than significant impacts for nine of the 17 environmental topics (agriculture and forestry resources, biological resources, cultural resources, geology and soils, land use and planning, mineral resources, population and housing, public services, and recreation). Thus, these environmental topics were not required to be further analyzed in the March 2017 Final Program EIR for the 2016 AQMP and a summary of the findings from the 2016 AQMP Initial Study was included in Section 4.9 of the March 2017 Final Program EIR for the 2016 AQMP.

The March 2017 Final Program EIR for the 2016 AQMP identified potentially significant environmental impacts that may result from implementation of the 2016 AQMP, including control measures and strategies. The 2016 AQMP includes 75 control measures, most of which are not applicable to the MCM Project (e.g., use of bonnet technology for ships). Therefore, many of the environmental impacts identified in the March 2017 Final Program EIR for the 2016 AQMP are not relevant to the impact analysis presented in this Addendum. The March 2017 Final Program EIR for the 2016 AQMP concluded that significant and unavoidable adverse environmental impacts from the 2016 AQMP may occur even after implementing mitigation measures for the following environmental topic areas:

- A. Aesthetics—due to increased glare and from the construction and operation of catenary lines and use of bonnet technology for ships;
- B. Air quality and GHG emissions—during construction activities;
- C. Energy—due to increased electricity demand;
- D. Hazards and hazardous materials—due to the following:
 - a. Increased flammability of solvents, reformulated coatings, adhesives, and sealants,
 - b. Storage, accidental release, and transportation of ammonia,
 - c. Storage and transportation of liquefied natural gas, and
 - d. Projects within 0.25 mile of schools;
- E. Hydrology—due to increased water demand;
- F. Noise and vibration—during construction activities;
- G. Solid and hazardous waste—construction waste and operational waste from vehicle and equipment scrapping; and
- H. Transportation and traffic—during construction and during operation on roadways with catenary lines and at the harbors.

Additionally, the March 2017 Final Program EIR for the 2016 AQMP identified cumulatively considerable impacts for the following environmental topic areas: aesthetics, air quality and GHG emissions, energy, hazards and hazardous materials, hydrology and water quality, noise, solid and hazardous waste, and transportation and traffic.

The March 2017 Final Program EIR for the 2016 AQMP concluded that the 2016 AQMP would have significant and unavoidable adverse environmental impacts even after mitigation measures were identified and applied. As such, mitigation measures were a condition of approval of the 2016 AQMP, and an MMRP was adopted. Findings were made, and a Statement of Overriding Considerations was adopted. The South Coast AQMD Governing Board certified the March 2017 Final Program EIR for the 2016 AQMP and approved the 2016 AQMP on March 3, 2017.

The MMRP for the March 2017 Final Program EIR for the 2016 AQMP, which lists all adopted mitigation measures, is included as Appendix B-1 to this Addendum. Appendix B-2 to this Addendum identifies the portion of the mitigation measures which specifically apply to the MCM Project, including the SCE Component.

7.1.2 April 2019 Final SEA for PAR 1134

The April 2019 Final SEA for PAR 1134 concluded that implementation of Amended Rule 1134 would have no significant effects or would have less than significant direct and indirect adverse effects on the following environmental topic areas: aesthetics, agriculture and forestry resources, biological resources, cultural resources, energy, geology and soils, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, solid and hazardous waste, and transportation and traffic. As such, these topics were not discussed further in April 2019 Final SEA for PAR 1134. The April 2019 Final SEA for PAR 1134 determined that air quality, and hazards and

hazardous materials were the only environmental topic areas that could be affected by implementation of the amended rule; therefore, these two environmental topic areas were evaluated in greater detail.

The April 2019 Final SEA for PAR 1134 evaluated impacts from the implementation of Amended Rule 1134, which included transitioning affected stationary gas turbines operated at NO_x RECLAIM facilities to a command-and-control regulatory structure. NO_x RECLAIM facilities with equipment subject to Rule 1134 were required to meet the NO_x emission limits as specified in Rule 1134. The decision to transition from NO_x RECLAIM into a source-specific command-and-control regulatory structure was approved by the South Coast AQMD Governing Board as Control Measure CMB-05 in the 2016 AQMP, and the potential environmental impacts associated with the 2016 AQMP, including Control Measure CMB-05, were analyzed in the March 2017 Final Program EIR for the 2016 AQMP certified in March 2017.

According to the April 2019 Final SEA for PAR 1134, it is estimated that Amended Rule 1134 will reduce NO_x emissions by 2.8 tons per day throughout the South Coast Air Basin after implementation of BARCT limits and will provide an overall environmental benefit to air quality. The April 2019 Final SEA for PAR 1134 found that, although reducing emissions of NO_x will create an environmental benefit, activities that facility operators may undertake to comply with Amended Rule 1134 may also create secondary adverse environmental impacts associated with the use of hazardous materials (South Coast AQMD 2019a).

South Coast AQMD staff determined that Amended Rule 1134 contained new information of substantial importance that was not known and could not have been known at the time the March 2017 Final Program EIR for the 2016 AQMP was certified. Specifically, the April 2019 Final SEA for PAR 1134 identified new potentially significant adverse effects relating to hazards and hazardous materials that may result from implementing Amended Rule 1134; these potentially significant impacts were not analyzed in the March 2017 Final Program EIR for the 2016 AQMP. Therefore, the April 2019 Final SEA for PAR 1134 identified new mitigation measures for hazards and hazardous materials. The analysis concluded that significant and unavoidable adverse environmental impacts from implementation of Amended Rule 1134 may occur as a result of potential exposure to hazardous materials even after mitigation is applied, as follows:

- Hazards and hazardous materials—from exposure to the Emergency Response Planning Guideline (ERPG) 2 level of 0.14 milligrams per liter (mg/L) of aqueous ammonia due to potential tank rupture.¹²

In addition, because physical modifications to facilities required to implement Amended Rule 1134 may cause adverse air quality impacts, the April 2019 Final SEA for PAR 1134 also analyzed air quality and concluded that potential construction and operational air quality impacts would be less than significant.

In summary, with the exception of hazards and hazardous materials, the conclusions reached in the April 2019 Final SEA for PAR 1134 are consistent with the conclusions reached in the previously certified March 2017 Final Program EIR for the 2016 AQMP.

¹² The ERPGs are exposure guidelines designed to help anticipate health effects from exposure to airborne chemical concentrations. The three tiers are ERPG-1, ERPG-2, and ERPG-3. ERPG-2 is described as the maximum airborne concentration below which nearly all individuals could be exposed for up to one hour without experiencing or developing irreversible or other serious health effects or symptoms that could impair an individual's ability to take protective action.

7.1.3 November 2019 Final SEA for PAR 1110.2 and PAR 1100

The November 2019 Final SEA for PAR 1110.2 and PAR 1100 concluded that implementation of these rules would have no significant effects or would have less than significant direct and indirect adverse effects on the following environmental topic areas: aesthetics, agriculture and forestry resources, biological resources, cultural resources, energy, geology and soils, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, solid and hazardous waste, and transportation and traffic. As such, these topics were not discussed further in the November 2019 Final SEA for PAR 1110.2 and PAR 1100. The November 2019 Final SEA for PAR 1110.2 and PAR 1100 determined air quality, and hazards and hazardous materials were the only environmental topic areas that could be affected by implementation of the amended rules; therefore, these two environmental topic areas were evaluated in greater detail.

The November 2019 Final SEA for PAR 1110.2 and PAR 1100 evaluated impacts from the implementation of Amended Rule 1110.2 and Rule 1100, which included transitioning the affected stationary and portable internal combustion engines at NO_x RECLAIM facilities to a command-and-control regulatory structure. NO_x RECLAIM facilities with equipment subject to Rule 1110.2 were required to meet the NO_x emission limits as specified in Rule 1110.2. The decision to transition from NO_x RECLAIM into a source-specific command-and-control regulatory structure was approved by the South Coast AQMD Governing Board as Control Measure CMB-05 in the 2016 AQMP, and the potential environmental impacts associated with the 2016 AQMP, including Control Measure CMB-05, were analyzed in the March 2017 Final Program EIR for the 2016 AQMP certified in March 2017.

According to the November 2019 Final SEA for PAR 1110.2 and PAR 1100, it is estimated that Amended Rule 1110.2 will reduce NO_x emissions by 0.29 ton per day throughout the South Coast Air Basin after implementation of BARCT limits and will provide an overall environmental benefit to air quality. The November 2019 Final SEA for PAR 1110.2 and PAR 1100 found that although reducing NO_x emissions will create an environmental benefit, activities that facility operators may undertake to comply with Amended Rule 1110.2 may also create secondary adverse environmental impacts associated with the use of hazardous materials (South Coast AQMD 2019b). In addition, amendments were proposed to Rule 1100 that would establish a compliance schedule for specified stationary engines.

South Coast AQMD staff determined that Amended Rule 1110.2 contained new information of substantial importance that was not known and could not have been known at the time the March 2017 Final Program EIR for the 2016 AQMP was certified. Specifically, the November 2019 Final SEA for PAR 1110.2 and PAR 1100 identified new potentially significant adverse effects relating to hazards and hazardous materials that may result from implementing Amended Rule 1110.2; these potentially significant impacts were not analyzed in the March 2017 Final Program EIR for the 2016 AQMP. Therefore, the November 2019 Final SEA for PAR 1110.2 and PAR 1100 identified new mitigation measures for hazards and hazardous materials. The analysis concluded that significant and unavoidable adverse environmental impacts from Amended Rule 1110.2 associated with potential exposure to hazardous materials may occur even after implementing mitigation measures due to the following:

- Hazards and hazardous materials—from exposure to the ERPG-2 level of 0.14 mg/L of aqueous ammonia due to potential tank rupture.

In addition, because physical modifications to facilities required to implement Amended Rule 1110.2 may cause adverse air quality impacts, the November 2019 Final SEA for PAR 1110.2 and PAR 1100 also analyzed air quality as a potentially significant environmental impact and concluded that potential construction and operational air quality impacts would be less than significant.

In summary, with the exception of hazards and hazardous materials, the conclusions reached in the November 2019 Final SEA for PAR 1110.2 and PAR 1100 are consistent with the conclusions reached in the previously certified March 2017 Final Program EIR for the 2016 AQMP.

7.1.4 MCM Project Components Considered Under the Previous CEQA Documents

As previously discussed, the March 2017 Final Program EIR for the 2016 AQMP identified 75 control measures and strategies to demonstrate how the region will attain various ambient air quality standards; of these, two (Control Measure CMB-01 and Control Measure CMB-05) would apply to the MCM Project. The March 2017 Final Program EIR for the 2016 AQMP did not address specific facilities affected by the control measures and provided a broad impact analysis regarding replacing, retrofitting, or constructing equipment to comply with the control measures and strategies outlined in the 2016 AQMP.

After the 2016 AQMP was adopted, Control Measure CMB-01 and Control Measure CMB-05 were implemented, resulting in amendments to Rule 1134, Rule 1110.2, and Rule 1100, which South Coast AQMD analyzed in the April 2019 Final SEA for PAR 1134, and the November 2019 Final SEA for PAR 1110.2 and PAR 1100. The April 2019 Final SEA for PAR 1134, and the November 2019 Final SEA for PAR 1110.2 and PAR 1100 specifically considered the MCS as one of the “Affected Facilities” to be analyzed, listed as “San Diego Gas & Electric.” (Facility ID 004242) in Appendix D of the April 2019 Final SEA for PAR 1134, and the November 2019 Final SEA for PAR 1110.2 and PAR 1100.

As analyzed in the April 2019 Final SEA for PAR 1134, a RECLAIM or non-RECLAIM facility operating compressor gas engines may consider installing a new SCR system and associated ammonia storage tank, replacing an existing SCR system or replacing an existing stationary gas turbine with a new, more efficient stationary gas turbine. The SDG&E Component of the MCM Project was analyzed under the latter scenario outlined in the April 2019 Final SEA for PAR 1134 for the proposed replacement of the four compressors to comply with Rule 1134. In addition, as analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, a RECLAIM or former RECLAIM facility operating compressor gas engines may consider undergoing a facility-wide engine modernization. A scenario of a facility-wide modernization of five engines at one facility was one of the scenarios analyzed for construction impacts, including installing new engines on a new footprint followed by the decommissioning of the existing engines once the new engines become operational. The SDG&E Component of the MCM Project would also fall under this scenario analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100.

Section 1.3 - Moreno Compressor Modernization Project Overview, and Section 5.2 - MCM Project Components, of this Addendum provide an overview of the MCM Project. Table 7-1 provides a summary of the MCM Project, including the SCE Component, and identifies if and how the components were considered in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP.

Table 7-1
Summary of MCM Project Components Included in the Previous CEQA Documents

Project Component	November 2019 Final SEA for PAR 1110.2 and PAR 1100; and April 2019 Final SEA for PAR 1134		March 2017 Final Program EIR for the 2016 AQMP	
	Addressed?	Applicable SEA Text	Addressed?	Applicable EIR Text
(1) SDG&E Component A. Compressor system upgrades: Upgrades would include two new compressor buildings and a concrete pad (new Plant 4) to house two new CGTs (each rated at 5,825 HP) (South Coast AQMD A/Ns 629922 and 629924), complete with post-combustion emission control systems for the CGTs, each consisting of an SCR system and an oxidation catalyst, and a Continuous Emissions Monitoring System for NOx control purposes (A/Ns 629923 and 629925), two new natural gas-fired emergency engines (each rated at 824 HP) (A/Ns 629926 and 629928), with associated two NSCR systems for NOx control purposes (A/Ns 629927 and 629929), new connections to an existing storage tank under P/N G73134 to supply ammonia to the new SCR system, two new EDCs (each rated at 4,800 HP), as well as other ancillary improvements.	Yes	Installation and operation of additional control equipment (up to four per facility) or selective noncatalytic reduction equipment, repowering, replacement, or retrofitting existing stationary engines (installed sequentially [one at a time]) and demolition and disposal of old equipment.	Yes	Implementation of strategies and control measures, specifically Control Measure CMB-05, Further NOx Reductions from RECLAIM Assessment.
(2) SCE Component A. Temporary construction power B. Ginger 12-kV super circuit interconnection C. Permanent circuit upgrades	No	Increased electrical demand identified.	Yes	“New and existing buildings shall incorporate building commissioning to facilitate improved and efficient building operation.” <i>(page 3.3-8 of the 2016 AQMP Final Program EIR)</i>

Key: MCM = Moreno Compressor Modernization; EIR = Environmental Impact Report; AQMP = Air Quality Management Plan; SEA = Subsequent Environmental Assessment; CGT = compressor gas turbine; HP = horsepower; A/N = Application Number; EDC = electric-motor-driven compressor; SCR = Selective Catalytic Reduction; NOx = nitrogen oxides; CMB = Combustion Source; RECLAIM = Regional Clean Air Incentives Market; MCS = Moreno Compressor Station; CPUC = California Public Utilities Commission; SCE = Southern California Edison; kV = kilovolt.

7.2 Analysis of Impacts from the Proposed SCE Component of the MCM Project

This Addendum includes an evaluation of the same 17 environmental topic areas identified in the South Coast AQMD's environmental checklist and evaluated in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. This section of the Addendum presents the results of the environmental analysis and conclusions of significance for the SCE Component. To determine the significance of the SCE Component impacts, significance criteria provided by South Coast AQMD were utilized. The analysis in the March 2017 Final Program EIR for the 2016 AQMP concluded that eight environmental topic areas would have potentially significant impacts (aesthetics, air quality and GHG emissions, energy, hazards and hazardous materials, hydrology and water quality, noise, solid and hazardous waste, and transportation and traffic) and summaries of these analyses are provided in Subsections 7.2.1 through 7.2.8. The topics of air quality, and hazards and hazardous materials are the only two environmental topics that were determined to have potentially significant impacts in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134. The remaining nine environmental topic areas that were found to have less than significant impacts in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP are examined in Chapter 8.0 of this Addendum. The environmental topic area of wildfire is evaluated in Section 8.2.1 Wildfire of this Addendum. The environmental topic area of tribal cultural resources is evaluated in Section 8.1.3 Cultural Resources.

The November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP identify several potentially significant impacts that cannot be mitigated to less than a level of significance and, therefore, are considered significant and unavoidable. However, as discussed in detail in Sections 7.2.1 through 7.2.8, the SCE Component of the MCM Project would not result in any new significant impacts, nor would it substantially increase the severity of any significant impacts identified in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. Furthermore, the analysis in these sections concludes that the SCE Component would not result in any significant impacts that cannot be mitigated to a less than significant level with adherence to applicable mitigation measures included in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. Therefore, the SCE Component of the MCM Project would not result in or substantially contribute to any significant and unavoidable effects identified in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP.

7.2.1 Aesthetics

The March 2017 Final Program EIR for the 2016 AQMP determined that the implementation of control measures in the 2016 AQMP could result in significant adverse aesthetic impacts. The November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 determined aesthetic impacts to be less than significant.

Impacts associated with aesthetics would be considered significant if any of the following criteria apply:

- The project will block views from a scenic highway or corridor.

- The project will adversely affect the visual continuity of the surrounding area.
- The impacts on light and glare will be considered significant if the project adds lighting which would add glare to residential areas or sensitive receptors.

7.2.1.1 Previous CEQA Documents

The March 2017 Final Program EIR for the 2016 AQMP determined that implementation of the 2016 AQMP could substantially degrade the existing visual character or quality of a site and its surroundings by the installation of catenary lines (a network of overhead wires on poles used to supply electric power to trains and trams) and use of bonnet technology on vessels at the ports. With incorporation of mitigation measures AE-1 through AE-5 (refer to Appendix B-1 of this document), the March 2017 Final Program EIR for the 2016 AQMP concluded that impacts would be significant and unavoidable. The March 2017 Final Program EIR for the 2016 AQMP determined that there are no officially designated scenic highways or highways eligible for state scenic highway designation in areas affected by construction of zero- or near-zero-emission equipment associated with the 2016 AQMP. Therefore, the March 2017 Final Program EIR for the 2016 AQMP concluded that there would be no impacts regarding substantial damage to scenic resources within a state scenic highway. The March 2017 Final Program EIR for the 2016 AQMP also determined that the installation of solar panels and cool-roof technology could significantly increase the amount of glare generated and impacts from glare would be significant and unavoidable. No feasible mitigation measures were identified for this impact (South Coast AQMD 2017b).

The November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 concluded that aesthetic impacts would be less than significant. Table 4-15 (see p. 4-33) of the April 2019 Final SEA for PAR 1134, and Table 4-22 (see p. 4-39) of the November 2019 Final SEA for PAR 1110.2 and PAR 1100, explain that significant aesthetic impacts from the construction and operation of catenary lines and use of bonnet technology for ships found in the March 2017 Final Program EIR for the 2016 AQMP would not be applicable because neither catenary lines nor the use of bonnet technology for ships are applicable to stationary engines or stationary gas turbines and the corresponding NO_x emission controls (e.g., SCR technology) as analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 (South Coast AQMD 2019a, 2019b).

The SDG&E Component of the MCM Project is within the scope of what was analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134; however, the SCE Component is not. As a result, a determination of whether or not the SCE Component would involve new or more significant aesthetic impacts than those analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP is addressed herein.

7.2.1.2 SCE Component

Scenic Vistas

The City's 2040 General Plan Updates, Open Space and Resource Conservation Element states that the principal local scenic resources within the City are all visible from the segment of State Route 60 that passes through the Badlands area, which is characterized as having steep, eroded hillsides (City of Moreno Valley 2026a). As indicated in Figure 7-1, City of Moreno Valley Scenic Resources and Ridgelines, the

closest scenic resources to the MCS identified in the City's Open Space and Resource Conservation Element are View Corridors¹³ designated from Alessandro Boulevard, Gilman Springs Road, and along World Logistics Center Parkway at the eastern edge of the City. The identified View Corridors provide views of expanses of open land in the San Jacinto Valley and views of the ephemeral Mystic Lake, located southeast of the MCM Project. Views of the San Bernardino and San Gabriel Mountains are also evident at times from the San Jacinto Valley floor (City of Moreno Valley 2026a). The Facility is located on the San Jacinto Valley floor and is within these designated View Corridors. In relation to the MCS, State Route 60 and its viewpoints are located approximately 1.9 miles to the north; Alessandro Boulevard is located approximately 0.6 miles to the north; and Gilman Springs Road, which runs northwest-southeast in the vicinity of the MCS, is located approximately 1.0 mile northeast of the Facility.

The SCE Component of the MCM Project includes the following: installation of temporary construction power within the Facility (including replacement of one existing distribution pole, installation of one new permanent distribution pole, and installation of one temporary distribution pole to be removed after construction); and modifications to the existing Ginger 12-kV circuit (refer to Figures 5-2 through 5-5 for alignment of the Ginger 12-kV super circuit and permanent circuit upgrades) involving restringing approximately three miles of existing distribution poles with new cables, circuit improvements on approximately three miles of the existing 12-kV line, new overhead conductor on approximately 4,800 feet of the existing 12-kV line, installing eight new 50- to 55-foot-tall distribution poles, replacing 50 distribution poles (up to 55 feet tall), and replacing approximately five existing joint distribution/subtransmission poles with five wood joint distribution/subtransmission poles (up to 85 feet tall), 30 light weight steel joint distribution/subtransmission poles (up to 85 feet tall), and five tubular steel poles (up to 85 feet tall).

The construction required for the SCE Component would be temporary and result in relatively minor disturbance to views. Views of the SCE Component construction activities located within and adjacent to the Facility by passing motorists within designated View Corridors would be largely obscured due to existing intervening development within the Facility and the distance of the Facility from the roads within the View Corridor. Surrounding mountain ranges would continue to be largely visible by passing motorists and from many other locations in the area; therefore, scenic resources would not be substantially impacted on an area-wide basis.

¹³ A View Corridor, often used interchangeably with scenic corridor, is a visible area or line of sight from a specific vantage point or along a designated route that maintains unobstructed views of points of interest like mountains or landmarks.

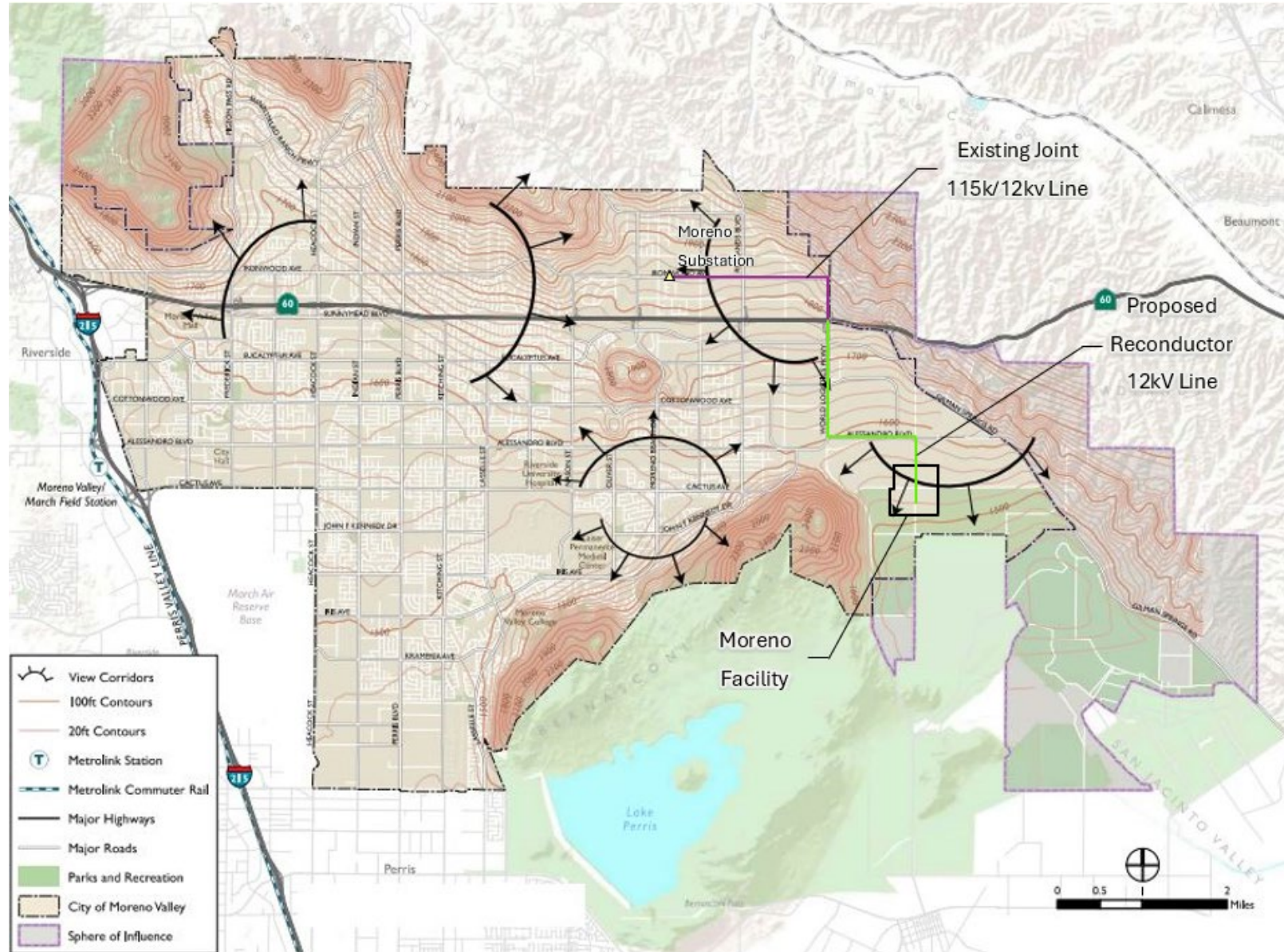


Figure 7-1
City of Moreno Valley Scenic Resources and Ridgelines

New poles (i.e. vertical features) included in the SCE Component would be similar in height to existing poles. New and replacement poles would be consistent with the aesthetic of existing distribution and transmission features in the vicinity and would result in relatively minor disturbances within the viewshed. The Ginger 12-kV super circuit and permanent circuit upgrades would result in modifications to the existing Ginger 12-kV circuit located within a portion of the designated View Corridor along Alessandro Boulevard, World Logistics Center Parkway, and Ironwood Avenue; however, these modifications would primarily consist of replacing existing poles with poles comparable in measurements, and restringing of cables on existing lines, resulting in minor changes to public views by passing motorists.

In summary, the SCE Component would not significantly change the visual landscape from City-designated View Corridors and, thus, would not adversely affect views of scenic resources. Impacts would be less than significant.

Scenic Highway

The MCM Project, including the SCE Component, is situated away from state scenic highways. The closest officially designated state scenic highway is State Route 243, located approximately 14.1 miles east of the MCS (Caltrans 2024). Due to distance and intervening topography, the SCE Component alignment is not visible from State Route 243. No mature trees, rock outcroppings, or historic buildings would be impacted by implementation of the SCE Component. No impact would occur.

Light and Glare

There is existing security lighting throughout the MCS, mounted on rooftops and on TSPs approximately 20 feet in height to maintain safe operating conditions. All new proposed lighting would be consistent with City General Plan 2040 policies, including Policy PPS.3-8 and City Municipal Code Section 9.10.110, Light and Glare, which states that no operation, activity, sign or lighting fixture shall create illumination, directly or indirectly, which exceeds 0.5 foot-candles minimum maintained on any adjacent property and that all lighting shall be designed to project downward and shall not create glare on adjacent properties.

Due to the temporary nature of construction activities, vehicles and equipment that would increase light and glare would move around the SCE Component construction areas and would not remain in any one location for a prolonged period of time. Construction lighting would only be utilized at dusk and would not be left on overnight. In addition, use of any construction lighting would be directed to specifically illuminate active areas of construction. During construction, exteriors of construction vehicles, including windshields, and equipment would represent sources of potential localized glare. Glare may be generated during hours of active construction and when vehicles and equipment are stored in the temporary staging/laydown areas within the Facility. However, due to the mobile nature of vehicles and equipment as well as temporary nature of construction activities, glare is not expected to disturb any one location for a particularly long duration. Any glare generated by construction activities may be briefly experienced at off-site locations with views toward active areas of construction, but would not be visible elsewhere in the visual landscape. In addition, public views of the SCE Component would be limited due to the rural and undeveloped character of the land surrounding the area.

For the SCE Component, the temporary construction power, Ginger 12-kV super circuit, and permanent circuit upgrades would be constructed consistent with the materials and scale of existing distribution and

subtransmission lines in the vicinity of the MCM Project and are not expected to substantially increase light or glare. By design, the SCE Component would not create a new source of light or glare that could adversely affect daytime or nighttime views in the area. Light and glare impacts would be less than significant.

7.2.1.3 Cumulative Aesthetic Impacts

Previous CEQA Documents

Section 5.2 of the March 2017 Final Program EIR for the 2016 AQMP found that implementation of the control measures in the 2016 AQMP would result in significant impacts to visual character due to installation of catenary lines, glare from solar panels, and bonnet technology from oceangoing vessels. The 2016 AQMP control measures would result in significant adverse aesthetic impacts and when combined with past, present, and reasonably foreseeable activities would result in a significant cumulative impact.

The November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 concluded that potential aesthetic impacts would be less than significant; therefore, cumulative aesthetic impacts were not analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134.

SCE Component

As detailed earlier, the SCE Component would not change the potential impact findings related to aesthetics as evaluated in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. Construction and operation of the SCE Component would result in less than significant impacts at the project level related to aesthetics. The SCE Component of the MCM Project would not require a land use designation or zoning change. The SCE Component would be consistent with the current utility-related uses of the Facility and overhead electrical infrastructure in the surrounding areas. Although the March 2017 Final Program EIR for the 2016 AQMP determined that there would be a cumulatively significant impact related to aesthetic resources, this impact was primarily associated with catenary lines, solar panels, and bonnet technologies, which are not part of the SCE Component. Views of aboveground infrastructure from the nearest City-designated View Corridor would either be obscured by distance or result in minor changes where modifications would consist of replacing existing infrastructure with infrastructure of comparable size and material.

Cumulative development projects in the surrounding viewshed area of the SCE Component would undergo the applicable level of environmental review and be required to comply with existing standards set forth in the City's General Plan and Municipal Code to regulate outdoor lighting and glare. As such, any future projects within the viewshed of the SCE Component are not anticipated to contribute to or exacerbate the previously identified cumulatively considerable impacts for aesthetic resources in the March 2017 Final Program EIR for the 2016 AQMP. Further, based on the location and design of the SCE Component, environmental review requirements, and standards for lighting and glare, the SCE Component would not result in any significant cumulative impacts to aesthetics or visual resources.

7.2.1.4 Mitigation Measures

As indicated in Section 7.2.1.1, the March 2017 Final Program EIR for the 2016 AQMP determined that implementation of the 2016 AQMP could substantially degrade the existing visual character or quality of a site and its surroundings by the installation of catenary lines and use of bonnet technology on vessels at the ports. With the incorporation of Mitigation Measures AE-1 through AE-5 (refer to Appendix B-1 of this document), the March 2017 Final Program EIR for the 2016 AQMP concluded that impacts would be significant and unavoidable. Mitigation Measures AE-1 through AE-5 are not applicable to the SCE Component of the MCM Project because the SCE Component would not involve catenary lines or the use of bonnet technology for ships.

7.2.1.5 Aesthetics Conclusion

As demonstrated by the preceding analysis, the SCE Component of the MCM Project would not result in new significant or substantial increases in the severity of previously identified significant impacts related to aesthetics, nor would it require new or modified mitigation measures or alternatives to be studied that were not already previously analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. The SCE Component would, therefore, not alter the conclusions in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP.

7.2.2 Air Quality and Greenhouse Gases

The March 2017 Final Program EIR for the 2016 AQMP determined that the implementation of the control measures in the 2016 AQMP could result in significant adverse air quality and greenhouse gas (GHG) impacts. Air quality impacts associated with increased emissions of criteria air pollutants, toxic air contaminants (TACs), and GHGs due to construction and operation related to Control Measure CMB-01 and Control Measure CMB-05 are discussed in Section 4.1 and cumulative air quality impacts are discussed in Section 5.4 of the March 2017 Final Program EIR for the 2016 AQMP. The March 2017 Final Program EIR for the 2016 AQMP indicated that the 2016 AQMP would result in a reduction of criteria pollutants in the South Coast Air Basin in order to attain the air quality standards. However, significant air quality impacts could be caused by modifications to facilities needed to implement the emission control rules if construction at four or more facilities were to occur on the same day. Mitigation Measures AQ-1 to AQ-23 would reduce construction emissions, but the overall construction air quality and GHG impacts after mitigation would remain significant.

Because the MCS includes both compressor gas turbines and engines, it was identified as an affected facility in both the November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134. The November 2019 Final SEA for PAR 1110.2 and PAR 1100 concluded that no exceedances of the air quality significance thresholds would be expected to occur for any pollutant for all project scenarios that were analyzed either during construction or during operation after all construction is completed. Likewise, the April 2019 Final SEA for PAR 1134 also concluded that potential construction air quality impacts would be less than significant. Upon completion of construction at all affected facilities, an overall benefit to operational air quality would occur due to the projects' overall NO_x emission reductions.

The analysis herein evaluates potential impacts to air quality and GHG emissions using the significance thresholds shown in Table 7-2. A facility may generate emissions both during the construction period (to install the proposed equipment before it can be utilized continuously), and through ongoing daily operations (after the temporary construction is completed and the construction equipment is removed). To determine whether air quality impacts from implementing the proposed project are significant, impacts are evaluated and compared to the criteria in Table 7-2: mass daily thresholds for construction, mass daily thresholds for operation, toxic air contaminant emissions, odor, greenhouse gas emissions, and ambient air quality standards. The SCE Component is considered to have significant adverse impacts if any of the significance thresholds in Table 7-2 are equaled or exceeded. The significance thresholds shown in Table 7-2 are the same as those used for the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP except for the addition of a significance threshold related to the federal 1-hour nitrogen dioxide (NO₂) ambient air quality standard in 2023 (see Table 7-2 footnote [d]).

The SDG&E Component of the MCM Project is within the scope of what was analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134; however, the SCE Component is not. As a result, a determination of whether or not the SCE Component would involve new or more significant air quality or GHG impacts than those analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP is addressed herein.

7.2.2.1 Construction Emissions and Impacts

Construction Emissions Analyzed in Previous CEQA Documents

The March 2017 Final Program EIR for the 2016 AQMP determined that the construction phases associated with implementation of the 2016 AQMP would exceed the regional significance thresholds and that after implementation of Mitigation Measures AQ-1 through AQ-23 (refer to Appendix B-1 of this document), impacts would remain significant and unavoidable (South Coast AQMD 2017b).

The air quality analysis in the April 2019 Final SEA for PAR 1134 includes the MCS as one of 16 “Affected Facilities” anticipated to require modifications to comply with Rule 1134. Additionally, the air quality analysis in the November 2019 Final SEA for PAR 1110.2 and PAR 1100 includes the MCS as one of the 21 “Affected Facilities” specifically considered in the impact analyses. The April 2019 Final SEA for PAR 1134 describes scenarios including installation of an SCR system and associated ammonia tank, replacement of an existing SCR system, and replacement of existing stationary gas turbine with stationary gas turbine with built-in dry low NO_x technology. The November 2019 Final SEA for PAR 1110.2 and PAR 1100 describes a scenario of a facility-wide modernization of five engines at one facility (South Coast AQMD 2019a, 2019b).

Table 7-2
South Coast AQMD Air Quality Significance Thresholds

Mass Daily Thresholds ^a		
Pollutant	Construction	Operation
NO _x	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM ₁₀	150 lbs/day	150 lbs/day
PM _{2.5}	55 lbs/day	55 lbs/day
SO _x	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day
Toxic Air Contaminants (TACs), Odor, and GHG Thresholds		
TACs (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Chronic & Acute Hazard Index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to South Coast AQMD Rule 402	
GHG	10,000 MT/yr CO ₂ eq for industrial facilities	
Ambient Air Quality Standards for Criteria Pollutants ^b		
NO ₂ 1-hour average annual arithmetic mean	South Coast AQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) 0.03 ppm (state) and 0.0534 ppm (federal)	
PM ₁₀ 24-hour average annual average	10.4 µg/m ³ (construction) ^c & 2.5 µg/m ³ (operation) 1.0 µg/m ³	
PM _{2.5} 24-hour average	10.4 µg/m ³ (construction) ^c & 2.5 µg/m ³ (operation)	
SO ₂ 1-hour average 24-hour average	0.25 ppm (state) & 0.075 ppm (federal – 99 th percentile) 0.04 ppm (state)	
Sulfate 24-hour average	25 µg/m ³ (state)	
CO 1-hour average 8-hour average	South Coast AQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)	
Lead 30-day Average Rolling 3-month average	1.5 µg/m ³ (state) 0.15 µg/m ³ (federal)	

^a Source: South Coast AQMD CEQA Handbook (South Coast AQMD, 1993)

^b Ambient air quality thresholds for criteria pollutants based on South Coast AQMD Rule 1303, Table A-2 unless otherwise stated.

^c Ambient air quality threshold based on South Coast AQMD Rule 403.

KEY: lbs/day = pounds per day ppm = parts per million $\mu\text{g}/\text{m}^3$ = microgram per cubic meter $\geq$ = greater than or equal to
 MT/yr CO₂eq = metric tons per year of CO₂ equivalents $>$ = greater than

Revision: March 2023

Construction Emissions from SCE Component

The proposed SCE Component of the MCM Project is expected to require approximately six months of planned construction composed of the following construction phases:

- SCE Temporary Power (Temporary construction power)
- SCE Ginger 12-kV super circuit (Ginger 12-kV super circuit)
- SCE Permanent Circuit Upgrades (Permanent circuit upgrades)

A preliminary construction schedule is provided in Table 5-2 and the types and quantity of construction equipment to be used were provided by SCE and are shown in Table 5-3 of this Addendum. The type and quantity of vehicles, which were also provided by SCE, are shown in Table 7-3 as well as in the CalEEMod Outputs in Attachment A of Appendix A, Air Quality and Greenhouse Gas Technical Summary Memorandum.

Table 7-3
Proposed Project Construction Traffic Summary

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip ^(a)	Vehicle Mix ^(b)
SCE Temporary Power	Worker	8	20	LDA, LDT1, LDT2
	Vendor	6	20	HHDT, MHDT
	Hauling	6	20	HHDT
SCE Ginger 12-kV Super Circuit	Worker	12	20	LDA, LDT1, LDT2
	Vendor	80	20	HHDT, MHDT
	Hauling	2	20	HHDT
SCE Permanent Circuit Upgrades	Worker	40	20	LDA, LDT1, LDT2
	Vendor	14	20	HHDT, MHDT

(a) The CalEEMod default distance of 20 miles is used (version 2022.1.1.41) for the miles per trip each way.

(b) LDA = Light-Duty Automobile; LDT = Light-Duty Truck; MHDT = Medium-Heavy-Duty Truck; HHDT = Heavy-Heavy-Duty Truck

The use of diesel-powered construction equipment emits ozone precursors (NO_x and VOC) and particulate matter (PM), including diesel particulate matter (DPM). Large construction projects using multiple pieces of large earthmoving equipment are typically evaluated to determine whether construction activities may exceed South Coast AQMD's peak daily threshold for NO_x emissions and could temporarily expose area residents to high levels of DPM. PM₁₀ and PM_{2.5} in diesel engine exhaust and fugitive dust are also generally pollutants of concern. Use of architectural coatings and other materials associated with finishing buildings may also emit VOC and TACs. The significance thresholds address the impacts of construction activity emissions on local and regional air quality.

The construction emission calculations for the SCE Component were performed using CalEEMod version 2022.1.1.41 (the version available at the time of the analysis in March 2026), the official statewide land use computer model designed to provide a uniform platform for estimating potential criteria pollutant emissions associated with both construction and operations of projects under CEQA. CalEEMod was

developed by the California Air Pollution Control Officers Association in collaboration with the South Coast AQMD, the Bay Area Air District, the San Joaquin Valley Air Pollution Control District, and other California air districts. Default land use data (e.g., emission factors, trip lengths, meteorology, source inventory) were provided by the various California air districts to account for local requirements and conditions.

PM10 and PM2.5 emitted during construction can vary greatly depending on the level of activity, the specific operations taking place, the equipment being operated, local soils, weather conditions, and other factors, making quantification difficult. Despite this variability in emissions, experience has shown that there are feasible measures that can be reasonably implemented to significantly reduce fugitive dust emissions from construction. South Coast AQMD Rule 403 – Fugitive Dust, requires that activities such as construction that generate fugitive dust must implement the Rule 403-listed Best Available Control Measures (BACMs) to minimize these emissions. Consistent with South Coast AQMD Rule 403, the BACMs for the SCE Component of the MCM Project would include frequent water application (twice per day as needed) to effectively control fugitive dust emissions from forming at greater than 20 percent opacity or crossing any property line.

As noted in Chapter 3.0 of this Addendum, the air quality analyses in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 concluded that potential construction and operational air quality impacts would be less than significant and mitigation would not be required for project-level or cumulative impacts. Although the November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 did not require mitigation, as also noted in Chapter 3.0 and earlier in Section 7.2.2, the March 2017 Final Program EIR for the 2016 AQMP determined that significant and unavoidable adverse environmental impacts to air quality associated with construction emissions would occur after implementing Mitigation Measures AQ-1 through AQ-23 (refer to Appendix B-1 of this document).

The criteria pollutant peak daily emissions from construction of the SCE Component are included in the CalEEMod Outputs in Appendix A, Air Quality and Greenhouse Gas Technical Summary Memorandum, and are summarized in Table 7-4. The peak daily construction emissions from the SCE component are associated with the Ginger 12-kV Super Circuit phase of the project. The two other phases: Temporary Construction Power and Permanent Circuit Upgrades, are not scheduled to overlap with the Ginger 12-kV Super Circuit phase (see Table 5-2, Estimated Construction Schedule) and each is estimated to generate lower peak daily construction emissions. Table 7-4 compares the peak daily construction emissions from the Ginger 12-kV Super Circuit phase against the South Coast AQMD significance thresholds. As described in Section 5.2.1, PDF-1 (Use of Tier 4 Final Engines on Construction Equipment) requires the SCE Component of the MCM Project's construction contractors to use Tier 4 Final engines for off-road diesel-powered construction equipment with engines greater than 50 HP. BACM will be implemented to control fugitive dust as required by South Coast AQMD Rule 403. Criteria pollutant peak daily emissions are compared to applicable significance thresholds for construction to determine significance. As shown in Table 7-4, the peak daily construction emissions would be less than the South Coast AQMD air quality significance thresholds and impacts would be less than significant.

Table 7-4
Peak Daily Construction Emissions and Significance Evaluation

Construction Emissions	VOC (lb/day)	NO_x (lb/day)	CO (lb/day)	SO_x (lb/day)	Total PM10^(a) (lb/day)	Total PM2.5^(a) (lb/day)
Peak Daily Construction Emission from SCE Component	1	12	46	0.1	2	0.7
Significance Threshold for Construction (Table 7-2)	75	100	550	150	150	55
Significant?	No	No	No	No	No	No

(a) Total PM10 and PM2.5 include both engine exhaust and fugitive dust.

Source: CalEEMod version 2022.1.1.41 (see Attachment A in Appendix A, Air Quality and Greenhouse Gas Technical Summary Memorandum).

For CalEEMod inputs related to vehicles and mileage, on-road vehicle needs for the SCE Component would consist of light-duty construction worker vehicles for commuting to the SCE Component, medium- and heavy-duty trucks such as water trucks for dust control, and other trucks such as cement trucks, pump trucks, and flatbed trucks. The number of workers and the number and type of trucks that would be used on the peak day for each phase were provided by SCE for the development of the CalEEMod inputs (see Appendix A). The trips per day (see Appendix A) are based on the number of worker and truck trips doubled to reflect two one-way trips as round trips. CalEEMod provides default trip length estimates for workers and vendors based on the 2015 California Statewide Travel Demand Model and regional travel demand models from local metropolitan planning organizations or Regional Transportation Planning Agencies, where available. Thus, for all construction phases, the CalEEMod default trip length of 20 miles one way was used for all worker and vendor trips.

As explained in Section 5.3.4, Construction and Demolition Materials Disposal, construction and demolition debris may be sent to approved facilities to meet the required 65 percent diversion through reuse, composting, or recycling. For a worst-case analysis of the potential impact to the environmental topic area of solid/hazardous waste, 100% of the construction debris will be assumed to go to landfills; but for a worst-case analysis of the potential impact to the environmental topic area of air quality, 100% of the hauling trips will be assumed to go to recycling centers which are further away than the landfills. Further information is provided in Section 7.2.7.2, but in summary, Badlands Sanitary Landfill is located 2.95 miles north of the MCS, and Lamb Canyon Sanitary Landfill 7.15 miles east of the MCS; while the Agua Mansa Material Recovery Facility is located approximately 17 miles northwest, Engelauf Construction Specialists 17 miles northwest, Ewles Materials 22 miles northwest, and Justice Urban Waste Recycling 16 miles northwest. Thus, for all construction phases, the CalEEMod default trip length of 20 miles one way was also used for all hauling trips.

Table 7-5 presents the estimated peak daily construction emissions for the MCM Project which is sum of the peak daily construction emissions from: 1) the complete replacement of a stationary gas turbine scenario from the April 2019 Final SEA for PAR 1134 (based on SEA Table 4-6); 2) the facility-wide engine modernization scenario from the November 2019 Final SEA for PAR 1110.2 and PAR 1100 (based on SEA Table 4-12); and 3) the estimated peak daily construction emissions from the SCE Component.

Table 7-5 shows that the peak daily construction emissions for the MCM Project would remain less than the South Coast AQMD air quality significance thresholds for construction and thus, the air quality impacts during construction would be less than significant.

**Table 7-5
Peak Daily Construction Emissions for the MCM Project**

Construction Emissions	VOC (lb/day)	NO_x (lb/day)	CO (lb/day)	SO_x (lb/day)	Total PM₁₀ (lb/day)	Total PM_{2.5} (lb/day)
Complete Replacement of a Stationary Gas Turbine (Table 4-6 from the Final SEA for Rule 1134)	1.4	12.9	10.1	0.0	6.1	3.6
Facility-wide Engine Modernization of Five Engines at One Facility (Table 4-12 from the Final SEA for Rule 1110.2 and Rule 1100)	4.51	35.74	32.54	0.10	12.16	6.98
SCE Component of the MCM Project Construction	1	12	46	0.10	2	0.7
Total Peak Daily Construction Emission from the MCM Project	6.91	60.64	88.64	0.20	20.26	11.28
Significance Threshold for Construction (Table 7-2)	75	100	550	150	150	55
Significant?	No	No	No	No	No	No

Key: MCM = Moreno Compressor Modernization; VOC = volatile organic compounds; lb/day = pounds per day; NO_x = nitrogen oxides; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = respirable particulate matter; PM_{2.5} = fine particulate matter

For the SCE Component of the MCM Project, potential impacts to air quality during construction would not result in a new impact, because the March 2017 Final Program EIR for the 2016 AQMP identified such impacts as significant and unavoidable after mitigation. Further, the impacts for the SCE Component of the MCM Project would be less severe than those identified in the March 2017 Final Program EIR for the 2016 AQMP because the impacts would be less than significant. The analysis presented herein concludes that construction-related air quality impacts would be less than significant, which is the same finding in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134.

Compliance with regulatory requirements, such as the implementation of South Coast AQMD Rule 403 for the control of fugitive dust, would reduce construction-related emissions of criteria pollutants associated with the SCE Component of the MCM Project such that they would not result in peak daily criteria pollutant emissions exceeding South Coast AQMD thresholds. Therefore, construction of the proposed SCE Component would not result in any new significant impacts, nor would it substantially increase the severity of significant impacts identified in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP.

Localized Construction Air Quality Impacts Analyzed in Previous CEQA Documents

The November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP did not include an analysis of localized ambient air quality impacts during construction.

Localized Construction Air Quality Impacts from SCE Component

In addition to a comparison of the peak daily emissions to the significance thresholds, an ambient air quality impact analysis was performed to ensure that there would not be cumulatively significant localized impacts. The South Coast AQMD localized significance thresholds (LSTs) were applied to the construction air quality impact analysis of the SCE Component. South Coast AQMD has established LSTs for both construction and operation that are applicable to NO_x, CO, PM₁₀, and PM_{2.5} (South Coast AQMD 2008).

LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard and are developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and distance to the nearest sensitive receptor. The SRAs are geographically defined and assigned specific numbers to allow for focused tracking, modeling, and management of air pollution. For PM₁₀, LSTs are derived based on requirements in South Coast AQMD Rule 403. The MCM Project is located within SRA 24 – Perris Valley.

As detailed in Chapter 5.0, the SCE Component of the MCM Project would consist of upgrades to address the increase in electrical power demand for the MCM Project. As shown on Figures 5-2 through 5-5, the SCE Component contains the following subcomponents: temporary construction power (Figure 5-2), Ginger 12-kV super circuit (Figures 5-2 through 5-4), and permanent circuit upgrades (Figure 5-5). Temporary construction power is required to support the construction laydown areas and associated facilities, and includes a 12-kV extension from the existing lines on Virginia Street. Work to install the upgraded power feed line would span approximately two days from start to finish. The Ginger 12-kV super circuit involves reconductoring of the existing distribution circuit and additional circuit improvements to accommodate the MCM Project compressor system upgrades. SCE will modify portions of an approximately six-mile-long segment from the existing SCE Moreno Substation (located on Ironwood Avenue, northwest of the Facility, shown on Figure 4-1) to the MCS. The construction work on the Ginger 12-kV super circuit line is expected to take approximately four months. Permanent circuit upgrades include installation of approximately 4,800 feet of additional overhead conductor along Ironwood Avenue on approximately 35 poles, all of which may be replaced. Construction work on the permanent circuit upgrades would occur approximately 14 months after completion of the Ginger 12-kV super circuit work and last approximately two months.

Currently, there are no receptors in the vicinity of the MCS where the temporary construction power for the SCE Component is sited; the closest residence is approximately 6,000 feet (1.1 miles) to the northeast and the closest school is in Moreno Valley approximately 13,400 feet (2.5 miles) to the west. While there are no worker receptors currently nearby, the World Logistics Center (WLC) has been approved, has constructed a warehouse facility approximately 11,000 feet (2.1 miles) to the north, and has announced plans to construct additional warehouses in areas adjacent to the Facility. Existing residences along World Logistics Center Parkway are located approximately 60 feet (18 meters) from the Ginger 12-kV super

circuit construction; however, these residences are slated to be removed and developed as WLC warehouses. Based on the map of proposed WLC warehouses, the closest potential worker receptor to the Ginger 12-kV super circuit line during pole replacements would be a future worker receptor as close as approximately 140 feet (42 meters) along the roadways traversing the WLC campus (The World Logistics Center, 2026).

The portions of the proposed Ginger 12-kV super circuit and permanent circuit upgrades alignments that enter the existing SCE Moreno Substation are approximately 25 meters from residential receptors within Moreno Valley (see Figure 5-4 and Figure 5-5). The Calvary Chapel Christian School and Church, north of and adjacent to the existing SCE Moreno Substation, is located approximately 330 feet (100 meters) from proposed construction activities along Ironwood Avenue for the super circuit and permanent circuit upgrades. The Calvary Chapel Christian School and Church west and adjacent to existing SCE Moreno Substation, a storage yard, and the Cross Winds Church on the south side of Ironwood Avenue are the closest worker receptors to the super circuit and permanent circuit upgrades, as no other businesses are located close to the construction activities. For receptor distances less than 25 meters, the LST guidance indicates that 25 meters should be used.

The LST screening tables provide emissions thresholds for one-, two-, and five-acre project sites with distances ranging from 25 meters (82 feet) to 500 meters (1,640 feet) to the nearest receptor location. According to the LST Guidance document, for the purposes of a CEQA analysis, a sensitive receptor would be a receptor such as a residence, hospital, or convalescent facility where it is possible that an individual could remain for 24 hours. In addition to sensitive receptors, locations where workers may be present for eight hours are also included in the LST analysis for short term (less than 24-hours) NO₂ and CO standards. The LST guidelines indicate that the LST methodology is not designed to evaluate localized impacts from mobile sources traveling over the roadways.

Construction of the SCE Component would occur at multiple locations over an approximately six-mile route over three phases, while the LST guidance contains options to select applicable thresholds based on the size of construction site footprint ranging in size from one-, two-, and five-acres. However, since some construction for the SCE Component could occur within 25 meters (82 feet) of residences, the LST analysis for determining the potential localized impacts from the SCE Component assumes that all of the construction emissions will occur in one phase, within one acre and with a receptor distance of 25 meters (82 feet) ; the SDG&E Component was not included in the LST analysis because the MCS is not located near any sensitive receptors. The LST results are provided in Table 7-6 and show that the peak daily emissions from SCE Component construction phases would be less than the LST thresholds for construction at the nearest off-site receptor.

Table 7-6
Peak Daily Construction Emissions for SCE Component
and Localized Significance Threshold Evaluation

Construction Scenario	Peak Daily Construction Emissions ^(a) and Thresholds ^(b) (lb/day)			
	NOx	CO	PM10	PM2.5
SCE Component Peak Daily Construction (from Table 7-4)	12	46	2	0.7
Total Peak Daily Construction Emissions from the MCM Project	12	46	2	0.7
Localized Significance Thresholds for Construction (1-acre, 25 meters)	118	602	4	3
Significant?	No	No	No	No

(a) Construction emissions are from CalEEMod version 2022.1.1.41 (see Attachment A of Appendix A, Air Quality and Greenhouse Gas Technical Summary Memorandum)

(b) Thresholds from South Coast AQMD 2008 for SRA 24 – Perris Valley.

Compliance with South Coast AQMD Rule 403, including but not limited to watering at least twice per day to reduce or prevent visible plumes of fugitive dust off-site from disturbed surface areas, combined with implementation of PDF-1 would ensure that the peak daily emissions of criteria pollutants during construction of the SCE Component would not exceed any of the South Coast AQMD LSTs. Therefore, the proposed construction would not result in any new significant impacts, nor would it substantially increase the severity of significant impacts identified in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP.

Construction TAC Impacts Analyzed in Previous CEQA Documents

The November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP did not include an analysis of health risk impacts from TAC emissions during construction.

Construction TAC Impacts from SCE Component

A substance emitted into the air is a TAC if it has the potential to cause adverse health effects in humans, including increasing the risk of cancer upon exposure, or acute (immediate) and/or chronic (cumulative) noncancer health effects. Adverse health effects associated with exposure to TACs may include carcinogenic (i.e., cancer-causing) and noncarcinogenic effects. Noncarcinogenic effects typically affect one or more target organ systems and may be experienced with either short-term (acute) or long-term (chronic) exposure to a given TAC.

Health risk assessments (HRAs) are typically performed for projects with long-term emissions of TACs that could pose significant health risks to nearby sensitive receptors. The SCE Component construction phases are anticipated to last less than six months and would primarily consist of linear work, meaning emissions would be dispersed over a broad area rather than concentrated at a single location. Due to the short duration and spatial distribution of emissions, the potential for prolonged exposure at any one

receptor location is minimal. Additionally, the only TAC analyzed for construction is DPM, which was determined by the California Office of Environmental Health Hazard Assessment as only having long-term effects. For this reason, an analysis of the acute effects of DPM was not conducted.

A screening HRA was prepared using South Coast AQMD's Tier 2 HRA Tool (2024b) to evaluate the potential health risk from exposure to DPM emissions during construction of the SCE Component. The Tier 2 HRA Tool requires the selection of the source type and characteristics (e.g., horsepower), project location, and duration from a limited number of options. The TAC emission rates and distance to the nearest residence, school, and worker locations are inputs for the tool. The Tier 2 HRA Tool calculates the maximum cancer risk, hazard indices, and cancer burden, using the three input receptor distances (for residents, schools, and workers). The Project-specific entries are discussed in the following paragraphs and are also included in Appendix A, Air Quality and Greenhouse Gas Technical Summary Memorandum, of this Addendum.

Construction of the SCE Component of the MCM Project would result in emissions of DPM from heavy construction equipment and trucks. DPM is characterized as a TAC by the State of California and was the only TAC analyzed for construction, as it has been shown to be by far the predominant TAC related to health risks during construction. The total DPM during construction was assumed to be equal to the PM10 exhaust emissions calculated using CalEEMod (see Attachment A in Appendix A). The Office of Environmental Health Hazard Assessment has identified carcinogenic and chronic noncarcinogenic effects from long-term exposure to diesel exhaust but has not identified health effects due to short-term acute exposure. As described in the LST analysis, construction activities for the SCE Component during the Ginger 12-kV super circuit and permanent circuit upgrades where sensitive receptors are located will occur primarily along Ironwood Avenue east of the existing SCE Moreno Substation. As with the LST analysis, the closest residences to these activities are in a residential area south of the SCE Moreno Substation on the south side of Ironwood Avenue and a few residences near Redlands Boulevard on the north side of Ironwood Avenue. The closest school is the Calvary Chapel Christian School. The closest worker locations are this school, two churches, and a storage yard along Ironwood Avenue.

The dispersion of the DPM emissions in this area is described in Appendix A. The DPM emissions and distance to the closest residential, school, and worker location and selected durations are shown in Table 7-7. The results of the Tier 2 HRA Tool are shown in Table 7-8 and the Tier 2 HRA Tool outputs are provided in Attachment B of Appendix A. Table 7-2 includes the significance thresholds for health risks as a maximum incremental cancer risk (MICR) of greater than or equal to 10 in one million, chronic and acute hazard indices (HIC and HIA) greater than or equal to 1.0 (project increment), and a cancer burden greater than or equal to 0.5. The Tier 2 HRA Tool output labels the highest of the cancer risks at the three distances as being the MICR, which in this case, are the residential receptors located along Ironwood Avenue due to their proximity to the construction activities. As shown in Table 7-8, the Tier 2 HRA results are less than these health risk criteria. Furthermore, the DPM emissions within a 500-meter radius of the receptor locations have been concentrated as if from a single point source even though some of the construction emissions will occur in other areas, such as off-site travel. Therefore, these results presented likely overestimate the potential health risks from construction.

Table 7-7
MCM Project SCE Component Construction Tier 2 HRA Tool Model Inputs

Construction Equipment Size Range ^(a)	Average Annual DPM Emissions (lb/yr) ^(b)	Modeled Duration (years) ^(c)	Closest Receptor Distance (Feet)		
			Residence	School	Worker
175 – 300 BHP	2.5	2	82	330	82

Key: MCM = Moreno Compressor Modernization; SCE = Southern California Edison; HRA = Health Risk Assessment; BHP = Brake horsepower; DPM = diesel particulate matter; lb/yr = pounds per year.

- (a) See equipment listing in Table 5-3. The Tier 2 HRA Tool requires the selection of a single size range from five options for diesel reciprocating internal combustion engines.
- (b) DPM emissions based on PM10 exhaust emissions from the CalEEMod run in Attachment A of Appendix A for construction equipment and worker and haul truck trips along a 3,200-foot segment located along Ironwood Avenue. See Appendix A for a discussion of the emissions determination.
- (c) The shortest duration offered in the Tier 2 HRA Tool is a two-year option. Actual construction activity duration for the Ginger 12-kV super circuit and permanent circuit upgrades combined are less than six months over two years for the SCE Component.

Table 7-8
MCM Project SCE Component Construction Tier 2 HRA Results

Construction Phases	Residence		School		Worker		Cancer Burden
	Cancer (in a Million)	Chronic Hazard Index ^(a)	Cancer (in a Million)	Chronic Hazard Index ^(a)	Cancer (in a Million)	Chronic Hazard Index ^(a)	
SCE Ginger 12-kV Super Circuit and Permanent Circuit Upgrades ^(b)	3.65	0.002	0.62	0.0004	0.22	0.002	0.005
Significance Threshold	10	1.0	10	1.0	10	1.0	0.5
Significant?	No	No	No	No	No	No	No

(a) An acute hazard index is not calculated for DPM, so only the chronic hazard index (HIC) is provided.

(b) DPM emissions within 1,640 feet (500 meters) of the receptor locations are included.

7.2.2.2 Operation Emissions and Impacts

Operation Emissions Analyzed in Previous CEQA Documents

The March 2017 Final Program EIR for the 2016 AQMP indicated that the 2016 AQMP would result in a reduction of criteria pollutants in the South Coast Air Basin, which was modeled to show attainment of

the air quality standards. Hence, implementation of 2016 AQMP control measures such as Control Measure CMB-05 – Further NO_x Reductions from RECLAIM Assessment₂ was anticipated to have a beneficial impact on air quality during operations. Likewise, the November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 concluded that implementation of Amended Rule 1134, Amended Rule 1110.2, and Amended Rule 1100 would result in direct air quality benefits from the reduction of NO_x emissions.

For the MCS, where SCR systems would be implemented, the November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 indicated that secondary criteria pollutant emissions may be generated as part of activities necessary for operating and maintaining the SCR systems used for NO_x emission reductions from the combustion equipment. In particular, the following activities may be sources of secondary criteria pollutant emissions during operation: 1) new vehicle trips via heavy-duty trucks for periodic aqueous ammonia deliveries for each SCR system installed; 2) new vehicle trips via heavy-duty trucks for periodic deliveries of fresh catalyst and for hauling away spent catalyst once the new SCR systems are installed; and 3) increased vehicle trips via heavy-duty trucks for periodic aqueous ammonia deliveries for the facility's increasing ammonia usage on existing SCR systems with replaced catalyst modules. Peak daily emissions from these activities are provided in Table 4-8 of the April 2019 Final SEA for PAR 1134, and Table 4-14 of November 2019 Final SEA for PAR 1110.2 and PAR 1100, which is replicated in this Addendum as Table 7-9. As shown in Table 7-9, operational emissions from one facility as a result of an increase in delivery trucks are less than the air quality significance thresholds for operation.

Table 7-9
Peak Daily Operational Emissions at One Facility

Operational Activity	VOC (lb/day)	NO_x (lb/day)	CO (lb/day)	SO_x (lb/day)	PM10 (lb/day)	PM2.5 (lb/day)
Increased Ammonia Delivery Trucks for 1 Facility	0.08	0.52	0.34	0.0	0.03	0.02
New Catalyst Delivery and Spent Catalyst Haul Trip at 1 Facility	0.15	1.04	0.68	0.0	0.07	0.04
Total	0.23	1.56	1.01	0.01	0.1	0.06
Significance Threshold for Operation	55	55	550	150	150	55
Exceed Significance?	No	No	No	No	No	No

Source: Table 4-8 of the Final SEA for Rule 1134 and Table 4-14 of the Final SEA for Rule 1110.2 and Rule 1100.

The SDG&E Component of the MCM Project is within the scope of what was analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134. However, because the SCE Component was not previously analyzed in the CEQA documents, whether the SCE Component would involve new or more significant operational air quality impacts than those analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP is addressed in the following discussion.

Operation Emissions from SCE Component

The temporary construction power is specifically provided for the temporary construction laydown areas and to support the execution of the MCM Project. No operations and, therefore, no operational emissions would result from the temporary construction power. There would only be minor vehicle emissions related to maintenance of the Ginger 12-kV super circuit during operation of the SCE Component. Furthermore, the Ginger 12-kV circuit is an existing distribution circuit, and operations and maintenance activities associated with the proposed Ginger 12-kV super circuit and permanent circuit upgrades would not be substantially different than those currently ongoing to support existing electrical infrastructure in the area. Hence, separate emissions were not calculated for the operations phase of the SCE Component. Because of the minimal change in emissions associated with these activities, the estimated peak daily emissions of criteria pollutants during operation of the SCE Component would not exceed the applicable air quality significance thresholds ; thus, the operational air quality impacts would be less than significant. Therefore, the SCE Component would not result in any new significant impacts, nor would it substantially increase the severity of significant impacts identified in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP.

Localized Operation Air Quality Impacts Analyzed in Previous CEQA Documents

The November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP did not include an analysis of localized ambient air quality impacts during operation.

Localized Operation Air Quality Impacts from SCE Component

As noted earlier, the Ginger 12-kV circuit is an existing distribution circuit, and operations and maintenance activities associated with the proposed Ginger 12-kV super circuit and permanent circuit upgrades would not be substantially different than the current support provided for the existing electrical infrastructure in the area; thus, the change in emissions from maintenance vehicles would be minimal. In addition, since the emissions would be distributed over more than five miles, the impacts due to these maintenance vehicles would be negligible. The LST guidelines indicate that the LST methodology is not designed to evaluate localized impacts from mobile sources traveling over roadways. Therefore, a further analysis of localized operational emissions for the SCE Component was not conducted.

Operational TAC Impacts Analyzed in Previous CEQA Documents

The March 2017 Final Program EIR for the 2016 AQMP identified multiple locations throughout the South Coast Air Basin where sensitive receptors are located in the vicinity of industrial facilities and provided a discussion of the health impacts related to TAC emissions. For operational impacts from TAC emissions, the March 2017 Final Program EIR for the 2016 AQMP stated that implementing the 2016 AQMP is expected to contribute to an overall reduction of TAC emissions.

The November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 assessed the impacts of ammonia slip as a TAC for facilities that would use SCR systems for NOx emissions control. Table 4-18 in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, and Table 4-11 in the April 2019 Final SEA for PAR 1134 indicated that ammonia slip emissions from a facility

would have impacts that are substantially less than the reference exposure level for ammonia, but did not assess impacts at sensitive receptors. Because the SCE Component was not previously analyzed, whether the SCE Component would involve new or more significant operational TAC impacts than those analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP is addressed herein.

Operational TAC Impacts from SCE Component

The operation of the SCE Component upgrades would generate negligible TAC emissions and would not otherwise expose sensitive receptors to substantial pollutant concentrations. The SCE Component, specifically the Ginger 12-kV super circuit and permanent circuit upgrades, includes operation of unmanned electrical infrastructure improvements. Emissions associated with occasional vehicle trips to the super circuit alignment and operations and maintenance activities, such as infrastructure washing and coating application, would be negligible. Such activities would occur infrequently and generally be consistent with ongoing operations and maintenance activities SCE currently undertakes in the area to support existing electrical infrastructure. Therefore, the SCE Component of the MCM Project would not result in any new significant impacts or substantial increases in the severity of previously identified significant impacts related to operational TAC impacts, nor would it require new or modified mitigation measures or alternatives to be studied, that were not previously analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. The SCE Component would therefore not alter the conclusions in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP.

7.2.2.3 Cumulative Air Quality and GHG Impacts

Cumulative Construction and Operation Air Quality Impacts Analyzed in Previous CEQA Documents

Section 5.4 of the March 2017 Final Program EIR for the 2016 AQMP, which addressed cumulative impacts, concluded that implementation of the 2016 AQMP is expected to result in significant adverse construction air quality impacts because emissions from construction for implementing the control measures from the 2016 AQMP have the potential to exceed the significance thresholds. Mitigation measures were identified, but air quality impacts from construction would remain potentially significant.

Cumulative impacts were also addressed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134, which concluded that air quality impacts from construction and operational activities would be less than significant. Thus, the air quality impacts due to construction, and operation would not be cumulatively considerable pursuant to CEQA Guidelines Section 15064(h)(1), and no significant adverse cumulative air quality impacts would be expected.

The November 2019 Final SEA for Rule 1110.2 and Rule 1100 also noted that the NO_x emissions from construction activities would be temporary when compared to the permanent long-term emission reductions of NO_x and that NO_x emissions during operation would be reduced by 0.29 ton per day (580 pounds per day) after implementation of BARCT limits. Likewise, the April 2019 Final SEA for PAR 1134 estimated NO_x emission reductions of 2.8 tons per day (5,600 pounds per day) after implementation of BARCT limits which were concluded to provide an overall environmental benefit to air quality. The

incremental NO_x emission reductions that were expected to occur would offset the temporary NO_x emissions generated during construction. The air quality benefits of existing and proposed South Coast AQMD rules are anticipated to bring South Coast AQMD into attainment with all national and most state ambient air quality standards. Therefore, the November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 concluded that cumulative operational air quality impacts from these projects would be less than significant because implementation of these amended rules was concluded to improve air quality overall from the anticipated NO_x emission reductions. Therefore, no significant cumulative adverse operational air quality impacts from implementing the amended rules would be expected.

Cumulative Construction and Operation Air Quality Impacts from SCE Component

The construction activities for the SCE Component include implementation of PDF-1 to require the use of Tier Final 4 engines on construction equipment rated at 50 HP and greater to ensure that air quality impacts from construction are less than significant. Similarly, operation of the SCE Component will result in negligible air quality impacts. As noted previously, when project impacts are less than significant, the air quality impacts due to construction and operation are not considered to be cumulatively considerable pursuant to CEQA Guidelines Section 15064(h)(1) and, therefore, no significant adverse cumulative air quality impacts would be expected.

Cumulative Construction and Operation TAC Impacts from SCE Component

The March 2017 Final Program EIR for the 2016 AQMP stated that implementing the 2016 AQMP is expected to contribute to an overall reduction in TAC emissions during long-term operations. The November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 assessed the impacts of ammonia slip as a TAC for facilities which would use SCR systems for NO_x emissions control. The November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP concluded that cumulative impacts related to TAC emissions would be less than significant.

As described in Section 7.2.2.1, due to the limited intensity and short duration of construction activities and spatial distribution of emissions of the construction phase of the SCE Component, the potential for acute and prolonged exposure to construction-related TAC emissions at any one receptor location is unlikely. Although not required for construction duration of less than six months, a screening Tier 2 HRA was performed and demonstrated that even with conservative assumptions, the impact would be less than significant. Therefore, construction activities would not result in an exceedance of applicable South Coast AQMD health risk criteria, and impacts would be less than significant.

Furthermore, as described in Section 7.2.2.2, operation of the SCE Component would result in negligible increase to TAC emissions associated with infrequent operations and maintenance activities, which would be similar in nature to ongoing maintenance activities undertaken to support existing electrical infrastructure in the area. Consequently, the analyses concluded that the SCE Component's TAC impacts would be less than significant, which is consistent with the air quality impact conclusions related to TACs in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. Therefore, the proposed SCE Component does not alter the less than significant impact conclusions for TACs in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017

Final Program EIR for the 2016 AQMP. As noted previously, when project impacts are less than significant, the impacts from TACs due to construction and operation are not considered to be cumulatively considerable pursuant to CEQA Guidelines Section 15064(h)(1) and, therefore, no significant adverse cumulative air quality impacts would be expected from the proposed SCE component.

Cumulative GHG Emissions Impacts from Construction and Operation Analyzed in Previous CEQA Documents

Impacts related to GHG emissions are cumulative in nature. The 2016 AQMP Initial Study in Appendix A of the March 2017 Final Program EIR for the 2016 AQMP indicated that the implementation of rules developed from the control measures could have a potentially significant impact. The 2016 AQMP contains incentive and educational control measures that target GHG emissions and includes other control measures not targeted at GHGs specifically, but provide GHG co-benefits. The 2016 AQMP also includes control measures that specifically address GHG emissions (Control Measures ECC-01, ECC-04, EGM-01, and ORHD-03). The Initial Study in Appendix A of the March 2017 Final Program EIR for the 2016 AQMP state: “Although some of the 2016 control measures are designed to take advantage of existing programs to reduce GHG impacts, other measures may have the potential to generate combustion emissions that could increase GHG emissions. For example, implementation of control measures that accelerate zero-emission technologies rely on electricity; an increase in electrical demand may result in increased electricity generation and subsequently increased GHG emissions associated with fossil fuel combustion and power plants.” Upon further analysis in the March 2017 Final Program EIR for the 2016 AQMP, GHG impacts were determined to be less than significant. The March 2017 Final Program EIR for the 2016 AQMP states that “Electricity is expected to be the predominant alternative fuel because it is more available, affordable, and can be used to power zero emissions vehicles. Existing power generating facilities are subject to Assembly Bill (AB) 32 and will be required to reduce GHG emissions by 2020 and any future power generating stations would be subject to stringent emission control requirements, including GHG emissions. As a result, GHG emissions associated with the use of alternative fuels are expected to be less than GHG emissions associated with the use of petroleum-based fuels. Therefore, no increase in GHG emissions is expected from the increased production and use of alternative fuels and GHG emission impacts are expected to be less than significant” (South Coast AQMD 2017b, p. 1-25). The March 2017 Final Program EIR for the 2016 AQMP goes on to say that implementation of the 2016 AQMP would not result in a cumulatively considerable impact requiring mitigation.

The November 2019 Final SEA for PAR 1110.2 and PAR 1100 indicated that the GHG analyses mainly focused on directly emitted carbon dioxide (CO₂) because it is the primary GHG pollutant emitted during the combustion process. Modification of existing air pollution control systems and the installation of new air pollution control systems do not affect the combustion process of the existing engine. In addition, engines that will be replaced or repowered are expected to be replaced with equipment having an identical or similar rating. Therefore, an increase in GHG emissions from the combustion of fuel is not expected from affected engines that are retrofitted, replaced, or repowered. Although the direct GHG emissions are not expected to increase, the November 2019 Final SEA for PAR 1110.2 and PAR 1100 indicated that CO₂ emissions from the operation of the NO_x control equipment are likely to increase from current levels due to the use of electricity, fuel, and water and the generation of more wastewater. The November 2019 Final SEA for PAR 1110.2 and PAR 1100 also determined that Rule 1110.2 would result in an increase of GHG operational emissions produced from additional truck hauling and deliveries necessary to accommodate the additional solid waste generation and increased use of chemicals and supplies (e.g., spent catalyst and reagent deliveries, i.e., aqueous ammonia in the SEA). The November 2019 Final SEA

for PAR 1110.2 and PAR 1100 concluded that the GHG impacts from implementation of the rule would be less than significant during construction and during operation (South Coast AQMD 2019b).

The April 2019 Final SEA for PAR 1134 concluded that the GHG impacts associated with implementation of the rule would be less than significant during construction, during construction overlapping with operation, and during operation. Because impacts were less than significant, no mitigation measures were required. The April 2019 Final SEA for PAR 1134 also concluded that implementing the rule is expected to generate less than significant adverse cumulative GHG impacts (South Coast AQMD 2019a).

Cumulative GHG Emissions Impacts from Construction and Operation of the SCE Component

Using CalEEMod, direct on-site and off-site GHG emissions were estimated for construction of the SCE Component. Typically, GHGs from short-term construction activities are amortized over 30 years. To amortize GHGs from temporary construction activities over a 30-year period (estimated life of the MCM Project/equipment), the total amount of carbon dioxide equivalent (CO₂e) emissions during construction (approximately six months of activity for the SCE Component) are calculated and then divided by 30. The amortized construction emissions are then added to the projected annual operational emissions to determine the significance of the GHG emissions.

Table 7-10 shows a breakdown of SCE Component construction GHG emissions over the nearly six months of construction activities. Table 7-10 also aggregates the CO₂e emissions for all construction phases to be approximately 545 metric tons (MT) or an amortized amount of 18 MT/year over a typical 30-year life of the Project.

Table 7-10
SCE Component Estimated Construction GHG Emissions (MT)

Construction Phase	CO₂	CH₄	N₂O	R	CO₂e
SCE Temporary Power	2	<1	<1	<1	2
SCE Ginger 12-kV Super Circuit	456	<1	<1	<1	465
SCE Permanent Circuit Upgrades	77	<1	<1	<1	78
Total	535	<1	<1	<1	545
Total 30-Year Amortized GHG Emissions	18				
South Coast AQMD GHG Significance Threshold	10,000				
Project's GHG Projected Emissions Increase is Significant?	No				

Key: GHG = greenhouse gas; MT = metric ton; CO₂ = carbon dioxide; CH₄ = methane; N₂O = nitrous oxide; R = common refrigerant GHGs; CO₂e = carbon dioxide equivalent

Source: CalEEMod version 2022.1.1.41 (See Attachment A in Appendix A).

The MCM Project involves the operation of two CGTs and two EDCs. Incorporation of two EDCs is consistent with the goals of the 2016 AQMP to use zero emission equipment where feasible. However, the EDCs require upgrades to the electrical distribution system. Direct GHG emissions are not expected from operation of the upgraded Ginger 12-kV super circuit and permanent circuit upgrades.

The South Coast AQMD adopted a GHG significance threshold of 10,000 MT per year of CO₂e for projects within South Coast AQMD jurisdiction. Projects with incremental increases less than this

threshold would not be cumulatively considerable. Projects with incremental increases greater than this threshold should be mitigated. As shown in the preceding analysis, the projected increase in GHG emissions due to the MCM Project's SCE Component would be approximately 18 MT CO₂e per year, which is substantially less than the GHG significance threshold of 10,000 MT CO₂e per year and thus, less than significant. Therefore, construction and operation of the proposed SCE Component would not result in any new significant impacts, nor would it substantially increase the severity of significant impacts identified in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP.

7.2.2.4 Mitigation Measures

As indicated in Section 7.2.2.1, the March 2017 Final Program EIR for the 2016 AQMP determined that the construction phases associated with implementation of the 2016 AQMP would exceed the regional significance threshold and after implementation of all feasible mitigation measures AQ-1 through AQ-23 (refer to Appendix B-1 of this document), impacts would remain significant and unavoidable.

The air quality impact analyses in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 include the MCS as one of the "Affected Facilities" specifically considered in these analyses. The April 2019 Final SEA for PAR 1134 describes a scenario of a stationary turbine replacement, while the November 2019 Final SEA for PAR 1110.2 and PAR 1100 describes a scenario of a facility-wide engine modernization. Both SEAs concluded that construction emissions for the SDG&E Component of the MCM Project on a peak day would be less than significant.

PDF-1 requires the use of Tier 4 Final engines on diesel-fired construction equipment rated at 50 HP or greater. With the inclusion of PDF-1, Section 7.2.2.1 identified that none of the 23 air quality mitigation measures from the March 2017 Final Program EIR for the 2016 AQMP would be applicable to the MCM Project, including the SCE Component. Also, like the November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134, the MCM Project including the SCE Component, would have less than significant air quality impacts without requiring mitigation measures.

7.2.2.5 Air Quality and GHG Impacts Conclusion

As demonstrated in the preceding analysis, the SCE Component would result in less than significant impacts related to air quality and GHG emissions during construction with implementation of PDF-1. Negligible air quality and GHG emissions are anticipated from the operation of the SCE Component.

In addition, the SCE Component would not result in any new significant impacts or substantial increases in the severity of previously identified significant impacts, nor would it require new or modified mitigation measures or alternatives to be studied, that were not previously analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. The SCE Component would, therefore, not alter the conclusions reached in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. As noted previously, when project impacts are less than significant, the air quality and GHG impacts are not considered to be cumulatively considerable pursuant to CEQA Guidelines Section 15064(h)(1) and, therefore, no significant adverse cumulative air quality impacts would be expected.

7.2.3 Energy

The March 2017 Final Program EIR for the 2016 AQMP determined that the implementation of the control measures in the 2016 AQMP could result in significant adverse energy impacts. The November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 determined energy impacts to be less than significant.

Impacts to energy resources would be considered significant if any of the following criteria are met:

- The project conflicts with adopted energy conservation plans or standards.
- The project results in substantial depletion of existing energy resource supplies.
- An increase in demand for utilities impacts the current capacities of the electric and natural gas utilities.
- The project uses energy resources in a wasteful and/or inefficient manner.

7.2.3.1 Previous CEQA Documents

The March 2017 Final Program EIR for the 2016 AQMP, as well as the 2016 AQMP Initial Study in Appendix A, focused on the operational energy impacts related to implementation of the control measures and did not assess the energy use related to construction of control technologies or other modifications at facilities needed to meet 2016 AQMP requirements. The March 2017 Final Program EIR for the 2016 AQMP did not discuss impacts related to compliance with existing energy standards or a state or local plan for renewable energy or energy efficiency in detail. Impacts related to compliance with existing energy standards and an adopted energy conservation plan were discussed in the 2016 AQMP Initial Study, included in Appendix A to the March 2017 Final Program EIR for the 2016 AQMP. The Initial Study concluded that implementation of the 2016 AQMP would provide potential energy conservation benefits, promote energy efficiency and conservation, and not conflict with existing energy plans, goals, or standards, and that no impacts associated with these criteria would occur.

The March 2017 Final Program EIR for the 2016 AQMP determined that implementation of the 2016 AQMP would result in significant adverse electricity consumption impacts because the potential electricity usage increase would exceed baseline electricity consumption by 7.8 to 12.7 percent. The March 2017 Final Program EIR for the 2016 AQMP indicated that the electricity consumption impacts would be significant and unavoidable, even after the incorporation of Mitigation Measures E-1 through E-7 (refer to Appendix B-1 of this Addendum). The implementation of the 2016 AQMP would result in less than significant impacts relating to increased demand for alternative fuels, alternative energy, renewable energy, petroleum fuels, and natural gas. The March 2017 Final Program EIR for the 2016 AQMP determined that implementation of the 2016 AQMP would increase the amount of renewable energy supplies and would support the efficient use of energy by decreasing the use of fossil fuels and increasing the reliance on renewable energy sources. However, neither the March 2017 Final Program EIR for the 2016 AQMP nor the 2016 AQMP Initial Study specifically discussed impacts regarding the relocation or construction of new or expanded electric power, natural gas, or telecommunication facilities (South Coast AQMD 2017b).

The November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 each provided a summary table (Table 4-22 and Table 4-15, respectively) for topics where the

potential environmental impacts were found to be less than significant, including energy. Table 4-22 indicated that the amount of electricity that would be needed to install SCR technology for implementation of Amended Rule 1110.2 would not be substantial, and impacts related to energy due to increased electricity demand would be less than significant (South Coast AQMD 2019a and 2019b).

The SDG&E Component of the MCM Project is within the scope of what was analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134; however, the SCE Component is not. As a result, a determination of whether the SCE Component would involve new or more significant energy impacts than those analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP is necessary and addressed herein.

7.2.3.2 SCE Component

Construction

The MCS is a crucial facility in SDG&E's/SoCalGas's system, needed to meet SDG&E's/SoCalGas's statutory obligation to provide reliable natural gas service to its customers. Modernization of the facility will replace eight older compressor engines with two new, more efficient CGTs with emissions control systems. The MCM Project would also replace some of the existing compression engine capacity with EDCs, which require electricity rather than natural gas.

The SCE Component of the MCM Project would implement upgrades to the SCE power system to provide service to the MCS and minimize impacts related to electrical demand. The SCE Component, as described in Section 5.2.2 of this Addendum, is a part of the MCM Project and would provide adequate electrical infrastructure to support operations at the MCS.

Energy calculations related to construction were based on the calculated mass emissions of CO₂ from CalEEMod results of off-road and on-road mobile sources associated with the SCE Component of the MCM Project construction. For construction, CalEEMod aggregates mobile source CO₂ emissions into four broad categories (typical fuel types assumed):

- Off-road equipment fleet composite (diesel Tiers 1–4)
- Hauling (heavy-heavy-duty diesel trucks)
- Vendor trips (medium-heavy- and heavy-heavy-duty diesel trucks)
- Worker trips (light-duty gasoline automobiles and trucks)
- Onsite Trucks (heavy-heavy-duty diesel trucks)

For each category, diesel and gasoline fuel consumption can be estimated using 2020 Climate Registry (40 CFR Part 98, Subpart C) emission factors for those fuels:

- Diesel Fuel Oil No. 2: 10.21 kilograms CO₂ per gallon (kg/gal) [22.51 pounds CO₂ per gallon]
- Motor Gasoline: 8.78 kilograms CO₂ per gallon [19.36 pounds CO₂ per gallon]

Table 7-11 shows the CalEEMod results of applying this calculation methodology, where total fuel consumption for the entire six-month construction period is estimated at 1,920 gallons of gasoline and 50,700 gallons of diesel. The use of fuels (diesel and gasoline) during construction is temporary and, based on the anticipated construction equipment and vehicles for the SCE Component, is within the capacity of the current diesel and gasoline fuel delivery systems (e.g., diesel fuel consumption is only 0.001 percent of the 3.5 billion gallons of diesel sold in California in 2024).

Table 7-11
Fuel Consumption During SCE Component Construction Based on CalEEMod

Mobile Source User	Types	Fuel	CO ₂ (MT)	CO ₂ Emission Factor (kg/gal)	Fuel Consumption (gallons)
Worker Vehicles	LDA, LDT1, LDT2	Gasoline	17	8.78	1,920
Vendor, Hauling & Onsite Trucks	MHDT, HHDT	Diesel	191	10.21	18,690
Off-road Equipment	Tier 4 for >50 HP	Diesel	327	10.21	32,010
Total			535	—	52,620

Key: MT = metric ton; CO₂ = carbon dioxide; kg/gal = kilograms per gallon; > = greater than; HP = horsepower.

Vehicle Types/Weight Classes: LDA = passenger cars/minivans/small sports utility vehicles (SUVs); LDT1 = 1/2 & 3/4 ton pickups/vans/large SUVs; LDT2 = 1 ton pickups/work trucks; MHDT = 3 axles (water, concrete, pump, flatbed, bucket, vendor); HHDT = 4+ axles (water, concrete, pump, flatbed, vendor); on-site and off-site hauling.

The SCE Component proposes to alter power utility systems, or more specifically, expand the method of production and upgrade power distribution. It does not result in the need for construction of new or substantially altered power or natural gas utility systems as a consequence of implementing the proposed project. Construction of the SCE Component would not result in significant impacts due to wasteful, inefficient, or unnecessary consumption of energy resources. Although the use of fuels during construction was not specifically addressed in the previous environmental documents, a determination of less than significant impact to energy resources is consistent with the energy impact findings in the previous environmental documents.

Operation

Once installed, the SCE Component will not require energy consumption on its own because it is designed to function as passive infrastructure by providing adequate electrical capacity to support the MCM Project; the energy demand of which has been previously evaluated in previous CEQA documents. By supporting the SDG&E Component, the SCE Component would help reduce overall MCM Project-related emissions and natural gas usage.

The SCE Component would not conflict with or obstruct any adopted energy conservation plans or state or local plans for renewable energy or energy efficiency. Regardless of whether the SCE Component is implemented, the MCS would continue to implement its current energy conservation plans that are in place. Thus, the SCE Component would not have an impact on the MCS's compliance with adopted plans or building codes. Therefore, the operation of the SCE Component would not result in additional energy impact.

7.2.3.3 Cumulative Energy Impacts

Previous CEQA Documents

Section 5.7 of the March 2017 Final Program EIR for the 2016 AQMP includes a discussion of operational cumulative impacts related to energy, but energy use during construction was not discussed. The March 2017 Final Program EIR for the 2016 AQMP evaluated cumulative energy impacts that could result in significant adverse electricity consumption impacts, because the potential electricity usage increase would exceed baseline electricity consumption by 7.8 to 12.7 percent. No significant impacts on natural gas supplies and petroleum fuels associated with the 2016 AQMP were identified because of the anticipated reduction in future demand and the wide availability of natural gas. Although alternative energy demand impacts were expected to be less than significant because adequate supplies are available, the 2016 AQMP control measures would result in significant adverse energy demand impacts and when combined with past, present, and reasonably foreseeable activities, would result in a significant cumulative demand impact. No additional mitigation measures were identified related to the cumulative energy impacts.

The November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 concluded that potential energy impacts would be less than significant. As noted previously, when project impacts are less than significant, the energy impacts are not considered to be cumulatively considerable pursuant to CEQA Guidelines Section 15064(h)(1) and, therefore, no significant adverse cumulative energy impacts would be expected from the projects analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134.

SCE Component

As detailed earlier, the SCE Component would not change the conclusions reached regarding the energy impacts evaluated in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. The SCE Component would result in less than significant project-level impacts related to construction-related energy/fuel use for construction equipment and vehicle trips. For operations, the SCE Component would also have less than significant project-level energy impacts.

The March 2017 Final Program EIR for the 2016 AQMP included seven mitigation measures (see Section 7.2.3.4 and Appendix B-1) to encourage project sponsors to work with the local energy provider and consider energy conservation measures in the planning stage for projects. It is expected that projects implemented pursuant to the 2016 AQMP will apply those mitigation measures to the extent applicable, further reducing potential cumulative impacts related to energy.

In sum, the proposed SCE Component of the MCM Project would not result in any new significant cumulative impacts, consistent with the analysis in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP that analyzed the scope of the SDG&E Component. Additionally, the SCE Component would not substantially increase the severity of the significant cumulative impacts identified in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP.

7.2.3.4 Mitigation Measures

As described in Section 7.2.3.1, the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP recognized that the implementing the control measure and amended rules could lead to a potential increase in electricity demand due to increased penetration of near-zero- and zero-emission technologies (e.g., EDCs) and potential increase in electricity demand associated with operating new control equipment (e.g., SCR system). The March 2017 Final Program EIR for the 2016 AQMP concluded that implementation of the 2016 AQMP would result in significant impacts because the potential electricity usage increase would exceed baseline electricity consumption. Certain mitigation measures related to energy from the MMRP from the March 2017 Final Program EIR for the 2016 AQMP have been identified as applicable to the MCM Project. The mitigation measures related to energy identified as applicable to the SCE Component of the MCM Project require implementation and documentation during the environmental review process pursuant to the MMRP for the Final Program EIR for the 2016 AQMP. The mitigation measures applicable to the SCE Component are listed below along with a discussion of how compliance with the requirements of each mitigation measure are fulfilled:

- E-1: A project applicant, project sponsor, or public agency shall provide to the lead agency documentation for approval of incentives to encourage the use of energy efficient equipment and vehicles and promote energy conservation prior to the beginning of project operation.

Compliance with Mitigation Measure E-1:

SDG&E and SCE, the project applicants, do not require the lead agency, South Coast AQMD, to provide incentives to fulfill the goal of Mitigation Measure E-1 to use energy efficient equipment. During construction, equipment greater than 50 HP will use Tier 4 Final engines to promote energy efficiency and conservation during construction. Contractors are required to implement construction BMPs such as limiting idling for trucks and heavy equipment and keeping logs for maintenance and usage. Regarding operation, the SCE Component would not require substantial energy consumption on its own, as it is designed to function as passive infrastructure. Rather, the SCE Component would support operation of the MCM Project, which includes technology for new compressors including two new, more efficient CGTs with emissions control systems and two new EDCs at the MCS. These equipment upgrades would support a robust operations model to plan compressor utilization to optimize emissions reductions with balanced energy usage (natural gas and electricity) (fuel-in-kind), and operational demand. Applicable equipment specifications have been provided to South Coast AQMD pursuant to the PTC application and review process. During construction, the SCE Component would incorporate the use of Tier 4 Final engines on equipment greater than 50 HP to further increase energy efficiency during construction. Contractors are required to implement construction BMPs such as limiting idling for trucks and heavy equipment and keeping logs for maintenance and usage.

- E-2: To the extent allowed by state and federal law, electricity generating utilities within the District can and should increase capacity of existing transmission lines to meet forecast electricity demand that supports sustainable growth, where feasible and appropriate in coordination with local planning agencies.

Compliance with Mitigation Measure E-2:

The SCE Component of the MCM Project fulfills Mitigation Measure E-2 by design. The SCE Component consists of upgrades to existing facilities to facilitate the increase in electrical power demand, including temporary construction power, a Ginger 12-kV super circuit, and permanent circuit upgrades. The temporary power would support the construction laydown areas and associated facilities for construction of the SDG&E Component, and includes a 12-kV extension from the existing lines on Virginia Street. The Ginger 12-kV super circuit involves reconductoring an existing distribution circuit and additional circuit improvements to accommodate the commissioning of the MCM Project. Permanent circuit upgrades would include installation of additional overhead conductor and pole replacements along the existing Ginger 12-kV circuit along Ironwood Avenue.

SCE designed the SCE Component after conducting engineering analysis to determine what system upgrades would be required to safely and reliably accommodate the commissioning of the MCM Project.

- E-3: The project applicant, project sponsor, or public agency shall submit projected electricity calculations to the local electricity provider for any project anticipated to require substantial electricity consumption. Such electricity calculations can and should be used by the local electricity provider when forecasting future electricity demand. Any infrastructure improvements necessary should be completed according to the specifications of the electricity provider.

Compliance with Mitigation Measure E-3:

The SCE Component of the MCM Project fulfills Mitigation Measure E-3 by design. Once installed, the SCE Component of the MCM Project would not require substantial energy consumption on its own. It is designed to function as passive infrastructure, providing adequate electrical capacity to support the MCM Project, the energy demand of which has been previously evaluated in previous CEQA documents.

- E-4: The project applicant, project sponsor, or public agency shall include energy analyses in environmental documentation with the goal of conserving energy through the wise and efficient use of energy.

Compliance with Mitigation Measure E-4:

The environmental effects associated with energy consumption and demand have been analyzed in this Addendum, the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP, which serve as the environmental documentation for issuance of the PTC. As demonstrated by the analysis herein, the SCE Component would not result in any new significant impacts or substantial increases in the severity of previously identified significant impacts related to energy, nor would it conflict with or obstruct any adopted energy conservation plans or state or local plans for renewable energy or energy efficiency. Current energy conservation plans that are in place would continue to be implemented with implementation of the Project, including the SCE Component.

Based on the preceding analysis, Mitigation Measures E-1 through E-4 have been fulfilled for the SCE Component.

Due to the increase in electricity needed for EDCs, the MCM Project includes reconductoring of the new distribution line and pole installation/replacement to provide the power needed for the SDG&E

Component of the MCM Project. Compliance with regulatory requirements, such as the applicable building codes and standards for engineering design, would ensure that the energy impacts are less than significant. This additional infrastructure will ensure that the MCM Project would not have significant effects on local or regional power supplies.

Although the construction of new electrical infrastructure was not anticipated in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP, the analyses in this Addendum determined that the SCE Component would not result in new significant impacts or increase in severity of a significant impact from construction of that infrastructure. The SCE Component proposes to alter power utility systems, or more specifically, expand the method of production and upgrade power distribution. It does not result in the need for construction of new or substantially altered power or natural gas utility systems as a consequence of implementing the proposed project. Therefore, the SCE Component would not cause any significant effects to energy resources due to construction and operation of new or retrofitted electrical power infrastructure.

7.2.3.5 Energy Conclusion

As demonstrated by the preceding analysis, the SCE Component would not result in any new significant impacts or substantial increases in the severity of previously identified significant impacts related to energy, result in significant adverse cumulative energy impacts, or require new or modified mitigation measures or alternatives to be studied that were not already previously analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. The SCE Component would therefore not alter the conclusions in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP.

7.2.4 Hazards and Hazardous Materials

The March 2017 Final Program EIR for the 2016 AQMP determined that implementation of control measures in the 2016 AQMP could result in significant adverse hazards and hazardous materials impacts. The November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 also determined hazard and hazardous materials impacts to be significant.

Impacts associated with hazards and hazardous materials would be considered significant if any of the following criteria apply:

- Non-compliance with any applicable design code or regulation.
- Non-conformance to National Fire Protection Association (NFPA) standards.
- Non-conformance to regulations or generally accepted industry practices related to operating policy and procedures concerning the design, construction, security, leak detection, spill containment or fire protection.¹⁴

¹⁴ These regulations and generally accepted industry practices include Institute of Electrical and Electronics Engineers (IEEE) 1547, IEEE 2030.5, Underwriters Laboratories (UL) 1741 Supplement A, UL 1973, UL 9540, and California Fire Code and NFPA standards.

- Exposure to hazardous chemicals in concentrations equal to or greater than the U.S. EPA's Emergency Response Planning Guideline (ERPG) 2 levels.

7.2.4.1 Previous CEQA Documents

The March 2017 Final Program EIR for the 2016 AQMP determined that implementation of the 2016 AQMP control measures would result in less than significant impacts related to the routine use of alternative fuels, caustics, catalysts, acidifiers, and sodium bisulfate; hazardous spills; and the storage and accidental release of ammonia in the refinery sector (South Coast AQMD 2017b). The March 2017 Final Program EIR for the 2016 AQMP also determined that implementation of the 2016 AQMP would result in significant and unavoidable impacts related to storage and transportation of liquid natural gas (LNG) even with implementation of Mitigation Measures HZ-3 through HZ-6 (refer to Appendix B-1 of this document for all mitigation measures); the accidental release of ammonia in the non-refinery sector; emission of or handling hazardous materials within 0.25 mile of schools with implementation of Mitigation Measures HZ-16 through HZ-18; and potential fire hazards associated with reformulated coatings, solvents, and consumer products with implementation of mitigation measures HZ-1 and HZ-2 (South Coast AQMD 2017b). The March 2017 Final Program EIR for the 2016 AQMP determined that, with implementation of Mitigation Measures HZ-7 through HZ-15, impacts from construction at facilities and sites identified on lists pursuant to California Government Code Section 65962.5 would be less than significant. Several hazards and hazardous materials impacts were not discussed in detail in the March 2017 Final Program EIR for the 2016 AQMP because they were found to have no impact in the 2016 AQMP Initial Study. These include impacts related to safety hazards for people residing or working in the project area due to proximity to a public use or private airport; impairing implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan; and exposing people or structures to a significant risk of loss, injury or death involving wildland fires (South Coast AQMD 2017b).

The November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 determined that significant and unavoidable impacts would result from the release of ammonia. Implementation of Mitigation Measures HZ-1 through HZ-6 would be expected to prevent a catastrophic release of ammonia from leaving a facility; however, without detailed information specific to each facility, this impact would remain significant and unavoidable after mitigation measures are applied because facilities may be located within 0.25 mile of a sensitive receptor. (South Coast AQMD 2019a, 2019b). The November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 determined that there would be less than significant impacts for the transportation of ammonia, and no significant impacts related to hazards associated with flammable materials are expected because operators of affected facilities are required to comply with all applicable design codes and regulations, conform to NFPA standards, and conform to policies and procedures concerning leak detection containment and fire protection (South Coast AQMD 2019a, 2019b).

The SDG&E Component of the MCM Project is within the scope of what was analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134; however, the SCE Component is not. As a result, a determination of whether or not the SCE Component would involve new or more significant impacts related to hazards than those analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP is required and is addressed herein.

7.2.4.2 SCE Component

Construction

Hazardous Materials

The SCE Component construction activities would require the use and disposal of hazardous materials associated with heavy equipment and machinery. It is not anticipated that substantial amounts of hazardous materials would be necessary for construction because equipment would be limited to typical construction equipment such as loaders, backhoes, graders, and trucks. However, inadvertent releases of hazardous materials could occur during construction activities, within temporary storage/staging areas, and/or while transporting hazardous material during construction. Hazardous materials that may be used during construction activities include, but are not limited to, gasoline, diesel fuel, lubricants, grease, adhesives, welding gases, solvents, paints, and vehicle- and equipment-maintenance-related materials. None of these materials would pose significant potential for offsite impacts as a result of their quantities, their relative toxicity, and/or their environmental mobility. In addition, the locations where hazardous materials would be used during construction are not located near any sensitive receptors, and construction of the SCE Component would not require the use or storage of acutely hazardous materials that could affect sensitive receptors. Wood poles removed as part of the SCE Component would be managed under the utility exemption of the Health and Safety Code (Hazardous Waste Fee Health and Safety Code) and the poles would be transported off site to an appropriate licensed Class I or Class II landfill or solid waste landfill.

The construction contractors would be required to ensure that the transport, handling, use, storage, and disposal of any hazardous materials occurs in accordance with the manufacturer's specifications and all applicable federal, state, and local laws and regulations, including but not limited to the hazardous materials safety regulations in Title 13 of the California Code of Regulations (13 CCR), Division 2, Chapter 6. Additionally, general requirements regarding the transportation of hazardous materials are governed by the California Vehicle Code Sections 31301–34510. Many of the anticipated hazardous construction materials may be recycled, and those that cannot be recycled would be transported by a licensed hazardous waste hauler and disposed of at an appropriately permitted offsite facility, in accordance with 22 CCR, Division 4.5, Environmental Health Standards for the Management of Hazardous Waste. SCE maintains Hazardous Material Business Plans (HMBPs) as applicable at its substations and other facilities. These plans would also be updated as applicable to reflect the construction scope of the SCE Component of the MCM Project to include information on construction-related materials and construction-generated waste to ensure ongoing compliance with all applicable federal, state, and local requirements related to hazardous materials. Alternatively, a Project-specific HMBP may be developed to provide information on the construction-related materials and construction-generated waste during construction of the SCE Component. The SCE HMBP would identify secondary containment and countermeasures required to be in place throughout construction, so that response would be immediate if any leaks or spills were to occur. Supplies and equipment to handle emergency spills would be clearly marked and kept near active construction workspaces and in temporary construction staging areas. Further, pursuant to any applicable site-specific SWPPP and BMPs, measures would be implemented during construction activities to reduce the potential for accidental release of construction-related hazardous materials to the environment.

With compliance with regulatory requirements, adherence to all manufacturer's specifications for use and disposal of hazardous materials, and implementation of HMBPs and the SWPPP BMPs, construction activities for the SCE Component would not create a significant hazard to the public or the environment and would comply with all applicable design codes, regulations, and industry practices. Impacts would be less than significant.

Nearby Schools, Airports, and Hazardous Sites

Calvary Chapel Christian School, adjacent to the existing SCE Moreno Substation, is located approximately 150 feet (46 meters) from proposed construction activities for the Ginger 12-kV super circuit and permanent circuit upgrades. The next closest school to the SCE Component alignment is Ridge Crest Elementary School, located approximately 1.8 miles southwest of the Ginger 12-kV super circuit. Transportation corridors in the vicinity of Ridge Crest Elementary School, including John F. Kennedy Drive, will not be used for Project-related transport of any hazardous material or for other construction-related truck trips, because this road does not provide access to the MCM Project. However, construction activities at the existing SCE Moreno Substation may involve temporary use, storage, transportation, and disposal of hazardous materials such as oils, fuels, lubricants, and solvents. As discussed earlier, the construction contractors would be required to ensure that the transport, handling, use, storage, and disposal of any hazardous materials occurs in accordance with the manufacturer's specifications and all applicable federal, state, and local laws and regulations, including but not limited to the hazardous state materials safety and transportation regulations. Hazardous construction materials would be transported by a licensed hazardous waste hauler and disposed of at an appropriately permitted offsite facility, in accordance with state law. Additionally, the SCE Component would comply with Mitigation Measures HZ-16 through HZ-18 from the March 2017 Final Program EIR for the 2016 AQMP, which require properly storing hazardous materials within secured locations, minimizing transportation of hazardous materials near schools when in session, and notifying nearby schools when transportation of hazardous materials may be necessary.

According to Appendix D of the November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134, the Moreno Facility is not located on a list compiled pursuant to California Government Code Section 65962.5 (South Coast AQMD 2019a, 2019b). Additionally, a Cortese list search found that there are no active hazardous waste sites within a 0.5-mile radius of the proposed SCE Component, and the nearest identified cleanup site is located approximately 5.2 miles northeast of the Facility along Jack Rabbit Trail (CalEPA 2024; DTSC 2024; SWRCB 2024).

The SCE Component is not located within two miles of an airport (South Coast AQMD 2019a, 2019b). The nearest facility accommodating air traffic is March Air Reserve Base, approximately 6.4 miles to the west of the Ginger 12-kV super circuit alignment. As such, with incorporation of applicable mitigation measures from the March 2017 Final Program EIR for the 2016 AQMP, construction of the SCE Component would not result in hazardous impacts due to its proximity to schools, hazardous waste sites, or airports. Impacts would be less than significant after mitigation is applied.

Fire Hazards

As discussed in Section 8.1.8, Public Services, of this Addendum, the SCE Component construction-related activities would not have the potential to adversely affect fire protection or emergency response times. The majority of the SCE Component would require construction activities outside the MCS,

including construction of the Ginger 12-kV super circuit and permanent circuit upgrades. Equipment laydown areas for construction of the SCE Component would not impede rights-of-way.

Construction activities would lead to a temporary increase in vehicle trips to and from the construction areas. However, the short-term increase in trips would not impede the movement of emergency vehicles or evacuation procedures and would not interfere with the City's Local Hazard Mitigation Plan (City of Moreno Valley 2023). Alessandro Boulevard, located approximately 0.6 miles north of the MCS, is an identified evacuation route in Moreno Valley (City of Moreno Valley 2023). Reconductor activities included as part of the Ginger 12-kV super circuit construction activities would have temporary construction areas within the Alessandro Boulevard right-of-way. As depicted in Figure 5-3, the reconductor impact area would occur north of Alessandro Boulevard and would not impede emergency evacuation within the roadway. If construction activities are required within public rights-of-way, such activities would be subject to an encroachment permit from the City, which would include emergency access and traffic control conditions as appropriate.¹⁵ The selected contractors would work with local police and traffic engineers to plan appropriate access alternatives in the event there are any temporary lane closures and traffic disruptions, if required. Additionally, California Vehicle Code Section 21806 allows drivers of emergency vehicles to have a variety of options for avoiding traffic, such as using sirens to clear a path of travel and driving in the lanes of opposing traffic. Therefore, SCE Component construction would not impair emergency or evacuation procedures along designated evacuation routes.

With compliance with regulatory requirements, coordination with emergency responders, and implementation of mitigation measure TR-1 from the March 2017 Final Program EIR for the 2016 AQMP, the SCE Component would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

Operation

Hazardous Materials

No acutely hazardous materials would be stored or used for temporary construction power, the Ginger 12-kV super circuit, or permanent circuit upgrades in the SCE Component of the MCM Project. Temporary construction power will be decommissioned once Project construction is complete. Operation of the Ginger 12-kV super circuit and subsequent permanent circuit upgrades requires minimal, if any, use of hazardous materials. Hazardous materials would be used, handled, and stored in compliance with applicable rules, regulations, and SCE standard protocols designed to protect the public or the environment from the risk of upset and accident conditions involving the release of hazardous materials. SCE maintains HMBPs at their substations and other facilities, which will be updated to reflect the SCE Component of the MCM Project.

To support safe operation and maintenance of the SCE Component of the MCM Project, SCE will comply with all applicable regulations and generally accepted industry practices related to operating policies and procedures concerning safety, security, and fire protection for substations and electrical subtransmission lines.

¹⁵ The City Municipal Code Section 8.04.030 adopts the standards and requirements of the Manual on Uniform Traffic Control Devices (MUTCD) 2003, Parts 5 and 6, prepared by the Federal Highway Administration and MUTCD 2003 California Supplement, Parts 5 and 6, prepared by the California Department of Transportation.

The MCM Project is designed to incorporate best available technology and safeguards for the protection of the public, the environment, personnel working in and around the MCM Project and existing facilities, and equipment. During the construction phase, SCE will perform design and safety reviews, including hazard and operability to identify, evaluate, and control hazards and risks. SCE is in regular communication with first responders, including Riverside County Fire Department, the primary emergency response agency for an emergency natural-gas or electrical-related incident.

With compliance with regulatory requirements, adherence to all manufacturer's specifications for use and disposal of hazardous materials, and implementation of applicable SCE HMBP updates and BMPs, the operation of the SCE Component of the MCM Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment during operational activities. Impacts would be less than significant.

Nearby Schools, Airports, and Hazardous Sites

Operation of the SCE Component of the MCM Project would not significantly impact nearby land uses. As discussed earlier, Calvary Chapel Christian School, adjacent to the existing SCE Moreno Substation, is located approximately 150 feet (46 meters) from proposed construction activities for the Ginger 12-kV super circuit and permanent circuit upgrades. SCE Component activities, within and adjacent to the existing SCE Moreno Substation, involve installation of new cable within an existing duct. The SCE Component would not substantially affect ongoing operations and maintenance activities undertaken by SCE for the Moreno Substation, and no change to the nature, volume, or methods for storage, transport, or disposal of hazardous materials at the substation would occur. If required as part of ongoing operations and maintenance activities at the substation, SCE will transport, handle, use, store, and dispose of any hazardous materials in accordance with the manufacturer's specifications and all applicable federal, state, and local laws and regulations, including but not limited to the hazardous state materials safety and transportation regulations. Furthermore, as discussed earlier, there are no active hazardous waste sites within a 0.5-mile radius of the proposed SCE Component (CalEPA 2024; DTSC 2024; SWRCB 2024), nor are there any airports within two miles of the SCE Component. As such, operation of the SCE Component would not result in hazardous impacts due to its proximity to schools, hazardous waste sites, or airports. Impacts would be less than significant.

Fire Hazards

The SCE Component of the MCM Project would not result in significant operational impacts related to fire protection or compliance with regulations related to exposure to hazardous chemicals. The number of permanent employees at the MCS is not expected to change with implementation of the MCM Project, including the SCE Component, and there would be no permanent changes to public roadways or public vehicular or pedestrian circulation that could alter emergency access or emergency evacuations.

The presence of electrical infrastructure has been associated with the generation of wildfires in undeveloped areas or areas of high fire hazard. Refer to the wildfire analysis provided in Section 8.2 of this Addendum. Recently, SCE developed its 2026-2028 Wildfire Mitigation Plan (WMP), which addresses grid design and system hardening, vegetation management, situational awareness and forecasting, emergency preparedness, collaboration, and community outreach, public safety power shutoff, and risk methodology and assessment. The primary goal of the WMP is to reduce the risk of

wildfires associated with utility equipment and to reduce the scope, scale, frequency, and impacts of Public Safety Power Shutoff (PSPS) events. The objectives of the WMP include the following (SCE 2025):

- Continue programmatic deployment of covered conductor and targeted undergrounding of distribution lines in SCE's High-Fire Risk Areas (HFRA) to reduce the likelihood that objects will contact powerlines and lead to an ignition, and to reduce the potential frequency and duration of PSPS events.
- Continue and expand transmission hardening programs such as proactive splice shunting, enhanced design standards, and evaluation of additional approaches to address ignition drivers on the transmission system.
- Continue execution of protection programs (e.g., Remote Earth Fault Current Limiters, Distribution Open Phase Detection (DOPD), and fast curve settings) to detect fault current and minimize ignition likelihood.
- Execute risk-informed inspections of utility assets for the distribution and transmission system that identify, prioritize, and resolve issues that pose potential ignition sources.
- Execute utility vegetation management programs to maintain clearances around utility lines, reducing the potential for ignitions due to vegetation contact with energized lines.
- Maintain and enhance SCE's extensive network of weather stations, HD cameras, and associated meteorological functions to provide situational awareness to SCE and to external parties such as fire suppression agencies.
- Provide effective and accurate communications to the public before, during, and after major outages, PSPS events, and emergencies with information and resources needed to mitigate potential safety and economic impacts.
- Maintain a comprehensive, all-hazards planning and preparedness program to provide effective emergency response, safely and expeditiously restore service during and after a major event, and communicate effectively with customers, stakeholders, and agency partners.

Implementation of the WMP is conducted in accordance with applicable regulations and SCE standards, including but not limited to CPUC GO 95 – Rules for Overhead Electrical Line Construction; CPUC GO 165 – Requirements for Electric Distribution and Transmission Facilities; SCE Distribution Overhead Construction Standards; SCE Distribution Underground Construction Standards; CPUC GO 128 – Rules for Construction of Underground Electric Supply and Communication Systems; SCE Distribution Apparatus Construction Standards; SCE Electrical Construction Station; SCE Electric Design Station Wiring; SCE Distribution Design Standards; and SCE Distribution Inspection Maintenance Program (SCE 2025). The SCE Component would be operated and maintained in accordance with the standards and protocols set forth in the 2026-2028 WMP, as well as applicable regulatory requirements, which would reduce potential impacts associated with fire hazards to less than significant levels.

With compliance with regulatory requirements, including SCEs 2026-2028 WMP, and implementation of the SCE HMBP and applicable BMPs, operation of the SCE Component would not create a significant hazard related to increased fire hazards in areas with flammable materials, and impacts would be less than significant.

7.2.4.3 Cumulative Hazards and Hazardous Materials Impacts

Previous CEQA Documents

Section 5.9 of the March 2017 Final Program EIR for the 2016 AQMP concluded that implementation of the 2016 AQMP would result in significant impacts, including fire hazard impacts associated with reformulated coatings, solvents, and consumer products; impacts from potential tank rupture of LNG and ammonia (in the non-refinery sector) and transport of LNG and ammonia; and hazard impacts associated with the handling of hazardous or acutely hazardous materials within 0.25 mile of an existing or proposed school site. The 2016 AQMP control measures would result in significant adverse hazards and hazardous waste impacts and when combined with past, present, and reasonably foreseeable activities would result in a significant cumulative impact.

The November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 found that hazards impacts from project-specific releases of ammonia would be significant even after mitigation measures are applied. The November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 concluded that the cumulative adverse hazards impacts could contribute to existing nearby hazard risks from other projects. Therefore, cumulative hazards risks from implementing Rule 1134, Rule 1110.2, and Rule 1100 would be significant.

SCE Component

As detailed earlier, the SCE Component would not change the potential impact findings related to hazards and hazardous materials as evaluated in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. The SCE Component would have less than significant project-level impacts related to hazards and hazardous materials with implementation of Mitigation Measures HZ-16 through HZ-18 from the March 2017 Final Program EIR for the 2016 AQMP. Potential impacts related to compliance with applicable regulations and building codes, NFPA standards, and accident conditions involving the release of hazardous materials into the environment are generally site-specific and are not typically cumulative in nature. The MCM Project, including the SCE Component, and other cumulative projects would be subject to existing regulations to minimize adverse effects related to the routine transport of hazardous materials, including the Resource Conservation and Recovery Act; the Comprehensive Environmental Response, Compensation, and Liability Act; the Hazardous Materials Transportation Act; Health and Safety Code Section 25163; and 22 CCR, Chapter 13. Compliance with applicable regulations and relevant mitigation measures from the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP, would ensure that the SCE Component would not result in a considerable contribution to cumulative impacts.

In summary, the proposed SCE Component of the MCM Project would not result in any new significant cumulative impacts, consistent with the analysis in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP that analyzed the scope of the SDG&E Component. Additionally, the SCE Component would not substantially increase the severity of the significant cumulative impacts identified in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP.

7.2.4.4 Mitigation Measures

As described in Section 7.2.4.1, the March 2017 Final Program EIR for the 2016 AQMP found that impacts related to hazards and hazardous materials were significant and unavoidable even with implementation of Mitigation Measures HZ-1 through HZ-18 (South Coast AQMD 2017b; refer to Appendix B-2 for applicable mitigation measures from the MMRP for the March 2017 Final Program EIR for the 2016 AQMP). Mitigation Measures HZ-1 and HZ-2 are not applicable because the MCM Project would not result in any significant impacts related to fire hazards with regulatory compliance and implementation of applicable SDG&E and SCE plans and policies. Mitigation Measures HZ-3 through HZ-6 are not applicable because the SCE Component of the MCM Project does not require LNG within any area of the MCM Project. Mitigation Measures HZ-7 through HZ-15 are not applicable because the MCM Project, including the Facility and the SCE Component, are not located on a list compiled pursuant to California Government Code Section 65962.5. Mitigation Measures HZ-1 through HZ-6 from November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 are not applicable because the SCE Component of the MCM Project does not propose installation or permitting of a new aqueous ammonia storage tank.

Mitigation Measures HZ-16 through HZ-18 related to hazards and hazardous materials from the MMRP from the March 2017 Final Program EIR for the 2016 AQMP have been identified as being applicable to the MCM Project. SCE will implement the Mitigation Measures HZ-16 through HZ-18 as applicable to the SCE Component of the MCM Project. Mitigation Measures HZ-16 through HZ-18 related to hazards and hazardous materials identified as applicable to the MCM Project are as follows:

- HZ-16: The temporary storage and handling of potentially hazardous materials/wastes should be in areas away from sensitive receptors such as schools or residential areas. These areas should be secured with chain-link fencing or similar barrier with controlled access to restrict casual contact from non-project personnel. All project personnel that may come into contact with potentially hazardous materials/wastes will have the appropriate health and safety training commensurate with the anticipated level of exposure.
- HZ-17: Where the construction or operation of projects involves the transport of hazardous materials, avoid transport of such materials within one-quarter mile of schools, when school is in session, wherever feasible.
- HZ-18: Where it is not feasible to avoid transport of hazardous materials, within one-quarter mile of schools on local streets, provide notification of the anticipated schedule of transport of such materials.

7.2.4.5 Hazards and Hazardous Materials Conclusion

As demonstrated by the preceding analysis, the SCE Component would not result in any new significant impacts or substantial increases in the severity of previously identified significant impacts related to hazards and hazardous materials, result in significant adverse cumulative hazards and hazardous materials impacts, or require new or modified mitigation measures or alternatives to be studied that were not already previously analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. The SCE Component would, therefore, not alter the conclusions in the November 2019 Final SEA for PAR 1110.2

and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP.

7.2.5 Hydrology and Water Quality

The March 2017 Final Program EIR for the 2016 AQMP determined that the implementation of Control Measures CMB-01 and CMB-05, as set forth in the 2016 AQMP, could result in significant adverse hydrology and water quality impacts. The November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 determined that hydrology and water quality impacts would be less than significant.

The impacts on hydrology and water quality would be considered significant if any of the following criteria apply:

- **Water Demand:**
 - The existing water supply does not have the capacity to meet the increased demands of the project, or the project would use more than 262,820 gallons per day of potable water.
 - The project increases demand for total water by more than five million gallons per day.
- **Water Quality:**
 - The project will cause degradation or depletion of ground water resources substantially affecting current or future uses.
 - The project will cause the degradation of surface water substantially affecting current or future uses.
 - The project will result in a violation of National Pollutant Discharge Elimination System (NPDES) permit requirements.
 - The capacities of existing or proposed wastewater treatment facilities and the sanitary sewer system are not sufficient to meet the needs of the project.
 - The project results in substantial increases in the area of impervious surfaces, such that interference with groundwater recharge efforts occurs.
 - The project results in alterations to the course or flow of floodwaters.

7.2.5.1 Previous CEQA Documents

The March 2017 Final Program EIR for the 2016 AQMP determined that implementation of the 2016 AQMP would result in less than significant impacts related to an increase in wastewater and wastewater treatment facility capabilities; water quality standards from accidental spills and discharge; increased use of alternative fuels, electric cars, ammonia, and sodium bisulfate; and water conveyance systems.

The March 2017 Final Program EIR for the 2016 AQMP determined that implementation of the 2016 AQMP would result in significant and unavoidable impacts related to groundwater depletion even with implementation of Mitigation Measures WQ-1 through WQ-4 (refer to Appendix B-1 of this document) and increase in water demand with implementation of Mitigation Measures WQ-1 through WQ-4 (South Coast AQMD 2017b).

Several hydrology and water quality impacts were not discussed in detail in the March 2017 Final Program EIR for the 2016 AQMP because they were found to have no impact in the 2016 AQMP Initial Study. This includes potential impacts related to substantial erosion or siltation due to changes to the existing drainage pattern; stormwater runoff exceeding the capacity of existing or planned stormwater drainage systems or generating an increase in polluted runoff; impeding or redirecting flood flows; releasing pollutants in flood hazard, tsunami, or seiche zones; conflicts with a water quality control plan or sustainable groundwater management plan; and exceeding water supplies during normal, single-, and multiple-dry years. The March 2017 Final Program EIR for the 2016 AQMP concluded that the availability of water supplies varies throughout the region. Therefore, mitigation measures would minimize water demand impacts on an individual facility basis (South Coast AQMD 2017b).

The November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 concluded that impacts related to hydrology and water quality would not occur or would be less than significant. Table 4-15 of the April 2019 Final SEA for PAR 1134 and Table 4-22 of the November 2019 Final SEA for PAR 1110.2 and PAR 1100 explained that the increase in water demand identified in the March 2017 Final Program EIR for the 2016 AQMP would not be applicable because stationary engines or stationary gas turbines and the corresponding NO_x emission controls (e.g., SCR technology) do not use water for their operation; therefore, impacts related to hydrology and water quality would not occur or would be less than significant (South Coast AQMD 2019a, 2019b).

The scope of the SDG&E Component is within the scenario analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134; however, the SCE Component is not. As a result, a determination of whether the SCE Component would involve new or more significant impacts related to hydrology and water quality than those analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP is required and addressed herein.

7.2.5.2 SCE Component

Construction

Water Quality

The MCM Project, including the SCE Component, is located in the San Jacinto River watershed, with runoff and surface waters in the watershed generally flowing toward the San Jacinto River from higher elevations in the north and west to lower elevations in the south and east. Reaches of the San Jacinto River in the vicinity of the SCE Component and immediately downstream are either not assessed or not listed as impaired for any pollutants in the 2024 California Integrated Report (State Water Resources Control Board 2025).

Construction activities, including ground disturbance, earth movement, and equipment use and staging, have the potential to degrade water quality due to temporary changes in drainage patterns, erosion and sedimentation, and minor leaks and spills. Construction site runoff can contain soil particles and sediments from construction activities. Dust from construction sites, in addition to spills or leaks from heavy equipment and machinery, laydown areas, and/or building sites, can also enter runoff and downstream water bodies. Typical pollutants include petroleum products and heavy metals from equipment as well as products such as paints, solvents, and cleaning agents, which could contain hazardous constituents.

Sediment from erosion of graded or excavated surface materials, leaks or spills from equipment, or inadvertent releases of construction materials could result in water quality degradation if runoff containing the sediment entered receiving waters in sufficient quantities to exceed water quality objectives of water bodies in the region. However, as discussed in further detail in this section, sediment and incidental pollutant contributions from construction activities would be expected to be minor and not measurable in the context of the watershed.

The SCE Component would result in disturbance greater than one acre and, therefore, would be required to obtain coverage under the General NPDES Permit for Discharges of Storm Water Associated with Construction Activity (Order No. 2022-0057-DWQ, NPDES No. CAS000002), also known as the Construction General Permit (CGP). As part of this coverage, Stormwater Pollution Prevention Plans (SWPPPs) compliant with CGP requirements would be developed and implemented during construction activities. The SWPPPs would evaluate the level of risk to receiving waters (i.e., the San Jacinto River) and identify potential non-stormwater discharges, appropriate construction BMPs, BMP maintenance schedules, final stabilization measures, required inspections, testing, reporting, and post-construction BMPs.

With implementation of onsite construction erosion and sediment control, regulatory requirements, and other applicable BMPs, construction of the SCE Component of the MCM Project would not cause degradation of groundwater or surface water resources substantially affecting current or future uses, and impacts would be less than significant.

Water Supply

Construction of the SCE Component, including the temporary construction power, Ginger 12-kV super circuit, and permanent circuit upgrades, would require water according to the types of activities that will be implemented. As described in Section 5.3.3.2, Water Use, construction-related water demand for the SCE Component is estimated to be up to approximately 10,000 gallons per day for dust control, soil compaction, and equipment and roadway washdown. Reclaimed water would be used during those construction activities, to the extent available and practicable. Water usage during construction is expected to be substantially less than the water demand significance criteria of 262,820 gallons per day of potable water. Eastern Municipal Water District (EMWD) is the water purveyor for the City. Based on the 2020 Urban Water Management Plan, EMWD and their imported water supplier, Metropolitan Water District of Southern California, have adequate existing and planned supplies to meet the EMWD service area demands during normal, single-, and multiple-dry year periods through the year 2045. Should planned supplies prove not to be viable, EMWD has alternative paths to reliability for water supply. Based on the 2020 Urban Water Management Plan, EMWD water is accessed from diverse sources, including local groundwater, desalinated groundwater, imported water, and recycled water (EMWD 2021).

The local groundwater basin, the San Jacinto Groundwater Basin, is managed by the West San Jacinto Groundwater Sustainability Agency (Groundwater Sustainability Agency), pursuant to the requirements of the Sustainable Groundwater Management Act (EMWD 2024). The Groundwater Sustainability Agency adopted a Groundwater Sustainability Plan (GSP) in 2023 that outlines sustainability criteria and management actions needed to ensure the San Jacinto Groundwater Basin is not depleted. The GSP defines chronic lowering of groundwater levels as a sustainability criteria indicator and establishes minimum criteria that would require the implementation of management actions to avoid chronic adverse effects.

As a result, adherence to the GSP criteria and management actions support sustainable management of the groundwater basin.

As demonstrated in the preceding analysis, the local water purveyor would have adequate supply to serve construction water demand for the SCE Component of the MCM Project. Furthermore, construction of the SCE Component would not result in demand for potable water of greater than 262,820 gallons per day or increase total water demand by more than 5 million gallons per day. Therefore, construction-related water supply impacts would be less than significant.

Flooding, Erosion, and Hydrology

The SCE Component, including temporary construction power, Ginger 12-kV super circuit, and permanent circuit upgrades, would involve trenching and excavations to install electrical infrastructure. Such activities may result in temporary localized changes to existing drainage patterns as sites would be prepared to create level work areas for equipment use and infrastructure installation.

Construction activities associated with the SCE Component would be subject to applicable SWPPP requirements. SWPPP measures would include minimizing the extent and duration of exposed soils, installing erosion and sediment control BMPs (e.g., straw wattles, silt fencing) and maintaining drainage continuity through the use of trench plating, temporary culverts, or flow bypass systems where needed to minimize potential ponding, flooding, and overflow. SWPPP requirements also include regular BMP inspections to confirm construction is not resulting in substantial erosion, siltation, or flooding. Finally, temporary construction work areas would be restored to pre-existing contours and sites would be stabilized to avoid permanent water quality impacts, pursuant to SWPPP requirements.

The final MCM Project stormwater design would be completed in compliance with regulatory requirements, including the Riverside County Hydraulic Design Manual (RCFCD 2024) and CGP requirements regarding stormwater. With compliance with regulatory requirements, construction of the SCE Component would not result in erosion or flooding, and hydrology impacts would be less than significant.

Wastewater Treatment Facilities

As summarized earlier, construction of the SCE Component would require limited water needs, and reclaimed water would be used to the extent available and practicable. Water usage during construction is expected to be substantially less than water demand significance criteria of 262,820 gallons per day of potable water. Portable restroom facilities would be used during construction, requiring a negligible amount of water. Based on the anticipated water demand during short-term construction activities, neither new water supply lines/water laterals nor new sewer lines would be required for the SCE Component. With adherence to regulatory requirements, the SCE Component would not exceed the existing capacity or result in the construction of new water or wastewater treatment facilities or sewer system facilities.

Operations

Water Quality

The onsite stormwater system for the MCM Project is designed in accordance with applicable requirements of the NPDES Permit and Waste Discharge Requirement for the Riverside County Flood Control and Water Conservation District, County of Riverside, and the Incorporated Cities of Riverside County within the Santa Ana Region Area-Wide Urban Runoff Management Program (Order No. R-8-2010-0033) (Riverside County MS4 Permit), including the Riverside County Low Impact Development BMP Handbook. Conditions of the permit are intended to be protective of water quality in the region. The stormwater system design would be further outlined in a Water Quality Management Plan (WQMP) and provided to the City and/or County. The WQMP would also include non-structural BMPs, including housekeeping, signage, and other practices to reduce stormwater pollution during operation of the Project, including the SCE Component, as applicable.

Operation of the SCE Component does not include planned or routine discharges of water pollutants. Stormwater runoff associated with impervious surfaces would be captured and treated in accordance with the stormwater system designed for the MCS. Installation of the Ginger 12-kV super circuit and permanent circuit upgrades would not add appreciable impervious surface, as it predominantly includes replacement of existing structures, construction of underground ducts, and installation of poles. Operation and maintenance activities associated with upgraded electrical infrastructure and access road maintenance would be similar in nature to activities SCE currently conducts on existing electrical and telecommunications infrastructure in the vicinity. As such, operation of the SCE Component would not result in substantial water quality impacts.

With adherence to regulatory requirements and MCM Project-specific plans, operation of the SCE Component would not cause degradation of groundwater or surface water resources substantially affecting current or future uses or result in a violation of NPDES permit requirements. Impacts would be less than significant.

Water Supply

The SCE Component of the MCM Project would not generate a new source of water demand and, thus, would not trigger the need for a water supply assessment nor result in a need to upgrade existing water supply infrastructure. Furthermore, the SCE Component would not deplete or interfere with groundwater supplies or recharge. In summary, the SCE Component of the MCM Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan, and operational impacts related to water supply would be less than significant.

Flooding, Erosion, and Hydrology

As described earlier, the SCE Component, including replacement of existing structures, construction of underground ducts, and installation of poles for the Ginger 12-kV super circuit and permanent circuit upgrades, would not substantially alter drainage patterns. The SCE Component also would not result in substantial erosion, flooding, or siltation, and this impact would be less than significant.

The SCE Component is not within a 100-year floodplain, a known area of localized intermittent flooding, a dam inundation area, or a mapped Federal Emergency Management Area (FEMA) flood hazard risk area (FEMA 2024; City of Moreno Valley 2026a). As such, there would be no impact related to the redirection of flood flows. The SCE Component is not located adjacent to a reservoir or other enclosed body of water that would potentially be susceptible to seiches. In addition, the SCE Component work areas are not located

near the Pacific Ocean and, therefore, would not be subject to tsunami inundation. There would be no impact related to flood hazards, tsunami, or seiche zones.

Wastewater Treatment Facilities and Sewer System

The MCS uses a septic system, and any increase of wastewater from the SCE Component of the MCM Project is expected to be negligible. Therefore, the capacities of the existing wastewater treatment facilities are sufficient to meet the needs of the SCE Component. The SCE Component would not result in relocation or construction of new or expanded wastewater facilities, the construction of which would result in significant environmental impacts, and impacts would be less than significant.

7.2.5.3 Cumulative Hydrology and Water Quality Impacts

Previous CEQA Documents

Section 5.10 of the March 2017 Final Program EIR for the 2016 AQMP concluded that the overall water demand from implementing the 2016 AQMP would have significant and unavoidable hydrology (water demand) impacts. As such, the 2016 AQMP control measures would result in significant adverse water demand impacts and when combined with past, present, and reasonably foreseeable activities and would contribute to cumulatively considerable impacts to hydrology and water quality.

The November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 concluded that potential hydrology and water quality impacts would be less than significant. As noted previously, when project impacts are less than significant, the hydrology and water quality impacts are not considered to be cumulatively considerable pursuant to CEQA Guidelines Section 15064(h)(1) and, therefore, no significant adverse cumulative hydrology and water quality impacts would be expected from the projects analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134.

SCE Component

As detailed earlier, the SCE Component would not change the potential impact findings related to hydrology and water quality as evaluated in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. The SCE Component would result in less than significant impacts at the project level related to hydrology and water quality with implementation of applicable regulatory requirements. The MCM Project, including the SCE Component, and other regional projects within the watershed area would be required to comply with existing City and/or County standards to minimize stormwater runoff and prevent substantial erosion or siltation. These standards include compliance with the CGP and applicable MS4 NPDES permit as well as required implementation of BMPs and low impact development (LID) design principles to mimic predevelopment hydrology. Projects in the City that involve grading activities during the rainy season but are not large enough to necessitate preparation of a SWPPP also would be required to prepare an erosion control plan in accordance with Section 8.21.160 – Erosion Control, of the City's Municipal Code to address potential effects of erosion, flooding, or the deposition of mud, debris, or construction-related pollutants. Therefore, in combination with other reasonably foreseeable future projects, the SCE Component would not result in cumulatively considerable impacts to hydrology and water quality.

The SCE Component would not require a land use or zone change and, thus, would be consistent with population and employment assumptions included in local and regional planning documents, including the regional water plans. As detailed in the 2020 Urban Water Management Plan, EMWD has adequate existing and planned supplies to meet the demands of the service area during normal, single-, and multiple-dry year periods throughout the 30-year planning period. Further, EMWD has alternative paths to reliability should planned supplies prove not to be viable. Therefore, the SCE Component would not result in cumulatively considerable impacts to water supply.

The MCM Project, including the SCE Component, would not result in any new significant cumulative impacts, nor would it substantially increase the severity of the significant cumulative impacts identified in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP.

7.2.5.4 Mitigation Measures

As indicated in Section 7.2.5.1, the March 2017 Final Program EIR for the 2016 AQMP determined that implementation of the 2016 AQMP would result in significant and unavoidable impacts related to groundwater depletion and increase in water demand, which is primarily associated with implementing Control Measure CMB-05 and the use of air pollution control equipment that utilize water, even after the implementation of Mitigation Measures WQ-1 through WQ-4. However, Mitigation Measures WQ-1 through WQ-4 are not applicable to the SCE Component of the MCM Project because: 1) minimal water will be used during the temporary construction period (up to 10,000 gallons per day of reclaimed water compared to the significance threshold of 262,820 gallons per day of potable water or five million gallons per day of total water), and 2) after construction, the SCE Component will not require any type of water for operation .

7.2.5.5 Hydrology and Water Quality Conclusion

As demonstrated by the preceding analysis, the SCE Component would not result in any new significant impacts or substantial increases in the severity of previously identified significant impacts related to hydrology or water quality, result in significant adverse cumulative hydrology or water quality impacts, or require new or modified mitigation measures or alternatives to be studied that were not already previously analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. The SCE Component would, therefore, not alter the conclusions in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP.

7.2.6 Noise

The March 2017 Final Program EIR for the 2016 AQMP determined that implementation of the control measures in the 2016 AQMP would result in significant adverse noise impacts. The November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 determined that noise impacts associated with certain activities, including replacement of engines and gas turbines, and installation of SCR, that would occur under the SDG&E Component of the MCM Project, would be less than significant.

The locations of the nearest sensitive noise receptors to the SDG&E Component and SCE Component are described in Section 6.1, Environmental Setting, of this Addendum. Sensitive noise receptors in the vicinity of the SDG&E Component and SCE Component fall within the City's jurisdiction.

A project would have a significant adverse noise or vibration impact if any of the following criteria apply:

- Construction noise levels exceed the local noise ordinances or, if the noise threshold is currently exceeded, project noise sources increase ambient noise levels by more than three decibels (dBA) at the site boundary. Construction noise levels will be considered significant if they exceed federal Occupational Safety and Health Administration (OSHA) noise standards for workers.
- The proposed project operational noise levels exceed any of the local noise ordinances at the site boundary or, if the noise threshold is currently exceeded, project noise sources increase ambient noise levels by more than three dBA at the site boundary.

7.2.6.1 Previous CEQA Documents

The March 2017 Final Program EIR for the 2016 AQMP determined that the implementation of the control measures in the 2016 AQMP would result in potentially significant noise and vibration impacts during construction and less than significant noise and vibration impacts during operation. The short-term construction impacts would remain significant and unavoidable with the implementation of Mitigation Measures NS-1 through NS-17 (South Coast AQMD 2017b; refer to Appendix B-1, Mitigation, Monitoring and Reporting Plan for the 2016 Air Quality Management Plan, for all mitigation measures in the MMRP for the Final Program EIR for the 2016 AQMP).

The November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 concluded that potential noise increases associated with certain activities, including replacement of engines and CGTs and installation of SCR that would occur under the SDG&E Component, would be within the allowable levels established by local noise ordinances for industrial areas, resulting in less than significant impacts (South Coast AQMD 2019a, 2019b).

The SDG&E Component of the MCM Project is within the scope of what was analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134; however, the SCE Component is not. As a result, a determination of whether or not the SCE Component would involve new or more significant noise impacts than those analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP is addressed herein.

7.2.6.2 SCE Component

Construction

The City Municipal Code has established restrictions on the time of day that construction activities can occur. Moreno Valley Municipal Code Section 11.80.030.D.7, Construction and Demolition, states:

No person shall operate or cause operation of any tools or equipment used in construction, drilling, repair, alteration or demolition work between the hours of 8:00 p.m. and 7:00

a.m. the following day such that the sound therefrom creates a noise disturbance, except for emergency work by public service utilities or for other work approved by the city manager or designee.

A noise disturbance is defined by the Moreno Valley Municipal Code as any sound that (a) disturbs a reasonable person of normal sensitivities, (b) exceeds the sound level limits set forth in Municipal Code Table 11.80.030-2, or (c) is plainly audible as defined in Municipal Code Section 11.80.030. Where no specific distance is set forth for the determination of audibility, references to noise disturbance are deemed to mean plainly audible at a distance of 200 feet from the real property line of the source of the sound on private property or from the source of the sound on roads or other publicly owned property.

Construction activities for the SCE Component would generally occur during the hours allowed by the City, which are specified in Section 11.80.030.D.7 – Construction and Demolition, of the City’s Municipal Code as 7:00 a.m. to 8:00 p.m. Certain construction activities for the SCE Component may require work outside of these hours. Nonetheless, as noted in Section 6.1, Environmental Setting, the nearest sensitive receptors to the Facility are along Gilman Springs Road, over a mile from the MCS. Given the distance to these receptors and intervening noise sources (e.g., public roadways), noise from activities associated with the installation of the temporary construction power included as part of the SCE Component would likely be imperceptible at sensitive receptors. As such, it would not create a noise disturbance as defined by the Moreno Valley Municipal Code.

Some portions of construction of the Ginger 12-kV super circuit and permanent circuit upgrades would occur adjacent to sensitive receptors. Because the City does not have a quantified limit on allowable construction noise at receptors closer than 200 feet from the source of sound, this analysis relies on guidance from the Federal Transit Administration (FTA), which recommends a criterion of 80 A-weighted decibels (dBA) 8-hour equivalent noise level (Leq(8-hr)) for construction noise at the exterior of an existing residence and 85 dBA Leq(8-hr) outside of a commercial land use (FTA 2018).

A noise prediction model, emulating and using reference data from the Federal Highway Administration Roadway Construction Noise Model (FHWA 2008) was used to estimate construction noise levels at the nearest occupied noise-sensitive land uses (residences) for the Ginger 12-kV super circuit and permanent circuit upgrades.¹⁶ This represents the most conservative analysis of construction noise for the MCM Project. Input variables for the predictive modeling consist of the equipment type and number of each (e.g., two graders, a loader, a tractor), the duty cycle for each piece of equipment, and the distance from the noise-sensitive receptor. The Roadway Construction Noise Model has default duty-cycle values for the various pieces of equipment, which were derived from an extensive study of typical construction activity patterns. Those default duty-cycle values were used for this noise analysis and are detailed in Appendix G, Construction Noise Modeling Input and Output, to this Addendum. Conservatively, no topographic or structural shielding was assumed in the construction noise modeling. At the site boundary distance for the both the Ginger 12-kV and permanent circuit upgrades construction phases, the analysis assumes that up to one piece of equipment for each listed type would be involved in the construction activity for a limited portion of the 8-hour period. In other words, along the boundary of the site, the operating equipment cannot “stack” or crowd the vicinity and still be able to operate. The results of the

¹⁶ Although the Roadway Construction Noise Model was funded and promulgated by the Federal Highway Administration, it is often used for non-roadway projects because the same types of construction equipment used for roadway projects are often used for other types of construction.

construction noise modeling for the proposed SCE Component, prior to implementation of mitigation measures, are displayed in Table 7-12.

Table 7-12
Construction Noise Levels at Nearest Sensitive Receptors

Construction Phase	Equipment Types Involved	Distance from Nearest Noise-Sensitive Receptor to Construction Site Boundary (Feet)	L_{eq}(8-hr) at Nearest Noise-Sensitive Receptor to Construction Site Boundary (dBA)
SCE Ginger 12-kV super circuit and permanent circuit upgrades	Crane, crawler tractor, excavator, generator set, other construction equipment, roller, skid steer loader, backhoe	60	79.4

Key: L_{eq}(8-hr) = equivalent noise level over an 8-hour period; dBA = A-weighted decibels; SCE = Southern California Edison; kV = kilovolt.

As presented in Table 7-12, the estimated construction noise level is predicted to be 79.4 dBA L_{eq}(8-hr) at the nearest existing residences (as close as 60 feet away on World Logistics Center Parkway and Ironwood Avenue) during Ginger 12-kV super circuit and permanent circuit upgrades construction activities. These are estimated noise levels at a source-to-receiver distance of 60, with the assumption that the heavy equipment is operating along the temporary impact boundary for a cumulative period of two to four hours per day, with equipment performing work at more distant locations or not operating during the remaining working hours. As such, construction of the SCE Component would not result in an exceedance of the FTA construction noise criteria of 80 dBA L_{eq}(8-hr).

The construction phase evaluated in Table 7-12 represents the worst-case condition due to the close proximity to noise-sensitive receptors (as close as 60 feet to the nearest sensitive receptors). All other construction activities associated with the SCE Component of the Project would be located at least 4,000 feet from the nearest sensitive receptor. At these distances, construction noise levels would be substantially attenuated due to geometric spreading, which causes sound levels to decrease by approximately 6 decibels (dB) per doubling of distance in open environments. For example, moving from 60 feet (the distance for the loudest modeled activity) to 3,300 feet represents more than five doublings of distance, resulting in a reduction of more than 30 dB from the worst-case levels presented in Table 7-12. In addition, atmospheric absorption, ground effects, and potential topographic or structural barriers (e.g., buildings, trees) would further contribute to noise attenuation. With this substantial distance attenuation, it is anticipated that construction noise from the SCE Component would be substantially less than FTA's daytime construction noise threshold of 80 dBA L_{eq}(8-hr) at nearby sensitive receptors. Potential construction noise impacts would be less than significant.

For onsite workers, predicted construction noise exposure levels would depend on the proximity of the listener to the feature(s) under construction. Existing workers are exposed to an elevated sound environment due to current MCS operations, and relevant OSHA regulations are currently implemented for these operations as part of onsite health and safety procedures pertaining to potential noise hazards and allowable exposure criteria. Predicted construction noise exposure levels would not exceed the existing operational noise levels or the effectiveness of OSHA regulatory protective measures for workers.

Construction of the SCE Component would generate ground-borne vibration, but vibration levels are expected to be well within acceptable thresholds due to the types of equipment used and the distances to sensitive receptors. According to the FTA (2018), a backhoe can produce a peak particle velocity of up to 0.089 inches per second (in/sec) at 25 feet. This level is less than the FTA's 0.2 in/sec threshold for potential cosmetic damage to residential structures and the threshold of human perception (commonly around 0.1 in/sec or 65 vibration decibels). Given the limited duration and routine nature of backhoe activity, vibration at this level would not be considered excessive. Although other construction activities may involve more vibration-intensive equipment, such as rollers or compactors, those activities would occur at distances of 60 feet or more from the nearest sensitive receptors. At such distances, vibration levels would attenuate substantially and would be substantially less than any thresholds of concern for human annoyance or structural impact. Based on the equipment types proposed, distances involved, and FTA criteria, the SCE Component would not result in excessive ground-borne vibration or ground-borne noise levels, and impacts would be less than significant.

Operation

Noise associated with operation of the subcomponents of the proposed SCE Component would not exceed off-site noise exposure criteria established by the City. Given the design of the SCE Component and the substantial distance to the nearest noise-sensitive receptor, operational noise impacts would be minimal and are qualitatively assessed.

The SCE Component would consist of upgrades to facilitate an increase in electrical power demand, the features of which do not produce perceptible operational noise. As detailed in Chapter 5.0, Background and Project Description, features include: temporary power poles, metering equipment, and a step-down transformer for the temporary construction power; and distribution poles, cables, a duct, conductors, and a replacement switch for the Ginger 12-kV super circuit and permanent circuit upgrades. As such, the SCE Component would not increase ambient sound levels beyond current conditions. Impacts would be less than significant.

The SCE Component is not located within two miles of a public or private airport or airstrip, nor is it included within any airport land use plan. Therefore, no operational impacts related to airport activities would occur.

7.2.6.3 Cumulative Noise Impacts

Previous CEQA Documents

Section 5.13 of the March 2017 Final Program EIR for the 2016 AQMP evaluated cumulative noise and vibration impacts associated with air pollution control technologies and exhaust standards and found that implementation of the 2016 AQMP control measures could result in significant construction noise and vibration impacts due to the geographic proximity of sensitive receptors. As such, the March 2017 Final Program EIR for the 2016 AQMP concluded that, when combined with past, present, and reasonably foreseeable activities, cumulatively considerable noise and vibration impacts could occur during construction. The March 2017 Final Program EIR for the 2016 AQMP determined that nearby noise-sensitive land uses could experience substantial increases in noise associated with regional operations of transportation facilities and increased vehicle activity. As such, the March 2017 Final Program EIR for

the 2016 AQMP concluded that, when combined with past, present, and reasonably foreseeable activities, noise impacts would be cumulatively considerable during operations.

The November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 concluded that potential noise impacts would be less than significant. As noted previously, when project impacts are less than significant, the noise impacts are not considered to be cumulatively considerable pursuant to CEQA Guidelines Section 15064(h)(1) and, therefore, no significant adverse cumulative noise impacts would be expected from the projects analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134.

SCE Component

As detailed earlier, the SCE Component would not change the potential impact findings related to noise as evaluated in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. The SCE Component would have less than significant impacts related to short-term construction noise and operational noise. For the SCE Component to have a cumulatively considerable noise impact at an offsite sensitive receptor, both its project-related activity and another source of noise would need to be sufficiently close together and exhibit adequate sound amplitude. The SCE Component's construction and operational noise would be less than significant and its contribution to cumulative noise levels from existing ambient sound sources (e.g., roadway traffic, HVAC system operation) would not be cumulatively considerable because there are no noise-generating activities that would be sufficiently close and/or generate noise loud enough to result in a cumulative impact. As such, the SCE Component would not result in any significant cumulative noise or vibration impacts.

7.2.6.4 Mitigation Measures

As indicated in Section 7.2.6.1, the March 2017 Final Program EIR for the 2016 AQMP determined that implementation of the 2016 AQMP would result in potentially significant noise and vibration impacts during construction and less than significant noise and vibration impacts during operation. The short-term construction impacts would remain significant and unavoidable with the implementation of Mitigation Measures NS-1 through NS-17. However, Mitigation Measures NS-1 through NS-17 are not applicable to the SCE Component of the MCM Project because, given the analysis contained herein, the SCE Component would not result in a potentially significant impact related to noise and vibration impacts during construction. When project impacts are less than significant, the noise and vibration impacts during construction are not considered to be cumulatively considerable pursuant to CEQA Guidelines Section 15064(h)(1) and, therefore, no significant adverse cumulative noise and vibration impacts during construction would be expected from the SCE Component.

7.2.6.5 Noise Conclusion

As demonstrated by the preceding analysis, the SCE Component would not result in any new significant impacts or substantial increases in the severity of previously identified significant impacts related to noise, result in significant adverse cumulative noise impacts, or require new or modified mitigation measures or alternatives to be studied that were not already previously analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. The SCE Component would, therefore, not alter the conclusions in the

November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP.

7.2.7 Solid/Hazardous Waste

The March 2017 Final Program EIR for the 2016 AQMP determined that the implementation of the control measures in the 2016 AQMP could result in significant adverse solid and hazardous waste impacts, but no mitigation measures were identified to reduce the potentially significant impacts due to early retirement of vehicles and equipment, and potential to exceed landfill capacities in the short term. However, the November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 determined implementation of those particular rules would result in less than significant solid and hazardous waste impacts.

A project would have a significant impact on solid and hazardous waste if the following criterion applies:

- The generation and disposal of hazardous and non-hazardous waste exceeds the capacity of designated landfills.

7.2.7.1 Previous CEQA Documents

The March 2017 Final Program EIR for the 2016 AQMP determined that impacts from solid and hazardous waste generated during construction and from vehicle and equipment scrapping would be significant and unavoidable, with no feasible mitigation measures. Although the March 2017 Final Program EIR for the 2016 AQMP did not discuss impacts related to federal, state, and local management and reduction statutes and regulations related to solid and hazardous waste in detail, the 2016 AQMP Initial Study concluded that implementation of the 2016 AQMP would not interfere with the facilities' ability to comply with federal, state, or local statutes and regulations related to solid and hazardous waste handling or disposal, and no impact would occur (South Coast AQMD 2017b).

The November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 concluded that either no significant impacts would occur or less than significant impacts would occur related to solid and hazardous waste. Table 4-15 of the April 2019 Final SEA for PAR 1134 and Table 4-22 of the November 2019 Final SEA for PAR 1110.2 and PAR 1100 determined that the significant solid waste impact identified in the March 2017 Final Program EIR for the 2016 AQMP would not be applicable because vehicle scrapping is not applicable to stationary engines or CGTs and the corresponding NOx emission controls (South Coast AQMD 2019a, 2019b).

The SDG&E Component of the MCM Project is within the scope of what was analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134; however, the SCE Component is not. As a result, a determination of whether or not the SCE Component would involve new or more significant impacts related to solid and hazardous waste than those analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP is addressed herein.

7.2.7.2 SCE Component

Construction

As indicated in Table 5-4 of Chapter 5, Background and Project Description, construction of the SCE Component of the MCM Project would result in the generation of solid waste comprised of miscellaneous electrical waste and wood (electrical poles). Removal of material for disposal for the SCE Component, estimated to be approximately 103 tons, would require approximately nine truck loads.

The solid waste generated by the SCE Component would not exceed state or local standards or the capacity of local infrastructure. The MCM Project, including the SCE Component, would be required to comply with the County of Riverside's Construction and Demolition (C&D) Waste Diversion Program, which mandates that 65 percent of C&D material are reused, composted, or recycled. In addition, pursuant to California's 2022 Green Building Standards Code (CALGreen) and the County's C&D Waste Diversion Program, 65 percent of C&D waste must be diverted from landfills. Accordingly, at least 65 percent of all C&D debris from the MCM Project would be diverted in compliance with these regulations. As discussed in Section 7.2.4, Hazards and Hazardous Materials, of this Addendum, hazardous waste generated during construction activities, such as used motor oil, empty paint cans, or empty solvent containers, would be managed and disposed of in compliance with all applicable federal, state, and local laws. The remaining 35 percent of C&D material that is not required to be recycled would be either disposed of or voluntarily recycled at a solid waste facility with available capacity. Further, Section 8.80.030 of the City's Municipal Code requires completion and submittal of a waste management plan to the City for approval prior to issuance of permits. The waste management plan would estimate the volume or weight of waste to be generated and the maximum volume or weight of such materials that can be feasibly reused or recycled and would indicate the vendor and/or facility that has been commissioned to collect, divert, reuse, or receive construction and demolition materials. The City and County are required to comply with the solid waste reduction and diversion requirements set forth in AB 75, Countywide Integrated Waste Management Plan; AB 939 and AB 341, California Integrated Waste Management Act; AB 1327, California Solid Waste Reuse and Recycling Access Act; AB 1374, Construction and Demolition Waste Reduction; and AB 1826, Mandatory Commercial Organics Recycling.

It is anticipated that construction waste from the SCE Component would be disposed of at the Badlands Sanitary Landfill, which is the nearest permitted waste landfill in Riverside County that has a full solid waste facility permit, located 2.95 miles north of the MCS (CalRecycle 2024a). Lamb Canyon Sanitary Landfill located approximately 7.15 miles east of the MCS may also accept construction and demolition waste associated with the SCE Component. Both landfills are regulated under federal, state, and local laws. The Badlands Sanitary Landfill has a maximum permitted disposal rate of 5,000 tons per day and a remaining capacity of 7,800,000 CY (10,202,400 tons), and it is expected to remain open until 2059 (CalRecycle 2024b). Lamb Canyon Sanitary Landfill has a maximum permitted disposal rate of 5,000 tons per day and a remaining capacity of 14,540,000 CY and is expected to remain open until 2032 (CalRecycle 2025). There are other facilities in the vicinity that process, recycle, and transfer inert waste and other construction and demolition waste materials, including several in Riverside County, such as Agua Mansa Material Recovery Facility (MRF; approximately 17 miles northwest), Engelauf Construction Specialists (approximately 17 miles northwest), Ewles Materials (approximately 22 miles northwest), and Justice Urban Waste Recycling (approximately 16 miles northwest; Riverside County Department of Waste Resources 2022). C&D debris from the SCE Component may be taken to these or similar facilities to attain the required 65 percent diversion (reuse, composting, or recycling) pursuant to CALGreen and the County's C&D Waste Diversion Program. Construction debris, even assuming the worst-case scenario shown in Table 5-4 where 100% of the 103 tons of waste were to be disposed, would be sufficiently accommodated by the existing Badlands and Lamb Canyon Sanitary Landfills. As a result, SCE Component construction activities and debris would not generate solid waste in excess of state or

local standards or in excess of the capacity of local infrastructure, nor would they otherwise impair the attainment of solid waste reduction goals (e.g., County and CALGreen standards). Impacts would be less than significant.

As discussed, the landfills in the region have existing capacity to accept hazardous and non-hazardous waste generated by the SCE Component. The SCE Component also would not interfere with or otherwise preclude implementation of the applicable waste management goals and regulations. As such, the SCE Component would comply with federal, state, and local management and reduction statutes and regulations related to recycling and disposal of hazardous and non-hazardous solid waste. Impacts under the proposed SCE Component would be less than significant.

Operations

Once operational, the SCE Component would not result in substantive long-term changes to landfill disposal needs, and solid waste would continue to be sufficiently accommodated by the existing landfills in the region. As a result, SCE Component operations would not generate solid waste in excess of state or local standards or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, and this impact would be less than significant.

7.2.7.3 Cumulative Solid/Hazardous Waste Impacts

Previous CEQA Documents

Section 5.17 of the March 2017 Final Program EIR for the 2016 AQMP concluded that the impacts from waste generated from construction of 2016 AQMP control measures and from vehicle scrapping programs could result in significant impacts. Further, the March 2017 Final Program EIR for the 2016 AQMP concluded that control measures would result in significant adverse solid and hazardous waste impacts when combined with past, present, and reasonably foreseeable activities, thereby resulting in a significant cumulative impact.

The November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 concluded that potential solid and hazardous waste impacts would be less than significant. As noted previously, when project impacts are less than significant, the solid and hazardous waste impacts are not considered to be cumulatively considerable pursuant to CEQA Guidelines Section 15064(h)(1) and, therefore, no significant adverse cumulative solid and hazardous waste impacts would be expected from the projects analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134.

SCE Component

As detailed earlier, the SCE Component would not change the potential impact findings related to solid and hazardous waste as evaluated in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. Construction of the SCE Component would result in a relatively small amount of miscellaneous electrical waste, wood (distribution poles), and sediment (soil). Although debris from the SCE Component's short-term construction activities would incrementally contribute solid waste to local landfills, the construction waste recycling and disposal would be conducted in accordance with all applicable regulations and waste

would be disposed of at the appropriate facilities with adequate capacity. The long-term operation of the SCE Component would not result in an increase in solid-waste-generating activities and, thus, would not contribute to a cumulatively considerable solid waste impact.

7.2.7.4 Solid/Hazardous Waste Conclusion

As demonstrated by the preceding analysis, the SCE Component would not result in any new significant or substantial increases in the severity of previously identified significant impacts related to solid or hazardous waste, result in significant adverse cumulative solid and hazardous waste impacts, or require new or modified mitigation measures or alternatives to be studied that were not already previously analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. The SCE Component would, therefore, not alter the conclusions in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP.

7.2.8 Transportation and Traffic

The March 2017 Final Program EIR for the 2016 AQMP determined that the implementation of control measures in the 2016 AQMP could result in significant adverse transportation and traffic impacts. The November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 determined transportation impacts to be less than significant.

A project's impacts on transportation and traffic would be considered significant if any of the following criteria apply:

- Peak period levels on major arterials are disrupted to a point where level of service (LOS) is reduced to D, E, or F for more than one month.
- An intersection's volume to capacity ratio increase by 0.02 (two percent) or more when the LOS is already D, E or F.
- A major roadway is closed to all through traffic, and no alternate route is available.
- The project conflicts with applicable policies, plans or programs establishing measures of effectiveness, thereby decreasing the performance or safety of any mode of transportation.
- There is an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system.
- The demand for parking facilities is substantially increased.
- Water borne, rail car or air traffic is substantially altered.
- Traffic hazards to motor vehicles, bicyclists or pedestrians are substantially increased.
- The need for more than 350 employees.
- An increase in heavy-duty transport truck traffic to and/or from the facility by more than 350 truck round trips per day.
- Increase customer traffic by more than 700 visits per day.

7.2.8.1 Previous CEQA Documents

The March 2017 Final Program EIR for the 2016 AQMP determined that implementation of the 2016 AQMP would result in significant and unavoidable impacts related to transportation and traffic during construction activities and operation on roadways with catenary lines and at the harbors with implementation of Mitigation Measure TR-1 (refer to Appendix B-1 of this document for mitigation measures from the Final Program EIR for the 2016 AQMP) (South Coast AQMD 2017b).

Several transportation impacts were not discussed in detail in the March 2017 Final Program EIR for the 2016 AQMP because they were found to have no impact in the 2016 AQMP Initial Study, including impacts related to a potential conflict with a program, plan, ordinance, or policy addressing the circulation system; hazards due to a geometric design feature or incompatible uses; and inadequate emergency access.

The March 2017 Final Program EIR for the 2016 AQMP did not discuss impacts regarding CEQA Guidelines Section 15064.3(b) relating to vehicle miles traveled (VMT) because the applicable metric for determining impacts under CEQA was LOS at the time the document was prepared. The March 2017 Final Program EIR for the 2016 AQMP found that impacts related to LOS were determined to be significant and unavoidable, with implementation of Mitigation Measure TR-1 (South Coast AQMD 2017b).

The November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 concluded that no significant impacts would occur related to transportation and traffic. Table 4-15 of the April 2019 Final SEA for PAR 1134 and Table 4-22 of the November 2019 Final SEA for PAR 1110.2 and PAR 1100 demonstrated that significant impacts found in the March 2017 Final Program EIR for the 2016 AQMP related transportation and traffic impacts on roadways and harbors would not be applicable to stationary engines nor CGTs and corresponding NOx emission controls. Impacts related to transportation and traffic were determined to be less than significant (South Coast AQMD 2019a, 2019b).

The SDG&E Component of the MCM Project is within the scope of what was analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, however, the SCE Component is not. As a result, a determination of whether or not the SCE Component would involve new or more significant impacts related to transportation and traffic than those analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 is addressed herein.

7.2.8.2 SCE Component

As of July 1, 2020, automobile delay and traffic congestion are no longer considered to be impacts on the environment for the purposes of a traffic and circulation analysis under CEQA (see Public Resources Code Section 21099[b][2]). Instead, CEQA now measures potential impacts on the environment in the category of traffic and circulation using the VMT metric (Public Resources Code Section 21099[b][2]; CEQA Guidelines Section 15064.3). Although LOS no longer constitutes a significant environmental effect under CEQA, the City's General Plan 2040 includes policies that provide LOS criteria to measure the localized effects of development and land use changes on the transportation network and on the efficiency of vehicular travel (City of Moreno Valley 2021). When preparing an addendum to a previously certified CEQA document, the significance criteria applied in the addendum should remain the same as what was relied on for the original analysis. Therefore, this Addendum evaluates the potential impacts of the SCE Component of the MCM Project based on LOS.

Construction

The MCS would continue to be accessed from the existing, gated entrance on Virginia Street, which requires security access to pass through. During construction, access to the MCM Project, including the SCE Component would be available via multiple roadways within the City, including Alessandro Boulevard, Davis Road, Brodiaea Avenue, World Logistics Center Parkway, Theodore Street, and Ironwood Avenue.

Due to the SCE Component areas and accessible roadways being relatively remote, construction activities would not result in congestion or require dedication of traffic lanes. For the SCE Component, construction activities for the entirety of the temporary construction power would occur within the MCS. Because the MCS is currently only accessible via gated access on Virginia Street and this access will be maintained upon modernization of the MCS, the temporary construction power as part of the SCE Component located within the MCS would not result in closure of or impede traffic on roadways in the vicinity.

For the remaining portion of the SCE Component, temporary lane closures may be required for construction of the Ginger 12-kV super circuit on segments of Virginia Street, Alessandro Boulevard, World Logistics Center Parkway, Theodore Street, Ironwood Avenue, and Redlands Boulevard. Temporary lane closures may also be required for construction of the permanent circuit upgrades along Ironwood Avenue and Redlands Boulevard.

In compliance with the City Public Works Department Transportation Engineering Division's requirements for traffic control on City roadways and to avoid impacts to the local transportation system from project construction, Mitigation Measure TR-1 from the March 2017 Final Program EIR for the 2016 AQMP will be required for the SCE Component. Mitigation Measure TR-1 requires preparation of a construction management plan to address any potential disruptions related to lane closures associated with Project construction activities. This includes construction activities for the Ginger 12-kV super circuit and permanent circuit upgrades on existing lines along Virginia Street, Alessandro Boulevard, World Logistics Center Parkway, Theodore Street, and Ironwood Avenue. The construction management plan would include a provision for scheduling heavy truck trips outside of peak hours to minimize impacts to peak hour roadway and intersection LOS. With adherence to Mitigation Measure TR-1, the SCE Component would not exceed the significance criteria for substantial increases in traffic in relation to the existing traffic load and capacity of the street system, or closure of a major roadway without alternate routes available. Impacts would be less than significant with mitigation.

During construction, the SCE Component would result in an increase of up to approximately 108 one-way trips of heavy-duty trucks per day. As such, the SCE Component would not result in an increase in heavy-duty transport truck traffic to and/or from the construction areas by more than 350 truck round trips per day; therefore, the number of truck trips associated with the SCE Component would be less than significant. Additionally, construction-related traffic would be temporary.

With Mitigation Measure TR-1, the potential impact to the local circulation network during construction activities would be minimized and there would be no changes that would affect the safety and accessibility of the transportation system. Implementation of the SCE Component would not interfere with the City's Local Hazard Mitigation Plan (City of Moreno Valley 2023). Emergency response providers near the MCS would also be notified in advance of construction siting, lane closure schedules

(if required), and potential alternate routes, as required by Mitigation Measure TR-1. Impacts would be less than significant with mitigation.

Construction parking would be accommodated primarily within the Facility with some limited temporary parking along SCE construction workspaces. The Facility would provide adequate parking facilities for worker and vendor parking needs and equipment staging activities for the SCE Component.

Operations

The number of permanent employees (15) at the MCS would not change with implementation of the SCE Component. Operation of the SCE Component would not generate new employees for SCE or otherwise substantially increase worker-related vehicle trips associated with long-term operations and maintenance of the temporary construction power, Ginger 12-kV super circuit, or permanent circuit upgrades. The SCE Component would not generate customers as the MCS would remain closed to the public. Thus, the SCE Component would also not exceed the significance threshold of increasing customer traffic by more than 700 visits per day. The SCE Component would not result in long-term impacts related to a substantial increase in parking demands, increased traffic at peak periods on major arterials, or increase in intersection volume-to-capacity ratio. No sharp curves, dangerous intersections, or incompatible uses would be introduced by the SCE Component of the MCM Project.

The SCE Component would not require any off-site alterations to the public transportation infrastructure or circulation system, including transit, roadway, bicycle, and pedestrian facilities. The SCE Component would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and impacts would be less than significant.

The temporary construction power, Ginger 12-kV super circuit, and permanent circuit upgrades for the SCE Component would not generate operational vehicle trips beyond occasional maintenance, similar to what is required for existing facilities under current conditions. As stated earlier, the SCE Component would not generate customers or customer traffic. Therefore, the SCE Component would not change the existing LOS for area roadways, change intersection volume-to-capacity ratio, or substantially increase traffic in relation to the existing traffic load and capacity of the roadway system, and would not exceed significance criteria for such impacts.

The SCE Component operations would also have no impact related to waterborne, railcar, or air traffic.

7.2.8.3 Cumulative Transportation Impacts

Previous CEQA Documents

Section 5.18 of the March 2017 Final Program EIR for the 2016 AQMP concluded that construction activities, including potential lane closures, would be significant. As such, the 2016 AQMP control measures would result in significant adverse transportation and traffic impacts and when combined with past, present, and reasonably foreseeable activities, would be cumulatively considerable.

The November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 concluded that potential transportation impacts would be less than significant. As noted previously, when project impacts are less than significant, the transportation impacts are not considered to be

cumulatively considerable pursuant to CEQA Guidelines Section 15064(h)(1) and, therefore, no significant adverse cumulative transportation impacts would be expected from the projects analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134.

SCE Component

As detailed earlier, the SCE Component would not change the potential impact findings related to transportation and traffic as evaluated in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. The SCE Component would result in less than significant impacts to short-term construction-related traffic with implementation of Mitigation Measure TR-1 from the Final Program EIR for the 2016 AQMP. The SCE Component would not require a land use, zone, or other change that would induce population or job growth and, thus, would be consistent with population and employment assumptions included in local and regional planning documents. Operation of the SCE Component would not generate new employees or otherwise substantially increase worker-related vehicle trips associated with long-term operations. As such, the proposed SCE Component of the MCM Project would not result in any new significant cumulative impacts, consistent with the analysis in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP that analyzed the scope of the SDG&E Component. Additionally, the SCE Component would not substantially increase the severity of the significant cumulative impacts identified in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP.

7.2.8.4 Mitigation Measures

As described in Section 7.2.8.1, the March 2017 Final Program EIR for the 2016 AQMP found that impacts related to LOS were significant and unavoidable even with implementation of Mitigation Measure TR-1 (South Coast AQMD 2017b; refer to Appendix B-2 for applicable mitigation measures from the MMRP for the Final Program EIR for the 2016 AQMP). Mitigation Measure TR-1 related to transportation from the MMRP from the March 2017 Final Program EIR for the 2016 AQMP has been identified as applicable to the MCM Project. SCE will implement the Mitigation Measure TR-1 as applicable to the SCE Component of the MCM Project. Mitigation Measure TR-1 related to transportation identified as applicable to the MCM Project is as follows:

- **TR-1:** The project applicant, project sponsor, or public agency shall develop a construction management plan that includes at least the following items and requirements, if determined to be feasible by the Lead Agency:
 - A set of comprehensive traffic control measures, including scheduling of major truck trips and deliveries to avoid peak traffic hours, detour signs if required, lane closure procedures, signs, cones for drivers, and designated construction access routes;
 - Notification procedures for adjacent property owners and public safety personnel regarding when major deliveries, detours, and lane closures will occur;
 - Location of construction staging areas for materials, equipment, and vehicles at an approved location;
 - A process for responding to and tracking complaints pertaining to construction activity, including identification of an onsite complaint manager. The manager shall determine the cause of the

complaints and shall take prompt action to correct the problem. The Lead Agency shall be informed who the Manager is prior to the issuance of the first permit;

- Provision for accommodation of pedestrian flow;
- As necessary, provision for parking management and spaces for all construction workers to ensure that construction workers do not park in street spaces;
- Any damage to the street caused by heavy equipment, or as a result of this construction, shall be repaired, at the project sponsor's expense, within one week of the occurrence of the damage (or excessive wear), unless further damage/excessive wear may continue; in such case, repair shall occur prior to issuance of a final inspection of the building permit. All damage that is a threat to public health or safety shall be repaired immediately. The street shall be restored to its condition prior to the new construction as established by the Lead Agency (or other appropriate government agency) and/or photo documentation, at the sponsor's expense, before the issuance of a Certificate of Occupancy;
- Any heavy equipment brought to the construction-site shall be transported by truck, where feasible;
- No materials or equipment shall be stored on the traveled roadway at any time;
- Prior to construction, a portable toilet facility and a debris box shall be installed on the site, and properly maintained through project completion;
- All equipment shall be equipped with mufflers;
- Prior to the end of each work-day during construction, the contractor or contractors shall pick up and properly dispose of all litter resulting from or related to the project, whether located on the property, within the public rights-of-way, or properties of adjacent or nearby neighbors; and
- Promote “least polluting” ways to connect people and goods to their destinations.

7.2.8.5 Transportation Conclusion

As demonstrated by the preceding analysis, the SCE Component would not result in any new significant impacts or substantial increases in the severity of previously identified significant impacts related to transportation or traffic, result in significant adverse cumulative transportation or traffic impacts, or require new or modified mitigation measures or alternatives to be studied that were not previously analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. The SCE Component would, therefore, not alter the conclusions in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP.

8.0 POTENTIAL ENVIRONMENTAL IMPACTS IN PREVIOUS CEQA DOCUMENTS FOUND NOT TO BE SIGNIFICANT

This chapter discusses the remaining nine environmental topics that were found to have less than significant impacts in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. The effect of the SCE Component on the conclusions relating to each of these environmental topics is discussed in the following sections.

At the time, the Notice of Preparation/Initial Study for the 2016 AQMP was circulated for public review and comment and following the certification of the March 2017 Final Program EIR for the 2016 AQMP, the CEQA Guidelines Appendix G environmental checklist did not include TCRs or wildfires as specific environmental topics. However, the CEQA Guidelines have since been updated to include these specific topics. For informational purposes, TCRs are discussed in Section 8.1.3, Cultural Resources, and wildfire is discussed in Section 8.2.1, Wildfire.

8.1 Analysis of Impacts for Environmental Topics Included in the Previous CEQA Documents

8.1.1 Agriculture and Forestry Resources

8.1.1.1 Previous CEQA Documents

The March 2017 Final Program EIR for the 2016 AQMP determined that implementation of the control measures in the 2016 AQMP would result in less than significant impacts to agriculture and forestry resources. It found that implementation of the 2016 AQMP would not require construction of new buildings or other structures that would convert farmland designated as Prime, Unique, or Farmland of Statewide Importance on the state's Farmland Mapping and Monitoring Program to non-agricultural use; conflict with zoning for agricultural uses or with an active Williamson Act contract; or conflict with zoning for land defined as forest land, or convert forest land to non-forest uses. The March 2017 Final Program EIR for the 2016 AQMP determined that the 2016 AQMP would provide benefits to agriculture and forestry resources through the improvement of air quality in the region (South Coast AQMD 2017b).

The November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 concluded that no significant or less than significant direct or indirect impacts would occur related to agricultural resources (South Coast AQMD 2019a, 2019b).

8.1.1.2 SCE Component

According to the California Department of Conservation's (DOC) California Important Farmland Finder, the MCM Project, including the SCE Component, does not occur on any lands mapped by the DOC as Farmland (Prime Farmland, Unique Farmland, or Farmland of Statewide Importance). The MCS is located on land designated as Urban and Built-Up Land, and lands immediately surrounding the Facility are designated as Farmland of Local Importance (DOC 2024a). The portion of the SCE Component located within the Facility (the temporary construction power) would be located on land designated as Urban and Built-Up Land. The Ginger 12-kV super circuit and permanent circuit upgrades would generally be located on land classified as Farmland of Local Importance, Urban and Built-Up Land, and Other Land (DOC 2024a). Farmland of Local Importance on which MCM Project components would be constructed consists

primarily of Class 3 soils, which have severe limitations relative to agricultural production (NRCS 2024). Two small portions of the Ginger 12-kV super circuit line would run adjacent to Prime Farmland and Farmland of Statewide Importance along Theodore Street north of State Route 60; however, all activities for the Ginger 12-kV super circuit in this area would occur within the existing Ginger 12-kV right-of-way. Therefore, the SCE Component of the MCM Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use and no impact would occur.

The 2006 General Plan designated the MCS and immediate surrounding area as Public Facilities and the remainder of the Facility as Open Space (City of Moreno Valley 2006). Similarly, the City's 2040 General Plan Update continues to designate the MCS and immediate surrounding area land use as Public, and the remainder of the Facility as Parks/Open Space (City of Moreno Valley 2026a). The MCS and immediate surrounding area has a zoning designation of Public Facilities, and the remainder of the Facility is zoned as Open Space/Park (City of Moreno Valley 2026b). Lastly, the SCE Component spans land zoned as Open Space/Park, Industrial/Business Park, and Large Lot Residential. The City does not have exclusive zoning for agriculture; therefore, agricultural zoning would not be affected by the SCE Component (City of Moreno Valley 2021). Further, no Williamson Act contract land exists near the SCE Component (DOC 2024b; City of Moreno Valley 2021). Therefore, no impacts related to agricultural zoning or a Williamson Act contract would occur.

There is no forest land, timberland, or areas zoned for Timberland Production in the City or near the SCE Component (City of Moreno Valley 2021). As such, the SCE Component would not result in impacts to forest land or timberland.

8.1.1.3 Agriculture and Forestry Resources Conclusion

As demonstrated by the preceding analysis, the SCE Component would not result in any new significant impacts or substantial increases in the severity of previously identified significant impacts related to agriculture or forestry, result in significant adverse cumulative agriculture and forestry resources impacts, or require new or modified mitigation measures or alternatives to be studied that were not already previously analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. The SCE Component would, therefore, not alter the conclusions in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP.

8.1.2 Biological Resources

8.1.2.1 Previous CEQA Documents

The March 2017 Final Program EIR for the 2016 AQMP determined that implementation of the 2016 AQMP would result in less than significant impacts to biological resources. It found that implementation of the 2016 AQMP would generally occur in areas zoned for commercial or industrial uses, which typically do not support candidate, sensitive, or special-status species; would not adversely affect any riparian habitat; would not adversely affect protected wetlands; would not interfere with the movement of any native resident or migratory fish or wildlife species; would not affect land use plans, local policies or ordinances, or regulations protecting biological resources; and would not affect habitat conservation plans (HCPs) or natural community conservation plans (South Coast AQMD 2017b).

The November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 concluded that no significant or less than significant direct or indirect impacts would occur related to biological resources (South Coast AQMD 2019a, 2019b).

8.1.2.2 SCE Component

Assessment Methodology

To determine the potential for affecting sensitive species within the MCM Project and vicinity, a desktop literature review and database search was conducted. The review encompassed the areas affected by the MCM Project, including both the SDG&E Component and the SCE Component, and a 500-foot radius buffer hereafter referred to as the Biological Study Area (BSA). The desktop review identified multiple species and habitats with the potential to be affected in the BSA which led to an initial field survey to verify the results of the desktop review. The initial field survey was conducted in July 2022 and culminated in a Habitat Assessment report prepared for the MCM Project (Appendix C-1).¹⁷ The Habitat Assessment report contains a list of literature and databases searched along with the special-status plant and wildlife species potential for occurrence tables. Based on the initial field assessment, a variety of biological field surveys were conducted in late 2022 through 2024 for the SDG&E Component and the SCE Component of the MCM Project.

A subsequent field reconnaissance survey was conducted on August 26, 2024 (Appendix C-2) around the SCE Component and a surrounding 500-foot buffer (which were incorporated into the overall MCM Project BSA). To conduct the field reconnaissance survey, a wildlife biologist and aquatic specialist assessed the SCE Component and buffer to map vegetation communities, identify potential jurisdictional aquatic resources, and determine the potential for special-status plant and wildlife species to occur. Additional field surveys were conducted in 2025 in support of the SCE Component.

Since the BSA occurs within the Western Riverside County Multiple Species Habitat Conservation Plan area (WRC MSHCP; County of Riverside 2003), biological field surveys were conducted in accordance with the survey guidelines in the WRC MSHCP. Furthermore, the SCE Component has the potential to obtain the WRC MSHCP benefits of permit streamlining as a Participating Special Entity (PSE). Therefore, species surveys that may be required as part of a WRC MSHCP Consistency Analysis should SCE proceed as a PSE, were conducted.

¹⁷ The *Habitat Assessment for the Moreno Compressor Modernization Project* (Appendix C-1) and 2024 *Habitat Assessment of Three Alternative Southern California Edison Alignments for the San Diego Gas and Electric Moreno Compressor Modernization Project* (Appendix C-2) evaluated potential biological resources associated with activities for the MCM Project, which comprises both the SDG&E Component and SCE Component. In addition, the 2024 *Habitat Assessment* (Appendix C-2) evaluated potential biological resources associated with potential SCE infrastructure options that were considered during planning stages but not ultimately pursued as part of the SCE Component. A summary of those potential biological resources for both components of the MCM Project is provided in this section for informational purposes. This section focuses on whether the SCE Component would involve new or substantially more severe impacts related to biological resources than those analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. While references in this section to resources within or near construction areas refer to both the SDG&E Component and SCE Component, disturbance for the SCE Component will be smaller than the total disturbance for the MCM Project. The conclusions of significance are focused on potential impacts of the SCE Component only.

Sensitive, Special-Status, Resident, and Migratory Species

Based on the desktop literature review and the field reconnaissance surveys in 2022 and 2024 of the MCM Project (Appendices C-1 and C-2), the following focused surveys were conducted: special-status plant species, listed vernal pool branchiopods (hereafter fairy shrimp), Crotch's bumble bee (*Bombus crotchii*), western spadefoot (*Spea hammondi*), coastal California gnatcatcher (*Polioptila californica californica*), burrowing owl (*Athene cunicularia*), and Stephens' kangaroo rat (*Dipodomys stephensi*). Surveys for these species were conducted consistent with the WRC MSHCP and the SDG&E Habitat Conservation Plan Amendment (SDG&E HCPA; SDG&E 2023) guidelines. The following sections detail the special-status species surveys for the MCM Project, including the SCE Component.

Special-Status Plant Species

Based on the Habitat Assessments conducted in 2022 and 2024, several special-status plant species have the potential to be affected in the BSA. Focused special-status plant species surveys were conducted in 2023 and 2025 in accordance with survey protocols set forth by Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed, Proposed and Candidate Plants (USFWS 2000); Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (CDFW 2018); and CNPS Botanical Survey Guidelines (CNPS 2001). Surveys in 2023 resulted in no detections of special-status plant species in the BSA. Focused surveys conducted in 2025 for the SCE Component of the MCM Project resulted in the detection of one special-status plant species, California black walnut (*Juglans californica*) in the BSA. Two individuals of California black walnuts were observed, one tree at the northern corner of the intersection of Highland Boulevard and Ironwood Avenue, and a second tree in a drainage north of Ironwood Avenue. Both California black walnut trees are outside of work areas and would not be directly impacted by the SCE Component. Indirect impacts to special-status plant species occurring in the BSA would be less than significant with implementation of PDF-2 (Pre-Construction Clearance Survey and Monitoring) and PDF-3 (Worker Environmental Awareness Program).

Fairy Shrimp

Riverside fairy shrimp [*Streptocephalus woottoni*] and vernal pool fairy shrimp [*Branchinecta lynchi*] are federally listed as endangered and threatened, respectively. Within the BSA, suitable habitat for these two species of fairy shrimp exists as temporary ponded depressions within disturbed areas. Wet season fairy shrimp surveys were conducted in 2022/2023 and 2025 following USFWS survey guidelines (USFWS 2017) within the MCM Project footprint with no federally listed species detected. Dry season surveys were conducted in 2024 and 2025 and no federally-listed species were detected. The temporary ponded depressions which were surveyed for fairy shrimp lack vernal pool plant indicators and do not qualify as vernal pools. Based on the absence of listed fairy shrimp species and lack of vernal pools within the BSA, no significant impacts would occur to fairy shrimp from the SCE Component. Implementation of PDF-2 (Pre-Construction Clearance Survey and Monitoring) and PDF-3 (Worker Environmental Awareness Program) would further minimize impacts to this species.

Crotch's Bumble Bee

Crotch's bumble bee is a state candidate endangered species. Suitable habitat occurs within the BSA in areas with high abundance of native and nonnative flowering plants and prevalence of small rodent

burrows for nesting. Surveys were conducted following California Department of Fish and Wildlife (CDFW) Survey Considerations for CESA Candidate Bumble Bee Species (CDFW 2023) for the MCM Project in 2024 and 2025 with the species detected along World Logistics Center Parkway. The species was not detected in regularly disced areas around the MCS. The species was detected twice in areas of suitable habitat. Given the suitable habitat within the BSA, PDF-2 (Pre-Construction Clearance Survey and Monitoring) would be implemented by the MCM Project, including for the SCE Component, to determine the presence or absence of Crotch's bumble bee prior to the commencement of construction activities. If present, avoidance measures established by a qualified biologist in accordance with PDF-2 would be implemented to avoid impacts to Crotch's bumble bee. With implementation of PDF-2 and PDF-3 (Worker Environmental Awareness Program), impacts would be less than significant.

Western Spadefoot Toad

Western spadefoot toad is a federally proposed threatened and CDFW Species of Special Concern. Within the BSA suitable habitat for western spadefoot occurs as temporary ponded areas (primarily dirt road ruts). Focused surveys for western spadefoot were conducted in 2024 for the MCM Project, and in 2025 for the SCE Component. As no USFWS/CDFW-approved western spadefoot survey protocol exists, a presence/absence survey protocol was developed in collaboration with herpetologists and professional wildlife biologists with western spadefoot experience. The surveys conducted in 2024 and 2025 focused on daytime searches of suitable breeding pools (in the form of temporary ponded areas), and nighttime visual inspections of temporary ponded areas (where western spadefoot may be breeding) and nearby aestivation and foraging areas. No western spadefoot were detected within the BSA during focused surveys. One adult western spadefoot was incidentally detected on April 25, 2025, during a Stephens' kangaroo rat trapping survey and was observed emerging from a small rodent burrow, approximately 10 feet west of Virginia Street near the northwest corner of the MCS. The SCE Component would include implementation of PDF-2 (Pre-Construction Clearance Survey and Monitoring) and PDF-3 (Worker Environmental Awareness Program) which would avoid unauthorized impacts to western spadefoot and reduce impacts to a less-than-significant level. Impacts associated with the SCE Component may be further minimized should SCE seek coverage under the WRC MSHCP and follow species-specific protocol and mitigation requirements, as applicable.

Coastal California Gnatcatcher

The coastal California gnatcatcher is a federally threatened species and a CDFW Species of Special Concern. Suitable habitat occurs in the form of Riversidian sage scrub northeast of the intersection of Theodore Street and Ironwood Avenue in the BSA. Surveys were conducted following the USFWS Coastal California Gnatcatcher Presence/Absence Survey Protocol (USFWS 1997) in 2025. Coastal California gnatcatchers were detected in areas of suitable habitat. Riversidian sage scrub is absent from the project workspaces. Impacts to coastal California gnatcatcher are anticipated to be less than significant. Impacts to coastal California gnatcatcher would be further minimized by the implementation of PDF-2 (Pre-Construction Clearance Survey and Monitoring) and PDF-3 (Worker Environmental Awareness Program).

Western Burrowing Owl

Western burrowing owl is a state candidate endangered species and a federal bird of conservation concern. Suitable habitat is scattered throughout the BSA. Focused surveys were conducted in 2023 and 2025 in

accordance with the Staff Report on Burrowing Owl Mitigation (CDFG 2012) and the Western Burrowing Owl Survey Instructions for the WRC MSHCP (County of Riverside 2006). During 2023 surveys, burrows suitable for burrowing owls were found within the BSA (primarily in the form of California ground squirrel burrows), but no burrowing owl or their sign were detected. During the first burrowing owl survey in March 2025 for the Ginger 12-kV super circuit alignment, one burrowing owl was detected using a burrow outside of the BSA, southwest of the intersection of Alessandro Boulevard and Virginia Street. The owl was not observed in subsequent surveys and was presumed to be a migrating individual. In addition, burrowing owl sign was detected at a burrow within the BSA (during the first survey in March 2025) just west of the MCM Project but no burrowing owls were detected at the burrow. Based on 2025 surveys, it is assumed that burrowing owls were using several burrows within and adjacent to the BSA during migration in March 2025 (as no subsequent surveys document further burrowing owl use).

Pre-construction surveys conducted in accordance with PDF-2 (Preconstruction Clearance Survey and Monitoring) would determine presence or absence of burrowing owl prior to the commencement of construction activities. If detected, avoidance measures established by a qualified biologist in accordance with PDF-2 would be implemented to avoid impacts to burrowing owl. With implementation of PDF-2 (Pre-Construction Clearance Survey and Monitoring) and PDF-3 (Worker Environmental Awareness Program), impacts to burrowing owl would be less than significant. In addition, SCE may obtain take coverage for burrowing owl under the WRC MSHCP as a PSE.

Stephens' Kangaroo Rat

The Stephens' kangaroo rat is a federal and state threatened species. Suitable habitat occurs throughout the BSA. Focused trapping for the MCM Project was conducted around the MCS and no Stephens' kangaroo rats were captured in April 2025. Previous focused trapping survey efforts in 2020 conducted adjacent to the MCS resulted in a single individual Stephens' kangaroo rat capture. Pre-construction surveys conducted in accordance with PDF-2 (Preconstruction Clearance Survey and Monitoring) would determine presence or absence of Stephens' kangaroo rat prior to the commencement of construction activities. If detected, avoidance measures established by a qualified biologist in accordance with PDF-2 would be implemented to avoid impacts to Stephens' kangaroo rat. With implementation of PDF-2 and PDF-3 (Worker Environmental Awareness Program), impacts to Stephens' kangaroo rat would be less than significant. In addition, SCE may obtain take coverage for Stephens' kangaroo rat under the Riverside County Habitat Conservation Area's (RCHCA) Stephens' Kangaroo Rat HCP.

Resident or Migratory Wildlife Species including Nesting Birds

The SCE Component is required to comply with the Migratory Bird Treaty Act and the California Fish and Game Code, which protects nesting birds by requiring nesting bird surveys (for activities during nesting bird season) prior to construction activities and establishment of appropriate no-work buffers around active bird nests if identified. The field reconnaissance surveys were conducted during the nesting bird season (February 15–August 31), on July 18 through 20, 2022, and on August 26, 2024, and suitable nesting habitat was observed to be present within the BSA. In accordance with PDF-3 (Worker Environmental Awareness Program), all project personnel would undergo Worker Environmental Awareness Program training to educate them on the specific environmental sensitivities pertinent to the SCE Component, while PDF-2 (Pre-Construction Clearance Survey and Monitoring) would require that biological surveys be conducted prior to construction to support nest avoidance. If active bird nests are identified through pre-construction surveys, appropriate avoidance and minimization measures

established by a qualified biologist would be implemented. With compliance with these PDFs, California Fish and Game Code, and the Migratory Bird Treaty Act, the SCE Component would result in less than significant impacts to nesting birds.

The SCE Component is not located within any designated wildlife corridors or habitat linkages, therefore, impacts on wildlife corridors and habitat connectivity would not occur (City of Moreno Valley 2021). Compliance with applicable federal and state regulatory requirements, including California Fish and Game Code and the Migratory Bird Treaty Act, and incorporation of proposed PDF-2 (Pre-Construction Clearance Survey and Monitoring) and PDF-3 (Worker Environmental Awareness Program) would further minimize potential impacts to designated wildlife corridors or native wildlife nursery sites.

Sensitive Natural Communities

Two CDFW sensitive vegetation communities occur within the BSA: riparian shrub and Riversidian sage scrub. During habitat assessments, a single patch of tamarisk scrub, a riparian shrub community, was observed occurring north of the MCS within the BSA, west of Virginia Street, in what appeared to be an area of historical agricultural water storage; and Riversidian sage scrub occurred in the northeast corner of Theodore Street and Ironwood Avenue. Both vegetation communities occur within the BSA, but outside of any areas to be impacted by the SCE Component. Therefore, the SCE Component would have no impact on sensitive natural communities.

During the habitat assessment, several aquatic features were identified as potentially jurisdictional. A subsequent aquatic resources delineation effort was conducted in 2025 that included a detailed assessment and mapping of each potentially jurisdictional drainage that occurs within the study area for Ginger 12-kV super circuit alignment. All drainages identified in the study area are ephemeral and do not support riparian or wetland vegetation. These drainages are unlikely to be federally jurisdictional, but are likely to be regulated by RWQCB as waters of the state and CDFW streambed, as well as riparian/riverine habitat as defined by the WRC MSHCP. Drainages in the BSA would be avoided by the SCE Component, and specific poles along the Ginger 12-kV super circuit and permanent circuit upgrades alignment would be sited so that activities for the SCE Component would not impact jurisdictional drainages. This impact would be less than significant.

Conflicts with Plans, Policies, and Ordinances Protecting Biological Resources

The SCE Component has been designed to avoid and minimize impacts to biological resources. With respect to local plans, policies, and ordinances protecting biological resources, Chapter 14.40, Tree Care, of the City's Municipal Code includes an ordinance that protects trees and provides permitting mechanisms for the removal of trees and the planting of replacement trees. In addition, the City's General Plan includes policies related to biological resources.¹⁸ The SCE Component would not result in the removal of any trees or encroachment on any protected trees. Generally, the only existing trees are landscaping trees within the MCS, which would not be removed as part of the SCE Component. Along the Ginger 12-kV super circuit and permanent circuit upgrades alignment, which is mostly located outside

¹⁸ As summarized further in Chapter 6, the CPUC has preemptive jurisdiction over the construction, maintenance, and operation of electric utility facilities pursuant to GO 131-E and no local discretionary permits or local consistency plan consistency evaluations are required for the SCE Component of the Project. However, SCE would be coordinating with local agencies regarding land use matters and references to the SCE Component's consistency with the City's Municipal Code, and policies under the General Plan are provided for informational purposes.

the Facility, trees would be avoided to the extent feasible, although some may be subject to trimming to promote access and fire safety for the SCE Component. No significant impacts to trees would occur. Impacts would be further minimized with implementation of PDF-2 (Pre-Construction Clearance Survey and Monitoring) and PDF-3 (Worker Environmental Awareness Program) to avoid impacts to biological resources.

With respect to other applicable conservation plans, if construction of the SCE Component cannot avoid take of protected species, take coverage would be sought through an applicable HCP. The following subsections summarize applicable HCPs that were in effect at the time the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP were approved, that remain in effect, and that are available for potential use by the SCE Component, should coverage under these plans be necessary. These HCPs include the Stephens' Kangaroo Rat HCP, and the WRC MSHCP. Each HCP has undergone previous environmental review prior to adoption, and if SCE applies for coverage under those plans, the SCE Component would be subject to the applicable mitigation requirements under those plans.¹⁹ No other local policies or ordinances protecting biological resources apply to the SCE Component.

Stephens' Kangaroo Rat Habitat Conservation Plan

The SCE Component is within the fee area of the Stephens' Kangaroo Rat HCP (RCHCA 1996). The RCHCA provides a process to extend take coverage for incidental take of Stephens' kangaroo rat occurring within RCHCA jurisdiction. The RCHCA provides both federal and state-take coverage for Stephens' kangaroo rat.

Western Riverside County Multiple Species Habitat Conservation Plan

The SCE Component would occur within the Criteria Area of the WRC MSHCP (Riverside County 2003). The WRC MSHCP provides a process to extend take coverage for the incidental take of 146 species, including burrowing owl. Take coverage as a PSE is afforded through an agreement with the Regional Conservation Authority. Any take extended through, and consistent with, the WRC MSHCP process and participation has been considered and authorized by USFWS and CDFW for the incidental take permit associated with the WRC MSHCP.

8.1.2.3 Biological Resources Conclusion

Where there is potential to impact biological resources, the SCE Component would implement PDF-2 (Pre-Construction Clearance Survey and Monitoring) and PDF-3 (Worker Environmental Awareness Program) to minimize impacts, and those impacts would remain less than significant. Compliance with federal, state, and local regulations, including obtaining take coverage when avoidance is not possible under the applicable aforementioned HCPs and incorporation of PDF-2 and PDF-3, the SCE Component

¹⁹ See, e.g., CEQA Guidelines Section 15065(b)(2): “. . . where a proposed project has the potential to substantially reduce the number or restrict the range of an endangered, rare, or threatened species, the lead agency need not prepare an EIR solely because of such an effect, if: (A) the project proponent is bound to implement mitigation requirements relating to such species and habitat pursuant to an approved habitat conservation plan or natural community conservation plan; (B) the state or federal agency approved the habitat conservation plan or natural community conservation plan in reliance on an environmental impact report or environmental impact statement; and (C) 1. such requirements avoid any net loss of habitat and net reduction in number of the affected species, or 2. such requirements preserve, restore, or enhance sufficient habitat to mitigate the reduction in habitat and number of the affected species to below a level of significance.”

would not conflict with any conservation plans that were in effect at the time of the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. Therefore, the SCE Component would not result in a substantial adverse effect on any species identified as a candidate, sensitive, or special-status species, and impacts would be less than significant.

As demonstrated by the preceding analysis, the SCE Component would not result in any new significant impacts or substantial increases in the severity of previously identified impacts related to biological resources, result in significant adverse cumulative biological resources impacts, or require new or modified mitigation measures or alternatives that were not previously analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. The SCE Component would, therefore, not alter the conclusions in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP.

8.1.3 Cultural Resources

8.1.3.1 Previous CEQA Documents

The March 2017 Final Program EIR for the 2016 AQMP determined that it is unlikely that implementation of the 2016 AQMP would impact cultural resources because existing facilities are in previously disturbed areas; therefore, impacts were found to be less than significant. The March 2017 Final Program EIR for the 2016 AQMP determined that although the likelihood of encountering cultural or archaeological resources is low, there is still a potential that additional buried archaeological resources may exist. However, the March 2017 Final Program EIR for the 2016 AQMP further concluded impacts to such unexpected subsurface resources would be avoided by using standard construction practices and measures listed in California Public Resources Code Section 21083.2 and CEQA Guidelines Section 15064.5, and therefore impacts were determined to be less than significant (South Coast AQMD 2017b).

The March 2017 Final Program EIR for the 2016 AQMP did not address impacts related to human remains. These topics were discussed in the 2016 AQMP Initial Study, included in Appendix A to the March 2017 Final Program EIR for the 2016 AQMP, which concluded that implementation of the 2016 AQMP would not disturb human remains interred outside formal cemeteries, and no impact would occur (South Coast AQMD 2017b).

The November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 concluded that no significant or less than significant direct or indirect impacts would occur related to cultural resources (South Coast AQMD 2019a, 2019b).

8.1.3.2 SCE Component

Historical and Archaeological Resources

Dudek completed a Cultural Resources Inventory and Evaluation Report for the MCM Project in 2025 (see Appendix D-1)²⁰, summarizing the results of analyses and pedestrian surveys completed in 2021,

²⁰ The *Cultural Resources Inventory and Evaluation Report for the Moreno Compressor Modernization Project – Moreno Valley, California* (Appendix D-1) and *Historic Built Environment Report for the SoCalGas Moreno Compressor*

2022, and 2025. A records search of SoCalGas's in-house California Historical Resources Information System (CHRIS) housing information received from the South Coastal Information Center (SCIC) included any previously recorded cultural resources within the MCM Project plus a 0.5-mile radius and investigations within the Project plus a 1-mile radius. The CHRIS search included a review of the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), California Points of Historical Interest list, California Historical Landmarks list, Archaeological Determinations of Eligibility list, California State Historic Resources Inventory list, and the City's landmark designation criteria.

The SCE Component would involve ground disturbance associated with construction of temporary construction power, the Ginger 12-kV super circuit, and permanent circuit upgrades. Construction of temporary construction power would occur entirely within the Facility, adjacent to the MCS. Dudek evaluated the MCS in 2021 and found it does not meet any of the criteria for listing in the National Register of Historic Places, CRHR, or as a City landmark, either individually or as part of an existing historic district, due to a lack of historical significance, engineering or architectural merit, and lack of requisite integrity (Appendix D-1). The Facility and surrounding areas have been previously disturbed and subject to various development since at least 1938 for residential, industrial, and agricultural use (Appendix D-1). Given the low potential for unrecorded, significant archaeological resources to exist within the Facility, construction and operation of temporary construction power would result in less than significant impacts.

Construction of the Ginger 12-kV super circuit and permanent circuit upgrades would involve ground disturbance associated with replacement of existing structures, installation of new structures, and installation of new cable, a duct, conductors, and a replacement switch. The Ginger 12-kV super circuit would occur adjacent to an existing historic period transmission line, the SCE Valley-Mayberry-Moreno-Vista 115 kV line along World Logistics Center Parkway, Theodore Street, and Ironwood Avenue. South Environmental evaluated this resource for historical significance and recommended it not eligible for listing on the NRHP and CRHR under all designation criteria (Appendix D-2). One historic period archaeological site (P-33-004210/CA-RIV-004210) was identified along Alessandro Boulevard where replacement of existing distribution poles would occur. P-33-004210/CA-RIV-004210 was tested and recommended not eligible for listing on the CRHR (Dice 2011, as cited in Appendix D-1). Additionally, portions of the historic period archaeological site were surveyed in 2022 and no archaeological features were identified. The remainder of disturbance associated with construction of the Ginger 12-kV super circuit, as well as the permanent circuit upgrades, would generally occur in previously disturbed areas within existing SCE rights-of-way/easements where cultural resources are unlikely to be encountered. Therefore, construction and operation of the Ginger 12-kV super circuit and permanent circuit upgrades would result in less than significant impacts.

Modernization Project, Moreno Valley, Riverside County, California (Appendix D-2) evaluated potential cultural, archaeological, and historical resources associated with activities for the MCM Project, which comprises both the SDG&E Component and the SCE Component. Additionally, these reports evaluated potential resources associated with potential SCE infrastructure options that were considered during planning stages but not ultimately pursued as part of the SCE Component. Some information related to the potential cultural and tribal cultural resources that may be impacted by both components of the MCM Project is summarized in this section for informational purposes. However, this section focuses on whether the SCE Component would involve new or more significant impacts related to cultural resources than those analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. The conclusions of significance are focused on potential impacts of the SCE Component, as described in this Addendum, only.

The SCE Component of the MCM Project includes PDF-3 (Workers Environmental Awareness Program [WEAP]) and PDF-4 (Inadvertent Discovery of Archaeological Resources), outlined in Table 5-1 of Section 5, Background and Project Description. PDF-3 requires construction workers to be trained on specific environmental sensitivities (including cultural resources) pertinent to the areas of construction activities, while PDF-4 requires a qualified archaeologist to evaluate any archaeological resources unearthed during construction. Given the nature of the resources within the SCE Component activities and with implementation of PDF-3 and PDF-4, the SCE Component would not result in a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5 or in the significance of an archaeological resource. Impacts would be less than significant.

Human Remains

The MCM Project, including the SCE Component, is not proximate to sources of water and, thus, the MCM Project is not within an area sensitive to tribal resources (human remains). No human remains have been discovered during development of the MCS and are not expected along existing SCE rights-of-way/easements where upgrades are proposed. In the event that human remains are discovered during ground-disturbing activities, activities would be halted as required by state law in Health and Safety Code Section 7050.5, which state that construction activity is required to stop in any area or nearby area suspected to overlie human remains. The County Coroner would then be contacted in compliance with Health and Safety Code Section 7050.5. Pursuant to California Public Resources Code Section 5097.98, if the remains are thought to be Native American, the County Coroner would notify the Native American Heritage Commission (NAHC), who would then notify the most likely descendant. With compliance with state law, impacts would be less than significant.

Tribal Cultural Resources

The SCE Component is not subject to AB 52, which requires consultation with Native American tribes during the CEQA process, because this Addendum does not require a notice of preparation or a notice of availability of a negative declaration or mitigated negative declaration to be filed.

A search of the NAHC Sacred Lands File was conducted on January 21, 2025, that included a search to determine the presence of any reported Native American cultural resources where the SCE Component activities would occur. The NAHC Sacred Lands File records search result was negative. No TCRs have been identified during previous development of the MCS, operations and maintenance activities within the MCS, or during cultural resource surveys and field investigations completed in support of the MCM Project, including the SCE Component. As described earlier, no archaeological resources listed in, or eligible for listing in, the CRHR or in a local register of historical resources, as defined in California Public Resources Code Section 5020.1(k), have been identified that would be impacted by the SCE Component of the MCM Project.

Implementation of PDF-3 would require workers to undergo a WEAP training regarding environmental sensitivities, including potential TCRs, prior to construction. PDF-4 outlines steps for proper treatment of resources if unearthed during construction activities. With implementation of these PDFs, the SCE Component of the MCM Project would not cause a substantial adverse change to a resource listed or eligible for listing in the CRHR or in a local register of historical resources as defined in California Public Resources Code Section 5020.1(k).

8.1.3.3 Cultural Resources Conclusion

As demonstrated by the preceding analysis, the SCE Component would not result in any new significant impacts or substantial increases in the severity of previously identified significant impacts related to cultural resources or TCR, result in significant adverse cumulative cultural resources impacts, or require new or modified mitigation measures or alternatives to be studied that were not already previously analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. The SCE Component would, therefore, not alter the conclusions in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP.

8.1.4 Geology and Soils

8.1.4.1 Previous CEQA Documents

The March 2017 Final Program EIR for the 2016 AQMP determined that implementation of the 2016 AQMP would result in less than significant impacts to geology and soils. The Final Program EIR found that implementation of the 2016 AQMP would not directly or indirectly expose people or structures to earthquake faults, seismic shaking, or seismic-related ground failure. In addition, soil erosion impacts are not expected because the modifications required by the 2016 AQMP would not require substantial grading or construction activities. The March 2017 Final Program EIR for the 2016 AQMP determined that existing geologic hazards would not be made worse through the implementation of the 2016 AQMP and the 2016 AQMP control measures would not promote development in remote areas that would require septic tanks or other alternative waste disposal systems (South Coast AQMD 2017b).

The March 2017 Final Program EIR for the 2016 AQMP did not address impacts related to landslides. However, this criterion was discussed in the 2016 AQMP Initial Study, which determined that proposed 2016 AQMP control measures would not directly or indirectly expose people or structures to landslides, and that no impact would occur (South Coast AQMD 2017b).

The March 2017 Final Program EIR for the 2016 AQMP states that if paleontological resources are uncovered during site preparation and grading, significant adverse impacts are not anticipated because construction activities would occur at previously disturbed industrial or commercial locations and existing laws are in place that are designed to protect and mitigate potential adverse impacts to cultural and paleontological resources. Paleontological resources were discussed in the Cultural Resources section of the 2016 AQMP Initial Study, which determined that it is unlikely that implementing the 2016 AQMP control measures would destroy unique paleontological resources, and no impact would occur (South Coast AQMD 2017b).

The November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 concluded that less than significant impacts would occur related to geology and soils. Impacts regarding paleontological resources were covered under the Cultural Resources section of the 2016 AQMP Initial Study. As such, the November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 concluded that less than significant impacts would occur related to cultural resources, including paleontological resources, and geology and soils (South Coast AQMD 2019a, 2019b).

8.1.4.2 SCE Component

Seismic Hazards

According to the California Geological Survey (CGS) Earthquake Zones of Required Investigation map, a portion of the SCE Component intersects the San Jacinto Fault Zone near the intersection of Theodore Street and Ironwood Avenue along the Ginger 12-kV super circuit alignment (CGS 2025). Work in this area would involve installation of new conductor and pole sets along existing SCE right-of-way where electrical infrastructure already exists. Given the existing infrastructure in place and the activities included in the SCE Component, construction and operation of the Ginger 12-kV super circuit would not exacerbate risks associated with fault rupture. No other portion of the SCE Component is located within an Alquist–Priolo Earthquake Fault Zone, as defined by the CGS (CGS 2025). Furthermore, the Geotechnical Investigation prepared for the MCM Project concludes that the potential for surface rupture during the design life of the proposed MCM Project is considered low (Appendix E).²¹

The SCE Component is situated within the seismically active region of Southern California and would likely experience moderate to severe ground shaking in response to a large magnitude earthquake occurring on a local or more distant active fault during the expected lifespan of the proposed structures. Due to the proximity of the MCM Project, including the SCE Component, to the nearest active fault zone, the SCE Component would potentially be subject to strong seismic ground shaking in the event of an earthquake. However, the SCE Component would be built in compliance with the applicable requirements of the CBC and CPUC General Order 95 so that new structures would be reinforced against potentially strong seismic ground shaking in a seismic event. As stated in the Geotechnical Investigation, potential ground shaking impacts would be avoided if the proposed structures are built in accordance with current building codes and engineering practices (Appendix E). In addition, the SCE Component would not directly or indirectly cause seismic ground shaking. As such, less than significant ground shaking impacts would occur.

As depicted in the CGS Earthquake Zones of Required Investigation map, the SCE Component is not within any liquefaction zones (CGS 2025). Furthermore, with compliance with the applicable requirements in the CBC and CPUC General Order 95, new structures would be reinforced against potential strong seismic ground shaking in a seismic event, thus minimizing the potential for damage due to liquefaction and seismically induced settlement. With compliance with regulatory requirements and incorporation of recommendations in the Geotechnical Investigation (Appendix E), the MCM Project, including the SCE Component, would not result in direct or indirect impacts related to seismic-related ground failure, including liquefaction. Impacts would be less than significant.

The SCE Component is located on generally flat, previously disturbed areas that do not include any steep slopes. The CGS Earthquake Zones of Required Investigation map shows that the SCE Component is not located within or near a seismically induced landslide zone (CGS 2025). Because there are no known

²¹ The *Report of Geotechnical Investigation Proposed Compressor Station Upgrade* (Appendix E) and *Paleontological Resources Review – Moreno Compressor Modernization Project* (Appendix F) evaluated geology and soils and paleontological resources associated with activities for the MCM Project, which comprises both the SDG&E Component and SCE Component. A summary of information related to geology and soils both components of the MCM Project is provided in this section for informational purposes. This section focuses on whether the SCE Component would involve new or more significant impacts related to geology and soils than those analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP.

landslide areas near the SCE Component and the SCE Component is not in the path of any known or potential landslides, implementation of the SCE Component would result in no impact regarding landslides.

Erosive, Unstable, or Expansive Soils

Soil-disturbing activities could potentially result in soil erosion and siltation of downstream drainages. Because the SCE Component would disturb more than 1 acre of soil, it would need coverage under the NPDES CGP. As part of this coverage, it is anticipated that a SWPPP would be required. The SWPPP would evaluate the level of risk to receiving waters (i.e., the San Jacinto River) from erosion and other construction-related pollutants and identify potential non-stormwater discharges, appropriate construction BMPs, BMP maintenance schedules, final stabilization measures, and post-construction BMPs. Erosion/sediment control would be conducted in accordance with industry BMPs and the SWPPP, which would be filed with the Santa Ana RWQCB via the state's online SMARTS system.

With compliance with applicable regulatory requirements and with implementation of the SWPPP and BMPs, construction of the SCE Component would not result in substantial soil erosion or the loss of topsoil.

Construction activities are subject to occupational safety standards for excavation and trenching, as specified in the California Safety and Health Administration regulations (8 CCR) and in Chapter 33 of the CBC. These regulations specify the measures to be used for excavation and trench work where workers could be exposed to unstable soil conditions. The SCE Component would be required to employ these safety measures during excavation and trenching. With compliance with applicable regulatory requirements and implementation of the geotechnical report recommendations, construction of the SCE Component would not result in development on unstable soils.

The SCE Component is not in an area of regional ground subsidence due to groundwater pumping, peat loss, or oil extraction (USGS 2024). As discussed earlier, liquefaction is not anticipated to affect the SCE Component. According to the Geotechnical Investigation (Appendix E), the MCS is located on expansive soil, where the upper clayey soils are expected to shrink and swell with fluctuating levels of moisture content. However, all structures would be built according to the applicable CBC and CPUC General Order 95 requirements, including those pertaining to material strength and setting depths, thus minimizing the potential for damage due to expansive soils, liquefaction, and seismically induced settlement. Additionally, recommendations in the Geotechnical Investigation would be implemented. With these recommendations incorporated into the SCE Component design, impacts would be less than significant.

Septic Tanks or Alternative Wastewater Disposal Systems

The SCE Component does not include new septic tanks or an alternative wastewater disposal system. The MCS includes a septic system, and no increase in wastewater is anticipated as a result of the SCE Component implementation. There are no plans to increase existing wastewater capacity. Therefore, no changes in circumstances and no new information of substantial importance relative to septic tanks or alternative wastewater disposal systems have been identified. No impact would occur.

Paleontological Resources

According to the Paleontological Resources Review prepared for the MCM Project, included as Appendix F to this Addendum, the MCM Project is underlain by Holocene (<11,700 years ago) alluvial fan deposits (map unit Qyf3), deposits of which are likely underlain by Pleistocene (approximately 11,700 to 2.58 million years ago) alluvial deposits at an unknown depth below the ground surface. In general, Holocene alluvium is generally too young on the surface and at shallow depths to contain significant paleontological resources and has low paleontological sensitivity. The paleontological sensitivity increases to moderate or high at depths beneath the Holocene sediments. Pleistocene deposits have moderate potential to contain in situ fossils and have a moderate paleontological sensitivity (Appendix F). During construction of the Highland Fairview Corporate Park, approximately 2.4 miles northwest of the MCS, it was recorded that the shallow soils of the Holocene alluvium areas (0–20 feet) did not contain paleontological resources (Appendix F).

Given the potential for significant paleontological resources to be preserved within the ground disturbance limits of the SCE Component, a paleontological review of the MCM Project has been completed, and a paleontological records search request was sent to the Natural History Museum of Los Angeles County and the Western Science Center. No paleontological resources have been identified near the MCM Project, including the SCE Component, based on desktop geological and paleontological review or during prior development of the MCS. However, it is possible that isolated deposits of middle to late Pleistocene sediments with a moderate potential for paleontological resources exist within the subsurface of the SCE Component at a depth of 20 feet or more below the surface. However, replacement structures would be placed in areas already disturbed due to placement of existing structures, and new distribution poles would not be expected to require excavation to depths where potential to encounter Pleistocene sediments would exist. Therefore, installation is unlikely to result in significant impacts to a paleontological resource. Impacts would therefore be less than significant.

8.1.4.3 Geology and Soils Conclusion

As demonstrated by the preceding analysis, the SCE Component of the MCM Project would not result in any new significant impacts or substantial increases in the severity of previously identified significant impacts related to geology and soils, result in significant adverse cumulative geology and soils impacts, or require new or modified mitigation measures or alternatives to be studied that were not already previously analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. The SCE Component would, therefore, not alter the conclusions in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP.

8.1.5 Land Use and Planning

8.1.5.1 Previous CEQA Documents

The March 2017 Final Program EIR for the 2016 AQMP determined that construction activities to modify transportation routes could temporarily disrupt or divide a community. However, because construction of new traffic routes/corridors is not required for implementation of the 2016 AQMP, once construction

activities are finished and physical barriers removed, no long-term land use impacts are anticipated, and impacts were found to be less than significant (South Coast AQMD 2017b).

The March 2017 Final Program EIR for the 2016 AQMP determined that the 2016 AQMP would not affect local government land use planning decisions, and impacts were found not to be significant (South Coast AQMD 2017b).

The November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 concluded that no significant or less than significant direct or indirect impacts would occur related to land use and planning (South Coast AQMD 2019a, 2019b).

8.1.5.2 SCE Component

The City of Moreno Valley's 2006 General Plan designated the MCS as Public Facilities and the rest of the Facility was designated as Open Space (City of Moreno Valley 2006). Similarly, the City's 2040 General Plan Update continues to designate the MCS as Public, and the rest of the Facility is designated as Parks/Open Space (City of Moreno Valley 2026a). The MCS has a zoning designation of Public Facilities, but the rest of the Facility is zoned as Open Space/Park (City of Moreno Valley 2026b). As described in Chapter 6 of this Addendum, Land uses in the area surrounding the Facility are designated Open Space/Park, as well as Industrial/Business Park uses to the north (City of Moreno Valley 2026a). Public utility, stations, yards, wells, and similar facilities excluding offices are conditionally permitted within the Public Facilities and Park/Open Space zones pursuant to Moreno Valley Municipal Code Section 9.02.020.

The Ginger 12-kV super circuit and permanent circuit upgrades to existing electrical lines for the SCE Component would be located within existing public or SCE utility rights-of-way and new SCE easements on land designated as Open Space, Business Park, Commercial, Office, and Residential. The zoning of these rights-of-way under the 2040 General Plan Update EIR include Open Space/Park, World Logistic Center Specific Plan, Office, Commercial, and Residential (City of Moreno Valley 2026b). The Ginger 12-kV super circuit upgrade and permanent circuit upgrades are on existing electrical lines. Public utility, stations, yards, wells, and similar facilities excluding offices are conditionally permitted within these zones pursuant to Moreno Valley Municipal Code Section 9.02.020.

There are no established communities within one mile of the MCS. Considering the existing public facilities and industrial uses at the Facility as well as the purpose and location of the SCE Component of the MCM Project (see Figure 4-1), no established communities would be physically divided during construction or operations, and no impacts would occur. The SCE subcomponents located within the Facility (i.e., temporary construction power) would be located within new SCE easements and consistent with the existing land use and zoning of the Facility. The Ginger 12-kV super circuit and permanent circuit upgrades to existing electrical lines would be located within existing public or SCE utility rights-of-way and would not impede an established community; therefore, no impact to established communities would occur with implementation.

The City of Moreno Valley is located within the Western Riverside County Multiple Species Habitat Conservation Plan (WRC MSHCP) Area. As discussed in Section 8.1.2, Biological Resources, the SCE Component would not conflict with the requirements of the WRC MSHCP.

The temporary construction power would be located within the Facility, adjacent to the MCS and partially within the existing right-of-way for Virginia Street and the existing Ginger 12-kV line. The Ginger 12-kV super circuit and permanent circuit upgrades to existing electrical lines would be located within existing rights-of-way, some of which pass through land zoned as World Logistics Center Specific Plan (City of Moreno Valley 2026b). In addition, as described in Section 6.3.2 of this Addendum, Article XII, Section 8 of the California Constitution establishes CPUC's preemptive authority over matters for which the legislature has granted CPUC regulatory powers. Utilities are exempt from local land use controls in conflict with "the paramount authority of the State" (California Public Utilities Code Section 6294). Due to CPUC's preemption, the CPUC has jurisdiction over the siting, construction, maintenance, and operation of electric facilities in California and the SCE Component is not subject to local discretionary zoning requirements. For informational purposes, the SCE Component would be consistent with existing uses, which are allowable uses under the Public land use designation of the 2040 General Plan update. All features are allowable use within the Public Facilities and Parks. Open Space zone. Further, the SCE Component would be located within existing public or SCE utility rights-of-way and SCE easements.

The SCE Component would not result in significant environmental impacts related to noise, water quality, cultural resources, or air quality, that would conflict with 2006 or 2040 General Plan Policies (City of Moreno Valley 2006, 2026a).²² Staging for the SCE Component construction would be temporary and would occur within the SDG&E Component staging area. The staging area designated as Open Space surrounding the MCS would be restored back to existing conditions upon completion of the MCM Project construction. Temporary staging areas required for the MCM Project, including the SCE Component, would not conflict with any land use plans, policies, or regulations.

The current and proposed uses for the SCE Component are consistent with the City's underlying land use designations and zoning and the SCE Component would not conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be less than significant.

8.1.5.3 Land Use and Planning Conclusion

As demonstrated by the preceding analysis, the SCE Component would not result in any new significant impacts or substantial increases in the severity of previously identified significant impacts related to land use, result in significant adverse cumulative land use and planning impacts, or require new or modified mitigation measures or alternatives to be studied that were not already previously analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. The SCE Component would, therefore, not alter the conclusions in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP.

8.1.6 Mineral Resources

8.1.6.1 Previous CEQA Documents

The March 2017 Final Program EIR for the 2016 AQMP determined that implementation of the 2016 AQMP would not result in the loss of a known mineral resource of value to the region or the loss of a

²² Based on the CPUC's preemptive jurisdiction over electric utility facilities, analysis of the SCE Component's consistency with the City's General Plan are provided for informational purposes.

locally important mineral resource recovery site, and impacts were found not to be significant (South Coast AQMD 2017b).

The November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 concluded that no significant or less than significant direct or indirect impacts would occur related to mineral resources (South Coast AQMD 2019a, 2019b).

8.1.6.2 SCE Component

The SCE Component, is located within Mineral Resource Zone 3 (MRZ-3) as identified in the City's General Plan 2040 City of Moreno Valley 2021). MRZ-3 is defined as land for which there are known mineral deposits, but the significance of mineral resources cannot be determined (City of Moreno Valley 2021). Currently, no mineral resources are extracted within the city, nor are there any significant mineral resource sites identified in the City's General Plan 2040 (City of Moreno Valley 2021). Additionally, the SCE Component work areas, are not used for the extraction of locally important minerals or minerals of value to the region, nor are the SCE Component work areas within a designated MRZ-1 or MRZ-2 Mineral Resource Zone. There are no oil or gas wells included in the SCE Component work areas (CalGEM 2025). Due to the lack of any known significant mineral resources, ground-disturbing activity for construction of the SCE Component would not result in the loss of locally important minerals or minerals of value to the region or the state or a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. No impacts would occur.

8.1.6.3 Mineral Resources Conclusion

As demonstrated by the preceding analysis, the SCE Component would not result in any new significant impacts or substantial increases in the severity of previously identified significant impacts related to mineral resources, result in significant adverse cumulative mineral resources impacts, or require new or modified mitigation measures or alternatives to be studied that were not already previously analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. The SCE Component would, therefore, not alter the conclusions in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP.

8.1.7 Population and Housing

8.1.7.1 Previous CEQA Documents

The March 2017 Final Program EIR for the 2016 AQMP determined that the 2016 AQMP would mainly affect existing commercial and industrial facilities in appropriately zoned industrial and commercial areas and is not anticipated to generate significant adverse effects on the South Coast Air Basin's population or population distribution. The 2016 AQMP contains no provisions that would lead to displacement of a substantial number of people or existing housing or necessitate the construction of replacement housing elsewhere. Therefore, impacts were found to be less than significant (South Coast AQMD 2017b).

The November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 concluded that no significant or less than significant direct or indirect impacts would occur related to population and housing (South Coast AQMD 2019a, 2019b).

8.1.7.2 SCE Component

The SCE Component does not include residential or commercial development that would increase population in the area. The SCE Component would involve work within the MCS and within public or SCE utility rights-of-way, and would not result in the displacement of existing people or housing. The proposed workforce for the SCE Component over the duration of construction is anticipated to be located within commuting distance of the MCM Project or could be accommodated by existing temporary accommodations and housing within the area. The number of permanent employees at the MCS and those associated with the SCE Component would not change upon implementation of the MCM Project. The SCE Component would not result in unplanned population growth either directly or indirectly. No impact would occur.

8.1.7.3 Population and Housing Conclusion

As demonstrated by the preceding analysis, the SCE Component would not result in any new significant impacts or substantial increases in the severity of previously identified significant impacts related to population and housing, result in significant adverse cumulative population and housing impacts, or require new or modified mitigation measures or alternatives to be studied that were not already previously analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. The SCE Component would, therefore, not alter the conclusions in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP.

8.1.8 Public Services

8.1.8.1 Previous CEQA Documents

The March 2017 Final Program EIR for the 2016 AQMP determined that implementation of the 2016 AQMP would result in less than significant impacts to public services, including fire and police protection, schools, parks, and other public facilities. Impacts to public services are not anticipated because the 2016 AQMP would not result in the need for new or physically altered government facilities to maintain acceptable service ratios, response times, or other performance objectives, and because implementation of the 2016 AQMP would not create a population increase that could increase demand for schools requiring new or physically altered school facilities (South Coast AQMD 2017b).

The November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 concluded that no significant or less than significant direct or indirect impacts would occur related to public services (South Coast AQMD 2019a, 2019b).

8.1.8.2 SCE Component

Construction

Construction activities may temporarily result in a slight increase in demand for fire protection services due to the operation of construction equipment and machinery capable of generating a spark that could ignite; storage, handling, and disposal of combustible materials; and the use of flammable or hazardous

materials, as is typical of construction sites. These activities could have the potential to temporarily increase the risk of a fire emergency associated with heat or sparks from construction equipment and vehicles that have the potential to ignite vegetation and start a fire, as well as from the use of combustible and flammable materials that could ignite and result in a fire if not stored or handled properly. However, for the reasons discussed in the following paragraphs, the potential for a temporary increase in demand for fire protection services would not result in significant environmental impacts pertaining to the need for new, expanded, or physically altered fire protection facilities.

Compliance with CalOSHA regulations, California Process Safety Management regulations, and applicable Code of Federal Regulations requirements would be maintained throughout implementation of the SCE Component. SCE would require all contractors working at the construction sites to comply with applicable California Department of Industrial Relations, Division of Occupational Safety and Health, and Fire and Building Code requirements, including requiring construction managers and personnel at the construction sites to be trained in fire prevention and emergency response. Fire suppression equipment specific to construction would continue to be maintained at the SCE Component work areas, as appropriate. Fire protection services to the SCE Component are provided by the Riverside County Fire Department, which is administered and operated by the California Department of Forestry and Fire Protection (CAL FIRE) under a cooperative contractual agreement with the City of Moreno Valley and the County of Riverside. Construction of the SCE Component would be required to comply with all applicable federal, state, and local codes and ordinances related to the maintenance of mechanical equipment, handling and storage of flammable materials, and cleanup of spills of flammable materials. State regulations and code requirements would require personnel to be trained in fire prevention and emergency response, maintenance for fire suppression equipment, and implementation of proper procedures for storage and handling of flammable materials. For the SCE Component within high fire risk areas, SCE would implement best management practices to reduce fire risk during construction, including hot work restrictions, work vehicles equipped with fire suppression equipment, and additional field work restrictions during elevated and extreme fire weather threat conditions (SCE 2021). With compliance with regulatory requirements and SCE standards, construction of the SCE Component would not increase the demand for fire protection services resulting in the need for additional fire personnel or equipment and new, expanded, or physically altered fire protection facilities. Impacts would be less than significant.

Short-term construction activities and personnel would not increase demand for sheriff or police services, schools, parks, or other public facilities and would not result in the need for new, expanded, or physically altered public facilities. No impacts would occur.

Operation

Once operational, the SCE Component would not generate additional need for fire protection services in excess of the fire protection services currently serving the permitted routine operations and maintenance activities at existing SCE infrastructure. Consistent with existing conditions, the use and storage of hazardous materials related to the SCE Component would be reported to and subject to protection by the Riverside County Fire Department. The SCE Component would be designed and operated in accordance with NFPA standards, the Public Safety Code (19 CCR), Building Standards Code (24 CCR), and local building standards, as applicable and consistent with input from the local fire department.

To ensure safe operation and maintenance of the SCE Component, SCE would comply with all applicable regulations and implement generally accepted industry practices related to operating policies and procedures concerning safety, security, and fire protection for substations and electrical subtransmission lines. SCE's implementation of the temporary construction power, Ginger 12-kV super circuit, and permanent circuit upgrades would be conducted in accordance with the standards and protocols set forth in SCE's 2026-2028 WMP as well as applicable regulatory requirements, which would reduce potential impacts associated with fire hazards (SCE 2025).

Flammable and combustible materials would be stored in accordance with NFPA 30 standards (latest revision incorporated by reference in Title 49 of the Code of Federal Regulations, Part 192) and all solvent use would comply with federal, state, and local regulations. Through compliance with federal, state, and local regulatory requirements, operation of the SCE Component would not increase the demand for fire protection services resulting in the need for additional fire personnel or equipment and new, expanded, or physically altered fire protection facilities. Impacts would be less than significant.

The SCE Component would not involve residential development and the number of permanent employees at the MCS and required to support of SCE facilities would not change with implementation of the SCE Component. Therefore, the SCE Component would not increase demand for sheriff or police protection services, schools, parks, recreational facilities, or other public facilities and construction or expansion of these existing public facilities would not be necessary. The SCE Component would not generate additional demand for sheriff or police protection services. No impacts would occur.

8.1.8.3 Public Services Conclusion

As demonstrated by the preceding analysis, the SCE Component would not result in any new significant impacts or substantial increases in the severity of previously identified significant impacts to public services, result in significant adverse cumulative public services impacts, or require new or modified mitigation measures or alternatives to be studied that were not already previously analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. The SCE Component would, therefore, not alter the conclusions in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP.

8.1.9 Recreation

8.1.9.1 Previous CEQA Documents

The March 2017 Final Program EIR for the 2016 AQMP determined that implementation of the 2016 AQMP would result in less than significant impacts to recreation because the 2016 AQMP does not have the potential to induce population growth, and because the control measures would not increase the use of, or demand for, existing neighborhood and/or regional parks and recreational facilities. Because the 2016 AQMP does not have the potential to induce population growth, the control measures would not require construction of recreational facilities that might have an adverse physical effect on the environment (South Coast AQMD 2017b).

The November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 concluded that no significant or less than significant direct or indirect impacts would occur related to recreation (South Coast AQMD 2019a, 2019b).

8.1.9.2 SCE Component

The SCE Component would not involve a change in population that would increase demand for recreational facilities, cause existing recreational facilities to experience physical deterioration, or otherwise cause direct or indirect impacts on recreational facilities. The Facility is located adjacent to the San Jacinto Wildlife Area, which is approximately 19,000 acres and is used recreationally for wildlife viewing, hiking, and hunting. The SCE Component would not cross into the wildlife area nor its recreational or park facilities. Thus, the SCE Component would not result in direct, adverse impacts to such facilities, requiring the construction or expansion of recreational facilities that may have an adverse physical effect on the environment. The SCE Component does not propose, nor is it required to provide, any recreational facilities. No impacts would occur.

8.1.9.3 Recreation Conclusion

As demonstrated by the preceding analysis, the SCE Component would not result in any new significant impacts or substantial increases in the severity of previously identified significant impacts to recreational facilities, result in significant adverse cumulative recreation impacts, or require new or modified mitigation measures or alternatives to be studied that were not previously analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. The SCE Component would, therefore, not alter the conclusions in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP.

8.2 Analysis of Impacts for Environmental Topics Not Included in the Previous CEQA Documents

8.2.1 Wildfire

As discussed in Section 2.4, CEQA Guidelines Revisions, of this Addendum, none of the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, or the March 2017 Final Program EIR for the 2016 AQMP included wildfire as an environmental topic area. Wildfire was not included because no criteria had been established under CEQA when the March 2017 Final Program EIR for the 2016 AQMP was prepared. However, CEQA now requires potential impacts associated with wildfires to be analyzed, and an evaluation of the SCE Component's potential to result in wildfire impacts is required and presented the following discussion. Impacts associated with wildfire would be considered significant if any of the following criteria are met or exceeded:

- The project would substantially impair an adopted emergency response plan or emergency evacuation plan.
- The project may exacerbate wildfire risks by exposing the project's occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire due to slope, prevailing winds, and other factors.

- The project may exacerbate wildfire risks or may result in temporary or ongoing impacts to the environment because the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) are required.
- The project would expose people or structures to significant risks such as downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.
- The project would expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildfires.

8.2.1.1 Previous CEQA Documents

The Hazards and Hazardous Materials section of the 2016 AQMP Initial Study, included in Appendix A to the March 2017 Final Program EIR for the 2016 AQMP, concluded that implementation of the 2016 AQMP would not have the potential to expose people or structures to a significant risk of loss, injury, or death involving wildland fires because site preparation of industrial facilities often includes the removal of vegetation for fire safety and commercial and industrial areas are not typically located near wildland or forested areas. The 2016 AQMP Initial Study concluded that no impact would occur related to wildland fires (South Coast AQMD 2017b). Therefore, wildfire was not an environmental topic discussed in further detail in the March 2017 Final Program EIR for the 2016 AQMP.

Potential impacts related to wildfire were not discussed in detail in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 (South Coast AQMD 2019a, 2019b).

8.2.1.2 SCE Component

Construction

According to CAL FIRE's Fire Hazard Severity Zone (FHSZ) map, the majority of the SCE Component is located within an area designated as a Local Responsibility Area but not within an FHSZ. A small portion of the Ginger 12-kV super circuit alignment is within and adjacent to a Very High FHSZ along Theodore Street and Ironwood Avenue. CAL FIRE mapped FHSZs are based on fuel loading, slope, fire history, weather, and other relevant factors as directed by California Public Resources Code, Sections 4201–4204, and California Government Code, Sections 51175–51189. Local Responsibility Areas include incorporated cities, urban regions, agriculture lands, and portions of the desert where the local government is responsible for wildfire protection, which is typically provided by city fire departments, fire protection districts, counties, and by CAL FIRE under contract (CAL FIRE 2024).

The SCE Component would result in a temporary increase in the number of workers within the Facility and surrounding area during construction thereby increasing the number of people that could be exposed to wildfire in the area. Construction activities associated with the SCE Component would involve the use of vehicles, engines, and other equipment that have the potential to generate sparks and, therefore, could exacerbate wildfire risks.

As described in Section 7.2.4, the City of Moreno Valley's Local Hazard Mitigation Plan identifies potential evacuation routes in the case of an emergency (City of Moreno Valley 2023). The closest primary

evacuation route to the SCE Component is Alessandro Boulevard. Reconductor activities, included as part of the Ginger 12-kV super circuit construction activities, would have temporary construction areas within the right-of-way associated with Alessandro Boulevard. As depicted on Figure 5-3, the reconductor impact area would generally occur north of Alessandro Boulevard and would not fully impede emergency evacuation within the roadway. Additionally, Mitigation Measure TR-1 from the March 2017 Final Program EIR for the 2016 AQMP requires a construction management plan to be prepared that includes various traffic control measures. These measures include notifying emergency response providers near the Facility and SCE Component in advance of construction activities in specific locations, providing temporary lane closure schedules (if required), and providing potential alternate routes. The selected contractor would work with local police and traffic engineers to plan appropriate access alternatives in the event there are any temporary lane closures and traffic disruptions, if required. Additionally, Vehicle Code Section 21806 allows drivers of emergency vehicles to have a variety of options for avoiding traffic, such as using sirens to clear a path of travel and driving in the lanes of opposing traffic. Therefore, with compliance with regulatory requirements and implementation of Mitigation Measure TR-1, the short-term construction activities for the SCE Component would not substantially impair an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant with mitigation incorporated.

The SCE Component is sited in flat areas that have been previously graded or disturbed and, thus, are not subject to risks associated with slope instability (Appendix E). Furthermore, the majority of the SCE Component is not located within a FHSZ, which considers fuel loading, slope, fire history, weather, and other relevant factors, and does not present a considerable fire risk.

New utility connections to SCE infrastructure would be sited and installed based on geotechnical field conditions. In accordance with tree and power line clearance requirements in California Public Resources Code Section 4293 and CPUC GO 95, SCE would maintain the utility infrastructure to manage fire and safety hazards and provide the electrical reliability of the proposed poles and conduit. For the SCE Component within high fire risk areas, SCE would implement best management practices to reduce fire risk during construction, including hot work restrictions, work vehicles equipped with fire suppression equipment, and additional field work restrictions during elevated and extreme fire weather threat conditions (SCE 2021). With compliance with regulatory requirements and general best management practices for construction, the SCE Component would not exacerbate wildfire risks during construction activities. Additionally, in the case of a wildfire event near the SCE Component, workers onsite would be advised on strategies to limit exposure by their local health and air quality officials to reduce exposure to pollutants.

Operations

Operation of the SCE Component would not substantially impair an adopted emergency response plan or emergency evacuation plan. Maintenance trips for the Ginger 12-kV super circuit and permanent circuit upgrades would be comparable to existing conditions because this SCE subcomponent would not introduce a new line where electrical infrastructure does not already exist.

To provide safe operation and maintenance of the SCE Component, SCE would comply with all applicable regulations and implement generally accepted industry practices related to operating policies and procedures concerning safety, security, and fire protection for substations and electrical lines.

The SCE Component would be built according to CBC applicable requirements and recommendations in the Report of Geotechnical Investigation (Appendix E). With compliance with regulatory requirements and implementation of the Geotechnical Investigation recommendations, construction of the SCE Component would not result in exposure of people or structures to significant risks, including downslope or downstream flooding or landslides.

During operations, the presence of power lines and energized electrical equipment can also pose a wildfire risk. New utility connections to existing SCE infrastructure, such as aboveground electrical connections (for the temporary construction power, Ginger 12-kV super circuit, and permanent circuit upgrades), would be subject to regular inspection to maintain proper power line clearances. In accordance with tree and power line clearance requirements in California Public Resources Code Section 4293 and CPUC GO 95 and GO 165, SCE would maintain the utility infrastructure to manage fire and safety hazards and support the electrical reliability of the proposed poles and conduit. Protective equipment, such as reclosers and fuses, in the adjacent public rights-of-way are standard components of the grid that help keep workers and the public safe by automatically shutting off the power in the case of a disturbance. SCE regularly inspects, maintains, and repairs the electrical infrastructure in the city. These activities involve both routine preventive maintenance and emergency procedures to maintain service continuity. Inspectors perform aerial and ground inspections of facilities and patrol aboveground components annually. Inspections for corrosion, equipment misalignment, loose fittings, and other common mechanical problems are performed at least every 3 years (pursuant to CPUC GO 165) for power lines.

As discussed in detail in Section 7.2.4.2, to minimize the risk of accidental ignition of a wildland fire from the proposed electrical lines, SCE operates in compliance with the recently updated 2026-2028 WMP (SCE 2025), which would reduce the significant wildfire risk and Public Safety Power Shutoff (PSPS) impacts. The primary goal of the WMP is to reduce the risk of wildfires associated with utility equipment and to reduce the scope, scale, frequency, and impacts of PSPS events. Implementation of the WMP is conducted in accordance with applicable regulations, including but not limited to GO 95, Rules for Overhead Electrical Line Construction; GO 165, Requirements for Electric Distribution and Transmission Facilities; SCE Distribution Overhead Construction Standards; SCE Distribution Underground Construction Standards; GO 128, Rules for Construction of Underground Electric Supply and Communication Systems; SCE Distribution Apparatus Construction Standards; SCE Electrical Construction Station; SCE Electric Design Station Wiring; SCE Distribution Design Standards; and SCE Distribution Inspection Maintenance Program (SCE 2025). SCE's implementation of the temporary construction power, Ginger 12-kV super circuit, and permanent circuit upgrades would be conducted in accordance with the standards and protocols set forth in SCE's 2026-2028 WMP as well as applicable regulatory requirements, which would reduce potential impacts associated with fire hazards.

8.2.1.3 Cumulative Wildfire Impacts

Previous CEQA Documents

An analysis of impacts due to wildfire was not included in the cumulative Hazards and Hazardous Materials section, Section 5.9, of the March 2017 Final Program EIR for the 2016 AQMP. However, the March 2017 Final Program EIR for the 2016 AQMP stated that there is the potential to expose people to significant impacts from wildland fires due to possible cumulative development in areas with a high fire hazard risk. However, because the 2016 AQMP Initial Study determined that implementation of the 2016

AQMP's control measures would have no impact regarding wildland fires, impacts from implementation of the 2016 AQMP would not contribute to cumulatively considerable impacts associated with wildfire.

Wildfire was not an environmental topic addressed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134. Although the November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 discussed cumulative hazards and hazardous materials impacts, the November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134 did not discuss cumulative impacts related to wildfire. As such, cumulative wildfire impacts were not analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, and the April 2019 Final SEA for PAR 1134.

Post-fire hazards (i.e., landslides, downstream flooding) are site specific; thus, these concerns would not combine with other development resulting in a cumulative effect. Therefore, post-fire hazards are not addressed on a cumulative level.

SCE Component

Because the SCE Component would temporarily increase traffic during construction, even with compliance with regulatory requirements and implementing Mitigation Measure TR-1, the selected contractor would work with local police and traffic engineers to plan appropriate access alternatives in the event there are any temporary lane closures and traffic disruptions. Similar to other development projects within the city, the SCE Component would be required to comply with the City's Traffic Control Plan Guidelines & Checklist and would prepare a temporary traffic control plan for construction activities within the city right-of-way. Operational traffic would be similar to existing conditions.

As stated previously, a small portion of the SCE Component is located within and adjacent to an area designated by CAL FIRE as a FHSZ, and areas designated as State Responsibility Areas and Very High FHSZ are located throughout Moreno Valley and the surrounding area. The proposed SCE Component would be located within the previously developed MCS and adjacent vegetated areas that are routinely maintained as part of ongoing operations at the MCS. Improvements in areas outside the MCS would occur within developed and disturbed areas where electrical infrastructure already exists that are also appropriately maintained under existing conditions. The SCE Component would not combine with other cumulative development projects in the area in a manner that would exacerbate the existing wildfire risk by expanding development into previously undeveloped or disturbed areas. Although proposed construction activities would increase the potential for ignitions to occur within previously developed and disturbed areas, the SCE Component would be required to comply with all applicable federal, state, and local regulations, codes, and standards discussed in Section 8.2.1.2 to minimize risks. The SCE Component would result in less than significant impacts with mitigation.

As such, the SCE Component of the MCM Project would not result in any new significant cumulative impacts, nor would it substantially increase the severity of the significant cumulative impacts identified in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP.

8.2.1.4 Mitigation Measures

As described in Section 8.2.1.1, the March 2017 Final Program EIR for the 2016 AQMP did not include extensive discussion of wildfire impacts, and the 2016 AQMP Initial Study determined that implementation of the 2016 AQMP's control measures would have no impact regarding wildland fires (South Coast AQMD 2017b). As described in Section 8.2.1.2, the SCE Component would comply with the previously discussed Mitigation Measure TR-1 from the MMRP for the March 2017 Final Program EIR for the 2016 AQMP (refer to Appendix B-2 for applicable mitigation measures from the MMRP for the March 2017 Final Program EIR for the 2016 AQMP).

8.2.1.5 Wildfire Conclusion

As demonstrated by the preceding analysis, the SCE Component would not result in any new significant impacts or substantial increases in the severity of previously identified significant impacts related to wildfire, result in significant adverse cumulative wildfire impacts, or require new or modified mitigation measures or alternatives to be studied that were not previously analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. The SCE Component would, therefore, not alter the conclusions in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP.

9.0 CONCLUSIONS

The 2016 AQMP includes strategy and control measures needed to attain the standards for which the South Coast Air Basin is not in attainment. To attain the ozone and PM_{2.5} ambient air quality standards, the 2016 AQMP identified the amount of NO_x emissions reductions that were needed. As part of the approval process of the 2016 AQMP, South Coast AQMD prepared a programmatic EIR pursuant to CEQA that disclosed the potential for significant impacts that could occur as a result of implementation of the 2016 AQMP (South Coast AQMD 2017b). Subsequent to the certification of the March 2017 Final Program EIR for the 2016 AQMP, South Coast AQMD staff determined that as Amended Rule 1134, Rule 1110.2, and Rule 1100 contained new information of substantial importance that was not known and could not have been known at the time the March 2017 Final Program EIR for 2016 AQMP was certified. Therefore, South Coast AQMD prepared and certified the April 2019 Final SEA for PAR 1134 and November 2019 Final SEA for PAR 1110.2 and PAR 1100 that tiered off the March 2017 Final Program EIR for the 2016 AQMP to facilitate the transition of affected equipment subject to the NO_x RECLAIM program to a command-and-control regulatory structure and to implement Control Measure CMB-05 (South Coast AQMD 2019a, 2019b). The MCM Project includes the SDG&E Component (compressor system upgrades) and SCE Component (temporary construction power, Ginger 12-kV super circuit, and permanent circuit upgrades) and has been proposed to comply with the mandates set forth in Rule 1134, Rule 1110.2, and Rule 1100 to retrofit or replace equipment at existing gas compressor facilities to achieve greater emissions reductions.

The SDG&E Component of the MCM Project is within the scope of what was analyzed in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP; however, the SCE Component is not. Therefore, this Addendum analyzes the potential impacts from the SCE Component and changes to the scope of the MCM Project that was previously analyzed in the prior CEQA documents. This Addendum concludes that implementation of the SCE Component would not result in any new significant environmental impacts that were not already identified in the certified November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP, and has determined that none of the previously identified significant effects would be substantially more severe with implementation of the SCE Component.

9.1 SCE Component Impact Summary

The SCE Component of the MCM Project would not result in new significant impacts, substantial increases in previously identified significant impacts, or the requirement for new mitigation measures or alternatives to be studied that were not already analyzed under the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP. In addition, implementation of the SCE Component would not change the conclusions reached in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP.

This Addendum provides adequate analysis and substantial supporting evidence pursuant to CEQA Guidelines Section 15164 and has concluded that none of the conditions described in CEQA Guidelines Section 15162 calling for preparation of a subsequent EIR have occurred. The SCE Component would not result in a considerable contribution to existing cumulative impacts in the region. In addition, past, present and reasonably foreseeable future projects in the region would presumably be bound by the lead agency

to: 1) comply with all applicable federal, state, and local regulatory requirements; and 2) incorporate all feasible mitigation measures, consistent with CEQA, to further ensure that any potential cumulative impacts be reduced to less than significant.

Through the incorporation of PDFs, compliance with federal, state and local laws and regulations, and implementation of all applicable mitigation measures of the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP, as outlined in this Addendum, the SCE Component of the MCM Project would not result in or substantially contribute to any of the significant and unavoidable project-level or cumulative impacts identified in the November 2019 Final SEA for PAR 1110.2 and PAR 1100, the April 2019 Final SEA for PAR 1134, and the March 2017 Final Program EIR for the 2016 AQMP.

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ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Definition
A/N	Application Number
AB	Assembly Bill
APN	Assessor's Parcel Number
AQMD	Air Quality Management District
AQMP	air quality management plan
BACM	Best Available Control Measure
BACT	best available control technology
BARCT	best available retrofit control technology
BMP	best management practice
BSA	Biological Study Areas
CAP	Climate Action Plan
C&D	construction and demolition
CalEEMod	California Emissions Estimator Model
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
CalOSHA	California Division of Occupational Safety and Health
Caltrans	California Department of Transportation
CBC	California Building Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CGP	Construction General Permit
CGT	compressor gas turbine
CMB	Control Measure for Combustion Sources
CO	carbon monoxide
CO ₂	carbon dioxide
CO _{2e}	carbon dioxide equivalent
CPCN	Certificate of Public Convenience and Necessity
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources
CY	cubic yards
dB	Decibel
dBA	A-weighted decibel
DOPD	Distribution Open Phase Detection
DPM	diesel particulate matter
EDC	electric-motor-driven compressor

Acronym/Abbreviation	Definition
EIR	environmental impact report
EMWD	Eastern Municipal Water District
ERPG	Emergency Response Planning Guideline
FHSZ	Fire Hazard Severity Zone
FTA	Federal Transit Administration
GHG	greenhouse gas
GO	General Order
GSP	groundwater sustainability plan
HCP	Habitat Conservation Plan
HMBP	hazardous materials business plan
HP	horsepower
HRA	Health Risk Assessment
ICE	Internal combustion engine
ID	Identification [number]
IEEE	Institute of Electrical and Electronics Engineers
in/sec	inches per second
kg	Kilogram
kV	kilovolt
Leq(8-hr)	equivalent noise level over an 8-hour period
LNG	liquid natural gas
LOS	level of service
LST	localized significance threshold
MCM	Moreno Compressor Modernization
MCS	Moreno Compressor Station
MMRP	Mitigation Monitoring and Reporting Program
MRZ	Mineral Resource Zone
MS4	Municipal Separate Storm Sewer System
MSHCP	Western Riverside County Multiple Species Habitat Conservation Plan
MT	metric ton
NFPA	National Fire Protection Association
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
O ₃	Ozone
OSHA	Occupational Safety and Health Administration
PDF	project design feature
PM ₁₀	respirable particulate matter
PM _{2.5}	fine particulate matter
PSPS	Public Safety Power Shutoff

Acronym/Abbreviation	Definition
PTC	Permit to Construct
RCHCA	Riverside County Habitat Conservation Agency
RECLAIM	Regional Clean Air Incentives Market
RTC	RECLAIM Trading Credit
RWQCB	Regional Water Quality Control Board
SCADA	supervisory control and data acquisition
SCE	Southern California Edison
SCR	Selective Catalytic Reduction
SDG&E	San Diego Gas & Electric
SEA	Subsequent Environmental Assessment
SIP	State Implementation Plan
South Coast AQMD	South Coast Air Quality Management District
SoCalGas	Southern California Gas Company
SO _x	Sulfur oxides
SRA	source receptor area
SWPPP	stormwater pollution prevention plan
TAC	toxic air contaminant
TCR	Tribal Cultural Resource
TSP	tubular steel pole
UL	Underwriters Laboratories
U.S.	United States
U.S. EPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
VMT	vehicle miles traveled
VOC	volatile organic compound
WEAP	Workers Environmental Awareness Program
WLC	World Logistics Center
WMP	Wildfire Mitigation Plan
WQMP	water quality management plan