

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



August 30, 2017

Patricia Adams  
Southern California Edison  
Infrastructure Licensing  
General Office #4 – SCE 10  
8631 Rush St  
Rosemead, CA, 91770

RE: Banducci Substation Project: Notice to Proceed #2 and Minor Project Change #1

Dear Ms. Adams,

On July 31, 2017, Southern California Electric (SCE) submitted Notice to Proceed (NTP) Request #2 to the California Public Utilities Commission (CPUC) for the Telecommunication facilities for the Banducci Substation Project, in the Town of Tehachapi and in unincorporated areas of Kern County, California. Under this NTP Request, SCE is seeking CPUC authorization to proceed with the Telecommunication system upgrades Routes #1 and #2 between the Banducci and the Monolith Substations. SCE also submitted a Minor Project Change (MPC) Request concurrent with the NTP Request, to document changes made to the Telecommunication system upgrades based on final engineering of the Project. Additional information was submitted by SCE on August 28, 2017.

The SCE Banducci Substation Project was evaluated in accordance with the California Environmental Quality Act (CEQA). The mitigation measures described in the Final Mitigated Negative Declaration (MND) were adopted by the CPUC as conditions of project approvals. The CPUC voted on June 11, 2015 to approve the SCE Banducci Substation Project (Decision D.15-06-009) and a Notice of Determination was submitted to the State Clearinghouse (SCH# 2014111032). The CPUC also adopted a Mitigation, Monitoring, Compliance and Reporting Program (MMCRP) to ensure compliance with all mitigation measures imposed on the Banducci Substation Project during implementation.

As currently proposed by SCE, the Banducci Substation Project includes four different components (substation, subtransmission, distribution, and telecommunication). NTP #1 for the construction of the Banducci Substation and 66 kV components was issued by the CPUC on January 18, 2017. NTP #3 for the distribution getaways and a portion of the telecom #1 route was issued by the CPUC on March 29, 2017. This is a typical process for projects with multiple components. Given that the Banducci Substation Project has been approved by the CPUC, as described above, this phased construction review process allows SCE to proceed with individual project components where compliance with all applicable mitigation measures and conditions can be documented.

This letter documents the CPUC's thorough evaluation of all activities covered in this NTP and MPC, including the Mitigation Measure Requirements and Responsibilities table provided with the subject NTPR. The evaluation process ensures that all mitigation measures applicable to the location and activities covered in the NTP are implemented, as required in the CPUC's Decision.

NTP #2, including the project changes requested in MPC #1, for the construction of the telecommunication Routes #1 and #2 is granted by the CPUC based on the factors described below.

## SCE NTP Request

In their NTP Request #2, SCE seeks CPUC authorization to conduct the following construction activities:

### SITE LOCATION AND CONDITIONS

Construction activities for the Project would occur within Kern County, California. ....the Project spans approximately 32 miles from the proposed Banducci Substation east to the existing Cummings Substation, then continuing east to the existing Monolith Substation, and then west back to the proposed Banducci Substation. For reference, the Project is located within the Keene, Tehachapi North, Cummings Mountain, and Tehachapi South United States Geological Survey (USGS) 7.5-minute topographic quadrangles.

Additional information on the features associated with the Project is described below.

### PROJECT COMPONENTS

This section describes the Project facilities, components, and site work associated with the Project. Construction equipment operating hours for these activities would occur in accordance with Mitigation Measures and would generally occur between the hours of 6:00 AM to 9:00 PM. In the event construction activities are necessary on days or hours outside of what is specified by the Mitigation Measures, SCE would obtain variances from the CPUC<sup>1</sup>. SCE has established a Project website. SCE has also designated the Project Manager as the public notification contact for the Project.

### **Project Elements/Construction Activities**

The following list of elements and activities potentially will be present or active throughout Project construction.

<b>Project Elements</b>	<b>Construction Activities</b>
<ul style="list-style-type: none"><li>• Portable toilets</li><li>• Temporary guard structures</li><li>• Temporary concrete clean-out area</li><li>• Existing access roads and overland travel</li><li>• Overhead telecommunication cable</li><li>• Underground telecommunication vaults, manholes, trenches, and cable</li><li>• Underground distribution vaults, duct banks, trenches, and cable</li><li>• Planned construction work areas and wire set-up sites (e.g., pull sites, wire splice sites)</li><li>• Construction equipment and vehicles</li><li>• Permit requirements (e.g., Best Management</li></ul>	<ul style="list-style-type: none"><li>• Project and contractor equipment, vehicle and material operation and storage</li><li>• Surveying and grading activities</li><li>• Aboveground construction activities</li><li>• Underground construction activities</li><li>• Vegetation removal, including grubbing and scraping</li><li>• Installation of vaults, duct banks, manholes, foundations, pole structures, underground cables and overhead wires</li><li>• Installation and removal of temporary fencing and BMPs</li><li>• Replacement and upgrades of existing facilities</li></ul>

<sup>1</sup> SCE would need to obtain variances from Kern County.

Practices [BMPs])	<ul style="list-style-type: none"> <li>• Temporary traffic control</li> </ul>
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**Site Work for Fiber Optic Telecommunication Systems**

Planned telecommunication equipment installation and upgrades are summarized below.

**Fiber Optic Telecommunication Cable Routes, Minor Project Change Description**

**Telecommunication Route #1**

SCE identified a potential General Order 95 conflict along Telecommunication Route #1 near Correction Substation. To eliminate the potential General Order 95 conflict, SCE proposed to modify Telecommunication Route #1 by installing fiber optic cable on two existing poles located just north of the approved routed. As a result, the fiber optic cable would be installed on existing poles 4220768E and 4220767E instead of on existing pole 314059E.

**Telecommunication Route #2**

SCE previously undergrounded a section of the existing overhead utility facilities located along Tehachapi Boulevard between Dennison Road and Hayes Street due to a Rule 20 condition. As a result, that section of overhead poles is no longer available for fiber optic cable attachment as part of the approved Telecommunication Route #2. To accommodate a continuous fiber optic cable route from Banducci Substation to Monolith Substation, SCE proposes to modify Telecommunication Route #2 by replacing an approximately 2.2-mile segment of the route with an approximately 1.5-mile segment. The majority of the relocated telecommunication route segment would be placed in an existing underground conduit. Telecommunication Route #2 would follow the route as described in the Final MND from Banducci Substation to existing pole 2226882E, which is located just south of the intersection of South Curry Street and West Valley Boulevard. At this pole, Telecommunication Route #2 would transition underground and continue north on South Curry Street for approximately 125 feet in new underground conduit and east for approximately 125 feet in existing underground conduit to an existing vault V5613175 on West Valley Boulevard. The route would then continue east on West Valley Boulevard in existing underground conduit for approximately 5,200 feet to Dennison Road. The route would then continue north along Dennison Road in existing underground conduit for approximately 2,200 feet to Tehachapi Boulevard, where it would continue east in an existing conduit as described in the Final MND. Please refer to Attachment C, pages 26-30.

In addition, to meet diversity separation requirements when entering Banducci Substation, SCE proposes to install a new 40-foot-tall wood pole (4812536E) with a new anchor and down guy located in line with the existing pole line immediately adjacent to Banducci Substation. Note that there is no existing pole located at the proposed location.

**Pole Loading for Telecommunication Routes #1 and #2**

SCE recently completed pole loading along Telecommunication Routes #1 and #2 due to the amount of time that has elapsed since initially performing pole loading. Based on the results, SCE proposes to modify the number and locations of pole replacements to accommodate as-is and as-designed conditions. Instead of replacing 39 existing poles, as described in the Final MND, SCE proposes to replace 21 existing poles. The replacement poles would be located immediately adjacent to the poles to be removed. In addition, SCE proposes to replace six existing down guys (Attachment B, page 6; Attachment C, pages 10, 11, 12, 24, 25) and install two new down guys and anchors (Attachment C, page 12). Please refer to Attachments B and C.

The poles proposed for replacement are not all the poles originally approved for replacement in the IS/MND. There is some overlap though. Poles that are still proposed for replacement at the previously identified locations are labeled on the maps as "Structures Still Proposed for Replacement." Poles that are no longer proposed for replacement are labeled on the maps as "Structures No Longer Proposed for Replacement."

The following Project Description is Section 4.10.5 from the Final IS/MND updated with the changes due to final engineering and included in the Minor Project Change shown in underline strikeout:

Telecommunications infrastructure would be added to connect the proposed Banducci Substation to SCE's telecommunications system and would provide Supervisory Control and Data Acquisition (SCADA), protective relaying, data transmission, and telephone services for the proposed Banducci Substation and associated facilities.

New telecommunications equipment would be installed within the MEER at the proposed Banducci Substation and within the existing MEER at Monolith Substation. In addition, approximately 28 miles of overhead fiber optic telecommunications cable would be installed on ~~754~~ 717 existing poles, ~~39~~ 21 of which are scheduled to be replaced prior to attaching new fiber optic telecommunications cable to them. The new poles would be similar in size to the existing poles. They would be buried to a depth of approximately 6 to 9 feet below the ground surface and would be 38 to 50 feet high and approximately 12 to 18 inches in diameter at ground level and would taper toward the top of the pole.

Approximately ~~4~~ 5 miles of underground fiber optic telecommunications cable would be installed in ~~47~~ 21 existing vaults and ~~seven~~ eight new 5 feet x 5 feet x 8 feet manholes. Overhead and underground fiber optic telecommunications cables would be installed on or in new and existing structures. The two proposed telecommunications routes are shown in Figure 4-5) (Proposed Telecommunication Routes) and are described below.

Proposed Telecommunication Route #1 is approximately 14.5 miles long and would connect the proposed Banducci Substation to the existing Cummings Substation on Highland Road and then continue to the existing Monolith Substation east of Tehachapi, as described below.

The proposed fiber optic telecommunications cable would:

- Exit the proposed Banducci Substation to the west and extend north in approximately 2,800 feet of new conduit to Highline Road.
- Continue east on Highline Road in approximately 450 feet of new conduit and then transition to an overhead position on an existing pole.
- Continue east overhead on Highline Road for approximately 6 miles then transition into an underground position from an existing pole.
- Continue east in approximately 270 feet of new conduit into the existing Cummings Substation.
- Exit the existing Cummings Substation to the east in 240 feet of new conduit, then transition to an overhead position on an existing pole.
- Continue east overhead for approximately 6.5 miles to Jameson Street.
- Continue north overhead for approximately 1 mile to an existing pole outside the existing Monolith Substation, where the fiber optic telecommunications cable would transition to an underground position.
- Continue west in approximately 160 feet of ~~new~~ existing conduit into the existing Monolith Substation.

Proposed Telecommunication Route #2 is approximately 17.5 miles long and would connect the Banducci Substation to the existing Monolith Substation.

The proposed fiber optic telecommunications cable would:

- Exit the proposed Banducci Substation to the west and turn north in approximately 290 feet of new conduit and then transition to an overhead position on a new wood riser pole on Pelliser Road.
- Continue north overhead on Pelliser Road for approximately 1.5 miles.
- Continue east overhead on Girardo Road for approximately 2 miles to West Valley Boulevard.
- Continue east on West Valley Boulevard overhead for approximately 6 miles to Woodford-Tehachapi Road, and transition to an underground position on an existing pole.

- Continue south on Woodford-Tehachapi Road underground in approximately 810 feet of proposed conduit to an existing pole, where it would transition to an overhead position.
- Continue south overhead for approximately 1,000 feet to Cherry Lane (Commercial Street).
- Continue east overhead for approximately 2.5 miles to South Curry Street.
- ~~Continue north on South Curry Street, west on West C Street, and north on South Mill Street overhead for approximately 1 mile to an existing pole, where it would transition to an underground position.~~
- ~~Continue east on West H Street underground in existing conduit for approximately 1,000 feet, then transition to an overhead position on an existing pole.~~
- ~~Continue east along Tehachapi Boulevard overhead for approximately 1 mile to Dennison Road, where it would transition to an underground position on an existing pole.~~
- ~~Continue east in a proposed conduit on Tehachapi Boulevard for approximately 240 feet to an existing vault.~~
- ~~Continue east on Tehachapi Boulevard underground for approximately 3 miles, where it would enter Monolith Substation through an existing conduit.~~
- Continue north on S. Curry Street for approximately 1,300 feet to SCE pole on the southeast corner of Curry St. and Valley Blvd.
- Continue north and then east through new and existing underground conduit for approximately 250 feet to SCE vault V5613175.
- Continue east on Valley Blvd. through existing underground conduit for approximately 5,200 feet to Dennison Rd.
- Continue north on Dennison Rd. through existing underground conduit for approximately 2,200 feet to Tehachapi Blvd.
- Continue east on Tehachapi Blvd. through existing underground conduit for approximately 16,000 feet to Williamson Rd.
- Continue north on Williamson Rd. through existing underground conduit for approximately 900 feet to the Monolith Substation.

## Access Roads

Where necessary, SCE would utilize overland access from the edge of paved or dirt roads to access pole locations and temporary construction areas, such as pole work areas, stringing setup areas, and staging area locations. Overland access routes would also occur within the temporary work areas for the poles. ~~Construction activities associated with temporary access could include vegetation clearing, blade grading, grubbing, mowing, and re-compacting.~~<sup>2</sup> The number of locations required would be dependent upon final engineering, topographical considerations, and availability of suitable terrain that would provide safe access for these construction activities. These access locations would not be maintained by SCE after Project construction is completed, but instead utilized on an as-needed basis for operation and maintenance.

## Site Preparation

Construction activities associated with the installation of the fiber optic cable components will require grading, trenching, and other site preparation activities. Site preparation will include installation of BMPs, which will be maintained throughout the remaining construction activities described below.

## Telecommunication System Construction Activities

Planned construction activities for fiber optic telecommunication cable installation are summarized below.

- **Installation of duct banks and vaults.** Installation of 5-inch diameter schedule 40 polyvinyl chloride (PVC) ducts and any associated vaults include, but is not limited to, trench excavation, duct, manhole, and vault installation, encasement, backfill and compaction. Each trench requires an excavation measuring approximately 12 to 18 inches wide and a minimum of 36 inches deep. For manholes and pull boxes, a hole would be excavated approximately 8 to 9 feet deep, 7 to 8 feet long, and 7 to 8 feet wide. Excess excavated soil will be hauled off-site for disposal at an SCE-

<sup>2</sup> Per SCE Data Request response submitted August 28, 2017.

approved facility. Any open trenches will be secured at the end of each work day to protect the public from fall hazards, including the use of steel plates to maintain road access.

- **Installation of approximately 32 miles of fiber optic cable.** Telecommunication cable will be installed in new and existing conduit (duct bank) and on new and existing overhead structures. Installation activities include transport of cable reels to the ducts and vault locations, pulling cable, clamping cable, splicing cable, and testing cable.
- **Fiber optic cable stringing.** Activities associated with the installation of cables onto the overhead poles include cable arms, engineered dielectric suspension supports, and hardware will occur.
- **Material Storage.** SCE may use one or more staging yards for fiber optic telecommunication cable construction activities including the Tehachapi Service Center and Highwind Substation. Materials will be placed inside the fenced perimeter in a designated area.

## ACTIVITY SCHEDULE

Construction of the work is anticipated to commence in June 2017 and continue for approximately 12 months.

## CPUC Evaluation of Preconstruction Mitigation Implementation

All applicable project mitigation measures (MMs), applicant proposed measures (APMs), compliance plans, and permit conditions shall be implemented. Some measures have on-going/time-sensitive requirements and are required to be implemented prior to and during construction where applicable. The Mitigation Measure Requirements and Responsibilities Table in SCE's NTP request provides preconstruction compliance information for the issue areas addressed by the Banducci Substation Project Final MND. The following contains a status of applicable mitigation measures and APM required submittals, including any outstanding requirements:

**Agricultural Resources:** The telecommunication line portion would not convert Prime Farmland to non-agricultural use. Note, though, that SCE entered into an agreement with Sequoia Riverlands Trust on February 9, 2016 and provided appropriate funds for compensation. The agreement provides for permanent preservation of up to 10 acres of farmland of equal quality to that disturbed by the Banducci Substation Project.

**Air Quality:** During construction, SCE's contractors will implement air pollutant abatement mitigation measures outlined in the Eastern Kern Air Pollution Control District (EKAPCD) rules and regulations. EKAPCD Rule 402 requires use of Reasonably Available Control Measures to minimize fugitive dust emissions, and examples of these measures appear as suggestions tabulated in EKAPCD Rule 402. The EKAPCD also provides suggested construction mitigation measures that should be used where applicable and feasible (EKAPCD, 2012b). Mitigation is required to ensure that project construction activities would be conducted in a manner consistent with EKAPCD Rule 402 and that the dust control measures recommended by EKAPCD are made enforceable. Implementation of Mitigation Measure (MM) AQ-1 (Implement EKAPCD Dust Control Measures) would ensure that construction does not violate the ambient air quality standards for PM10 or contribute substantially to existing violations.

**Biological Resources:** In accordance with MM B-1, SCE and its contractors will conduct biological resource surveys within 30 days prior to the start of construction confirming the presence or sign of special-status or listed biological resources, if any, in the vicinity of the Project, including the telecommunication routes. Clearance surveys will be conducted no more than 7 days prior to the start of construction in a particular area to identify potential plant and animal species that may be affected by construction activities. Biological monitors will monitor construction activities in areas with special-status species, native vegetation, wildlife habitat, or unique biological resources to ensure such resources are avoided to the extent feasible.

SCE provided a Jurisdictional Delineation Report for the telecommunication routes on July 31, 2017 in support of this NTP Request, as required by approved mitigation measures. According to SCE, project components and work areas have been sited to avoid impacts to all potentially jurisdictional waters.

SCE previously submitted a 2016 Botanical Survey Report and a 2016 Tehachapi Slender Salamander (TSS) Habitat Assessment for the Banducci Substation Project, and provided updated survey memos for 2017 surveys along with the NTPR submittal. According to SCE, no sensitive vegetation communities or special-status plant species were identified in proposed work areas.

SCE submitted a memorandum to demonstrate implementation of MM B-10; Follow APLIC Guidelines. SCE has designed and will install and maintain distribution lines and all electrical components in accordance with the Suggested Practices for Avian Protection on Power Lines.

**Cultural Resources:** A Cultural Resources Construction Phase Management Plan was submitted by SCE on November 22, 2016. A total of nine cultural resources are located within the Project Study Area. Of these, seven are located outside of the Area of Direct Impact (ADI), within areas where no ground disturbing work will be conducted. Prior to construction, SCE recommends that three of these sites be demarcated as an Environmentally Sensitive Area (ESA) using high-visibility flagging tape or a similar method. Construction equipment and crews should be instructed to avoid the ESA to the extent possible; if existing access roads transect the site boundaries, the ESAs should be marked in such a way as to allow construction vehicles to use the roads. If changes to the Project result in ground disturbances within 100 feet of these resources, such work should be monitored by a qualified archaeologist. The remaining four resources located outside of the ADI are historic. Prior to construction, crews shall be instructed to avoid these resources.

Three resources are located within the ADI, and will be managed and avoided per the Cultural Resources Construction Phase Management Plan which includes avoidance and monitoring if ground disturbing activities take place within 100-feet.

**Paleontological Resources:** One fossil locality has been noted within the Proposed Project area. The majority of the area consists of low-sensitivity younger Quaternary alluvium (Holocene) sediments; however, these sediments can exist as a very thin veneer on top of older Pleistocene sediments that can contain fossils. Therefore, the potential exists for unique paleontological resources to be encountered within the Project area during ground-disturbing construction activities exceeding 10 feet in depth. Potential adverse impacts on these resources include, but are not limited to, destruction by construction equipment and Project-related vehicles, increased weathering and erosion, unauthorized collection of fossils by Project personnel, and vandalism. SCE submitted a Paleontological Monitoring and Treatment Plan on November 22, 2016 and the Plan was finalized on February 10, 2017.

**Geology and Soils:** In accordance with MM G-1, SCE prepared a Geotechnical Investigation Report, which was approved by the CPUC on February 17, 2016.

**Hazards and Hazardous Materials:** Given the long history of agricultural use in the area at and near the telecommunication routes, excavation and grading for all project components in this area may encounter residual pesticides and/or herbicides in the soil. Avoidance and management measures for hazardous materials include testing of the soils for evidence of pesticides and to observe soils during grading or excavation work for evidence of contamination.

**Hydrology & Water Quality.** A Storm Water Pollution and Prevention Plan (SWPPP) has been prepared and will be implemented during construction and until final stabilization is achieved. Erosion control and pollution prevention measures presented in the SWPPP address elements such as track-out controls, stock-pile handling, dewatering discharge, drain inlet protection, and replacement of any disturbed pavement or landscaping. In compliance with MM HYD-2, SCE and its contractors will obtain water for dust control or soil compaction activities from non-potable sources, if reasonably available from local water purveyors, and

ensured in a water contract through a local water agency or district. In addition, per MM HYD-3, if groundwater is unexpectedly encountered during construction, operation, or decommissioning of the Project, SCE and its contractors will perform dewatering activities in compliance with the California Stormwater Quality Association (CASQA) Handbook for Construction or other similar guidelines, as approved by the Central Valley and/or Lahontan RWQCB, as applicable based on jurisdiction.

**Noise.** In accordance with MM N-1, SCE and its contractors will limit grading, scraping, hole augering, and pole installation to daylight hours, between 6:00 a.m. and 9:00 p.m. Exceptions for work outside of these hours will be allowed for Project safety or to take advantage of the limited times when power lines can be taken out of service or as determined to be warranted by the CPUC, at which time a Variance to the Noise Ordinance from Kern County will be required. If nighttime work is needed because of clearance restrictions on power lines, SCE will take appropriate measures to minimize disturbance to local residents by informing them in advance of the work schedule. In addition, SCE and its contractors will maintain construction equipment and vehicle mufflers in accordance with equipment vendor specifications on all engines used in construction. Where feasible, construction traffic will be routed to avoid noise-sensitive areas, such as residences, schools, religious facilities, hospitals, and parks.

**Traffic and Transportation.** Consistent with MM T-1 and MM T-2, SCE and its contractors will restrict all necessary lane closures or obstructions on major roadways associated with overhead or underground construction activities to off peak periods in congested areas to reduce traffic delays. Lane closures must not occur between 6:00 and 9:30 a.m. or between 3:30 and 6:30 p.m., unless authorized in writing by the responsible public agency issuing the encroachment permit. Police departments, fire departments, ambulance services, and paramedic services serving the Project area have been notified 30 days in advance by SCE of the proposed locations, nature, timing, and duration of any construction activities and advised of any access restrictions that could impact their effectiveness. SCE will secure any necessary encroachment permits.

**Worker Environmental Awareness Program.** In accordance with MM C-4, MM H-1, and MM HYD-1, SCE prepared and will implement a Worker Environmental Awareness Program (WEAP) for the Project. Construction crews and contractors will be required to participate in the WEAP training prior to starting work on the Project. SCE will provide the WEAP training to communicate the Project's environmental concerns and appropriate work practices. The WEAP training includes a discussion of biological, cultural, paleontological, and other sensitive resources that could exist in the Project site and vicinity, and discusses the measures required to protect the sensitive resources that may be encountered during the course of the Project. The WEAP for the Banducci Substation Project was approved by the CPUC on December 23, 2016.

## **Conditions of NTP Approval**

The conditions noted below shall be met by SCE and its contractors:

- All applicable project mitigation measures, APMs, compliance plans, and permit conditions shall be implemented. Some measures have on-going/time-sensitive requirements and shall be implemented prior to and during construction where applicable.
- Copies of all relevant permits, compliance plans, and this NTP #2 shall be available on site for the duration of construction activities. All permits and plans shall be made available to the CPUC Environmental Monitor (EM) upon request.
- Prior to construction, plant communities/sensitive plant locations shall be added to Project maps, or submitted to the CPUC EM as GIS layers. To capture ongoing project and resource changes during construction, updated construction and resource maps, and digital spatial data (KML/KMZ or GIS data viewable from mobile device) shall be made available to SCE/contractor field monitoring staff and the CPUC EM as changes occur.



- **MM AG-1:** SCE shall notify adjacent agricultural operations of construction schedules at least 30 days in advance of the start of construction-related activities. Documentation of compliance with this measure shall be provided to the CPUC prior to construction. The Applicant shall document all complaints and strategies for resolving complaints in regular reporting to the CPUC.
- **MM B-1, MM B-6, MM B-7, and MM B-9:** Preconstruction surveys consistent with these mitigation measures shall be conducted and submitted to the CPUC for review and verification prior to construction activity.
- **MM B-2:** A buffer shall be established around special-status plants or plant populations within which no construction work is permitted unless the CPUC determines that such work may proceed without significantly impacting the special-status species. The size of the buffer shall be adequate to ensure that plants are not significantly disturbed and shall be determined by a qualified biologist.
- **MM B-11:** Native vegetation in Big Sagebrush Scrub, Blue Oak Woodland, and Foothill Pine-Oak Woodland vegetation communities and aquatic features in construction sites shall be flagged for avoidance prior to construction activities. If avoidance is not feasible, SCE shall implement one or both of the measures included in MM B-11 to offset or compensate for those impacts.
- **MM B-13:** Prior to construction, SCE shall identify any trees covered by tree protection local policies or ordinances that may be affected by construction of the Proposed Project and consult with applicable jurisdictional agencies prior to any tree alteration, removal, or other impacts. SCE shall provide documentation to the CPUC demonstrating compliance with this measure prior to construction.
- **MM C-1:** Wherever a pole, access road, equipment, etc., must be placed or accessed within 100 feet of a recorded, reported, or known archaeological site eligible or potentially eligible for the CRHR, the site will be flagged on the ground as an Environmentally Sensitive Area (ESA) (without disclosure of the exact nature of the environmental sensitivity [i.e., the ESA is not identified as an archaeological site]).
- **MM C-4 and MM H-1:** Prior to the commencement of work, crewmembers will attend a Worker Environmental Awareness Training.
- **MM H-2:** Prior to construction, soil samples shall be collected in construction disturbance areas where the land has historically or is currently being farmed to identify the possibility of and to delineate the extent of pesticide and/or herbicide contamination. These soil test results shall be provided to the CPUC prior to construction.
- **MM HYD-2:** Project water supply for dust control or soil compaction activities shall be obtained from non-potable sources, if reasonably available from local water purveyors, and ensured in a water contract through a local water agency or district. SCE shall provide documentation to the CPUC demonstrating compliance with this measure prior to construction.
- **MM HYD-3:** Should dewatering activities be necessary, the CPUC shall be provided with copies of dewatering activity reports.
- **MM N-1:** SCE and its contractors will limit grading, scraping, hole augering, and pole installation to daylight hours, between 6:00 a.m. and 9:00 p.m. Exceptions for work outside of these hours will be allowed for Project safety or to take advantage of the limited times when power lines can be taken out of service or as determined to be warranted by the CPUC, at which time a Variance to the Noise Ordinance from Kern County will be required.
- **MM T-1:** SCE shall restrict all necessary lane closures or obstructions on major roadways associated with overhead or underground construction activities to off-peak periods in congested areas to reduce traffic delays. Lane closures must not occur between 6:00 and 9:30 a.m. or between 3:30 and 6:30 p.m., unless

otherwise authorized in writing by the responsible public agency issuing an encroachment permit. Documentation of authorizations for lane closures during these peak times shall be provided to the CPUC.

- Prior to construction, SCE shall identify and provide the locations of water sources proposed to be used during construction to the CPUC. As proposed in the Data Request response sent August 28, 2017, vehicles will not be allowed to cross the drainages while water is flowing.
- All spills one gallon or greater, or any spills that enter Environmentally Sensitive Areas shall be reported to the CPUC EM immediately.
- Any incursions into or impacts to Environmentally Sensitive Areas shall be reported to the CPUC EM immediately.
- SCE shall provide daily summaries of all compliance incidents, nest events, or species events to the CPUC EM.
- No movement or staging of construction vehicles or equipment shall be allowed outside of the approved areas. If additional temporary workspace areas or access routes, or changes in technique and mitigation implementation to a lesser level are required, a Minor Project Change request shall be submitted for CPUC review.
- SCE shall provide a weekly report to CPUC documenting construction and compliance activities. Complaints to SCE regarding construction activities shall be provided within the subject weekly report, as well as crew members receiving WEAP training during the subject period.

Sincerely,



Jensen Uchida  
CPUC Environmental Project Manager

cc: V. Strong, Aspen