

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



March 29, 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 #3

Dear Ms. Adams,

On February 7, 2017, Southern California Electric (SCE) submitted Notice to Proceed (NTP) Request #3 to the California Public Utilities Commission (CPUC) for the Banducci Substation Project, near the Town of Tehachapi, in unincorporated Kern County, California. Under this NTP Request, SCE is seeking CPUC authorization to construct three new 12 kV distribution getaways associated with the Banducci Substation Project (totally approximately 3,550 feet in length), as well as a portion of Telecommunication Route #1 that will be collocated with the 12 kV underground distribution getaway facilities.

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. A separate NTP (#2) will be issued for the remaining telecom portions of the project. 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, 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 #3 for the construction of the 12 kV getaways and the collocated telecommunications portion is granted by the CPUC based on the factors described below.

SCE NTP Request

In their NTP Request #3, SCE seeks CPUC authorization to conduct the following construction activities:

12 kV Distribution Lines and Collocated Telecommunications

The 12 kV distribution getaway routes would be accessed via the existing paved Pellisier Road and the existing unpaved Highline Road. The 12 kV distribution getaway routes are generally located within existing roadways and shoulders. Site preparation will include installation of BMPs, which will be maintained throughout the remaining construction activities described below.

Major below-grade construction activities associated with the 12 kV distribution getaways include, but are not limited to:

- Trench excavation (approximately 24 inches wide and approximately 96 inches deep);
- Directional boring and associated excavation of bore and receiving pits (approximately 10 feet by 1-foot and approximately 10 feet by 30 feet, respectively);
- Excavation for 9 vaults (approximately three feet greater than the vault's width and length, and approximately four feet deeper than vault's height) and overlapping telecommunications manholes;
- Installation of duct banks, vaults, equipment pads, and overlapping telecommunications manholes;
- Installation of distribution cable, fiber optic cable, and distribution equipment.

Major above grade activities associated with the 12 kV distribution getaways and the collocated portion of the telecommunication route are as follows:

- Installation of risers at transitions between overhead and underground;
- Installation of distribution equipment, including poles, cross-arms, insulators, conductor, etc.;
- Cable splices and terminations.

Three existing, wooden subtransmission poles located west of Banducci Substation were previously identified for removal as part of the IS/MND and NTP Request #1. Note that the three poles will remain in a temporary configuration with new cross-arms installed to support the existing distribution circuit until removal may occur following completion of the electrical work associated with the Project.

Materials and equipment may be stored at the Banducci Substation Staging Yard and at the existing staging yards located at Highwind Substation and Tehachapi Service Center.

CPUC Evaluation of Preconstruction Mitigation Implementation

All applicable project mitigation 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 12 kV distribution 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 12 kV getaway and collocated telecommunications line route, wire stringing locations, access roads, and staging yards. 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 12 kV getaway and collocated telecommunications route on February 7, 2017 in support of this NTP Request, as required by approved mitigation measures. SCE previously submitted a 2016 Botanical Survey Report and a 2016 Tehachapi Slender Salamander (TSS) Habitat Assessment for the Banducci Substation Project and an additional Jurisdictional Delineation Report for areas covered by NTP #1 on November 22, 2016. No jurisdictional waters, Tehachapi slender salamander (TSS) habitat, sensitive vegetation communities, or special-status plant species were observed within the 12 kV and collocated telecom survey area.

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.

Two 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 proposed Banducci Substation site and 12kV distribution getaway alignment, 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) will be 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 and will coordinate with Kern County and emergency service providers. Police departments, fire departments, ambulance services, and paramedic services serving the Project area will be 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 #3 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.
- As required by MM AG-1, prior to construction, the Applicant shall submit a copy of the template used for the notification letter and a list of the landowners notified to the CPUC. The Applicant shall document all complaints and strategies for resolving complaints in regular reporting to the CPUC.
- Prior to the start of ground disturbance, SCE shall provide evidence to the CPUC that an Agricultural Conservation Easement has been granted in perpetuity to the local jurisdiction or an Agricultural Land Trust.
- Preconstruction surveys consistent with MM B-1, MM B-6, and MM B-9 shall be conducted and submitted to the CPUC for review and verification prior to construction activity.
- 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.
- 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.
- Should dewatering activities be necessary, the CPUC shall be provided with copies of dewatering activity reports.
- The applicant shall provide documentation of coordination with Kern County and emergency service providers regarding emergency access and/or response to the Project area during construction to avoid restricting movements of emergency vehicles to the CPUC prior to construction.
- No construction activities may occur until SCE's Fire Management Plan is finalized.
- Prior to construction, SCE shall identify and provide the locations of water sources proposed to be used during construction to the CPUC.
- 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