

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 1, 2021

Tom Diaz
Project Manager
Major Environmental Projects
Southern California Edison
2244 Walnut Grove Avenue
Rosemead, CA, 91770

RE: Eldorado-Lugo-Mohave Upgrade Project: Notice to Proceed #2

Dear Mr. Diaz,

On March 23, 2021, Southern California Edison (SCE) submitted Notice to Proceed (NTP) Request #2 to the California Public Utilities Commission (CPUC) for the construction of portions of the Eldorado-Lugo-Mohave Upgrade Project (ELM Project). The Project would increase the amount of power delivered on the existing Eldorado-Lugo and Lugo-Mohave 500-kV transmission lines, address line clearance discrepancies, facilitate communication between substations, and modify substations to accommodate the Proposed Project. SCE's Eldorado-Lugo-Mohave Upgrade 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 August 27, 2020 to approve SCE's Eldorado-Lugo-Mohave Upgrade Project (Decision D.20-08-032) and a Notice of Determination was submitted to the State Clearinghouse (SCH# 2019089033). The CPUC also adopted a Mitigation Monitoring, Compliance and Reporting Program (MMCRP) to ensure compliance with all mitigation measures imposed on the ELM Project during implementation.

NTP Request #2 includes some project components that are located on lands under CPUC's jurisdiction; monitoring of project construction on federal lands will be conducted by the respective federal agencies. Specifically, this NTP request includes the following construction activities; tower raise modifications on the Lugo-Mohave and Eldorado-Lugo transmission lines at two locations, development of the Coolwater Staging Yard, and the establishment of Helicopter Landing Zone 184. The subject project components were field validated by the CPUC Environmental Monitor on March 30, 2021. SCE anticipates requesting additional NTP authorizations in a phased approach. Given that the ELM 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 applicable to the subject NTP Request. 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 for the construction of the requested portions of the ELM Project is granted by the CPUC based on the factors described below.

Notice to Proceed Request Summary

SCE requests an NTP from the CPUC to construct the following improvements along certain segments of the existing 500 kV transmission line, located in California on non-federal lands:

- Tower raise modifications on the Lugo-Mohave and Eldorado-Lugo transmission lines (two locations)
- Establishment of Helicopter Landing Zone 184
- Development of the Coolwater Staging Yard

These activities are described in the Final Mitigated Negative Declaration (November 2019) developed by the CPUC and are consistent with the proposed work to be performed at the upgrade locations of the project.

Overhead Line Discrepancy Tower Raises

This project component addresses potential overhead line clearance discrepancies along the Eldorado-Lugo and Lugo-Mohave 500 kV transmission lines. Construction activities consist of raising towers at two locations to address overhead clearance discrepancies on non-federal (CPUC) lands. Tower modifications will include raising the following towers by inserting new lattice-steel sections in tower bodies.

- Lugo-Mohave M22-T4 – minimum 15 feet
- Eldorado-Lugo M14-T4 – minimum 18.5 feet

Helicopter Landing Zone

Helicopters will use designated helicopter landing zone (HLZ) 184 for this phase of tower raises. HLZ 184 is located approximately 0.5-mile south of the I-15 intersection on the east side of Basin Road.

Coolwater Staging Yard

The Coolwater staging yard is located on the north side of I-40, approximately 10 miles east of Barstow, California. The staging yard will serve as a reporting location for workers, vehicle and equipment parking, and material storage during project execution. The yard may be fenced and have construction trailers for supervisory and clerical personnel and may be lit for staging and security.

Site Locations and Conditions

Existing conditions at these sites and the associated areas of disturbance are indicated as follows.

Construction Location (San Bernardino County)	Site Conditions	Approximate Disturbed Acres	Vegetation Impacts	
			Vegetation Type	Acres
Discrepancy Construction Tower Raise: Eld-Lug M14-T4	The tower raise site is on the existing 500 kV transmission line ROW containing access roads. The Project area is characterized as mostly undeveloped and open lands, utilities, and other infrastructure, and some low-density residential properties.	0.26	Developed (includes roads, homes, ornamental areas)	0.08
			<i>Eriogonum fasciculatum</i> Shrubland Alliance	0.04
			<i>Prunus fasciculata</i> – <i>Salazaria mexicana</i> Shrubland Alliance	0.14
Discrepancy Construction Tower Raise: Lug-Moh M22-T4	The tower raise site is on the existing 500 kV transmission line ROW containing access roads. The Project area is characterized as mostly undeveloped and open lands, utilities, and other infrastructure, and some low-density residential properties.	0.27	<i>Atriplex polycarpa</i> Shrubland Alliance	0.04
			Developed (includes roads, homes, ornamental areas)	0.12
			<i>Suaeda moquinii</i> Shrubland Alliance	0.11

Construction Location (San Bernardino County)	Site Conditions	Approximate Disturbed Acres	Vegetation Impacts	
			Vegetation Type	Acres
Helicopter Landing Zone 184	The Proposed Project area is characterized by mostly undeveloped and open lands, utilities, and infrastructure. (See NTRP 1 descriptions)	1.09	Developed (includes roads, homes, ornamental areas)	0.02
			<i>Larrea tridentata</i> - <i>Ambrosia dumosa</i> Shrubland Alliance	1.07
Coolwater Staging Yard	The Proposed Project area is characterized by mostly undeveloped and open lands, utilities, and infrastructure. (See NTRP 1 descriptions)	20.98	Barren - Not Developed	20.98

Project Activity Schedule

Construction will start May 1, 2021, with the tower raising work described above, which will be completed by our specialized overhead tower raise contractor within approximately 10 months. The proposed completion date is February 2022. The Coolwater staging yard will be used to support the tower raise construction schedule and throughout the duration of the ELM Project.

Project Component	Construction Start Date	Completion Date
Tower Raise Construction	May 2021	February 2022
Coolwater Yard	January 2022	March 2022

Access Roads

Construction improvements included within this NTPR will not require the construction of new access roads. Access will be provided from existing utility access roads and public access roads to/from the Project site.

Preconstruction Activities

Tower raise construction will be contained within the existing transmission ROWs; therefore, minimal site preparation will be required for the tower modifications. Portable generators will be used if an existing connection cannot be established with an existing facility inside the ROW. Air quality will be in compliance with regulations and laws, and the generators will be placed away from noise-sensitive areas when possible. Portable sanitation facilities and construction trailers could be brought onsite. Clearing of vegetation or application of crushed rock or gravel may be required within the existing ROW for the tower work areas. The Storm Water Pollution Prevention Plan (SWPPP) requirements will be implemented (i.e., Best Management Practices [BMP]). Onsite parking will be provided to construction personnel with an expected crew not to exceed 20 people at each site.

Site preparation required for the staging yard may include vegetation clearing and grubbing, with minimal grading to provide drainage berms for stormwater management, and SWPPP requirements will be implemented. Onsite parking will be provided for construction personnel.

Construction Activities

Tower raise construction will be completed for two towers under this NTP (of the nine total for the Project). The material is currently staged at the Lugo Substation yard and will be hauled to each tower raise site as work begins at each site. The crews will use all available work areas adjacent to the tower for laydown of material and equipment.

After material is staged at the tower, the crews will begin rigging the tower at the splice location to ferry tools and material up from underneath the center of the tower. Rigging will be completed using butterfly hoists or bull ropes and soft-track skid steer is used to limit the rigging zone further. The ampjack jacking equipment will be set into position on the tower to split the tower. The tower will be split (lattice steel will be disconnected) and raised at 5-

foot intervals to then build in the new steel extension sections. This process will continue until the proposed height is reached and the structure will be bolted together as a single structure.

Typical daily construction activities will include use of construction trailers and portable restrooms, personal parking for construction personnel, export of disassembled equipment, and installation of related components and equipment. Other daily construction activities may include refueling and equipment maintenance and repair, containment of waste disposal, and component assembly.

Workers will arrive and park personal vehicles onsite during construction or may carpool to the sites from project approved staging yards and marshalling sites. Onsite personnel will vary depending on activities being performed that day and other factors.

Potential equipment that may be used during construction include the following:

- Ampjack tower lifting system
- Water truck or water buffalo
- Manlift/Bucket truck
- Telehandler/Reachfork
- Boom/Crane Truck
- 1-ton Truck, 4x4
- Flatbed truck/trailer
- Compressor trailer
- Worker commute vehicle
- Bell 220 or Bell 400 Helicopter (for transport)

Construction will be performed by either SCE construction crews or contractors. Multiple crews will work concurrently when possible; however, the estimated deployment and number of crew members will vary depending on factors such as material and equipment availability, weather, and construction scheduling. It is anticipated that approximately 20 construction personnel will be working at each Project site on any given day.

Steel associated with the tower raises has been delivered to the Lugo Substation and will be hauled to each tower raise site as work begins for each site. Other materials associated with construction will be delivered via truck by vendors and suppliers directly to the site or to the nearest staging yard and/or substation for storage and distribution to the specific sites.

Any land that may be temporarily disturbed as a result of this Project will be restored in accordance with the Habitat Restoration and Revegetation Plan (HRRP) following project completion.

The construction activity will be maintained within the existing ROWs; therefore, minimal site preparation would be necessary for installation of these components. Stormwater BMPs will be installed at various work sites required by the Project's SWPPP, if necessary.

Night Use

Work is not anticipated to occur at night, but portable lights would be used at work areas if needed and approved by the local jurisdiction. In the event that night work is conducted, night lighting will comply with MM AES-4.

Helicopter Use

Helicopters will be used during tower raise construction. Helicopters will be used to transport personnel, materials, and equipment from approved project helicopter landing zones and staging yards to remote tower sites that are located on federal and non-federal lands.

Helicopters will use designated helicopter landing zone (HLZ) 184 for this phase of tower raises. HLZ 184 is located approximately 0.5-mile south of the I-15 intersection on the east side of Basin Road. HLZ 184 is 1.09

acres in size and contains 0.02 acres that have been developed (includes roads, homes, ornamental areas) and 1.07 acres that contain the vegetation association *Larrea tridentata* - *Ambrosia dumosa* Shrubland Alliance.

Helicopter use is not required to construct the Coolwater Staging Yard; however, the yard may be used as a fly yard for helicopters throughout the course of the ELM Project.

Except in emergency situations, helicopters will land and hover near the ground in and over project approved access roads, spur roads, and work areas.

The helicopter would only be mobilized for short durations in the morning and afternoon for the transport of personnel and equipment. The helicopter will return to its base throughout the course of each day when not in active use. Potential bases for helicopter operation would include the Ludlow Airport or others within close proximity to the Project site. Flight paths that minimize flights in wilderness areas, near schools, hospitals, nursing homes, and other sensitive group receptors will be determined prior to construction by the helicopter contractor. CPUC/Bureau of Land Management (BLM) monitors will be notified by email the day prior to flights regarding the specific sites to be used for helicopter retrieval of materials, equipment, or personnel and the destination of the materials, equipment, or personnel being transported.

Beta Engineering will implement a Helicopter Use Plan, in accordance with Mitigation Measure T-3 for CPUC and BLM approval and courtesy distribution to each jurisdiction through which the Project passes, prior to commencing helicopter use.

Water Use

Construction water will be supplied from a project-approved water source.

Other Activities

Additional construction or operational activities are not planned at the project site.

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. Section 7.1.1 in SCE's NTP request provides the required environmental submittals for the issue areas addressed by the Eldorado Lugo Mohave Upgrade Project Final MND. The following contains a status of applicable MM and APM required submittals and requirements. Any outstanding requirements are also included:

Aesthetics: As required by MM AES-1, design fundamentals that reduce the visual contrast of new facilities with the characteristic landscape were used by SCE in the final design of the approved project. SCE prepared a Project Design and Surface Treatment Plan for CPUC review and approval. The Plan includes details of how the design will minimize visual intrusion and contrast by effectively blending earthwork, vegetation manipulation, and facilities with the landscape. The Project Design and Surface Treatment Plan was approved by the CPUC on September 10, 2020. In compliance with MM AES-2, SCE shall screen construction activities from view. To reduce significant impacts associated with construction yards, staging areas, and material and equipment storage areas shall be visually screened using temporary screening fencing, with the exception of construction yards, staging areas, and material and equipment storage areas on existing substation properties.

As required by MM AES-3, only the minimum amount of vegetation necessary for the construction of structures and facilities shall be removed during construction. As required by MM AES-4, SCE shall avoid all night lighting where possible and minimize its use under all circumstances.

Air Quality: As required by MM AQ-1, SCE shall prepare and implement Dust Control Plan that describes all measures that will be implemented for the project. The plan includes restrictions for vehicle traffic speeds on unpaved roads, watering frequencies for disturbed areas, covering loaded haul vehicles or provide adequate freeboard, and the reduction of non-essential earth-moving activity under high wind conditions. In addition, in compliance with APM AIR-03, off-road diesel construction equipment with a rating between 100 and 750 horsepower would be required to use engines compliant with the U.S. Environmental Protection Agency's final Tier 4 non-road engine standards. Additionally, as required by APMs AIR-03, AIR-04, and AIR-05, limitations on equipment idling would be implemented, ridesharing would be encouraged, and construction diesel engines would be maintained in good working order. The Dust Control Plan was approved by the CPUC on November 17, 2020.

Biological Resources: A Worker Environmental Awareness Program (WEAP) will be prepared to educate on-site workers about the proposed Project's sensitive environmental issues in accordance with MM BR-2. Throughout the duration of construction, SCE shall be responsible for ensuring that all on-site project personnel receive this training prior to beginning work. SCE shall maintain a list of all personnel who have completed the WEAP training. The WEAP was approved by the CPUC on September 10, 2020.

SCE prepared a Habitat Restoration and Revegetation Plan (HRRP) in accordance with MM BR-4 to outline the restoration or revegetation of all temporary disturbance areas. The HRRP was approved by the CPUC on December 11, 2020.

An Integrated Weed Management Plan (IWMP) was developed in compliance with MM BR-5 to propose methods of preventing or controlling project-related spread or introduction of weeds. The IWMP was approved by the CPUC on September 10, 2020.

As required by MM BR-6, a Cacti and Yucca Salvage Plan was developed and approved by the CPUC on December 11, 2020. Also a requirement of MM BR-6, a Special-Status Plant Salvage and Relocation Plan was developed. This plan was approved by CPUC on January 27, 2021.

As required by MM BR-8, SCE is required to compensate for all desert tortoise habitat loss. SCE prepared a Habitat Conservation Plan documenting the mitigation strategy for impacts to desert tortoise habitat. The HCP was approved by the CPUC on October 30, 2020.

Consistent with the requirements of MM BR-9, a Raven Management Plan was developed and approved by the CPUC on November 24, 2020.

SCE prepared a Nesting Bird Management Plan (NBMP) consistent with MM BR-10. This plan was developed to describe methods to minimize potential project effects to nesting birds, and to avoid any potential for unauthorized take. The NBMP was developed in coordination with CDFW and USFWS and was approved by the CPUC on December 11, 2020.

As required by Mitigation Measure BR-11, a Burrowing Owl Passive Relocation Plan was developed and approved by the CPUC on November 24, 2020.

Preconstruction surveys for special-status plants and wildlife will be conducted consistent with MMs BR-6, BR-9, BR-11, BR-12, and BR-13. SCE will ensure wildlife impact avoidance and minimization through measures outlined in MM BR-7 during project construction.

Cultural Resources: As required by MM CR-3, a Cultural Resources Management Plan (CRMP) was prepared by SCE. The CRMP was approved by the CPUC on December 9, 2020. A Tribal Engagement Plan

was prepared and included in the CRMP and the CRMP was provided to the tribes for review, consistent with APM-TCR-2.

Hazards and Hazardous Materials. SCE prepared and will implement a Project-specific Hazardous Materials and Waste Management Plan pursuant to Title 24, Part 9 of the California Code of Regulations (CCR) that identifies hazardous materials to be transported, used, and stored on site for the proposed construction activities as well as hazardous wastes generated onsite as a result of the proposed construction activities and appropriate management procedures. The Hazardous Materials and Waste Management Plan was approved by the CPUC on October 30, 2020.

Hydrology and Water Quality. SCE submitted Erosion Control Plans included in the Storm Water Pollution Prevention Plans developed for the project.

Noise. Best Management Practices for construction noise management will be implemented as outlined in MM N-1 to reduce construction noise levels to the extent feasible. Construction noise shall be confined to days and hours consistent with local jurisdiction regulations. Construction traffic shall be routed away from residences, recreational facilities, and schools to the maximum extent feasible.

Consistent with APMs NOI-01 and NOI-02, SCE will ensure that helicopter operations at landing zones at landing zones within 700-feet of occupied residences are limited to 2 hours per day and that helicopters maintain a height of at least 500-feet when passing over residential areas, except at temporary construction areas or when actively assisting with conductor stringing.

Paleontological Resources: A Paleontological Resource Mitigation and Monitoring Plan (PRMMP) was prepared for the Eldorado-Lugo-Mohave Upgrade Project. The PRRMP was approved by the CPUC on November 17, 2020.

Traffic and Transportation. Consistent with MM T-1, SCE will prepare and implement a Construction Traffic Control Plan. A Helicopter Use Plan was prepared for CPUC approval to identify the specific locations requiring deconstruction of existing project facilities or construction of new or replacement project facilities as outlined in MM T-3. The plan identifies the specific locations requiring deconstruction or construction work using helicopters. The Helicopter Use Plan was approved by the CPUC on November 17, 2020.

Wildfire. SCE prepared a Fire Management Plan as required by MM WF-1. The Plan requires that a qualified Fire Marshal be established to implement and enforce all provisions of the Fire Management Plan. The Fire Management Plan was approved by the CPUC on November 17, 2020.

Conditions of NTP Approval

The conditions noted below shall be met by SCE and its contractors prior to the start of construction:

- 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 shall be available on site for the duration of construction activities. All permits and plans shall be made available to the CPUC Environmental Monitors (EMs) upon request.
- 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 EMs as changes occur.

- SCE shall coordinate with the National Park Service (NPS) to review project plans prior to work on NPS lands
- **BR-1:** SCE shall submit resumes of biological monitors to the CPUC for approval at least 10 working days prior to the monitor commencing field duties.
- **BR-3:** Prior to any ground-disturbing activities, SCE shall provide CPUC and BLM with final engineering GIS shapefiles depicting all temporary and permanent disturbance areas, as well as summary data on temporary and permanent disturbance for each vegetation or habitat type. CPUC EM to verify site staking.
- **BR-10:** A designated access route to Mohave-Lugo M22 T4 shall reviewed and approved by USFWS if it occurs within “one-mile line-of-sight and one-half mile no line-of-sight buffer to ensure that project construction activities do not result in injury or disturbance” to nesting golden eagles. Signage shall be installed along the approved route prior to its use.
- **MM BR-13:** SCE shall conduct pre-construction surveys for desert kit fox, ringtail, and American badger no more than 30 days prior to initiation of construction activities and submit to CPUC and BLM for review and approval.
- **MMs BR-6, BR-9, BR-11, BR-12, and BR-13:** Conduct reconstruction surveys for special-status plants and wildlife. Results of preconstruction surveys shall be provided to the CPUC for review and approval.
- **APM-CUL-1:** SCE shall perform surveys prior to construction for any Proposed Project areas not yet surveyed (e.g., new or modified staging areas, pull sites, or other work areas).
- **MM HWQ-2:** If Horizontal Directional Drilling (HDD) is required, an HDD Fluid Management Plan shall be prepared and implemented.
- **MM N-2:** No less than 15 days prior to construction that would occur within 500 feet of residences, businesses, or other occupied structures, SCE shall distribute a public notice mailer. SCE shall also establish a toll-free telephone number for receiving questions or complaints during construction and develop procedures for responding to callers. SCE shall address all complaints within one week of when the complaint is filed, and shall provide to the CPUC, within 15 days of the end of each month, a monthly report with records of all complaints and responses. SCE shall mail the notice to all residents or property owners within 500 feet of the right-of-way or within 1,000 feet of helicopter fly yards and flight paths.
- **MM T-1:** Prior to the start of construction of a project component that could affect traffic (e.g., OPGW reconductoring over public roadways), SCE shall submit a Construction Traffic Control Plan for review and approval by state and local agencies responsible for public roads that would be directly affected by the construction activities and/or would require permits and approvals.
- **MM T-2:** Prior to construction, SCE shall establish the pre-construction conditions of the roads within 500 feet in each direction of project access points and confer with State and local agencies.
- **APM-TCR-1:** Provide monitoring reports to the CPUC on a monthly basis.
- **MM UT-1:** Prior to commencing construction or as soon as such data are available, if it is not available before construction, SCE shall determine and report to CPUC and BLM the location of adjacent utilities and other metallic or conducting objects susceptible to induced voltages and currents. Prior to the in-service date of the Proposed Project series capacitors, SCE shall ensure that the necessary grounding or other appropriate measures to provide appropriate cathodic protection has been installed and shall confirm this to the CPUC and BLM.
- **MM UT-3:** SCE shall provide CPUC and BLM metallic object locations that may present a shock hazard as soon as available and prepare an Induced Current Touch Study for CPUC and BLM review and approval.

- **MMCRP:** Once preconstruction survey reports are submitted, the CPUC EMs shall conduct site reviews to verify that the required site boundary and resource staking has been installed in work areas. Typically, each work site shall be delineated by markers (usually wooden stakes) which define the approved work area boundaries. Any Environmentally Sensitive Area (ESA) identified during preconstruction surveys shall also be delineated for avoidance. Only after the preconstruction survey reports and staking verification reviews occur, is construction permitted to begin.
- **MMCRP:** SCE will prepare and distribute a weekly environmental compliance status report for distribution to the CPUC consistent with project permits, mitigation measures, and the Mitigation Monitoring, Compliance and Reporting Plan (MMCRP). Prior to the start of monitoring activities, SCE shall provide a proposed format describing content and organization of Weekly Compliance Reports for CPUC review and approval.
- **MMCRP:** 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 Temporary Extra Work Space (TEWS) or Minor Project Change (MPC) request shall be submitted for CPUC review (MMCRP Section 4.6). In addition, all water sources and disposal sites not previously identified shall require a TEWS or an MPR.

Sincerely,



Eric Chiang
CPUC Environmental Project Manager

cc: V. Strong, Aspen