

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

March 10, 2010

Susan J. Nelson, AIA
Project Manager
Southern California Edison
2244 Walnut Grove Ave.
Rosemead, CA 91770

RE: Tehachapi Renewable Transmission Project (Segments 4-11), Notice to Proceed (NTP # 2)

Dear Ms. Nelson,

On January 28, 2010, Southern Californian Edison (SCE) submitted a Notice to Proceed Request seeking authorization from the California Public Utilities Commission (CPUC) to conduct the proposed expansion of the Vincent Substation 500 kV and 220 kV switchracks and associated equipment at the existing Vincent Substation, located approximately 0.5 miles east of Highway 14 and Sierra Highway, near the City of Acton, in unincorporated Los Angeles County, California.

The SCE Tehachapi Renewable Transmission Project (Project) was evaluated in accordance with the California Environmental Quality Act and a Certification of Public Convenience and Necessity (CPCN) was granted by CPUC Decision 09-12-044, (Application #07-06-031), SCH #2007081156 on December 17, 2009. **NTP # 2 is granted by CPUC for the proposed activities based on the following factors:**

- SCE submitted the following information:

SCE is requesting to begin the proposed expansion of the Vincent Substation 500 kV and 220 kV switchracks and associated equipment for the Project. The existing Vincent Substation is located approximately 0.5 miles east of Highway 14 and Sierra Highway, near the City of Acton, in unincorporated Los Angeles County. SCE's Notice to Proceed Request (NTPR) only addresses the work associated with the Vincent Substation expansion as part of Segment 9 of the Segments 4 through 11 TRTP Project. Construction of the Vincent Substation expansion consists of several major activities:

- Expansion of 500 kV north and south buses for line Positions No. 1X to No. 4X
- Expansion of 220 kV switchrack for position No. 2X

Description of the proposed Vincent Substation expansion activities are included in Sections 2.2.10.3 (Vincent Substation) and 2.2.12.10 (Substation Construction) of the FEIR/DEIS. The FEIR/DEIS was based on preliminary engineering, and several refinements of the project components have been made based on the final engineering design. Such changes have been noted in the NTPR.

The Vincent Substation 500 kV and 220 kV expansion will occur on an approximately 20-acre area located adjacent to the west side of the existing Vincent Substation, of which approximately 0.68 acres is newly acquired land (the FEIR/DEIS indicated approximately 0.2 acres of new land). The site is a combination of disturbed and undisturbed land. During construction, the site will be accessed from Rockyford Road, which connects to the Angeles Forest Highway.

Construction facilities and activities that will be possibly present and active throughout the duration of the project include:

Construction Facilities – Project and contractor equipment and material storage areas, office trailers, portable toilets, water tanks and retention basin, and temporary concrete clean-out area.

Construction Activities – Project and contractor equipment and material storage, grading activities, relocation of existing dirt road, underground construction activities, and aboveground construction activities.

The entire approximately 20-acre substation expansion area (pad) will be graded, fenced, and covered with a 4-inch thick layer of crushed rock. Some additional side-slope grading may be required to blend existing terrain with the new substation pad. The total land disturbance associated with site preparation will be approximately 20 acres, which includes the following: substation pad expansion, side slope grading, reroute of existing Foreston Road, driveway, and temporary and permanent facilities site.

Prior to the start of grading, the entire pad area to be graded will be stripped of organic matter and loose rocks. An estimated quantity of approximately 5,000 cubic yards of soil mixed with stones and organic matter will be transported offsite and disposed at an appropriate waste disposal facility. Once the surface has been cleared, the grading operations will begin. The proposed grading scheme will establish a high point at the eastern end of the substation pad and slope down at 2.5 percent toward the western end of the pad.

The existing 1,100-foot-long fence west of the existing 500 kV switchrack position No. 1 will be replaced with approximately 2,550 linear feet of new chain link fence to enclose the entire expansion area (the FEIR/DEIS indicated approximately 2,400 linear feet of new chain link fence). Perimeter chain link fencing will conform to the requirements for electrical substations and have a minimum height of 8 feet above the adjacent finished grade to the outside of the substation. All perimeter fences and gates will be fitted with barbed wire.

Asphalt concrete paving will be applied to the facility access road and to all designated internal driveways over an aggregate base material and a properly compacted sub-grade, as recommended by the geotechnical investigation. The paving activities will take place after major construction. Those areas that were not paved or covered with concrete foundations or trenches will be surfaced with a 4-inch layer of untreated, 3/4-inch nominal crushed run rock. The rock will be applied to the finished grade surface after all grading and below grade construction has been completed.

A paved substation entrance driveway will be installed on the north side of the substation. In addition, a new 800-foot-long, 25-foot-wide resident access dirt road will be established on the west side of the substation (west of the expansion area).

Major underground activities associated with the project are as follows: install foundations for new 500 kV and 220 kV bays and associated structures, install associated grounding grid, install associated cable trenches, and install associated duct banks.

Major aboveground activities associated with the project are as follows: expand 220 kV switchrack, expand 500 kV switchrack, install two (2) 500 kV shunt capacitor banks, install a retaining wall east of position No. 3X.

Temporary power poles will be installed within the substation for electric power and communication services.

Following completion of all construction activities, landscaping will be installed as specified in the Substation Landscaping Plan. This plan will be submitted to the CPUC at least 60 days prior to implementation of landscaping activities.

- SCE submitted a Biological Review prepared by AMEC Earth & Environmental, Inc. dated January 8, 2010. Three vegetation communities are mapped on the Project site. These include Mojave Juniper Woodland and Scrub (MJWS), California Annual Grassland (CAG), and Ruderal Grassland (RUD) (AMEC 2007a). Additionally, developed areas (DEV) are also mapped on areas of the Project site. A literature review identified 26 special-status biological resources that occur or have potential to occur in the vicinity (approximate 5-mile radius) of the Project site. No special-status vegetation communities, riparian vegetation communities, wetlands, marshes, or vernal pools are present on the Project site or immediately adjacent.

Several ephemeral drainages that lack riparian vegetation and surface moisture are, however, present onsite and immediately adjacent (to the north and south). The northern offsite, but immediately adjacent drainage is mapped as the Santa Clara River. SCE conducted a jurisdictional wetland delineation to determine which features, if any, were jurisdictional. After further analysis, the three potential water features identified within the expansion area were found to be non-jurisdictional (lacking an ordinary high water mark or a bed/bank).

One special-status plant species, short-joint beavertail (*Opuntia basilaris* var. *brachyclada*), was found and mapped on and in the vicinity of the Project site. Two populations totaling nine plants and a single individual were mapped onsite. Additional populations are located immediately adjacent to the site and in the vicinity (AMEC 2009a & 2009h). Focused surveys did not find any other special status plant species.

Habitat for special-status fish or amphibians is not present on or in the vicinity of the Project site. Although suitable habitat for a variety of special-status reptiles, birds, or mammals is present onsite, none of these species have been observed or reported on the Project site during any of the biological surveys between 2007 (AMEC 2007, SCE 2007, URS 2007) and 2009 (AMEC 2009a-h, Aspen 2009a-b). Focused surveys for Burrowing Owl (*Athene cunicularia*) ended with negative results (AMEC 2007b & 2009g). Potential for the occurrence of the following special-status wildlife species is considered possible to likely: coast horned lizard (*Phrynosoma coronatum*[*blainvillii* population]), Cooper's hawk (*Accipiter cooperii*), Bell's sage sparrow (*Amphispiza bellii bellii*), golden eagle (*Aquila chrysaestros*), prairie falcon (*Falco mexicanus*), loggerhead shrike (*Lanius ludovicianus*), American badger (*Taxidea taxus*). All but Cooper's hawk have the potential to reside on the site. Cooper's hawk potential is for foraging only. Potential for the occurrence of the following special-status wildlife species is considered to be unlikely: silvery legless lizard (*Anniella pulchra pulchra*), Ferruginous hawk (*Buteo regalis*), Swainson's hawk (*Buteo swainsoni*), Pallid bat (*Antrozous pallidus*), Townsend's big-eared bat (*Corynorhinus townsendii*), spotted bat (*Euderma maculatum*), western mastiff bat (*Eumopsperotis californicus*), southern grasshopper mouse (*Onychomys torridus Ramona*) and Tehachapi pocket mouse (*Perognathus alticolus Inexpectatus*). Of these, only the southern grasshopper mouse and Tehachapi pocket mouse have the unlikely potential to reside on the site. Potential for the remaining species is for foraging only. Since the nearest Swainson's hawk nest is approximately 21.57 miles away from the Vincent Substation, the area will not be included for calculations of foraging habitat.

- SCE submitted a report by IFC International titled *Supplemental Archaeological Resources Survey for the Vincent Substation Expansion Area, Segment 9, TRTP, Los Angeles County, California*. Most of the Vincent Substation Expansion Area was surveyed by Pacific Legacy in 2008 (Pacific Legacy 2008). However, an approximate two acre portion of the site was not surveyed as part of the Pacific Legacy study. The report documents the results of an archaeological survey of the additional two acre disturbance area. The proposed disturbance area is located approximately 600 meters west of East Angeles Forest Highway. A records search for the two acre disturbance area was included in the 2008 Pacific Legacy Study. The records search was conducted at the South Central Coastal

Information Center at California State University, Fullerton and consisted of a review of all available maps, cultural resource reports, and archaeological site records within a ¼ mile radius of the proposed site. Results of the records search indicated that no cultural resources or potential historic properties have been identified within or adjacent to the substation expansion area. IFC International conducted an archaeological field survey on December 28, 2009. The survey concentrated on the identification of culturally significant artifacts or structures within the two acre area not surveyed by Pacific Legacy. The surface was examined by walking parallel transects spaced no more than 15 meters apart. Road construction and a dirt turn-around have disturbed the southern end of the surveyed area resulting in high ground visibility. Surface visibility of the central and northern portions was obscured by deep brush resulting in less than 30% ground visibility. No cultural resources were identified during the archaeological field survey. Results of the records search indicate that no cultural resources have been recorded within the Vincent Substation Expansion area. No prehistoric or historic-period cultural resources were identified as a result of the field survey. The Vincent Substation expansion area contains Quaternary older alluvium and requires monitoring per the Paleontological Resources Management Plan (PRMP).

- SCE will be issuing an Authorization to Proceed (ATP) to the substation expansion contractor which will specify the allowed activities at the substation, and required mitigation prior to occupation and during construction activities.

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

- All work boundaries shall be flagged prior to yard occupation.
- Biological Monitors shall have copies of the updated pre-construction biological survey reports with mapped resources. Maps shall be regularly updated to reflect ongoing nesting activity and the identification of any other sensitive biological resources.
- Existing bird nests shall be flagged and inspected for activity by the Biological Monitors prior to vegetation disturbance.
- In conformance with federal and State regulations regarding the protection of raptors, a pre-construction survey for burrowing owls, in conformance with CDFG protocol, consisting of three site visits, shall be completed no more than 30 days prior to the start of construction within suitable habitat at the Project site(s) and buffer zone(s). The biologists shall use the CBOC 1993 survey protocol.
- If woodrat middens are present in the work area, SCE shall follow the procedures for passive relocation as described in Mitigation Measure B-36.
- If any special-status species are discovered, the CPUC EM and the appropriate resource agencies shall be notified immediately.
- Short-joint beavertail cacti relocation may proceed prior to the approval of the Habitat Restoration and Revegetation Plan.
- The Habitat Restoration and Revegetation Plan shall be completed, reviewed and approved in a timely manner prior to the completion of substation construction activities.

- Following completion of all construction activities, landscaping will be installed as specified in the Substation Landscaping Plan. This plan shall be submitted to the CPUC at least 60 days prior to implementation of landscaping activities.
- If any unanticipated cultural resources are discovered, the CPUC EM shall be notified immediately.
- Due to the Quaternary older alluvium soils at the Vincent Substation expansion area, Paleontological Monitoring is required per the Paleontological Resources Management Plan (PRMP).
- For the TRTP project-wide Fire Management Plan (non-ANF), SCE requested that they be allowed to submit a separate Operations and Maintenance Fire Management Plan 60 days prior to energizing transmission lines rather than prior to construction. The CPUC agreed to this change in the timing of the submittal.
- Prior to fuel storage on the subject site, a Fuel Storage Plan shall be submitted to CPUC for review and approval. The Plan shall specify method and location of fuel storage, volumes, demonstration of compliance with regulatory requirements regarding fuel storage, and spill containment and response measures. All fueling of equipment shall be conducted in approved refueling locations only.
- Copies of all relevant permits, compliance plans, and this Notice to Proceed shall be available on site for the duration of construction activities.
- 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 to construction technique or mitigation implementation to a lesser level are required, a Variance Request shall be submitted for CPUC review and approval.

Sincerely,



John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen