

PUBLIC UTILITIES COMMISSION505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

August 24, 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 #13)

Dear Ms. Nelson,

On July 16, 2010, Southern Californian Edison (SCE) submitted a Notice to Proceed Request (NTPR) seeking authorization from the California Public Utilities Commission (CPUC) to remove existing 220 kV transmission lines and to construct new 220 kV and 500 kV transmission lines along the eastern portion of Segment 8, between Tower M65-T2 (west of Central Avenue, City of Chino) and Tower M73-T5/M7-T1 (Mira Loma Substation, City of Ontario) for the Tehachapi Renewable Transmission Project (TRTP). The lines traverse through the cities of Chino and Ontario. The upgrade and installation of these transmission lines are located in San Bernardino County, California, and are referred to as Segment 8 Chino Hills - Phases 2 and 3.

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 #13 is granted by CPUC for the proposed activities based on the following factors:**

- SCE submitted the following information:

SCE is requesting a Notice to Proceed for the removal of existing 220 kV transmission lines and the construction of new 220 kV and 500 kV transmission lines along the eastern portion of Segment 8, between Tower M65-T2 (west of Central Avenue, City of Chino) and Tower M73-T05/M7-T1 (Mira Loma Substation, City of Ontario). The lines traverse through Chino and Ontario. The upgrade and installation of these transmission lines are located in San Bernardino County.

Segment 8 Chino Hills – Phases 2 and 3: The Phase 2 portion would include routing of the new Chino-Mira Loma No.1 and No. 2 double-circuit (DC) 220 kV T/L and replacing the existing south structures of the Chino-Mira Loma No. 1 single circuit (SC) structures and the existing DC structures in the existing right-of-way (ROW). The Phase 3 portion would include routing of the new Mira Loma-Vincent 500 kV T/L from west of Central Avenue to the Mira Loma Substation and the new Chino-Mira Loma No. 3 220 kV T/L from the Chino Substation to the Mira Loma Substation, And replacing the existing DC 220 kV Chino-Mira Loma No. 2 and No. 3 T/L structures in the existing ROW. In addition, several new 220 kV structures east of the Chino Substation will be installed to facilitate crossing the Chino-San Onofre 220 kV T/L, the Chino Serrano 220 kV T/L and the Chino-Mira Loma No. 3 220 kV T/L underneath the new Mira Loma-Vincent 500 kV T/L. The new construction and replacement of these facilities along Phases 2 and 3 will extend for an approximate 7- and 9-mile portion of Segment 8, respectively.

Site Locations and Conditions

The Segment 8 East construction activities consist of different routes for Phases 2 and 3. A description of each route is provided in the following text.

Phase 2 – Chino-Mira Loma No. 1 and No. 2 220 kV T/L

The Phase 2 construction of the new Chino-Mira Loma No. 1 and No. 2 DC 220 kV T/L will proceed east from Chino Substation and replace the existing Chino-Mira Loma No. 1 South Circuit structures from M0-T1 to M5-T1 and the existing DC structures from M5-T1 to M7-T1 (at Mira Loma Substation). This replacement will begin at Chino Substation and be route through the Cities of Chino and Ontario to the Mira Loma Substation for approximately 7 miles. Conductor will be removed along two portions of the Chino-Mira Loma No.1 North 220 kV T/L to de-energize the line. Approximately 200 feet of conductor will be removed from M0-T1 to the first tower on the Chino-Mira Loma No. 1 North 220 kV T/L. The final portion of conductor removal will take place from the tower north of M5-T1 to M5-T2.

Phase 3 – Mira Loma-Vincent DC 500 kV T/L and the Chino-Mira Loma No. 3 220 kV T/L

For Phase 3, construction of the new Mira Loma-Vincent DC 500 kV T/L will replace the Chino-Mesa 220 kV T/L structures and the Chino-Soquel 66 kV T/L, which is currently built on 220 kV structures. In addition, the new Mira Loma-Vincent DC 500 kV T/L and the Chino Mira Loma 3 220 kV T/L will replace the existing DC 220 kV Chino-Mira Loma No. 2 and No. 3 T/L structures. A description of these new transmission line routes and other construction activities are provided as follows:

- The new Mira Loma-Vincent DC 500 kV T/L will begin at M65-T2 (west of Central Avenue) and end at M73-T5 (Mira Loma Substation), an approximate 9-mile portion of Segment 8. From M65-T2, the new Mira Loma-Vincent DC 500 kV T/L will proceed north for approximately 0.65 miles to M66-T1. From M66-T1, the new line will proceed east and be constructed in existing SCE ROW to M66-T8 for approximately 1.0 miles. At M66-T8, the new line will proceed northeast, crossing Edison Avenue to M67-T1 where it will continue east for approximately 5.5 miles to M72-T3. At M72-T-3, the new line becomes single-circuit and proceeds north for approximately 0.5 miles to M73-T1 (in expanded ROW) and then is routed east for 1.0 miles before terminating at the Mira Loma Substation.
- The new Chino-Mira Loma No. 3 220 kV T/L will begin at the Chino Substation and end at the Mira Loma Substation, an approximate 7-mile portion of Segment 8. From M67-T1, the Chino-Mira Loma No. 3 220 kV T/L will be placed on the south circuit position of the new Mira Loma-Vincent 500 kV T/L and proceed east for approximately 5.5 miles to M72-T3. After M72-T3, the Chino-Mira Loma No. 3 220 kV T/L will continue east and be placed on the existing Chino-Mira Loma No. 2 and No. 3 structures beginning at M6-T3. From M6-T3, the Chino-Mira Loma No. 3 220 kV T/L will require split phase configuration for approximately 1.0 mile west of Mira Loma Substation in order to reduce calculated EMF. These transposition structures will be installed near tower M0-T9 and changed back to the original phasing configuration near M0-T3 (close to the Mira Loma Substation fence line).
- Several new 220 kV structures will be installed to facilitate crossing the Chino-San Onofre 220 kV T/L, the Chino Serrano 220 kV T/L and the Chino-Mira Loma No. 3 220 kV T/L underneath the new Mira Loma-Vincent 500 kV T/L. These structures include two new DC 220 kV on the Chino-San Onofre 220 kV T/L and Chino-Serrano 220 kV T/L. At this same location, two new SC structures will be installed on the Chino-Mira Loma No. 3 220 kV T/L to facilitate crossing underneath the new Mira Loma-Vincent 500 kV T/L before transitioning up and attaching to the new Mira Loma-Vincent 500 kV T/L and Chino-Mira Loma No. 3 DC 500 kV towers.

Construction equipment operating hours for the Segment 8 Phases 2 and 3 removal, installation and upgrade of the transmission lines on these separate alignments are planned to be from approximately 7:00 a.m. to 7:00 p.m. SCE has established a TRTP toll-free information line (877-795-8787) and website (www.sce.com/tehachapi). The information line is the designated public notification contact for the TRTP.

Project Elements/Construction Activities

Project elements that will possibly be present or active throughout the construction of the transmission line include: new or improved access roads, wire setup sites (i.e., pull sites, wire splice sites, tensioning sites), transmission foundations, structures and wires, temporary guard poles, construction equipment and vehicles, helicopters and permit requirements (e.g., Best Management Practices). Construction activities that will possibly be present or active throughout the construction of the transmission line include: grading for access roads and site preparation; removal of existing foundations, structures, and wires; installation of foundations, tower/pole structures, and wires; operation of construction equipment and vehicles; operation of helicopters; installation, maintenance and removal of guard poles; installation, implementation and installation, maintenance and removal of permit requirements, and material salvage and disposal.

Site Work

Site work for the removal and installation of the transmission lines will include grading for access roads and site preparation; removal of existing transmission structures/foundations, wires and hardware assemblies; installation of new transmission structures/foundations, and wires and hardware assemblies.

Access Roads – Construction of the new DC 500 kV and 220 kV structures will involve clearing, grubbing, and grading existing and new access roads. New access roads will be graded during this phase of construction. All new roads and planned improvements to existing roads have been designed to be a 14-foot-wide roadway. Berms or swales approximately 2 to 3 feet wide will be created on each side of the roadway where necessary. Additionally, roadway width will be required to accommodate vehicle turning, vehicle turnouts, sidecast, and backslope. Drainage improvements will be implemented in certain access road locations to deviate water away from access roads to control erosion.

Site Preparation – Construction activities associated with the removal and installation of the transmission lines will require grading and other site preparation activities. Some of these activities would be temporary (e.g., roads, land disturbance for construction staging areas and crane pads associated with tower assembly and erection). Other construction activities would be permanent in nature, and the land would remain in use after construction (e.g., tower footings and access roads). Typically the staging area for construction activities would require an area of approximately 200 by 200 feet. Typically, in locations of relatively level terrain, only vegetation removal would occur to prepare the site for construction. In more rugged terrain or sloping site conditions, both vegetation removal and grading may be necessary to prepare the staging area for construction. To support the equipment and vehicle traffic, the graded area will be compacted. Site preparation is necessary to accommodate new tower sites and perform crane operation during the assembly of tower structures. The construction of new lattice steel towers (LSTs) and tubular steel poles (TSPs) will occur on former tower sites, where possible.

Major Belowgrade Activities – It is anticipated that below grade activities such as excavation, drilling and foundation construction will be necessary for the Phase 2 and 3 construction of the new transmission lines. Construction of the new LSTs and TSPs will require construction of drilled concrete pier foundations. Typically, LSTs will require four excavated holes of 3 to 6 feet in diameter and 15 to 50 feet deep. TSPs will require one hole up to approximately 10 feet in diameter and 60 feet in depth. For removal sites, the existing LST footing would be excavated and removed to a depth of 2 feet below grade. Any remaining footing foundation would remain in place and the excavation filled and compacted to match the surrounding grade.

Major Abovegrade Activities – The construction for the Segment 8 East T/L consists of the removal of approximately 73 existing structures and the construction of approximately 95 new structures to upgrade existing transmission lines for Phases 2 and 3. Planned construction activities for each phase are summarized as follows.

PHASE 2 ACTIVITIES ARE AS FOLLOWS:

Removal of 25 existing SC 220 kV Chino-Mira Loma No. 1 South Circuit structures and 13 DC 220 kV Chino-Mira Loma No. 1 structures. This activity would include removal of structures and their foundations (2 feet below grade), conductor and other hardware assemblies.

Construction of 40 new Chino-Mira Loma No. 1 and No. 2 DC 220 kV T/L structures. Of these 40 new DC 220 kV structures, 4 are TSP and 36 are LST. Construction would include installation of foundations, structures and wires.

PHASE 3 ACTIVITIES ARE AS FOLLOWS:

Removal of 25 existing DC 220 kV Chino-Mira Loma No. 2 and No. 3 structures as well as 7 existing Chino-Mesa 220 kV structures. This activity will include removal of structures and their foundations (2 feet below grade), wires and hardware assemblies.

Construction of 49 new Mira Loma-Vincent 500 kV T/L structures. Of these 49 new DC 500 kV structures, 35 are TSP and 14 are LST. Construction at each site will include installation of foundation, structures and wires.

Construction of 4 new Chino-Mira Loma 220 kV T/L structures. Construction at each site will include installation of foundation, structures and wires.

Construction of 2 new Chino-San Onofre and Chino-Serrano 220 kV T/L structures. Both structures are TSPs. Construction at each site will include installation of foundations, structures and wires.

The removal and construction activities for these transmission structures will require a work area measuring approximately 200 by 200 feet. These areas will be located within the existing ROW corridor or approved work areas. An area within the approved work areas will be used for a crane pad. A crane will be used to install each structure.

There are approximately 30 wire setup sites that will be used for Phase 2 and 3. Of these, wire stringing will occur at approximately 26 sites and wire splicing at approximately 4 sites. Each pull/tension site, wire splice site, and wire setup will occupy a work area of approximately 500 feet by ROW width.

Other Activities

Helicopters will be used during the removal and installation of wires. The final location of helicopter landing zones and support areas will be provided upon approval of the contractor's Congested Area Flight Plan by the Federal Aviation Administration. Any additional surveys or analysis required once landing zones are identified will be conducted and the results provided to the CPUC.

- **Biological Resources:** On August 16, 2010, SCE submitted a Biological Review, prepared by ICF International dated August 2010 for Segment 8 Phase 2 and 3. Based on information from the FEIR/DEIS (Aspen 2009a) and additional vegetation mapping completed by ICF (ICF 2010m), eight vegetation communities were mapped in Segment 8 Phases 2 and 3 including mulefat scrub and nonnative woodland, but primarily consisting of disturbed/developed and agricultural land. Focused surveys that have been completed in conjunction with Segment 8 of the TRTP, which includes Segment 8 Phases 2 and 3 were reviewed. Focused survey reports that were reviewed were for rare plants (AMEC 2007a, 2009a) and burrowing owl (AMEC 2009j) as well as the Jurisdictional Delineation Report for the Tehachapi Renewable Project: Segments 7 and 8 (ICF 2010h). Southern tarplant (*Centromadia parryi* ssp. *australis*) and smooth tarplant (*Centromadia pundens* ssp. *laevis*),

as well as San Bernardino aster (*Symphyotrichum defoliatum*), salt spring checkerbloom (*Sidalcea neomexicana*) and Coulter's saltbush (*Atriplex coulteri*) all have the potential to occur within the project component, although 2007, 2009 and 2010 surveys have been negative for any special-status species. Focused surveys in 2009 and 2010 were positive for burrowing owl in four areas: southwest of the Chino Substation, to the east and south of M71-T1, and southeast of the Mira Loma substation. Additional burrowing owls were observed south of Chino Substation between M6-T6 and M66-T7. Other special-status species observed within the project component included a single ferruginous hawk and a group of migrating Swainson's hawk seen in March 2007, as well as three loggerhead shrikes. These species were not observed in subsequent surveys. There will be impacts to one jurisdictional feature within the project component along the west side of Oaks Avenue; a final jurisdictional analysis is ongoing.

- **Cultural Resources.** SCE has submitted the following Cultural Resources Survey Reports for Segment 8 East – Phase 2 and 3 (review status of each report is noted in parenthesis following the report name):

Supplemental Archaeological Survey Report, TRTP, Segment 8 East (Phases 2 and 3), San Bernardino County, CA. (Report submitted by SCE 8-06-10. Under Review.)

Paleontological Assessment and Sensitivity Report for SCE's TRTP, Segment 8 East (Phase 2 and 3), Cities of Chino and Ontario, San Bernardino County, CA (Report submitted by SCE 8-10-10. Under Review.)

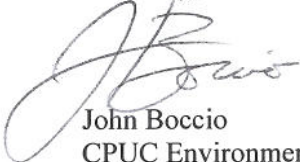
The conditions noted below shall be met by SCE and its contractors:

- Prior to site occupation and/or construction, SCE shall have all cultural resources reports reviewed and approved by the participating agencies. Conditions noted within the subject reports shall be implemented.
- All sensitive resource buffers shall be flagged prior to site occupation/construction. Resource flagging shall be field verified by the CPUC Environmental Monitor (EM) prior to project area use.
- The Segment 8 Chino Hills – Phase 2 and 3 ground disturbance areas shall be included in the project Habitat Restoration and Revegetation Plan required by MM B-1a, subject to review and approval by CPUC.
- If helicopters will be utilized, a biological report shall be submitted to the CPUC regarding potential impacts to sensitive species.
- A biological pre-construction survey, including maps of identified resources, shall be submitted to and approved by the CPUC prior to site occupation/disturbance. All threatened or endangered species observations from the 2010 protocol level surveys shall be included on these project maps. Confirmation of agency notification of listed species observations in the project areas—shall be submitted to the CPUC prior to site occupation.
- Biological survey sweeps are required to occur immediately preceding and during project area set up and occupation as part of required biological monitoring activities. Sweeps for nesting birds shall include a 500 foot buffer. If active nests are found, a biological monitor shall establish a required buffer around the nest and no activities will be allowed within the buffer until the young have fledged from the nest or the nest fails. For *listed riparian species*, no work will be authorized within 500 feet

of an active nest and all activities will stop immediately within 500 feet of the nest (Mitigation Measure B-15). The biological monitor shall conduct regular monitoring of the nest to determine success/failure and to ensure that project activities are not conducted within the buffer until the nesting cycle is complete or the nest fails. The biological monitor shall be responsible for documenting the results of the surveys and the ongoing monitoring. The buffer may be adjusted with the approval of CDFG and USFWS, and with prior knowledge of the CPUC. If special-status plant or animal species or bird nests are observed within the project area, CDFG and the CPUC EM shall be notified immediately (within 24 hours). After complete sweeps have been submitted and approved by the CPUC EM, site occupation can occur; however, if occupation does not occur within seven calendar days of survey, biological clearance sweeps shall be re-conducted prior to site occupation, including nesting bird surveys during the breeding season.

- Per MM B-29, Implement CDFG Protocol for Burrowing Owls, SCE shall conduct protocol pre-construction surveys in potential burrowing owl habitat.
- Per APM BIO-3, SCE will submit final design plans and specifications for the project if there are newly identified jurisdictional features. If necessary, SCE shall secure a Streambed Alteration Agreement from the California Department of Fish and Game.
- Continuous monitoring of earth moving activities in areas characterized by high to very high paleontological sensitivity shall be conducted.
- If unanticipated biological, cultural or paleontological resources are detected, the CPUC EM shall be notified immediately.
- SCE shall provide a letter to the CPUC from a California registered geotechnical engineer following the completion date of all of the foundation activities for each segment. The letter will confirm that SCE followed the geotechnical report recommendations and the common engineering practice in southern California at the time of the project.
- 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.
- 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