

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

September 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 #17)

Dear Ms. Nelson,

On August 9, 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 from the area south of the Angeles National Forest boundary along Interstate 605 and State Route 60 to the Mesa Substation in the City of Montebello for Segment 7 of the Tehachapi Renewable Transmission Project (TRTP). The upgrade and installation of these transmission lines are located in the cities of Duarte, Irwindale, Baldwin Park, Industry, South El Monte, Montebello, and Monterey Park in Los Angeles County, California. SCE submitted additional biological and cultural information to the CPUC on September 7, 2010.

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 #17 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 from the area south of the Angeles National Forest boundary along Interstate 605 and State Route 60 to the Mesa Substation in the City of Montebello. The upgrade and installation of these transmission lines are located in the cities of Duarte, Irwindale, Baldwin Park, Industry, South El Monte, Montebello, and Monterey Park in Los Angeles County, California.

Site Locations and Conditions

A major portion of the Segment 7 Transmission Line (T/L) will include removal of the existing Antelope-Mesa 220 kV T/L and installation of the new Mira Loma-Vincent double circuit (DC) 500 kV T/L. Segment 7 T/L spans approximately 16 miles along existing right-of-way (ROW) from Duarte to Montebello.

Mira Loma-Vincent 500 kV T/L and Rio Hondo-Vincent No. 2 220 kV T/L

Conductor will be removed from existing structures M22-T1 to M54-T2 on Rio Hondo-Vincent No. 1. Construction of the new Mira Loma-Vincent 500 kV T/L will proceed south from the new structure M27-T2 to M42-T6 near Mesa Substation. This will replace the existing Antelope-Mesa T/L. The existing Rio Hondo-Vincent No. 2 circuit will be removed from its existing route and placed on the east circuit of the new Mira Loma-Vincent DC 500 kV T/L from M27-T2 to M31-T4. From M31-T4, the Rio Hondo-Vincent No. 2 circuit joins Rio Hondo-Vincent No. 1 at existing structure M59-T1D, and

then enters the Rio Hondo Substation. Approximately 9 of the 16 miles of the new Mira Loma-Vincent 500 kV will be split-phased. Split-phasing of the Mira Loma-Vincent 500 kV T/L will occur after the Rio Hondo-Vincent No. 2 T/L joins the Rio Hondo-Vincent No. 1 tower near the Rio Hondo substation. The new Mira Loma-Vincent DC 500 kV T/L will be split-phased from M32-T1 to M40-T2. The new Mira Loma-Vincent 500 kV T/L transfers to Segment 8 at M40-T3 at San Gabriel Boulevard (known as the San Gabriel Junction). West of M40-T3 to Mesa Substation, DC 500 kV structures will be built replacing the Antelope-Mesa 220 kV T/L.

Rio Hondo-Vincent No. 1 220 kV T/L

The Rio Hondo-Vincent No. 1 T/L will be split-phased from M54-T2 (immediately north of M54-J2) to M58-T4 (between M58-J3 and Live Oak Avenue). The split-phase structures will be installed near M54-T2 and M58-T4. The Rio Hondo-Vincent No. 1 T/L will require an interset structure, M54-T3A, on the existing transmission line.

Project Components

Construction equipment operating hours for the Segment 7 T/L removal, installation and upgrade of the transmission lines 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 and/or improved access roads; wire setup sites (i.e., pull sites, wire splice sites, tensioning sites); transmission foundations, structures and wires; temporary guard structures; 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; 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 – Removal of 220 kV structures and construction of the new DC 500 kV and 220 kV structures will involve clearing, grubbing, and grading existing and new access roads. Approximately one (1) mile of new access roads is planned. 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., construction roads, land disturbance for construction staging areas and crane pads associated with tower assembly and erection). Other construction activities would be permanent, 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 measuring approximately 200 by 200 feet at each tower. 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 removal of existing structures and installation of new towers 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. All site preparation will be conducted in compliance with all permit requirements and will include installation of Best Management Practices.

Major Belowgrade Activities – Segment 7 T/L will involve the installation of approximately 2,000 linear feet of underground conduit and inner duct for fiber optic cable from the Rio Hondo Substation fence line to a contractor installed riser on the existing Rio Hondo-Vincent No. 1 and No. 2, Structure M59-T1D, and the new Mira Loma-Vincent structure M32-T1. It is anticipated that belowgrade activities such as excavation, drilling and foundation construction will be necessary for the 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 approximately 3 to 8 feet in diameter and 15 to 75 feet deep. TSPs will require one hole of approximately 6 to 12 feet in diameter and up to 50 feet deep. For removal sites, the existing LST footing would be excavated and removed to a depth of 2 feet belowgrade. 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 7 T/L consists of removing conductors from some of the existing structures along Antelope-Mesa and Rio Hondo-Vincent No. 1 and No. 2, the removal of approximately 75 existing structures, and the construction of approximately 81 new structures.

- **Removal of conductors from existing Antelope-Mesa and Rio Hondo-Vincent No. 1 and No. 2 structures.** This activity would include removal of conductors from structure M54-T1 to Mesa Substation, the removal of conductors from existing structure M22-T1 to existing structure M54-T2, and the removal of conductor and OHGW on existing structure M58-T4 to existing structure M59-T1D.
- **Removal of approximately 75 structures within the Antelope-Mesa 220 kV Transmission Line Section.** This activity would include the removal of approximately 75 structures and associated safety fences and anti-climbing devices for approximately 16.4 miles starting at structure M54-T1A through M119-T3. This activity would include removal of structures and their foundations (2 feet below grade), conductor and other hardware assemblies.
- **Construction of approximately 81 new DC 500 kV T/L structures.** Of these 81 new DC 500 kV structures, 75 are LST and 6 are TSP. 74 new LSTs and 4 TSPs will be a part of Mira Loma-Vincent 500 kV and Rio Hondo-Vincent No. 2 220 kV. One new LST and two TSPs will be a part of Rio Hondo-Vincent No. 1 220 kV. Construction would include installation of foundations, structures, and wires.
- **Installation of approximately 600 linear feet of Optical Ground Wire (OPGW).** This activity would include installation of approximately 600 linear feet of OPGW from the last structure of Segment 7 (M42-T6) to the existing Antelope-Mesa T/L position at Mesa Substation.

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 measuring at least 50 by 50 feet within the approved work area will be used for a crane pad. A crane will be used to install each structure.

There are approximately 35 wire setup sites that will be used for Segment 7 T/L. Each pull/tension site, wire splice site, and wire setup will occupy a work area measuring approximately 500 feet by ROW width.

Other Activities

Helicopters will be used during wire removal and installation. 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 September 7, 2010, SCE submitted a Biological Review, prepared by ICF International dated August 2010 for the Segment 7 T/L of TRTP. A literature review was conducted to identify special-status biological resources known to occur within the Biological Survey Area (BSA), defined as the Project Component and within 500 feet of the Project Component. General and focused biological surveys have been completed in conjunction with Segment 7 of the TRTP. The FEIR/DEIS (Aspen 2009a) and ICF (2010ee) vegetation mapping was reviewed and used for this Project Component. A detailed evaluation of prior focused biological surveys and reports that address the BSA was completed. Biological data collected from completed 2010 focused surveys was used (ICF 2010m-p, 2010hh). Other records reviewed for the Project Component included the California Department of Fish and Game (CDFG) California Natural Diversity Data Base (CNDDB), California Native Plant Society (CNPS) Inventory of Rare Plants (CNPS 2010) and the U.S. Fish and Wildlife Service (USFWS) Critical Habitat Portal (USFWS 2010).

Based on information from the FEIR/DEIS and additional vegetation mapping completed by ICF in 2010, 21 vegetation communities were mapped within the Project Component and include the following: agriculture, California annual grassland, sparsely vegetated streambed, southern coast live oak riparian forest, coast live oak woodland, coastal sage scrub, disturbed/developed, ruderal wetland, exotic-giant reed, freshwater marsh, mixed chaparral, mule fat scrub, mule fat scrub-disturbed, nonnative woodland, water, Riversidean alluvial fan sage scrub, ruderal grassland, southern arroyo willow riparian forest, southern sycamore alder riparian woodland, southern willow scrub, and southern willow scrub-disturbed (ICF 2010ee). A wetland delineation performed along Segment 7 confirmed isolated dry washes, several non-riparian streams, as well as riparian vegetated streams. Other features such as roadside ditches and swales were also assessed during the delineation. A total of 95 separate linear drainage features were documented and assessed in the Segment 7 jurisdictional delineation survey areas. Within the survey area, 22 areas met the criteria for federal wetlands (hydric soils, wetland hydrology, and prevalence of hydrophytic vegetation). An additional jurisdictional impact analysis to support revised road and structure engineering disturbance areas is underway. Any necessary permit modifications will be submitted to the appropriate regulatory agencies. Jurisdictional impact calculations will be provided in the permit application amendment.

Numerous focused biological surveys have been completed within this Project Component. Focused rare plant surveys were conducted in 2009 and 2010 in accordance with MMs B-7 and B-23. The 2010 rare plant focused survey identified five special-status species including southern tarplant (*Centromadia parryi* ssp. *australis*), Plummer's mariposa lily (*Calochortus plummerae*), Catalina mariposa lily (*Calochortus catalinae*), California walnut (*Juglans californica*), and San Gabriel oak (*Quercus* ssp.) (ICF 2010m). The special-status wildlife species observed within the BSA in 2009 and/or 2010 include coastal California gnatcatcher (*Polioptila californica*), least Bell's vireo (*Vireo bellii pusillus*), willow flycatcher (migrants of undetermined subspecies), and southwestern pond turtle (*Emys marmorata pallida*). Coastal California gnatcatchers were observed throughout the Montebello Hills during focused surveys and incidentally observed during preconstruction surveys for the Mesa Substation (one nesting pair) and for an area east of San Gabriel Boulevard and west of the Rio Hondo (foraging individuals). Least Bell's vireo were confirmed present within portions of Whittier Narrows, the San Gabriel River, and Rio Hondo where suitable riparian habitat exists. Least

Bell's vireo were also incidentally observed during a coastal California gnatcatcher survey upstream of Huntington Drive. Focused protocol-level surveys for burrowing owl (*Athene cunicularia*) were conducted in 2009 and 2010 and potential burrowing owl features (burrows) were identified; however, 2010 surveys confirmed burrowing owls are absent.

- **Cultural Resources.** SCE has submitted the following Cultural Resources Survey Reports for Segment 7 T/L (review status of each report is noted in parenthesis following the report name):
 - *Historic Property Treatment Plan for Sites PL-SCE-SEG7-07, SCE TRTP, Los Angeles County, CA (USACE Lands)* (AE Memo of Revised Treatment Plans sent 7-14-10 accepts revisions. ACOE Memorandum dated 7-20-10 accepts revised treatment plan.)
 - *Historic Property Treatment Plan for Site CA-LAN-3814, SCE TRTP, Los Angeles County, CA (USACE Lands)* (AE Memo of Revised Treatment Plans sent 7-14-10 accepts revisions. ACOE Memorandum dated 7-20-10 accepts revised treatment plan.)
 - *Supplemental Archaeological Survey Report No. 2, TRTP, Segment 7, Los Angeles, CA* (AE Memorandum dated 9-21-10 had comments.)
 - *TRTP, Segment 5 and 7: NRHP/CRHR Review of SCE Company Antelope-Mesa 220 kV Transmission Line, Los Angeles County, CA.* (AE Memorandum dated 8-27-10 concurs with findings).

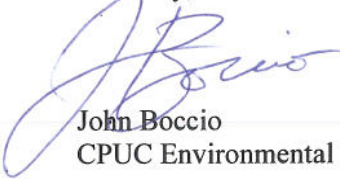
The conditions noted below shall be met by SCE and its contractors:

- 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.
- All construction areas and access roads identified in the NTPR submitted by SCE shall be flagged prior to construction. Flagging of construction areas and access roads shall be field verified by the CPUC EM prior to site use.
- The Segment 7 T/L 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.
- All 2010 focused biological survey reports applicable to the project areas in this NTP shall be reviewed and approved by the CPUC prior to construction or site occupation at these locations.
- If helicopters will be utilized during construction, a report shall be submitted to the CPUC regarding potential impacts to nesting birds, and noise and dust on adjacent sensitive land uses.
- 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.
- No construction or site occupation shall occur in the project areas under consultation with CDFG for the 2081 Incidental Take Permit and 1602 Streambed Alteration Agreement, and the US Army Corps of Engineers (USACE) Record of Decision (ROD) until those permits are issued and all applicable conditions for consulted species are implemented.
- 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 or revised road and structure engineering disturbance areas that will impact jurisdictional features. If necessary, SCE shall secure a Streambed Alteration Agreement from the CDFG and/or other required agency permits.
- Topsoil shall be salvaged and stored properly for replacement in the areas trenched for the fiber optic cable (FOC).
- In accordance with the final version of the Paleontological Resources Management Plan (PRMP), paleontological resource monitoring is recommended during any earth moving activities associated with the Segment 7 T/L.
- If unanticipated biological, cultural or paleontological resources are detected, the CPUC EM shall be notified immediately.
- To fulfill MM EIH-1a, SCE shall submit a letter from an engineer stating that SCE's design conforms to the applicable regulations required by MM EIH-1a.
- For APM HYD-7, SCE shall submit the project overlay on topography maps in locations where there are any waterways, floodplains, or potential erosion areas identified, along with a letter from a hydrologist identifying the course of action for the design and permitting for any towers placed in a waterway, flood zone, or which have the potential for erosion.
- 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.
- The City of jurisdiction's approval or applicable Municipal Code reference shall be provided to CPUC for all future Sunday work or for work outside of the hours 7:00 AM to 7:00 PM, Monday through Saturday, prior to the commencement of work.
- Refueling and fueling locations shall be a minimum of 100-feet away from existing drainages. If construction debris or spills enter into environmentally sensitive areas, the jurisdictional agencies and the CPUC EM shall be notified immediately.
- 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