

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

November 30, 2010

Susan J. Nelson, AIA
Southern California Edison
Regulatory Affairs
2244 Walnut Grove Avenue, Quad 3D, GO1
Rosemead, CA 91770

RE: Tehachapi Renewable Transmission Project (Segments 4-11), Notice to Proceed (NTP #20)

Dear Ms. Nelson,

On October 15, 2010, Southern Californian Edison (SCE) submitted a Notice to Proceed Request (NTPR) seeking authorization from the California Public Utilities Commission (CPUC) to construct the Segment 10 Telecom of TRTP. Segment 10 Telecom includes the installation of new All-Dielectric Self-Supporting fiber optic telecom cables along two routes, which will occur between SCE's Rosamond to Windhub Substations and Rosamond to Whirlwind Substations, and installation of the 12 kV distribution poles and power line between the Rosamond Substation to Whirlwind Substation in Kern 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 #20 is granted by CPUC for the proposed activities based on the following factors:**

- SCE submitted the following information:

SCE submitted a Notice to Proceed Request (NTPR) seeking authorization from the CPUC to construct the Segment 10 Telecom of TRTP, which includes the installation of new All-Dielectric Self-Supporting (ADSS) fiber optic telecom cables (FOCs) along two routes, which will occur between SCE's Rosamond Substation to Windhub Substation and Rosamond Substation to Whirlwind Substation in Kern County, California. For Rosamond Substation to Windhub Substation Segment 10 Telecom, the FOC will be strung on existing or new poles, or installed in new underground conduit. For Rosamond Substation to Whirlwind Substation Segment 10 Telecom, the FOC will be strung on existing or new poles, or installed in new underground conduit. Installation of the 12 kV distribution poles and power line will also occur along this route and is requested under this NTPR.

Site Location and Conditions

The construction of one ADSS FOC between the following facilities is for telecom interconnection between Rosamond Substation, Windhub Substation, and Whirlwind Substation; and to provide protective relay circuits, Supervisory Control and Data Acquisition (SCADA) circuits, data, and telecommunication services.

- **Route from Rosamond Substation to Windhub Substation.** From the existing communication room at Rosamond Substation, the FOC will be installed in new underground conduit for approximately 105 feet, rise-up an existing pole and continue north approximately 0.5 mile overhead on SCE existing pole facilities located on the east side of 60th Street West. The route then turns west on Felsite Avenue proceeding on the north side of the road for six poles and then to the south side for the remainder of existing pole facilities for 0.5 mile. The route turns north on 65th Street West continuing on existing SCE poles for approximately 2.0 miles, then turns west on the south side of Favorito Avenue on existing SCE poles for approximately 2.0 miles. The route

continues west underground in new conduit as part of a new utility duct bank for approximately 510 feet, rises-up on existing SCE pole facilities, and continues west for approximately 0.4 mile. The route turns north on Tehachapi Willow Springs Road and continues on the west side of the street on existing SCE pole facilities for approximately 3.5 miles to Backus Road. At Backus Road the route turns west for approximately 1.0 mile on existing SCE pole facilities until it reaches 100th Street West. The route turns north on 100th Street West on existing SCE pole facilities for approximately 1.7 miles, where it crosses Tehachapi Willow Springs Road. After crossing Tehachapi Willow Springs Road, the route continues north for approximately 2.3 miles. The route then turns east onto SCE's right-of-way along Sunset Road on existing pole facilities for approximately 1.0 mile, then continues north along 90th Street West for approximately 1.5 miles on existing SCE pole facilities. The route proceeds north along 90th Street West on new pole facilities to Oak Creek Road (approximately 0.5 mile). The route turns east on Oak Creek Road on new poles for 0.8 mile and proceeds underground in a new utility duct bank conduit in a southerly direction 682 feet and in a westerly direction 613 feet, terminating at the Windhub Substation communication room.

- **Route from Rosamond Substation to Whirlwind Substation.** From the existing communication room at Rosamond Substation, the FOC will proceed southwest for approximately 80 feet in conduit in new underground utility duct bank where it rises-up on an existing SCE pole on Rosamond Boulevard. The route turns west on existing SCE pole facilities located on the north side of Rosamond Boulevard for approximately 8 miles. The route proceeds in new underground utility duct bank approximately 750 feet, crossing 140th Street and rise-up on SCE pole at the northwest corner of Rosamond Boulevard and 140th Street. The route continues west on existing SCE poles for approximately 1 mile to the northeast corner of Rosamond Boulevard and 150th Street West where it turns south. It continues south on 150th Street West located on existing SCE poles for approximately 2.1 miles. The route turns west on the north side of Gaskell Road and continues 2 miles on existing poles to 170th Street West. The route turns north on 170th Street West and continues overhead on new 12 kV distribution poles located on the east side of the street for approximately 0.7 mile. The FOC and 12 kV power lines continue north in new underground conduit for approximately 820 feet. The FOC and power lines rise-up onto a new distribution pole then proceed north approximately 0.8 mile. The route turns west in new underground conduit for approximately 1,420 feet.

The routes traverse streets, and disturbed and undisturbed land. Approximately 32 miles will be located in existing SCE rights-of-way. Approximately 510 linear feet of the underground fiber line will be installed on newly acquired easements or fee-owned property. Access to these routes will be along public streets or existing access roads. Approximately 855 feet will be underground work along franchised right-of-way. Of the entire 32 miles of fiber line, approximately 3.7 miles of new poles will be installed within franchise rights.

Project Components

This section describes the project components, including project elements, construction activities, and site work associated with the installation of the new telecom and 12 kV distribution lines.

Construction operating hours for the Segment 10 Telecom project 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/tehadchapi). 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 these routes include the following: pull/tension sites, underground conduits, 12 kV distribution poles, FOC, 12 kV power line, construction equipment and vehicles, permit requirements (e.g. BMPs).

Construction activities that will possibly be present or active throughout the construction of these routes include the following: installation of pole structures, underground conduit, and FOC; 12 kV

distribution pole installation; operation of construction equipment and vehicles; installation, maintenance, and removal of permit requirements.

Site Work

Site work for the FOC will include installation of new poles; installation of FOC on new and existing poles; installation of 12 kV distribution line on new poles; and underground installation of FOC. Specific information on these activities is provided below.

Site Preparation

No ground disturbing site preparation activities are anticipated.

Belowground Activities

A total of approximately 4,132 linear feet of FOC will be installed in new underground utility duct bank conduits at eight locations along the route. Each duct bank conduit requires a 20-foot wide temporary disturbance area. In addition, a 12 kV power line will be installed along 170th Street West, and from 170th Street West to the communications room at Whirlwind Substation. This new 12 kV power line will utilize the same underground conduit as the FOC. For new underground utility duct bank installation, a trench will be excavated, a utility duct bank installed, and the trench filled with concrete slurry (bottom portion) and native soil (top portion) to existing grade.

Aboveground Activities

With the exception of the belowground installation activities described in the preceding section, the FOC and 12 kV distribution lines will be installed aboveground. The 12 kV distribution line and portions of the FOC will be installed on new poles. An estimated 76 new wood poles will be installed, as summarized below.

- Rosamond Substation to Windhub Substation Route. An estimated 38 poles will be installed for this FOC line route.
- Rosamond Substation to Whirlwind Substation Route. An estimated 38 new poles will be installed to support the 12 kV distribution line and FOC. The poles will be installed along 170th Street.

The ground disturbance area around each new pole location will be limited to an approximate 5-foot radius around the pole (permanent pole diameter 18 inches). The poles will be installed to approximate depths of 5 to 7 feet below ground surface. Twenty-three (23) poles along the route will be supported by concrete anchors. These anchors, approximately 3-foot square by 3-foot deep, will be located within the ground disturbance area of a pull site.

The remaining portions of FOC will be installed on existing overhead transmission, distribution, and communication structures.

The height of new overhead structures associated with the FOC and 12 kV line will be approximately 25 to 45 feet above ground surface.

Wire pulling will be performed at an estimated 71 sites along the route. Each pull site will consist of an approximate 20 by 25 foot disturbance area (500 square feet).

- **Biological Resources:** The USFWS Biological Opinion (BO) was issued on July 31, 2010. The CDFG 2081 Incidental Take Permit was issued on November 23, 2010. The 2081 is required for Segment 10 Telecom for Swainson's hawk, desert tortoise, and Mohave ground squirrel.

SCE submitted a report titled *SCE TRTP Component, Segment 10 Telecommunications Biological Review* prepared by ICF International dated October 2010. A literature search was conducted for the

project site to determine the potential for special-status biological resources to occur within the 5-mile vicinity of the project site. Focused surveys were conducted between 2007 and 2009 for rare plants, burrowing owl (*Athene cunicularia*), desert tortoise (*Gopherus agassizii*), Swainson's hawk (*Buteo swainsoni*), and Mohave ground squirrel (*Spermophilus mohavensis*) along portions of the project site that occur within the TRTP right-of-way (portions of Segments 4 and 10 that intersect the telecommunications route), and adjacent to the Windhub and Whirlwind Substations. Focused surveys for 2010 along the project site were also conducted for rare plants, desert tortoise, and Swainson's hawk. A general biological survey was also conducted in late 2009/2010 along the project site plus a 500-foot survey buffer, and the biological conditions, including major vegetation communities, plant and wildlife inventories, and hydrologic features, were documented.

Twelve natural vegetation communities were identified within the project site and adjacent areas, and two of these, Joshua tree woodland and Mojave desert wash scrub, are considered sensitive natural vegetation communities (Aspen 2009a). In addition to desert wash scrub habitat, portions of the project site support man-made hydraulic features, including irrigation pipes, culverts, and unvegetated irrigation ponds. No potentially jurisdictional hydraulic features or habitats will be impacted, and native vegetation will be avoided to the maximum extent feasible.

No special-status plant species were observed within the project site alignment during the general biological survey; however, Alkali mariposa lily (*Calochortus striatus*), a CNPS 1B.2, has been identified as part of the rare plant surveys completed this year (ICF 2010m, 2010ee, 2010zz), and Mojave spineflower (*Chorizanthe spinosa*), a CNPS 4.2 species, was identified within an adjacent TRTP contractor yard (Racetrack Contractor Yard). Two alkaline species, Alkali mariposa lily and Horn's milk-vetch (*Astragalus hornii*), were historically recorded approximately 1 mile north of the project site, and portions of the project site provide suitable alkaline soils.

No special-status raptors were observed during previous biological surveys. Vegetated areas adjacent to the project site provide suitable foraging and nesting habitat for some raptors, including burrowing owl and Swainson's hawk. The 2010 protocol-level focused surveys for Swainson's hawks identified 8 total nests (7 breeding pairs) within the Antelope Valley and was found to occur within approximately 1 mile of the project site (ICF and Bloom Biological 2010a).

No special-status reptile species were observed during previous biological surveys. The project site is located within the identified western Mojave range for desert tortoise. The project site includes suitable Joshua tree woodland and Mojave creosote scrub habitat for desert tortoise. The project site also provides suitable habitat for both the California (*Phrynosoma coronatum frontale*) and San Diego (*Phrynosoma coronatum blainvillii*) horned lizard species (ICF 2010hh).

No special-status mammal species were observed during previous biological surveys. The project site provides suitable habitat for Mohave ground squirrel, but does not overlap within the historic range of the species. The project site also provides suitable habitat for Tehachapi pocket mouse, but is east of the known range for the species. Suitable habitat occurs within the 500-foot survey buffer of the project site for American badger (*Taxidea taxus*).

Cultural Resources. SCE submitted a report titled *Cultural Resources Inventory of the SCE Whirlwind to Rosamond and Rosamond to Windhub Telecommunication Line, Kern County, CA*. The CPUC and the ANF have reviewed the report and concur with the report findings.


A paleontological sensitivity review was conducted in 2010 (Paleo Solutions 2010). In accordance with the final version of the PRMP and the paleontological sensitivity report, paleontological resource monitoring is recommended during any earth moving activities associated with the Segment 10 Telecom.

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

- All sensitive resource buffers shall be flagged prior to construction/site occupation. Resource flagging shall be field verified by the CPUC EM prior to site 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.
- A biological preconstruction 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.
- 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. 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 1602 Streambed Alteration Agreement until those permits are issued and all applicable conditions are implemented.
- The Segment 10 Telecom 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.
- For underground construction, topsoil shall be salvaged and stored properly for replacement in the areas trenched for the fiber optic cable (FOC).
- Prior to commencement of construction activities, all crew personnel including haul truck and concrete truck drivers shall be appropriately trained on environmental issues including protocols for air quality, hazardous materials, biological resources, known and unanticipated cultural materials, as well as SWPPP BMP's. A log shall be maintained on site with the names of all crew personnel trained.
- In accordance with the final version of the PRMP and the paleontological sensitivity report, paleontological resource monitoring shall be conducted during any earth moving activities associated with the Segment 10 Telecom.
- If unanticipated biological, cultural or paleontological resources are detected, the CPUC EM shall be notified immediately.

- Kern County 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