

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

January 12, 2011

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

RE: Tehachapi Renewable Transmission Project (Segments 4-11), Notice to Proceed (NTP #24)

Dear Ms. Nelson,

On November 11, 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 east of San Gabriel Boulevard and south of State Route (SR) 60, known as the San Gabriel Junction, to the area just east of SR 57 and just south of the City of Diamond Bar for the Tehachapi Renewable Transmission Project (TRTP). The upgrade and installation of these transmission lines are located in the Cities of Pico Rivera, Industry, Whittier, and La Habra Heights, the unincorporated communities of Hacienda Heights and Rowland Heights, and the Puente Hills Landfill Native Habitat Preservation Authority (PHLNHPA) lands, in Los Angeles County, California, and are referred to as Segment 8 Transmission Line (T/L) West – Phase 4. Cultural and biological information was submitted on December 10 and 20, 2010, respectively.

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 #24 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 Segment 8, Phase 4 from the area east of San Gabriel Boulevard and south of State Route (SR) 60, known as the San Gabriel Junction, to the area just east of SR 57 and just south of the City of Diamond Bar for the Tehachapi Renewable Transmission Project. The upgrade and installation of these transmission lines are located in the Cities of Pico Rivera, Industry, Whittier, and La Habra Heights, the unincorporated communities of Hacienda Heights and Rowland Heights, and the Puente Hills Landfill Native Habitat Preservation Authority (PHLNHPA) lands, in Los Angeles County, California, and are referred to as Segment 8 Transmission Line (T/L) West – Phase 4.

Segment 8 T/L West – Phase 4 portion of the new Mira Loma – Vincent 500 kV double-circuit (DC) T/L will replace the existing Chino –Mesa 220 kV T/L alignment. Several existing structures affecting intersecting existing transmission lines will be removed and replaced with structures to maintain clearances with the new Mira Loma – Vincent 500 kV DC T/L. Two existing transmission lines will be re-routed along with the new Mira Loma – Vincent 500 kV DC T/L along the northern boundary of the Rose Hills Memorial Cemetery. Existing telecommunications (telecom) fiber optic cable (FOC), currently situated on the Mira Loma – Walnut & Center – Olinda 220 kV DC T/L, will be permanently re-routed onto approximately one mile of existing overhead lines.

Site Locations and Conditions

The Segment 8 West (Phase 4) spans approximately 16 miles along existing and new SCE right-of-way from the San Gabriel Junction to unincorporated Los Angeles County, just south of the City of Diamond Bar. A description of the Segment 8 T/L West (Phase 4) Route is provided in the following section.

Mira Loma-Vincent 500 kV T/L

Construction of the new Mira Loma-Vincent 500 kV T/L will begin at the San Gabriel Junction, which is 500 feet east of San Gabriel Boulevard and approximately two miles east of the Mesa Substation. From the San Gabriel Junction, the new Mira Loma-Vincent 500 kV T/L will leave the Antelope-Mesa 220 kV T/L alignment and connect into the existing Chino-Mesa 220 kV T/L alignment, where the existing single-circuit 220 kV structures will be removed and replaced with DC 500 kV structures located adjacent to the existing structures. About three miles west of the Rose Hills Memorial Cemetery property, a new tubular steel transposition structure will be installed near M40-T5 to operate the line in a split-phased configuration. Then, approximately one mile of the Mira Loma-Vincent 500 kV T/L will be routed along the northern boundary of the Rose Hills Memorial Cemetery property. From the Rose Hills Cemetery area, the Mira Loma-Vincent 500 kV T/L will travel east towards the City of La Habra Heights. Split-phasing will occur east of tower M29-T1A and will continue to a new transposition structure at tower M23-T2A. The Segment 8 T/L West (Phase 4) portion of the Mira Loma-Vincent 500 kV T/L will continue east to structure M55-T2.

Telecom Re-route

The route begins near Tower M10-T1 of the Mira Loma-Walnut & Center-Olinda 220 kV DC T/L. At this location, pole number 2336372E is part of an existing all-dielectric-self-supporting (ADSS) route that attaches to the fiberwrap on the transmission line. A new splice location will be established at this pole and will serve as the beginning location for the re-route. The route then proceeds 350 feet northeast to pole number 2336374E on the west side of Skyline Trail Road. The route then proceeds east, following Skyline Trail Road overhead, on existing poles for approximately 4,640 feet. At pole number 1093917E the route turns south and continues overhead on existing poles for 120 feet to pole number 4630390E, where it will connect with an existing splice box to an existing FOC. This existing FOC then proceeds in existing underground conduit to the College Comm. Site.

The telecom re-route will involve using existing poles and underground conduits that will not be impacted by demolition and rebuild plans. The telecom re-route will use a combination of existing FOC and new FOC along existing overhead and underground facilities. Additionally, one communications pole will be removed as part of the telecom re-route.

Construction equipment operating hours for the Segment 8 Phase 4 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 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, permit requirements (e.g., Best Management Practices), and overhead and underground fiber optic cable.

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 structures; implementation and installation, maintenance and removal of permit

requirements; installation of underground facilities for fiber optic cable; 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, wires and hardware assemblies; trenching and installation of duct banks for fiber optic cable. Specific information on these activities is provided in the following section.

Access Roads – Construction of the new DC 500 kV and 220 kV structures will involve clearing, grubbing, and grading existing and new access roads. 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 of 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, installation of new tower sites and to 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 BMPs.

Major Underground Activities – Not applicable.

Major Belowgrade Activities – It is anticipated that belowgrade activities such as excavation, drilling and foundation construction will be necessary for 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 11 feet in diameter and 15 to 60 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 belowgrade. Any remaining footing foundation would remain in place, and the excavation filled and compacted to match the surrounding grade.

Major Abovegrade Activities – The Phase 4 construction of the removal of approximately 54 existing structures, removal of approximately 12 existing 66 kV structures, and the construction of approximately 97 new structures to upgrade existing transmission lines for Phase 4, as well as the construction of 21 temporary shoe-fly poles (ESPs). Planned construction activities for Segment 8 T/L West (Phase 4) are summarized as follows:

- **Removal of 36 existing SC structures.** This activity would include 35 existing structures on the Chino-Mesa T/L and one existing structure on the Antelope-Mesa T/L. This activity will include removal of structures and their foundations (2 feet below grade), wires and hardware assemblies.

- **Removal of 18 existing DC structures.** This activity would include removal of structures and their foundations (2 feet below grade), conductors and other hardware assemblies on various 220 kV transmission lines and one structure on the LADWP Victorville-Century T/L.
- **Removal of 12 existing 66 kV structures.** This activity would include removal of 8 LSTs and 4 LWSPs that were decommissioned as part of the Mesa-Narrows and Walnut-Hilgen-Industry-Mesa-Reno 66 kV relocation. This activity will include removal of structures and their foundations (2 feet below grade), wires and hardware assemblies.
- **Construction of 67 new Mira Loma-Vincent DC 500 kV T/L structures.** This activity will include 2 TSPs, 64 LSTs and 1 TSP for split-phasing. Construction at each site will include installation of foundations, structures, and wires.
- **Temporary construction of 21 shoe-fly (ESPs) poles.** Twenty one temporary structures will be installed to allow for construction of the nearby transmission line structures.
- **Replace, remove and re-route various existing 220 kV T/L structures.** This activity will include the construction of 30 new DC 220 kV T/L that will include 26 LSTs and 4 TSPs. The 4 TSPs are two sets of 2-Pole structures on the LADWP Victorville-Century T/L. This activity would include foundation installation, structure, and conductor.

The removal and construction activities for these transmission structures will require a work area measuring approximately 200 by 200 feet or width of ROW. These areas will be located within the existing right-of-way corridor or approved work areas. An area measuring at least 50 feet 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 32 wire setup sites that will be used for Segment 8 T/L West (Phase 4). Each pull/tension site, wire splice site, and wire setup will typically occupy a work area measuring approximately 500 feet by ROW width.

Approximately 5,210 linear feet (approximately 1 mile) of FOC will be installed on existing overhead pole lines adjacent to local streets.

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 December 20, 2010, SCE submitted a Biological Review, prepared by ICF International dated December 2010 for Segment 8 West (Phase 4) (Project Component). Numerous focused biological surveys have been completed within this Project Component and a 500-foot buffer (biological survey area [BSA]). Twenty-seven vegetation communities were mapped within the BSA for Segment 8 West (Phase 4) including: agriculture, bunch grass grassland, California annual grassland, California annual grassland – wildflower field, California walnut woodland, coast live oak woodland, burned coast live oak woodland, coastal sage scrub, disturbed coastal sage scrub, disturbed/developed, exotic-giant reed, freshwater marsh, mixed chaparral, disturbed mixed chaparral, mule fat scrub, disturbed mule fat scrub, nonnative woodland, ruderal grassland, ruderal wetland, southern arroyo willow riparian forest, southern coast live oak riparian forest, southern cottonwood willow riparian forest, southern sycamore alder riparian woodland, southern willow scrub, disturbed southern willow scrub, sparsely vegetated streambed, and open water. Between 2007 and 2009, focused surveys that were conducted within the Project Component include: rare plants, burrowing owl (*Athene cunicularia*), riparian birds (southwestern willow flycatcher

[*Empidonax traillii extimus*], least Bell's vireo [*Vireo bellii pusillus*], and western yellow-billed cuckoo [*Coccyzus americanus occidentalis*]), coastal California gnatcatcher (*Polioptila californica*), southwestern pond turtle (*Emys marmorata pallida*), two-striped garter snake (*Thamnophis hammondi*) and south coast garter snake (*Thamnophis sirtalis ssp.*), and coast range newt (*Taricha torosa torosa*). In 2010, focused surveys were conducted for rare plants, burrowing owl, riparian birds, coastal California gnatcatcher, southwestern pond turtle, two-striped garter snake, and south coast garter snake (ICF 2010, BonTerra 2010).

Portions of the Project Component are located within federally designated critical habitat for the coastal California gnatcatcher. The 2010 rare plant focused survey identified special-status plant species, including California walnut (*Juglans californica* var. *californica*), Catalina mariposa lily (*Calochortus catalinae*), Coulter's matilija poppy (*Romneya coulteri*) and Englemann oak (*Quercus engelmannii*) (ICF 2010at). Intermediate mariposa lily (*Calochortus weedii* var. *intermedius*) is also located along Segment 8 West (Phase 4), which is a special-status plant species. SCE disagrees with the identification of the intermediate mariposa lily; however, and Aspen/CPUC provided comments to SCE in regards to the identification and status of the lily on January 10, 2011. Locally regulated tree species observed during tree inventory surveys include blue elderberry (*Sambucus mexicana*), California bay laurel (*Umbellularia californica*), California scrub oak (*Quercus berberidifolia*), canyon live oak (*Quercus chrysolepis*), coast live oak (*Quercus agrifolia*), red willow (*Salix laevigata*), and California black walnut (*Juglans californica*) (ICF 2010av).

Special-status wildlife species observed within the BSA with specific mitigation measures in the FEIR include coastal California gnatcatcher, least Bell's vireo, yellow-billed cuckoo, willow flycatcher, and southwestern pond turtle. Potential burrowing owl features were identified in 2009 and 2010; however, 2010 surveys did not observe any burrowing owls. The Project Component provides potential nesting habitat for bird species that are protected under the Migratory Bird Treaty Act and California Department of Fish and Game Code, including raptors. The Project Component crosses several drainage features, of which at least 14 will be affected. Construction impacts on jurisdictional waters will require the appropriate permits and adherence to applicable permit-specific conditions.

- **Cultural Resources.** SCE has submitted the following Cultural Resources Survey Reports for Segment 8 West – Phase 4 (review status of each report is noted in parenthesis following the report name):

TRTP Cultural Resources Report with Negative Findings: Segment 8 West (Phase 4), Los Angeles and San Bernardino Counties, CA (The report has been reviewed and approved by the CPUC and ANF.)

Cultural Resources Survey of Segment 8 West (Phase 4), Addendum, SCE TRTP, Los Angeles County, CA (Applied Earthworks memorandum dated 12-30-10 had comments regarding the report. ANF memorandum dated 1-6-11 had comments regarding the report.)

TRTP Cultural Survey Report with Negative Findings, Segment 8 - College Whittier Fiber Optic Cable Relocation, Los Angeles County, CA. (The report has been reviewed and approved by the CPUC and the ANF.)

Paleontological Assessment and Sensitivity Report for SCE's TRTP, Segment 8 West (Phase 4), Los Angeles County, CA. (The report has been reviewed and approved by the CPUC.)

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

- 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.
- Segment 8 West – Phase 4 crosses several drainage features, of which at least 14 will be affected. Prior to construction within jurisdictional waters, a list of the affected drainages and the appropriate permits shall be submitted to CPUC, and applicable permit-specific conditions shall be implemented during construction.
- The following towers and associated disturbance areas, as well as the listed access road, shall be avoided until resolution is provided regarding the intermediate mariposa lily (*Calochortus weedii* var. *intermedius*), which are present at these locations: M45-T3, M6-T3, M55-T2, and the northern access road to towers M45-T5. In addition, no widening of the access road to tower M49-T4 shall occur until resolution is provided.
- 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 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.
- 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.
- The Segment 8 West – Phase 4 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.
- 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.

- 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.
- Prior to the use of helicopter for Segment 8, Phase 4 construction activities, 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. In addition, prior to their use, a report shall be submitted to the CPUC regarding potential impacts to sensitive biological species, and the impacts of noise and dust on adjacent and nearby sensitive land uses.
- 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.
- 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.
- At least 14 days prior to the start of any construction-related activities, SCE shall provide notification to potentially affected property owners, and copies of the notification and distribution list shall be provided to the CPUC at the time of noticing (Mitigation Measures L-1a and L-1b). In addition, SCE shall provide all affected property owners with quarterly updates on any changes to the information provided in the pre-construction notification (Mitigation Measure L-1c).
- Los Angeles County or applicable City 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.
- 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 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.
- 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,

A handwritten signature in cursive script, appearing to read "J Boccio".

John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen