

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



March 8, 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 #27)

Dear Ms. Nelson,

On January 10, 2011, Southern California Edison (SCE) submitted a Notice to Proceed Request (NTPR) seeking authorization from the California Public Utilities Commission (CPUC) to construct the Segment 10 Transmission Line (T/L) of the Tehachapi Renewable Transmission Project between SCE's Windhub Substation and Whirlwind Substation in Kern County, California. On January 25, 2011, SCE submitted additional information regarding the project environmental requirements and biology. On February 18, 2011, SCE submitted the focused bat surveys report. On February 28, SCE submitted additional information regarding road improvements and updated maps. On March 8, SCE submitted acreage impact information demonstrating consistency with the USFWS Biological Opinion.

The SCE Tehachapi Renewable Transmission Project (TRTP) 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 #27 is granted by CPUC for the proposed activities based on the following factors:**

- SCE submitted the following information regarding the construction of the Segment 10 T/L:

SCE is requesting authorization from the CPUC to construct Segment 10 T/L of TRTP, which consists of the construction of approximately 16 miles of new 500 kV transmission line between SCE's Windhub Substation and Whirlwind Substation in Kern County. New construction of the Segment 10 T/L includes a 16-mile section of new right-of-way (ROW) of what will ultimately become the Whirlwind-Windhub 500 kV T/L from Rack Position 1 at the existing Windhub Substation to Rack Position 9 at the new Whirlwind Substation. New construction also includes a 0.16-mile section of the Antelope-Windhub 500 kV T/L on existing lattice steel towers (LSTs) from Rack Position 6 at the existing Windhub Substation to structure M0-T2. A 0.43-mile section of the temporary Windhub Bypass (Antelope-Windhub) 220 kV T/L from structure M0-T2 to Windhub Rack Position 13 will be removed.

Site Location and Conditions

The construction activities for Segment 10 T/L will occur within Kern County. Segment 10 spans approximately 16 miles from the Windhub Substation to the Whirlwind Substation, both in Kern County. New construction of the Segment 10 T/L includes a 16-mile section on new ROW of what will ultimately become the Whirlwind-Windhub 500 kV T/L from Rack Position 1 at the existing Windhub Substation to Rack Position 9 at the new Whirlwind Substation. This includes the construction of 89 single-circuit (SC) and one double-circuit (DC) LSTs and all necessary conductors, ground wires and hardware. New construction also includes a 0.16-mile section of the Antelope-Windhub 500 kV T/L on existing lattice steel towers from Rack Position 6 at the existing Windhub Substation to structure M0-T2, using all necessary conductors, ground wires and hardware. A 0.43-mile section of the temporary Windhub Bypass (Antelope-Windhub) 220 kV T/L

from structure M0-T2 to Windhub Rack Position 13 will be removed. This work includes the complete removal of two (2) tubular steel poles (TSPs) and concrete foundations on the east side of Windhub Substation, the partial removal of one TSP inside the Windhub Substation, and the removal of all conductors, ground wires and hardware associated with these structures.

Numerous 220 kV and 500 kV line outages will be required to complete the scope of work. Segment 10 construction also includes access roads and underground fiber optic work.

Project Components

Construction equipment operating hours for the installation and upgrade of the Segment 10 T/L activities are planned from approximately 6:00 AM to 9:00 PM Monday through Friday, and 8:00 AM to 9:00 PM on Saturday and Sunday. 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 TRTP.

Project Elements/Construction Activities

Project elements that will possibly be present or active throughout the construction of the transmission line include the following: new/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 the following: grading for new and improved 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; use of implosive sleeves; installation, maintenance and removal of guard poles; installation, maintenance and removal of permit requirements; and material salvage and disposal.

Site Work

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

Access Roads

In most areas, construction of the new 500 kV structures will involve clearing and grading of new, temporary or permanent access roads. Improvements to existing access roads may also include grading, blading and vegetation clearing or removal. New roads and planned improvements to existing roads have been designed to be 14-foot-wide roadways. Additionally, some roads may be capped to protect archaeological resources. Berms or swales approximately 2 to 3 feet wide will be created on each side of the roadway, where necessary, in compliance with applicable mitigation measures. Additionally, roadway width will also be required to accommodate vehicle turning, vehicle turnouts, sidecast, and backslope.

In some locations, access to construction areas will take place in the form of temporary overland travel. In these areas, overland access will be made without the creation of new temporary or permanent access roads.

Site Preparation

Construction activities associated with the removal and installation of the transmission line will require grading and other site preparation activities. Some of these activities would be temporary (e.g. land disturbance for construction staging areas and crane pads associated with tower assembly and erection). Other construction activities would be permanent, where the land would remain in use after construction (e.g. tower footings and access roads). Additionally, some sites may be capped to protect archaeological resources.

Typically, the staging area for construction activities would require an area of approximately 150 by 150 feet. In locations of relatively level terrain, only vegetation removal would typically be required to prepare the site for construction. In more rugged terrain or sloping site conditions, both vegetation clearing or removal and grading will 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, as well as to remove existing structures. Site preparation will be conducted in compliance with all permit requirements and installation of Best Management Practices.

Underground Major Activities

Approximately 800 linear feet of Fiber Optic Cable (FOC) will be installed in a new underground utility duct bank at four locations along the route. These duct banks will connect FOC and optical ground wire (OPGW) between different transmission line towers. This will enable the construction of the Project's multiple configurations of transmission lines without affecting the communications path. New underground utility duct bank installation is typically comprised of an approximate 1.5 foot wide by 3-foot-deep trench with two five inch PVC conduits installed. The trench will then be filled with a mixture of concrete and concrete slurry (bottom portion) and native soil (top portion) to existing grade.

Below Grade Major Activities

It is anticipated that below grade 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 concrete foundations. Typically, LSTs will require four excavated holes of 3 to 6 feet in diameter and 15 to 40 feet deep and TSPs typically will require one hole up to 10 feet in diameter and 60 feet deep.

For removal sites, the existing footings would typically 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.

Above Grade Major Activities

Segment 10 T/L construction consists of the construction of a new 500 kV transmission line. Planned construction activities at these areas are summarized below.

- **Construction of 90 New Windhub-Whirlwind 500 kV T/L Structures.** Construction at each site will include installation of foundation, structures, and wires.
- **Construction of 0.16-mile Section of Antelope-Windhub 500 kV T/L on Existing Structures.**
- **Removal of 0.43-mile Section of the Temporary Windhub Bypass (Antelope-Windhub) 220 kV T/L.** This activity will include the removal of two (2) tubular steel poles (TSP) and concrete foundations (2 feet below grade), wires and hardware assemblies on the east side of Windhub Substation, and the partial removal of one TSP inside the Windhub Substation.

The removal and construction activities for these transmission structures will require a work area measuring approximately 150 feet by 150 feet. These areas will be located within the existing ROW corridor or approved work areas. An area within the approved work area will be used for a crane pad. A crane will be used to install each structure.

Wire setup sites will be used to support wire stringing, including: pulling, splicing, tensioning and other disturbances along the route. 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. Existing identified construction disturbance areas will be used for helicopter landing zones, and will be included in the contractor's Congested Area Flight Plan to be approved by the Federal Aviation Administration. Any additional surveys or analysis required if new landing zones are identified will be conducted and the results provided to the CPUC.

- **Biological Resources:** The USFWS Biological Opinion (BO) was issued on July 31, 2010. The BO is required for Segment 10 T/L for desert tortoise. USFWS has reviewed the proposed roadway improvements for Segment 10 T/L (map set provided February 28, 2011) and found them to be consistent with the BO. The CDFG 2081 Incidental Take Permit was issued November 23, 2010. The 2081 is required for the Segment 10 T/L for Swainson's hawk, desert tortoise, and Mohave ground squirrel. The proposed roadway

improvements for Segment 10 T/L (map set provided February 28, 2011) have been reviewed and approved by CDFG, and are consistent with the CDFG Incidental Take Permit (ITP - 2081 Permit).

SCE submitted a revised report titled *SCE TRTP Segment 10 Transmission Line Biological Review* prepared by ICF International dated January 2011. The biological survey area (BSA) for the Segment 10 T/L Project Component was defined as the Project Component plus a 500-foot buffer. The 330-foot wide, linear Project Component footprint occurs in SCE's new ROW. A literature search was conducted for the Project Component to determine the potential for special-status biological resources to occur within the 5-mile vicinity of the site. Focused surveys were conducted between 2007 and 2009 for special-status plants, burrowing owl (*Athene cunicularia*), desert tortoise (*Gopherus agassizii*), Swainson's hawk (*Buteo swainsoni*), and Mohave ground squirrel (*Spermophilus mohavensis*) along the Segment 10 Project Component, and adjacent to the Windhub (not part of TRTP 4-11) and Whirlwind Substation (Segment 9). Focused surveys for 2010 along the Project Component were conducted for special-status plants, desert tortoise, bats, burrowing owl, and Swainson's hawk. Focused surveys for bats along the Segment 10 T/L Project Component were recently completed and the report submitted on February 18th.

Twelve vegetation communities were identified within the BSA and include: Mojave creosote bush scrub, Mojave mixed woody scrub, desert salt bush scrub, desert bunchgrass grassland, California annual grassland, rabbitbrush scrub, Joshua tree woodland, ruderal grassland, Mojave desert wash scrub, non-native woodland, agriculture, and disturbed/developed. Three of these, Joshua tree woodland, Mojave desert wash scrub, and desert bunchgrass grassland, are considered sensitive natural vegetation communities (Aspen 2009a). Two alkaline species, Alkali mariposa lily (*Calochortus striatus*) and Horn's milk-vetch (*Astragalus hornii*), were historically recorded approximately one (1) mile north of the Project Component, and portions of the Project Component provide suitable alkaline soils. Special-status plant surveys completed in 2010 identified alkali mariposa lily and Mojave spineflower (*Chorizanthe spinosa*) along the Telecom 10 Project Component. However, no special-status plant species were observed in Segments 4 or 10 during 2007 and 2008 focused surveys (Aspen 2009a, 2009c), and none were observed within Segment 9 Whirlwind (AMEC 2009ae) during the 2009 special-status plant surveys. Special-status plant surveys for 2010 within the Project Component were completed with negative results. No other special-status plant species were observed within the Project Component.

Four incidental special-status wildlife species were detected during the 2009 and 2010 surveys, which include: burrowing owl, LeConte's thrasher (*Toxostoma lecontei*), loggerhead shrike (*Lanius ludovicianus*), and Northern harrier (*Circus cyaneus*). Vegetated areas adjacent to the Project Component provide suitable foraging and nesting habitat for some raptors, including burrowing owl and Swainson's hawk. Adjacent vegetated areas provide suitable habitat (e.g., foraging) for loggerhead shrike, mountain plover (*Charadrius montanus*), Northern harrier, Cooper's hawk (*Accipiter cooperii*), ferruginous hawk (*Buteo regalis*), prairie falcon (*Falco mexicanus*), golden eagle (*Aquila chrysaetos*), sharp-shinned hawk (*Accipiter striatus*), white-tailed kite (*Elanus leucurus*), long-eared owl (*Asio otus*), and LeConte's thrasher. Portions of the Project Component occur within the southeastern edge of the Swainson's hawk breeding range (ICF and Bloom Biological 2010a, 2010b). Previous focused surveys for Swainson's hawk along Segments 4, 5, 9, and 10 (AMEC 2009ag, 2009ah) were negative for nesting hawks within the Project Component. One Swainson's hawk was observed in flight east of Segment 4, but not within the Segment 10 BSA. Protocol-level focused surveys for Swainson's hawk were completed in 2010 for Segments 4, 9, and 10 (ICF and Bloom Biological 2010a, 2010b). Although the 2010 surveys identified eight total nests (seven breeding pairs) within the Antelope Valley, no nests occur within the Project Component. CDFG recommends that no new disturbances or other project-related activities that may cause Swainson's hawk nest abandonment or forced fledging be initiated within 0.25-mile of an active nest between March 1 and September 15, or until August 15 if a Management Authorization is obtained for the project from CDFG (CDFG 1994). These buffer zones may be adjusted as appropriate in consultation with a qualified ornithologist and CDFG. Other measures, as stipulated in the Section 2081 permit, where suitable habitat exists for Swainson's hawk will be implemented to ensure that there are no impacts on Swainson's hawk.

Phase I, II, and III burrowing owl surveys (CBOC 1993) were completed for Segments 4, 5, 9, and 10 in September 2010 (ICF 2010ab, 2010ac, 2010am) and active burrows and two burrowing owls were observed within the northern portion of the Whirlwind substation. Preconstruction burrowing owl surveys were completed for Segment 9 and Telecom 10 in November and December 2010 (ICF 2010an, 2010bz, 2010cn, 2010ca, 2010db). Burrowing owls, occupied burrows, and several potential burrows were recorded within the Whirlwind BSA. Additionally, potential burrowing owl features were identified within portions of the Telecom 10 BSA that overlaps with the Segment 10 T/L BSA (ICF 2010db).

No special-status reptile species were observed during previous biological surveys. The Project Component is located within the identified western Mojave range for desert tortoise. The Project Component includes suitable Joshua tree woodland and Mojave creosote scrub habitat for desert tortoise and there is a low density population of desert tortoise in the TRTP area. Protocol surveys were completed for desert tortoise along Segment 10 (AMEC 2009e) and the Whirlwind Substation (AMEC 2009ac) in 2009, and results were negative. Surveys for desert tortoise were completed in 2010 along Segments 4, 9 and 10 (ICF 2010s; ICF and ECORPS 2010a, 2010b) and no desert tortoise was identified within the BSA. Mitigation measures, as stipulated in the BO and Section 2081 permits, where suitable habitat exists for desert tortoise, will be implemented to ensure that there are no impacts on desert tortoise. The Project Component also provides suitable habitat for both the California (*Phrynosoma coronatum frontale*) and San Diego (*Phrynosoma coronatum blainvillii*) horned lizard species.

No special-status mammal species were observed during previous biological surveys. The Project Component provides suitable vegetation communities for Mohave ground squirrel, but does not overlap within the historic range of the species. The TRTP area is approximately 5 miles west of the published range for the species. Previous focused surveys for Mojave ground squirrel along Segments 4, 9, and 10 were negative (AMEC 2009d, 2009af), and protocol surveys near the Windhub Substation in 2008 were negative (Venherweg 2008). Mitigation measures stipulated in the Section 2081 authorization where suitable habitat exists for Mohave ground squirrel will be implemented. The Project Component provides suitable habitat for Tehachapi pocket mouse (*Perognathus alticolus inexpectatus*), but is east of the known range for the species. Suitable habitat occurs within the BSA for American badger (*Taxidea taxus*) and Townsend's big-eared bat (*Corynorhinus townsendii*) (foraging only). Preconstruction surveys for bats completed in 2010 for Segments 4, Telecom 10 (ICF 2010bw, 2010bx) and Segment 9 (ICF 2010bp) were negative for bats. An assessment for suitable habitat within Segment 10 for roosting bats was completed and submitted February 18th.

Approximately 43 jurisdictional water features were observed throughout the Project Component; all appeared to be natural washes. These drainage features are jurisdictional waters of the State. The State Water Resources Control Board (SWRCB) approved SCE's application for a WDR permit for impacts on drainages regulated under the Porter-Cologne Act at the December 2010 Board Meeting. In addition, the project is subject to regulation under Sections 1600-1616 of the California Fish and Game Code. A Streambed Alteration Agreement (SAA) was issued by CDFG on December 22, 2010 (CDFG 2010f). The majority of the jurisdictional features mapped will either be avoided or will only be temporarily impacted. Two features will be temporarily and permanently impacted by tower construction and maintenance, although no structure footings will be located within jurisdictional waters. One temporary guard structure work area intersects a jurisdictional drainage. Six features will be permanently affected by the construction of new access roads.

- **Cultural Resources.** SCE has submitted the following Cultural Resources Survey Reports for the Segment 10 T/L (review status of each report is noted in parenthesis following the report name):

- *Isolated Historic Refuse Deposit – Determination of Eligibility (Appendix K) for Archaeological Sites PL-SCE-SEG10-01, PL-SCE-SEG10-02, and PL-SCE-SEG10-03, Segment 10 SCE TRTP, Kern County, CA.* (The report has been reviewed and approved by the CPUC and ANF.)
- *Historic Property Treatment Plan for Site PL-SCE-SEG10-04 on Segment 10, SCE TRTP* (The report has been reviewed and approved by the CPUC, ANF and SHPO.)
- *Historic Property Treatment Plan for Site CA-KER-7218 on Segment 10, SCE TRTP* (The report has been reviewed and approved by the CPUC, ANF and SHPO.)
- *TRTP Segments 4, 5, and 10 – Proposed Capping of Cultural Resources (Draft 7/05/2010).* (The report has been reviewed and approved by the CPUC and ANF, but agrees there needs to be further discussions regarding curation details.)
- *Supplemental Archaeological Survey Report #1, TRTP Segment 10, Kern County, CA* (The report has been reviewed and approved by the CPUC.)
- *Supplemental Archaeological Survey Report #2, TRTP Segment 10, Kern County, CA* (The report has been reviewed and approved by the CPUC and ANF.)
- *TRTP Segments 4, 5 and 10 Management Plan, Kern and Los Angeles Counties, CA.* (The CPUC and ANF reviewed the report and submitted comments to SCE.)
- *Segment 10: NRHP/CRHR Review of SCE Co. PL-SCE-SEG10-08, Kern County, California.* (The report has been reviewed and approved by the CPUC and ANF.)
- *Evaluation of NRHP and CRHR Eligibility of Archaeological Site CA-KER-7218, SCE, TRTP, Segment 10, Kern County, CA.* (The report is currently under review by the CPUC and ANF.)
- *Cultural Survey Report for a Variance on Segment 10 T/L of Previously Un-Surveyed Areas within the TRTP (0.5 acre of roadway northwest of Const 84 and 0.5 acre southeast of Windhub Substation)* (The report shall be submitted, reviewed, and approved by participating agencies prior to site occupation and/or construction in this area.)

According to the final Paleontological Resource Management Plan and the paleontological sensitivity report, paleontological resource monitoring is recommended during any earth moving activities associated with the Segment 10 T/L.

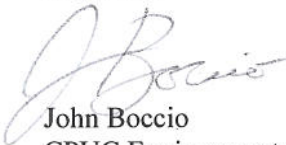
The conditions noted below shall be met by SCE and its contractors:

- 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.
- 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.

- 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.
- Per MM B-29, Implement CDFG Protocol for Burrowing Owls, SCE shall conduct protocol pre-construction surveys in potential burrowing owl habitat.
- Segment 10 T/L crosses several drainage features, of which at least 8 will be permanently affected. Prior to construction within jurisdictional waters, a list/maps of the affected drainages and the appropriate permits shall be submitted to CPUC, and applicable permit-specific conditions shall be implemented during construction.
- 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.
- The Segment 10 T/L 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.
- Topsoil salvaging shall be conducted in accordance with the approved Habitat Mitigation and Monitoring Plan (HMMP) for Segment 10 T/L.
- Use of the subject site as a helicopter landing zone shall not be allowed until the contractor's Congested Area Flight Plan is approved by the Federal Aviation Administration and additional surveys and/or analysis are submitted and approved by CPUC, including but not limited to the following: 1) Updated flight plan and traffic control plans will be evaluated for impacts to nesting birds and desert tortoise to ensure that mitigation measure requirements for required buffers are adhered to (Mitigation Measures B-5, B-10, B-14 and B-30); 2) SCE shall route all construction traffic and helicopter flight away from residences, schools, and recreational facilities to the maximum extent feasible (Mitigation Measure N-1b).
- 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.
- Prior to site occupation and/or construction, SCE shall add the information from *Cultural Survey Report for a Variance on Segment 10 T/L of Previously Un-Surveyed Areas within the TRTP (0.5 acre of roadway northwest of Const 84 and 0.5 acre southeast of Windhub Substation)* to the construction maps.
- Paleontological resource monitoring shall be conducted during any earth moving activities associated with the Segment 10 T/L.
- If unanticipated biological, cultural or paleontological resources are detected, the CPUC EM shall be notified immediately.

- 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).
- Kern County approval or applicable Municipal Code reference shall be provided to CPUC for any work outside of the days and hours allowed under the Kern County Noise Ordinance, and any other ordinance or permit.
- USFWS consultation and response is required for any work to be conducted outside of daylight hours (see Biological Opinion [BO] dated July 31, 2010, Conservation Measure #13, Pg. 18).
- 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 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.
- 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