

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



June 30, 2011

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

RE: Tehachapi Renewable Transmission Project (TRTP), Segments 4-11: Notice to Proceed (NTP #31)

Dear Ms. Nelson,

On June 9, 2011, Southern Californian Edison (SCE) submitted a Notice to Proceed Request (NTPR) for the installation of transmission line conductor for Segment 11 Transmission Line (T/L) from the Goodrich Substation to the Mesa Substation (Segment 11A) for the Tehachapi Renewable Transmission Project (TRTP), in the Cities of Pasadena, San Gabriel, Rosemead, and Monterey Park in Los Angeles County, California. **This NTP #31 is approved by CPUC based on the following factors:**

- SCE submitted the following information:

SCE requests a Notice to Proceed (NTP) for the installation of transmission line conductor for Segment 11 T/L from the Goodrich Substation to the Mesa Substation (Segment 11A) for the TRTP, in the Cities of Pasadena, San Gabriel, Rosemead, and Monterey Park in Los Angeles County, California. The Goodrich to Mesa portion of the Mesa - Vincent No. 2 220 kV double-circuit (DC) T/L will utilize an empty circuit on the existing Eagle Rock - Mesa 220 kV T/L starting at Tower M8-T5, located just outside the Goodrich Substation. The installation of the conductor continues on the line into Mesa Substation. Segment 11A T/L Goodrich to Mesa spans approximately 9 miles along existing SCE right-of-way (ROW).

**PROJECT COMPONENTS**

Construction equipment operating hours for the installation of conductor and its associated activities are planned to be from 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](http://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: wire setup sites (i.e., pull sites, wire splice sites, tensioning sites); transmission wires; temporary guard structures; construction equipment and vehicles; helicopters; and permit requirements (e.g., Best Management Practices).

Activities that will possibly be present or active throughout the construction of the transmission line include: installation of wires; operation of construction equipment and vehicles; operation of helicopters; installation, maintenance and removal of guard structures; and implementation and installation, maintenance and removal of permit requirements.

## **Site Work**

Site work for the conductor installation will be minimal. Activities include clearing existing access roads, installing guard structures and traffic control, and the installation of new transmission wires and hardware assemblies. Specific information on these activities is provided in the following section.

**Access Roads** – Conductor installation on the existing 220 kV structures will require mowing and possibly grubbing existing access roads. No grading or other access road improvements are anticipated.

**Site Preparation** – Site preparation activities associated with the conductor installation include vegetation removal within the structure work area around each transmission structure. Vegetation removal primarily involves mowing the structure work area or removing small trees or shrubs. Typically, the structure work area for construction activities would require an area of approximately 150 by 150 feet at each tower; this work area is limited by the ROW, city streets and access roads, and buildings.

**Major Aboveground Activities** – Segment 11A T/L Goodrich to Mesa construction consists of the installation and removal of guard structures, and installing conductor on approximately 51 existing structures (including wire pulling and wire splicing). Planned construction activities for Segment 11A T/L Goodrich to Mesa are summarized as follows:

**Installation and removal of guard structures.** Three methods of guard structure will be utilized: guard poles, guard trucks, and flower pot guards, as described below:

- **Guard Poles.** Typically, two poles are placed approximately 30 feet apart in 30 to 36 inch diameter holes no more than 10 feet deep. The holes will be backfilled with the excavated material and then compacted, and a third pole will be hung from the two poles. The height and weight of the guard poles will vary. The presence of existing structures and underground utilities will limit the use of guard poles.
- **Guard Trucks.** Guard trucks will be used at locations where there is not enough room or underground utilities limit the work space. The "guard truck" is a small boom truck that has a roller unit mounted to the tip of the boom. The main locations for this type of guard will be on streets and highways where digging is not allowed or practical.
- **"Flower Potted" Guard Poles.** "Flower pot" guards are typically used in areas where there may not be enough room for a crane truck and also in an area where digging is not allowed or feasible. This configuration essentially consists of large metal containers with an adapter built inside that will accept a small standing pole. Each metal container is filled with either sand or water while on site to give it the weight it needs to perform the function it is designed for. If water is used, it will be potable water from a fire hydrant.

**Conductor Installation.** Conductor installation includes work at each transmission structure to install hardware, and work at wire setup sites to pull and tension the conductor and to install conductor sleeves, as described below:

- **Structure Work Area.** The work area around each transmission structure will be approximately 150 by 150 feet from the center of the tower, but the work area is generally limited by the ROW, existing roads and access roads, and adjacent transmission and other structures. No ground-disturbing activities within the structure work area are anticipated. Mowing of existing vegetation and minor grubbing may be required to clear the area where a bucket truck would be located.

A helicopter will be used to install a small pulling line for the stringing of the conductor. The conductor and hardware will be installed using equipment such as crane trucks, pullers, and tensioners.

- **Wire Setup.** Approximately 12 wire setup sites will be used for conductor installation on Segment 11A T/L Goodrich to Mesa. The size of each wire setup site varies according to site conditions. The primary activities at the sites will be the setup and use of pulling and tensioning equipment as well as conductor sleeve installation.
- **Other Activities.** Helicopters will be used during the installation of wires. Helicopters will fly out of a local airport or Material Yard 75 South (Irwindale Material Yard). No landing zones or helicopter support areas will be utilized within the Segment 11A ROW.
- **Biological Resources:** SCE submitted a biological review with the NTPR by ICF International dated June 2011, titled *SCE Tehachapi Renewable Transmission Project Component – Segment 11A Goodrich to Mesa Transmission Line Biological Review*. The report summarizes results of prior surveys conducted for the TRTP Study Corridor and discusses the literature review and focused field surveys conducted for the Project Component, including focused surveys conducted in 2011 for special-status species potentially occurring within the TRTP right-of-way (ROW). This includes discussion of resources located within the Project Component and a 500-foot buffer, referred to as the Biological Study Area (BSA).

The Project Component traverses highly developed urban areas, and much of the native vegetation and riparian stream corridors present within the Project Component plus the BSA are disturbed. The 2009 burrowing owl (*Athene cunicularia*) habitat assessment (AMEC 2009a) determined that suitable habitat is not present along Segment 11, and additional focused surveys were not necessary. Focused and preconstruction survey reports for TRTP Segment 11, the San Gabriel Contractor Yard, and the Mesa Substation were also reviewed, including the 2007 special-status plant report, 2008 burrow survey, 2009 burrowing owl habitat assessment, 2010 focused surveys for special-status plants, trees, special-status bats, and the jurisdictional delineation report for Segments 6 and 11.

Vegetation communities mapped within the BSA include: disturbed coast live oak woodland, nonnative woodland, disturbed sparsely vegetated streambed, ruderal wetland, disturbed mule fat scrub, California annual grassland, ruderal grassland, disturbed/developed areas, and open water. Previous focused surveys for special-status plants conducted for Segments 6 and 11 (AMEC 2007a; ICF 2010au) did not identify special-status plants within the BSA. Results of the 2011 special-status plant survey were also negative in the BSA (ICF 2011j). Previous focused surveys for regulated trees conducted for Segments 6 and 11 (ICF 2010dj) identified regulated trees within the northern portion of the BSA. Species identified include canyon live oak (*Quercus chrysolepis*), Fremont's cottonwood (*Populus fremontii*), California walnut (*Juglans californica*), white alder (*Alnus rhombifolia*), western sycamore (*Platanus racemosa*), and coast live oak (*Quercus agrifolia*), which were identified within the BSA and Project Component. Results of the 2011 regulated trees surveys included coast live oaks.

Preconstruction focused habitat assessment surveys for bats completed in 2011 within the BSA identified 75 potential colonial or solitary bat roosting features. Nine of these features occur within the Project Component, and 66 occur within the 500-foot buffer (ICF 2011j). Features include cavities and crevices within trees, and exfoliating bark or bark fissures primarily in nonnative woodland (ICF 2011bl). Potential colonial bat roosting features were identified within the BSA.

Nesting birds have been observed within the BSA and to date, active nests include red-tailed hawk (*Buteo jamaicensis*), house finch (*Carpodacus mexicanus*), mourning dove (*Zenaida macroura*), killdeer (*Charadrius vociferous*), and hooded oriole (*Icterus cucullatus*) nests within the Mesa Yard and Mesa Substation, and northern mockingbird (*Mimus polyglottos*) within the San Gabriel Contractor Yard.

Seven sparsely vegetated streambeds were identified within the BSA during the delineation field work for Segments 6 and 11 (ICF 2010aj). One jurisdictional feature (11-85-S-1) was identified within the Project Component near Tower M13-T5. Additional jurisdictional features were identified within the 500-foot buffer. These drainage features are jurisdictional waters of the State, waters of the United States, and state

streambeds. Impacts on these features would require the issuance of the following regulatory permits: 401 Water Quality Certification by the State Water Resources Control Board (SWRCB), 404 Authorization by the U.S. Army Corps of Engineers (USACE), and a Streambed Alteration Agreement by the California Department of Fish and Game (CDFG). However, all jurisdictional features within the BSA will be flagged as environmentally sensitive areas (ESAs) and avoided, therefore no permits are required.

- **Cultural and Paleontological Resources:** SCE submitted cultural and paleontological information with the NTPR for Segment 11 Transmission Line (T/L) from the Goodrich Substation to the Mesa Substation (Segment 11A). Per the NTPR, all construction activities associated with Segment 11A T/L Goodrich are planned to take place in areas previously surveyed for TRTP (Pacific Legacy 2007 and 2010). No cultural resources have been previously recorded within any of the proposed construction work areas. During the initial investigation for the TRTP, the Eagle Rock-Mesa (which are the towers receiving the additional conductor) was thought to have been constructed early enough to qualify as historic infrastructure, but further research has revealed a construction date of 1968, and therefore this line is not a historic resource. Two historic-era industrial buildings have been documented adjacent to the SCE right-of-way, but have been determined ineligible for listing in the NRHP/CRHR (Edwards and Smith 2009). Furthermore, these buildings will not be affected by the proposed conductor work along the Segment 11A T/L Goodrich to Mesa. No additional cultural resources assessment is necessary to provide cultural clearance for the work identified in this NTPR.

Per the final Paleontological Resources Management Plan (PRMP) that was approved on August 22, 2010, paleontological monitoring is necessary only during ground disturbance in native soils in areas of medium to high sensitivity for paleontological resources. Soils type and composition varies throughout the Segment 11A T/L Goodrich to Mesa. The highly sensitive Fernando Formation is found from Mesa Substation to CT M16-T2, and any ground disturbance in this area will require full-time monitoring by a qualified paleontologist. From CT M16-T2 to M15-T5, and from M9-T5 to M9-T3, soils are defined as Quaternary Older Alluvium and/or Gravels, and will require spot-check monitoring during the course of ground disturbance extending deeper than 2 feet. For the remainder of Segment 11A T/L Goodrich to Mesa, the soils are considered Quaternary Alluvium and/or Gravels and will not require paleontological monitoring. No monitoring is required during the course of above-ground conductor work along the Segment 11A T/L Goodrich to Mesa. Paleontological monitoring may occur in the instance that buried native soils reveal high sensitivity for paleontological resources.

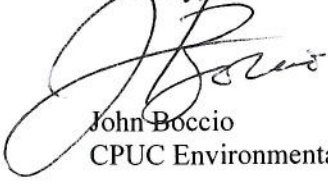
**The conditions noted below shall be met by SCE and its contractors:**

- 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.
- 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).
- 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.
- 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.

- 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.
- Refueling and fueling locations shall be a minimum of 100-feet away from existing drainages or water features. If construction debris or spills enter into environmentally sensitive areas, the jurisdictional agencies and the CPUC EM shall be notified immediately.
- Ground disturbance in the highly sensitive Fernando Formation, found from Mesa Substation to CT M16-T2, shall require full-time monitoring by a qualified paleontologist.
- Ground disturbance extending deeper than 2 feet in the area where soils are defined as Quaternary Older Alluvium and/or Gravels, from CT M16-T2 to M15-T5, and from M9-T5 to M9-T3, shall require spot-check monitoring during the course of ground disturbance extending deeper than 2 feet.
- If unanticipated biological, cultural or paleontological resources are detected, the CPUC EM shall be notified immediately.
- Per Mitigation Measure L-1a, SCE shall provide summary documentation to the CPUC of all complaints, comments, and concerns communicated to the liaison every two months for the duration of construction and for one year following the completion of construction.
- Los Angeles 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.
- 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 black ink, appearing to read "John Boccio". The signature is fluid and cursive, with a large initial "J" and "B".

John Boccio  
CPUC Environmental Project Manager

cc: V. Strong, Aspen