

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



January 13, 2012

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 #33)

Dear Ms. Nelson,

On December 2, 2011, Southern Californian Edison (SCE) submitted a Notice to Proceed Request (NTPR) for the Segment 6B areas off U.S. Forest Service lands within the Angeles National Forest, which include portions of an access road that pass through a private in-holding east of Structure 48, Tehachapi Renewable Transmission Project (TRTP), in unincorporated Los Angeles County, California. **This NTP #33 is approved by CPUC for work within unincorporated Los Angeles County based on the following factors:**

On September 21, 2011, the U.S. Forest Service issued Special Use Permit LAR 403064 for TRTP work in the Angeles National Forest. The U.S. Forest Service issued a letter dated January 11, 2012, stating that all permit conditions necessary to start work on this phase of the project have been met and that the letter serves as the notice to proceed with construction of Segment 6B T/L for TRTP work in the Angeles National Forest.

- SCE submitted the following information:

SCE has requested a Notice to Proceed (NTP) for the areas off U.S. Forest Service lands within the Angeles National Forest, which include portions of an access road that pass through a private in-holding east of Structure 48, on Segment 6B T/L of the TRTP, in unincorporated Los Angeles County, California.

SITE LOCATION AND CONDITIONS

Segment 6B T/L spans approximately 9.2 miles along existing SCE right-of-way (ROW) from Structure 35 to Structure 72. The area covered under this NTP is specifically for portions of the access road that pass through a private in-holding east of Structure 48.

PROJECT COMPONENTS

Segment 6B includes the removal of 38 existing Antelope – Mesa SC 220 kV T/L structures and the installation of 38 new Rio Hondo – Vincent No. 2 SC 220 kV (built to 500 kV specifications) T/L LSTs. Below is a description of the Project components, including site facilities and operations, and site work associated with Segment 6 T/L Structures 35 through 72, including T/L removal and installation.

Construction equipment operating hours for the removal, installation and upgrade of the transmission lines on Segment 6 T/L Structures 35 through 72 are planned from approximately 7:00 a.m. to 7:00 p.m., Monday through Saturday. 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: existing access roads and new access roads; wire setup sites (i.e., pull sites, wire splice sites, tensioning sites); transmission foundations, structures and conductors; temporary guard structures; construction equipment and vehicles; helicopter and associated ground support facilities; permit requirements (e.g., Best Management Practices); wash stations; Helicopter Assembly Yards (HAYs), Landing Zones (LZs), and Helicopter Support Yards (HSYs).

Construction activities that will possibly be present or active throughout the construction of the transmission line include: vegetation removal/grubbing; grading for existing and new access roads and site preparation; removal of existing foundations, structures, and conductor and hardware assemblies; installation of foundations, tower/pole structures, and conductor and hardware assemblies; operation of construction equipment and vehicles; operation of helicopters and construction by helicopter; installation, maintenance and removal of guard structures; implementation and installation, maintenance and removal of permit requirements; material salvage and disposal; restoration of existing access roads (not used for construction); restoration of work areas; wash station installation and operation; civil engineering activities described in the Construction Work Plan (CWP); installation of marker balls in response to FAA determinations; site capping; compacting graded areas; development of HAYs, LZs, and HSYs; use of implosive sleeves to splice transmission conductor joints (pursuant to requirements in ANF Construction Fire Plan).

- **Biological Resources:** SCE submitted a biological review with the NTPR by ICF International dated November 3, 2011, titled *Segment 6B NTPR Update*. The report summarizes results of prior surveys conducted for the TRTP Study Corridor and discusses the literature review and focused field surveys conducted for Segment 6B T/L Structure 35 to Structure 72 on both ANF and non-ANF lands (Project Component), including focused surveys conducted in 2009, 2010 and 2011 for sensitive species potentially occurring within the right-of-way.

For Segment 6B in its entirety, potential permanent impacts from new tower installations and access roads will total approximately 35.31 acres, 17.06 acres of which will occur on disturbed/developed habitat. Of the remaining 18.25 acres, 3.45 acre of impact will occur on sensitive native habitats: bigcone Douglas fir – canyon oak forest (0.11 acre), canyon oak forest (1.34 acres), Coulter pine forest (1.92 acres), southern arroyo willow riparian forest (0.06 acre), southern cottonwood willow riparian forest (0.01 acre), southern sycamore alder riparian woodland (<0.01 acre), southern willow scrub (0.01 acre), and Tucker oak scrub (<0.01 acre). All tower work and sites adjacent to and within sensitive habitats will be field-adjusted to avoid and/or minimize impacts to sensitive species and habitats to the greatest extent feasible.

For Segment 6B in its entirety, potential temporary impacts resulting from the pulling and wire setup sites, guard structures, helicopter assembly yards (HAYs), helicopter support yards, landing zones, hiking trails, pullouts, additional work areas, and access roads will total approximately 47.68 acres, the majority of which will occur on mixed chaparral (27.66 acres) and disturbed/developed (9.35 acres) habitats. Potential temporary impacts to the remaining 10.67 acres include approximately 3.29 acres of sensitive native habitats, comprised of bigcone Douglas fir – canyon oak forest (0.02 acre), canyon oak forest (0.77 acres), Coulter pine forest (6.02 acres), southern arroyo willow riparian forest (0.06 acre), southern cottonwood willow riparian forest (0.10 acre), southern willow scrub (0.01 acre), and Tucker oak scrub (0.14 acre). All pulling sites and guard pole sites adjacent to and within sensitive habitats will be avoided and/or minimized to the greatest extent feasible.

The area off ANF lands, which include portions of an access road that pass through a private in-holding east of Structure 48, are made up of the following vegetation communities: interior live oak scrub and mixed chaparral.

- **Cultural and Paleontological Resources:** SCE submitted cultural and paleontological information with the NTPR for Segment 6B Transmission Line (T/L) from Structure 35 to Structure 72, which includes both ANF and non-ANF lands. Initial cultural resources surveys and assessments were completed for the TRTP by Pacific Legacy in 2007. All cultural resources located within this portion of TRTP Segment 6 are identified in the Construction Phase Management Plan (CPMP). The most recent management measures are located in the CPMP and the Cultural GIS files. These documents may be referred to for management measures pertaining to all resources on Segment 6.

Following initial project design for Segment 6, several changes have prompted additional cultural resources assessments. One Supplemental Survey report, one formal NRHP/CRHR Evaluation, and one Extended Phase One Testing report have been submitted for agency review and are summarized and referenced below.

Supplemental Cultural Resources Assessment. Supplemental cultural resources surveys and assessments were conducted as a result of project engineering changes. These efforts resulted in negative findings for the area encompassing Segment 6B. No newly recorded cultural resources were observed during the course of surveys or background research in this portion of the project.

Previous Formal NRHP/CRHR Evaluations. CA-LAN-3136 has been formally evaluated for listing on NRHP and CRHR (Compass Rose 2008). This site has been recommended ineligible for listing on either register, and as such, no significant impacts or adverse effects are expected as a result of construction activities at this location. SCE has established this archaeological site as an Environmentally Sensitive Area (ESA) and will restrict access to the resource outside of the ADE. Cultural resources monitoring will take place during all road improvement activities at CA-LAN-3136.

The Barley Flats Nike Missile Site (LA-09) was formally evaluated for NRHP eligibility (Hatheway 1987). This site has been determined ineligible for listing on the NRHP, and as such, no adverse effects are expected as a result of construction activities at this location. Associated structures and features originally recorded within the site boundaries have either been destroyed or altered significantly since construction. Furthermore, construction will utilize the area in its current condition. This resource will not be flagged or monitored during construction activities for TRTP.

These two sites, CA-LAN-3136 and Barley Flats Nike Missile Site (LA-09), do not affect the off-ANF lands covered under this NTP.

Road Improvements along Segment 6B. SCE and contractual specifications for road improvements on Segment 6 of TRTP require establishment of project roads that consist of a 14-foot drivable surface with 2-foot berm and/or swale, and 50-foot minimum turning radius. Because of the sensitive nature of cultural resources along roadways on Segment 6B, construction team identified specific areas within six cultural resources where roads would be widened (CA-LAN-1128/H, CA-LAN-2363, CA-LAN-3004, CA-LAN-3005H, and CA-LAN-3008, and PL-SCE-Seg6-04). The extent of road improvement width was translated into the TRTP GIS database and assessed as the Area of Direct Effects (ADE) for these resources. The off-ANF access road covered under this NTP will not affect any of these cultural sites or CA-LAN-2206.

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 at CT 69, within the ANF. Soils at this location are comprised of Quaternary Older Alluvium, which is classified as a moderate level of sensitivity for harboring paleontological resources. Additional 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 for any areas off ANF Lands:

- All ANF SUP LAR 403064 terms and conditions shall be implemented during construction activities for Segment 6B T/L within ANF lands.
- 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 on non-ANF lands, 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).
- 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.
- 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 and ANF 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 on non-ANF lands.
- 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 on non-ANF lands. 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