

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



February 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 #34)

Dear Ms. Nelson,

On January 30, 2012, Southern Californian Edison (SCE) submitted a Notice to Proceed Request (NTPR) for transmission line conductor reconfiguration and structure installation at and around the Gould Substation and outside Goodrich Substation for Segment 11D Transmission Line (T/L) of the Tehachapi Renewable Transmission Project (TRTP), in the Cities of Pasadena and La Cañada Flintridge, in Los Angeles County, California. Additional information was submitted on February 7, 2012. **This NTP #34 is approved by CPUC based on the following factors:**

- SCE submitted the following information:

SCE requests a Notice to Proceed (NTP) for transmission line conductor reconfiguration and structure installation at and around the Gould Substation and outside Goodrich Substation for Segment 11D T/L for the TRTP, in the Cities of Pasadena and La Cañada Flintridge, in Los Angeles County, California. Additional information was submitted on February 7, 2012. Conductor for the Goodrich – Gould 220kV T/L, the Gould – Sylmar 220kV T/L, and the Eagle Rock – Pardee 220kV T/L (which will become Eagle Rock – Gould 220kV T/L) will be relocated at Gould Substation, and three new structures, including two tubular steel poles (TSPs) and one lattice steel tower (LST), will be installed. The associated wire stringing for the three new structures will be covered in a separate NTPR. At Goodrich Substation, activity includes installation of a double-circuit H-frame TSP.

**SITE LOCATION AND CONDITIONS**

The construction activities for Segment 11D would occur within the cities of Pasadena and La Cañada Flintridge in Los Angeles County. Construction activities include transmission line reconfiguration at Gould Substation and the installation of three new structures. Work in and around Gould Substation includes the following:

- Conductor on the Goodrich – Gould 220kV T/L will be removed from M18-T3 to Position No. 2. New conductor will be installed from M18-T3 to Position No. 4.
- The Gould – Sylmar 220kV T/L will be removed from M44-T1 to Position No. 1. New conductor will be installed from M44-T1 to Position No. 2.
- Conductor for the Eagle Rock – Pardee 220kV T/L will be removed between M43-T3 and M44-T1. New conductor will be installed from M44-T1 to Position No. 1. As a result, this T/L will become the Eagle Rock – Gould 220kV T/L.

- Three (3) new foundations and structures (two tubular steel poles [TSPs] and one lattice steel tower [LST]) will be installed for the new Mesa – Vincent No. 2 220kV T/L (Segment 11).

Construction activities around Goodrich Substation will include the following:

- New foundations and structure (one double-circuit H-frame TSP) will be installed for the existing Eagle Rock – Mesa 220kV T/L and new Mesa – Vincent No. 2 220kV T/L.

## **PROJECT COMPONENTS**

Construction equipment operating hours for 11D activities are planned to be 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](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: improved access roads; wire setup sites (i.e., pull sites, wire splice sites, tensioning sites); transmission wires; transmission foundations and structures; contractor show up and material storage at Gould Substation; construction equipment and vehicles; helicopters and associated ground support; permit requirements (e.g., Best Management Practices); and hot work at Gould Substation.

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 wires; installation of wires; wire stringing using helicopters; operation of construction equipment and vehicles; transmission foundation installation; transmission structure erection; implementation and installation, maintenance and removal of permit requirements; material salvage and disposal; and restoration or work areas.

### ***Site Work***

Site work activities include clearing existing access roads and work areas, installing traffic control, installation of foundations, erection of transmission structures, wire removal, and the installation of new transmission wires and hardware assemblies.

### ***Access Roads***

Existing access roads will require clearing, grubbing, and minor grading. All planned improvements to existing roads have been designed to be a 14-foot wide roadway. Typically, approximately 2-foot wide berms and 2-foot wide swales are on each side of the roadway for a total of 18 feet.

### ***Site Preparation***

Site preparation activities associated with the installation of foundations and structures, and conductor removal and 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 and shrubs. Blading of foundation work areas or wire setup sites may be required. Site preparation activities would be temporary.

Typically, the structure work area for construction activities would require an area of approximately 150 by 150 feet at each tower, limited by the ROW, access roads, and substation equipment. All site preparation will be conducted in compliance with all permit requirements and will include installation of Best Management Practices.

## Major Aboveground Activities

Segment 11D construction consists of the removal and installation of conductor into Gould Substation and the installation of two TSPs and one LST. At Goodrich Substation, construction consists of the installation of one double-circuit H-frame TSP. Planned construction activities for Segment 11D are summarized as follows:

**Foundation Installation.** Foundation installation for three new structures at Gould Substation will include the anchor bolt assemblies for two TSPs and stub angles for one LST. The TSPs require one foundation per structure and the LST requires four foundations, one for each leg. Foundation installation for one new structure at Goodrich Substation will include the anchor bolt assemblies for a double-circuit H-frame TSP. The H-frame TSP requires two foundations, one for each leg.

**Structure Installation.** Structures 67, 68, and 69 for Segment 11 will be erected at Gould Substation. Structure 72 for Segment 11 will be erected at Goodrich Substation.

**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:

- **Wire Setup.** Approximately three wire setup sites will be used for conductor installation on Segment 11D at Gould Substation. The size of each wire setup site will vary 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.
- **Biological Resources:** SCE submitted a biological review with the NTPR by ICF International dated January 2012, titled *SCE Tehachapi Renewable Transmission Project Component – Segment 11D Transmission Line Gould and Goodrich Substations 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 and a 500-foot buffer, referred to as the Biological Study Area (BSA), including focused surveys conducted in 2011 for special-status species potentially occurring within the TRTP right-of-way (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 Project Component. Previous surveys that were conducted for Segments 6 and 11 of the TRTP include surveys for vegetation (ICF 2010au), special-status plants (AMEC 2009v; ICF 2010au), trees (ICF 2010df), and special status bats (ICF 2011bl). The Project Component traverses highly developed urban areas, and much of the native vegetation and riparian stream corridors present within the BSA are disturbed. Therefore, the Project Component alignment lacks suitable habitat for riparian birds (AMEC 2009x; ICF 2010di) and special-status reptiles and amphibians (AMEC 2009s, 2009v; ICF and Bon Terra 2010h, 2010i).

### *Vegetation Communities*

Vegetation communities mapped within the BSA include bigcone Douglas fir – canyon oak forest, coast live oak woodland – disturbed, mixed chaparral, nonnative woodland, southern coast live oak riparian forest, sparsely vegetated streambed – disturbed, and disturbed/developed.

### *Plants and Trees*

Previous focused surveys for special-status plants conducted for Segments 6 and 11 (AMEC 2007a; ICF 2010au, 2011cq) did not identify special-status plants within the BSA.

Previous focused surveys for regulated trees conducted for Segments 6 and 11 (ICF 2010dj, 2011cq) identified regulated trees within Gould Substation BSA. The Project Component at Gould Substation includes blue elderberry (*Sambucus cerulea*), coast live oak (*Quercus agrifolia*), Coulter pine (*Pinus coulteri*), Jeffrey Pine (*Pinus jeffreyi*), knobcone pine (*Pinus attenuata*), and San Gabriel oak (*Quercus*

*durata gabrielensis*). The 500-foot buffer includes blue elderberry, California walnut (*Juglans californica*), coast live oak, knobcone pine, San Gabriel oak, and western sycamore (*Platanus racemosa*) (AMEC 2007a; ICF 2010dj, 2011hj).

#### ***Special-Status Wildlife Species***

No special-status wildlife species have been identified within the BSA. Preconstruction focused bat habitat assessments surveys that overlapped the BSA were negative (ICF 2011bl).

#### ***Hydrological Features***

Sixteen jurisdictional features were identified within the BSA during the delineation field work for Segments 6 and 11 (ICF 2010aj) and 11A (ICF 2011ec). Nine jurisdictional features were identified within the Gould Project Component and include 11-55-S-1, 11-55-S-2, 11-55-S-3, 11-55-S-5, 11-55-S-6, 11-55-S-7, 11-55-S-8, 11-55-S-9, and 11-55-S-10. These features will be avoided by construction and will only include occasional foot traffic to access other defined work areas outside of jurisdictional features. These features will be flagged as environmentally sensitive areas (ESAs) in the field and no construction equipment or vehicles will be allowed. In addition, no vegetation trimming, ground disturbance, placement of fill, or alteration of bed and banks is allowed; therefore, no permits are required for foot traffic/access. The other seven jurisdictional features within the 500-foot buffer will not be impacted. Any additional jurisdictional features found within the BSA will be flagged as ESAs and avoided.

- **Cultural and Paleontological Resources:** SCE submitted cultural and paleontological information with the NTPR for Segment 11D Transmission Line (T/L) at and around the Gould Substation and Goodrich Substation. Initial cultural resources surveys and assessments were completed for the TRTP by Pacific Legacy in 2007. One supplemental cultural resources survey report was prepared for the work associated with Segment 11D of TRTP, titled *Supplemental Survey, Segment 11, Tehachapi Renewable Transmission Project* (Belcourt 2011). The report did not identify any potential impacts to cultural resources as a result of constructing Segment 11D.

Per the final Paleontological Resources Management Plan (PRMP) that was approved on August 22, 2010, paleontological monitoring is not required during this portion of Segment 11. Soils at these locations are comprised of artificial fill and quartz diorite, which are classified as a low 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.

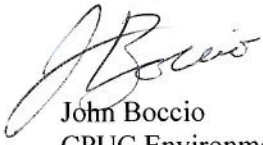
#### **The conditions noted below shall be met by SCE and its contractors:**

- Prior to construction of all transmission line towers and spans, SCE shall provide documentation demonstrating that the subject towers and spans are or are not subject to FAA regulation. For those towers and spans that are subject to FAA regulation, SCE shall limit construction to the tower foundations and first twenty feet of assembly until compliance with FAA regulation is provided to CPUC.
- Prior to construction SCE shall submit the Storm Water Pollution Prevention Plan (SWPPP) for Segment 11D T/L to the CPUC.
- 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.
- During the nesting season, 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. 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.
- 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).
- 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.
- 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 the first letter "J" being particularly large and stylized.

John Boccio  
CPUC Environmental Project Manager

cc: V. Strong, Aspen