STATE OF CALIFORNIA Edmund G. Brown Jr., Governor

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

May 16, 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 #35)

Dear Ms. Nelson,

On January 26, 2012, Southern Californian Edison (SCE) submitted a Notice to Proceed Request (NTPR) for the Segment 6C Transmission Line (T/L) areas off U.S. Forest Service lands within the Angeles National Forest, which includes activities associated with, and south of, Structure 113, on Segment 6C T/L for the Tehachapi Renewable Transmission Project (TRTP), in unincorporated Los Angeles County, California. SCE submitted additional information on May 1, 2012. **This NTP #35 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 May 14, 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 6C 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 includes activities associated with, and south of, Structure 113, on Segment 6C T/L of the TRTP, in unincorporated Los Angeles County, California.

  SITE LOCATION AND CONDITIONS

  Segment 6C T/L spans approximately 10.3 miles along existing SCE right-of-way (ROW) from Structure 72 to Structure 113. The area covered under this NTP is specifically for the non-ANF lands south of the ANF.

  The southern ANF boundary is located between Structure 112 and 113 on Segment 6C T/L. Structure 113 is located in the City of Duarte, and will be accessed via Encanto Parkway to the south.

  PROJECT COMPONENTS

  The total component of Segment 6C T/L includes the removal of 44 existing Antelope – Mesa SC 220 kV T/L structures and the installation of 41 new Rio Hondo – Vincent No. 2 SC 220 kV (built to 500 kV specifications) T/L LSTs. For Segment 6C T/L, 28 structures will be constructed by helicopter methods.

  Construction equipment operating hours for the removal, installation and upgrade of the transmission lines on Segment 6C T/L 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.

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, conductor and hardware assemblies; installation of new transmission structures/foundation, conductor and hardware assemblies.

ACCESS ROADS

Construction of the new structures will involve clearing, grubbing, and grading existing access roads. Trimming will occur where vegetation poses a blockage to vehicles either on the sides of the roadway or the canopy above. Where site conditions allow, existing access roads will be maintained to meet SCE and Forest Service specifications. Access road maintenance will generally be allowed according to terms and conditions of existing SCE road permits. If possible within the existing berm or swale of the road, the graded road will have a minimum drivable width of 14 feet and preferably a shoulder width of an additional 2 feet on each side (berm and swale) for a total minimum width of 18 feet. Road maintenance and civil engineering activities, as described in the October 2011 Construction Work Plan, will be conducted along access and spur roads south of the ANF boundary to Encanto Parkway.

SITE PREPARATION

Site preparation will be conducted to accommodate removal of existing structures, installation of new tower sites, and to perform crane operation during the assembly of tower structures. Construction activities associated with the removal and installation of the transmission lines may include grading and vegetation removal. Graded areas will be compacted to support equipment and vehicle traffic.

Two helicopter landing zones and five wire setup sites will be used for Segment 6C T/L construction south of the ANF. Grading activities will include crane pad installation and wire setup site preparation. Other Segment 6C construction activities are described in the Construction Work Plan.

MAJOR ABOVE-GRADE ACTIVITIES

Construction associated with TRTP Segment 6C, south of the Angeles National Forest, consists of the removal of one existing structure and the construction of one new structure to upgrade existing transmission lines. Planned construction activities are summarized as follows and identified in Figures A.3.99 through A.3-102 of the Construction Work Plan.

- **Removal of 1 existing Antelope – Mesa Single-Circuit (SC) 220kV T/L Structure.** This activity will include removal of one structure (M54-T1) and its foundations (2 feet below grade), wires and hardware assemblies.

- **Removal of conductor on existing Rio Hondo – Vincent No. 2 220kV T/L.** This activity will include removal of conductor from M22-T1 and M54-T2.

- **Installation of 1 new Rio Hondo – Vincent No. 2 SC 220kV (built to 500kV specifications) T/L structure.** This activity will consist of building Structure 113. Construction at the site will include installation of foundation, structure and wires.

- **Installation of conductor on Rio Hondo – Vincent No. 2 and Mira Loma – Vincent.** This activity will include installation of hardware on existing M22-T1 and M27-T2 and installation of conductor between these structures, creating new Mira Loma – Vincent 500 kV transmission line. This activity will also include installation of hardware on new Structure 113 and M27-T2 and installation of conductor between these structures, creating the connection for Rio Hondo – Vincent No. 2.

- **Biological Resources:** SCE submitted a biological review with the NTPR by ICF International dated January 11, 2012, titled *Segment 6C NTPR – 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 Segment 6C T/L Structure 72 to Structure 113 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 6C in its entirety, potential permanent impacts from new tower installations and access roads will total approximately 65.36 acres, 40.97 acres of which will occur on disturbed/developed habitat. Of the remaining 24.39 acres, 7.96 acres of impact will occur on sensitive native habitats: bigcone Douglas fir – canyon oak forest (7.73 acres), California bay forest (0.20 acre), and southern coast live oak riparian forest

(0.04 acre). All tower and work 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 6C in its entirety, potential temporary impacts resulting from the pulling and wire setup sites, helicopter assembly yards (HAYs), landing zones, hiking access trails, pullouts, additional work areas, and access roads will total approximately 54.44 acres, the majority of which will occur on mixed chaparral (13.62 acres) and disturbed/developed (13.42 acres) habitats. Potential temporary impacts to the remaining 27.39 acres include approximately 6.78 acres of sensitive native habitats, comprised of bigcone Douglas fir – canyon oak forest (6.77 acres) and California bay forest (0.01 acre). All pulling sites adjacent to and within sensitive habitats will be avoided and/or minimized to the greatest extent feasible.

Applications for a Section 401 Water Quality Certification from the State Water Resources Control Board (SWRCB), a Section 404 Authorization from the U.S. Army Corps of Engineers (USACE) under the Clean Water Act, and a Streambed Alteration Agreement from CDFG under Sections 1600-1616 of the California Fish and Game Code (CDFG) were submitted on September 8, 2010. In addition, a revised impact analysis was performed for engineering changes for the entire Segment 6 project alignment and submitted to the agencies of February 17, 2011. A 401 Water Quality Certification (File No. 1 l003IN) was received for the Segment 6 project alignment on August 23, 2011. The 404 Authorization (SPL-201 1000735) was received on September 1, 2011. The 1602 Streambed Alteration Agreement (1600-2010-0268-R5) was received for the Segment 6 project alignment on October 31, 2011.

For the work off-ANF lands in and around Structure 113 (Project Component), vegetation communities known to occur include coast live oak woodland, southern coast live oak riparian forest, coastal sage scrub, disturbed/developed, mixed chaparral, and southern willow scrub. Southern coast live oak riparian forest and southern willow scrub are state protected or regulated habitats. Two special-status plant species were observed within the Project Component during focused surveys, including Plummer's mariposa lily (*Calochortus plummerae*), and San Gabriel oak (*Quercus durata* var. *gabrielensis*). Coast live oak (*Quercus agrifolia*), a protected tree under local ordinances, occurs within the Project Component. Special-status wildlife species signs and habitat observed within the area include San Diego desert woodrat (*Neotoma lepida intermedia*) middens, potentially suitable ringtail (*Bassariscus astutus*) habitat, and potential bat roosts. While coastal sage scrub is located in the project vicinity, it is not suitable to support coastal California gnatcatcher (*Polioptila californica*). A jurisdictional delineation identified that the Project Component crosses several drainages (ICF 2010aj). These drainage features are considered to be jurisdictional waters, subject to USACE, SWRCB, and CDFG permits issued for the Segment 6 project alignment.

- **Cultural and Paleontological Resources**: SCE submitted cultural and paleontological information with the NTPR for Segment 6C Transmission Line (T/L) from Structure 72 to Structure 113, 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 T/L 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 T/L.

  Two specialist's reports were prepared for the management of cultural resources along this portion of Segment 6 T/L of TRTP. In addition to the initial cultural resources assessment for TRTP (Pacific Legacy 2007), one supplemental survey report was completed for newly proposed project disturbance areas, titled Supplemental Archaeological Survey Report, TRTP, Segment 6, Los Angeles County, California (Pacific Legacy 2011). One cultural resource is located within the direct area of effect of Segment 6C T/L, the historic-era Cogswell Dam (P-19-188446). Management of this resource is not required, as no alterations to the dam are planned for its use as a Helicopter Assembly Yard. Two archeological sites (CA-LAN-1523

and CA-LAN-241) are located within 50 feet of roadways, and cultural resources monitoring is required during any potential road maintenance activities within the ESAs for these resources.

Van Tassel Motorway, a historic road (P-19-0186917), occurs in the area off-ANF lands in Segment 6C T/L. The cultural report prepared for Segment 7 T/L states that potential impacts may stem from activity as SCE work areas, Structure 113 and CT1x, and that the site has been previously recommended as ineligible for listing on the NRHP and CRHR. A supplemental survey report detailing the impacts was submitted to the CPUC in October 2010 (Supplemental Archaeological Survey Report #2, TRTP Segment 7, Los Angeles County, California).

Per the final PRMP that was approved on August 22, 2010, paleontological monitoring is not necessary during ground disturbance on Segment 6C T/L. Soils throughout this area consist of Granite, Gneiss, Quartz, Diorite, Basalt Dikes, Andesite Dikes and Gravels, Fill soils and Sands. All of these sediments are considered low 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 6C 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.

- 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.

- 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).

- 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