

PUBLIC UTILITIES COMMISSION

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April 25, 2013

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 #37)

Dear Ms. Nelson,

On July 20, 2012, Southern Californian Edison (SCE) submitted a Notice to Proceed Request (NTPR) for the Segment 11B Transmission Line (T/L) areas off U.S. Forest Service lands outside of the Angeles National Forest for the Tehachapi Renewable Transmission Project (TRTP), in the Cities of La Cañada Flintridge and Pasadena, and the unincorporated community of Altadena, in Los Angeles County, California. **This NTP #37 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 April 19, 2013, confirming that they have received the Segment 11B construction plan and that it has been reviewed by their specialists. At this time, they have no concerns regarding SCE's plan to begin work on Segment 11B.

Of the existing 35 structures to be worked on, 26 are outside of the ANF and 9 are within the ANF. However, some of the Wire Setup Sites (WSS) and guard pole sites for structures off-ANF lands are within the ANF. New tower construction includes three towers outside the Gould Substation (Constructs 67, 68, and 69) and a tower outside the Goodrich Substation (Construct 72). These are outside of the ANF. Access roads for this segment cross through lands outside the ANF as well as within the ANF.

- SCE submitted the following information:

SCE has requested a Notice to Proceed (NTP) for the areas off U.S. Forest Service lands outside of the Angeles National Forest on Segment 11B T/L of the TRTP, in unincorporated Los Angeles County, California.

SITE LOCATION AND CONDITIONS

Segment 11B T/L spans approximately 9 miles along existing SCE right-of-way (ROW) from Gould Substation to Goodrich Substation. The construction activities for Segment 11B would occur within the Cities of La Cañada Flintridge and Pasadena, the unincorporated community of Altadena, and the Angeles National Forest, in Los Angeles County. The new conductor will be installed on existing structures (Eagle Rock – Mesa 220 kV T/L) starting at Construct 68 (new), located near Gould Substation and continuing to Tower M8-T5 (existing), located just outside Goodrich Substation.

PROJECT COMPONENTS

This section describes the Project components, including site facilities and operations, and site work associated with Segment 11B.

Construction equipment operating hours for the installation of conductor and its associated activities are planned from approximately 7:00 a.m. to 7:00 p.m., Monday through Saturday. Authorization will be obtained for work to be conducted on Sunday or for extended work hours. 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: improved existing access roads, wire setup sites (i.e., pull sites, wire splice sites, tensioning sites), transmission structures and conductors, temporary guard structures, construction equipment and vehicles, helicopters and associated ground support facilities, permit requirements (e.g., Best Management Practices), and access gates.

Project construction activities that will possibly be present or active throughout the construction of the transmission line include: vegetation removal/grubbing; installation of tower/pole structures and conductor; installation of marker balls; clearing and grubbing for existing access roads and site preparation; operation of construction equipment and vehicles; operation of helicopters; installation, maintenance and removal of guard structures; implementation and installation, maintenance and removal of permit requirements; clearing, grubbing and grading of wire setup sites; and install or replace access gates.

SITE WORK

Site work for the installation of the transmission lines will include clearing and grubbing of existing access roads; clearing, grubbing, and grading of wire stringing pull tension sites, and site preparation; installation of new transmission structures, conductor and hardware assemblies. Specific information on these activities is provided in the following sections.

ACCESS ROADS

Where site conditions allow, existing access roads will be maintained to meet SCE and, where applicable, 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. Gates on existing access roads may be installed or replaced as needed.

Vegetation adjacent to existing roadways may encroach on the roadway, or canopy cover may be too low for higher clearance vehicles. In such cases, trimming will occur where vegetation poses a blockage to vehicles either on the sides of the roadway or the canopy above. All trimming associated with existing access roads will occur either within the 18-foot road boundary or in the area above those boundaries (within the 15-foot maximum clearance height required for passage of construction vehicles). Trimming will be the minimum amount necessary to accommodate passage of the required construction vehicles for the activities in the area.

SITE PREPARATION

Site preparation activities associated with the conductor installation include vegetation removal within the structure work area around each transmission structure for those structures that will be accessed conventionally, and possibly leveling of an area to support a bucket truck. Vegetation removal primarily involves mowing the structure work area or removing small trees or shrubs. Site preparation activities would be temporary. The work area surrounding structures that will be accessed by helicopter will not be cleared of vegetation.

Typically, the structure work area for construction activities would require an area of approximately 150 by 150 feet for structures that will be accessed conventionally and 100 by 100 feet for structures that will be accessed by helicopter.

WIRE SETUP SITES

Wire setup sites (pull sites) are temporary construction areas required for prepping wires before they can be installed on existing or constructed towers. Approximately 5 wire setup sites will be used for Segment 11B. The size of the sites will be determined by both terrain and environmental studies. In locations of relatively level terrain, only vegetation removal will occur to prepare the wire setup sites. In more rugged terrain or sloping site conditions, both vegetation removal and grading may be necessary to prepare the wire setup sites. Site preparation will be conducted in compliance with all permit requirements and will include installation of Best Management Practices. Construction of wire setup sites will require the use of road graders, water trucks, dozers, excavators, and backhoes.

MAJOR ABOVE-GRADE ACTIVITIES

Segment 11B construction consists of the installation and removal of guard structures, erection of two TSPs, and installing new, bundled conductor on approximately 3 new and 35 existing structures (including wire pulling and wire splicing). Planned construction activities are summarized as follows:

- **Installation and removal of guard structures:** Three types of guard structures 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 on 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 conductors and to install conductor sleeves, as described below:
 - **Structure Work Area:** The structure work area for each transmission structure will require an area of approximately 150 by 150 feet for structures that will be accessed conventionally and 100 by 100 feet for structures that will be accessed by helicopter. The work area in urban areas is generally limited by the ROW, existing roads, access roads, and adjacent transmission lines and other structures. Mowing of existing vegetation and minor grubbing, plus ground leveling 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 conductors. The conductors and hardware will be installed using equipment such as crane trucks, pullers, and tensioners.
 - **Wire Setup:** Approximately five wire setup sites will be used for conductor installation of Segment 11B. 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. Personnel may walk outside the construction work area for stringing-related activities (checking sag or identifying stop marks).

OTHER ACTIVITIES

Helicopters will be used during the installation of the conductor. Helicopters will fly out of a local airport. Three Helicopter Support yards (HSYs) will be established, in the vicinity of Gould Substation, Mount Wilson, and PT site M1-T4. Approximately six landing zones will be used to deliver equipment and personnel to sites that are only accessible by helicopter.

- **Biological Resources:** SCE submitted a biological review with the NTPR by ICF International dated June 2012, titled *Segment 11B Transmission Line Gould Substation to Goodrich Substation – 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 11B T/L from Gould Substation to Goodrich Substation on both ANF and non-ANF lands (Project Component), including focused surveys conducted in 2011 for special-status species potentially occurring within the TRTP right-of-way. This includes discussion of resources located within the Project Component and a 500-foot buffer. The Project Component plus the 500-foot buffer is referred to as the Biological Study Area (BSA).

Potential temporary impacts resulting from access hiking trails, pullouts, road features, structure work areas, and wire setup sites will total approximately 36.725 acres, the majority of which will occur in disturbed/developed land (18.088 acres) and mixed chaparral (8.951 acres). No impacts will occur on sensitive native habitat because no sensitive native habitat is present within the Project Component.

A literature search was conducted for the Project Component to determine the potential for special-status biological resources to occur within a 5-mile vicinity of the Project Component. Previous focused surveys performed for Segment 11 were reviewed to determine the presence of any special-status species that may occur within the BSA.

No special-status wildlife species were observed within the Project Component. Focused coast range newt (*Taricha torosa*) surveys conducted within the BSA were negative for coast range newt; however, the 2009 survey did identify two-striped garter snake (*Thamnophis hammondi*) and yellow warbler (*Dendroica petechia*) within the 500-foot buffer (AMEC 2009ab, ICF and BonTerra 2010g). Coast range newt, red-shouldered hawk (*Buteo lineatus*), and sharp-shinned hawk (*Accipiter striatus*) were observed within the 500-foot buffer during 2006 surveys. San Diego desert woodrat (*Neotoma lepida intermedia*) potential middens were identified within the Project Component and within the 500-foot buffer. High and medium potential bat roosts were identified during the preconstruction bat habitat assessments within the Project Component and within the BSA (ICF 2011bl).

Previous focused surveys for special-status plants were conducted for Segments 6 and 11 (AMEC 2007a; ICF 2010au, 2011hk). The Project Component includes Coulter's matilija poppy (*Romneya coulteri*) and Engelmann oak (*Quercus engelmannii*) (AMEC 2007a) near M6-T4, Engelmann oak near M6-T3, and San Gabriel oak (*Quercus durata* var. *gabrielensis*) near M18-T2A (AMEC 2007a). The 500-foot buffer includes California walnut (*Juglans californica*), Coulter's matilija poppy, Engelmann oak, Plummer's mariposa lily (*Calochortus plummerae*), Robinson's peppergrass (*Lepidium virginicum* var. *robinsonii*), and San Gabriel oak (AMEC 2007a, ICF 2010au, 2010dj, 2011hj, 2011hk).

Previous focused surveys for regulated trees conducted for Segments 6 and 11 (ICF 2010dj, 2011cq) identified regulated trees within the BSA. The Project Component includes big-cone Douglas fir (*Qseudotsuga macrocarpa*), blue elderberry (*Sambucus mexicanus*), canyon live oak (*Quercus chrysolepis*), coast live oak (*Quercus agrifolia*), Coulter pine (*Pinus coulteri*), Jeffrey pine (*Pinus jeffreyi*), San Gabriel oak, western sycamore (*Platanus racemosa*), and white alder (*Alnus rhombifolia*) (ICF 2010dj, 2011hj). The 500-foot buffer includes arroyo willow (*Salix lasiolepis*), big-cone Douglas fir, bigleaf maple (*Acer macrophyllum*), blue elderberry, California bay laurel (*Umbellularia californica*), California buckeye (*Aesculus californica*), California juniper (*Juniperus californica*), California walnut, canyon live oak, coast live oak, Coulter pine, Engelmann oak, Fremont cottonwood (*Populus fremontii* spp. *fremontii*), Goodding's willow (*Salix gooddingii*), incense cedar (*Calocedrus decurrens*), interior live oak (*Quercus wizliseni* var. *wizliseni*), Jeffrey pine, Lodgepole pine (*Pinus contorta*), San Gabriel oak, western sycamore, and white alder (AMEC 2007a; ICF 2010dj, 2011hj, 2011hk).

There are 33 features and 2 potentially jurisdictional features identified within the BSA, 15 of which overlap the Project Component (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, 11-55-S-10, 11-59-S-200, 11-67-S-2, 11-67-S-3, 11-67-S-4, 11-70-S-1, and Basin). These features consist predominantly of concrete-lined v-ditches placed in uplands to control for potential erosion around the substation. The listed jurisdictional features will be flagged as environmentally sensitive areas (ESAs) and avoided by all mechanized equipment and vehicles. However, due to required work areas being located adjacent to and on both sides of jurisdictional features, foot traffic through these flagged jurisdictional features may occur as needed to access entire work areas. If any potential jurisdictional features are subsequently identified within the Project Component, they will be staked and flagged as ESAs and avoided.

One Riparian Conservation Area (RCA) overlaps the 500-foot buffer and will not result in impacts from the Project Component.

For the work off-ANF lands, temporary impacts will be mitigated on-site per the Habitat Mitigation and Monitoring Plan (HMMP) and APM BIO-1a, as well as SWPPP requirements, weed control (Mitigation

Measure [MM] B-3a), dust control (MM AQ-1a), and visual resources (MM V-1 and APM AES-8 and APM AES-13). Any permanent impacts to special-status vegetation communities and special-status species habitat will be mitigated off-site per agreements with CDFW and USFWS, and Applicant Proposed Mitigation (APM) BIO-7.

- **Cultural and Paleontological Resources:** SCE submitted cultural and paleontological information with the NTPR for Segment 11B Transmission Line (T/L) from Gould Substation to Goodrich Substation, which includes both ANF and non-ANF lands. The memorandum states that no cultural resources shall be significantly impacted or adversely affected by construction activities associated with Segment 11B of the TRTP. The Construction Phase Management Plan (CPMP) for TRTP and the Cultural GIS files for TRTP identify all previously recorded resources located in the vicinity of Segment 11B. These documents contain the most recent management measures pertaining to all cultural resources in the vicinity of Segment 11B. Pacific Legacy completed the initial cultural resources surveys and records search for the TRTP in 2007 (Pacific Legacy 2007), which identified several resources in the vicinity of Segment 11B. One supplemental cultural resources survey took place at Gould Substation (Belcourt 2011). These efforts did not identify previously recorded or newly recorded cultural resources at this location. SCE submitted the supplemental survey report under separate cover from this NTPR. The agencies approved this report in 2011.

Several cultural resources are located in the vicinity of Segment 11B; however, none will be adversely affected or significantly impacted.

Mount Lowe National Register of Historic Places District: A portion of Segment 11B crosses the Mount Lowe National Register of Historic Places District (P-19-180689). Segment 11B also crosses three additional resources that are contributing elements to this District: Historic Sam Merrill Trail (CA-LAN-3090H), Pacific Electric Railway (P-19-188471), and the Mount Lowe Tramway (FS# 05015100006). There will be no adverse effects to the District from the construction activities associated with Segment 11B. Project design avoided the District and its contributing elements. No ground disturbance activities, road improvements, or other potential impacts will take place within the District or its contributing elements. Cultural resources monitoring is not required at these locations during construction of Segment 11B of TRTP.

Historic Roads: Seven previously recorded historic roads are located along Segment 11B: Historic Forest Service Road 2N68 (P-19-186873), Brown Mountain Road (P-19-186872), Arroyo Seco Road (Forest Service # [FS#] 05015100063), Chaney Truck Trail (FS # 05015100192), Millard Canyon Trail (CA-LAN-3099H), Mount Lowe Truck Trail (FS# 05015100087), and Mount Wilson Toll Road (CA-LAN-2343H). All roads were evaluated for inclusion on the National Register of Historical Places and are recommended not eligible (Compass Rose 2010). During construction of Segment 11B, these roads shall be managed according to the ANF Regional PA, which allows for maintenance grading. Cultural resources monitoring is not required during road improvements along these roads.


Segment 11B also crosses one additional historic-era resource (P-19-186879). No ground disturbance, road improvements, or other potential impacts will take place within this resource. Cultural resources monitoring is not required at these locations during construction of Segment 11B of TRTP.

Per the final PRMP that was approved on August 22, 2010, paleontological monitoring is necessary only during ground disturbance in native soils considered sensitive for harboring paleontological resources. Between M6-T2 and M7-T1 of Segment 11B, soils are comprised of old alluvial fan deposits, which are considered moderately sensitive for paleontological resources (PFYC = 3). Full time paleontological resources monitoring is required during non-drilling ground disturbance in this area. Additional 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 11B 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.
- No construction of FAA regulated towers shall occur until CPUC approval of SCE's Petition for Modification of Decision 09-12-044 is granted.
- 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.
- Per the PRMP, full time paleontological resources monitoring is required during non-drilling ground disturbance in the area between M6-T2 and M7-T1 of Segment 11B.
- 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