

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 23, 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 #38)

Dear Ms. Nelson,

On August 1, 2013, Southern Californian Edison (SCE) submitted a Notice to Proceed Request (NTPR) for the removal of transmission line structures and foundations to support the pending Chino Hills Underground construction of the Segment 8 Phase I Transmission Line (T/L) for the Tehachapi Renewable Transmission Project (TRTP), in the Cities of Chino Hills and Chino, in San Bernardino County, California. Additional information was submitted on August 12, 14, 16, and 22, 2013.

The SCE Tehachapi Renewable Transmission Project (Project) was evaluated in accordance with the California Environmental Quality Act and a Certification of Public Convenience and Necessity (CPCN) was granted by CPUC Decision 09-12-044, (Application #07-06-031), SCH #2007081156 on December 17, 2009. An Addendum to the Final Environmental Impact Report (October 2009) was prepared for the TRTP Chino Hills Undergrounding, and approval of the Chino Hills Undergrounding was granted by CPUC Decision 13-07-018 on July 11, 2013. **NTP #38 is granted by CPUC for the proposed activities based on the following factors:**

- SCE submitted the following information:

SCE has requested a Notice to Proceed (NTP) for the removal of transmission line structures and foundations to support the pending Chino Hills Underground construction of the Segment 8 Phase I T/L for the TRTP, in the Cities of Chino Hills and Chino, in San Bernardino County, California. Subsequent to the approval of the NTPR (NTP #11 dated August 12, 2010) by the CPUC, and as discussed in the Addendum to the Final Environmental Impact Report, June 2013, the removal of transmission line structures and foundations was identified to support the pending Chino Hills Underground construction. Changes include the following:

- Remove remaining foundations at twelve (12) former 220 kV tower locations (foundations were previously only removed to a depth of 2 feet below grade).
- Remove five (5) 500 kV Lattice Steel Towers (LSTs) and their foundations.
- Remove eleven (11) 500 kV Tubular Steel Poles (TSPs) and their foundations.

Both the Lattice Steel Towers (LSTs) and Tubular Steel Poles (TSPs) will essentially be removed in reverse order of construction. LSTs will be unbolted in sections that are manageable and then set on the ground by a crane for full disassemble and transport to an off-site material yard. Several sizes of cranes will be utilized from 90 to 350 ton. TSPs will be jacked apart at existing slip joints and lowered to the ground, and at that point, crews will plasma cut TSPs into sections of no greater than 35 feet in length in preparation for transport to a scrap facility.

Foundations will be broken and removed utilizing hydraulic breakers mounted on either rubber tire backhoes or tracked excavators. Where feasible, and depending on the required depth of removal, all concrete foundations to be excavated will be done at a slope of approximately 2:1. For larger foundations, those to be removed to greater than 10 feet, a

trench box/shield would be utilized, which would help to avoid a large excavation. It is expected that with the use of this trench box/shield, the excavation will be kept to approximately within six (6) feet of the edge of the foundation.

At each foundation removal location, the excavation will be backfilled and compacted to match the surrounding grade.

Construction activities will occur within previously-approved work areas and construction equipment will utilize previously-approved access roads.

The proposed removals needed to facilitate underground construction are described in the Tables 1 and 2 below.

Table 1: 220 kV Structure Foundation Removal

Structure Number	Foundation Removal Activity
M26-T2	Remove 4 foundations to 7.5 feet below grade
M27-T1	Remove 4 foundations to 7.5 feet below grade
M27-T2	Remove 4 foundations to 7.3 feet below grade
M28-T1	Remove 4 foundations to 7.3 feet below grade
M28-T2	Remove 4 foundations to 7.5 feet below grade
M28-T3	Remove 4 foundations to 7.5 feet below grade
M29-T1	Remove 4 foundations to 7.3 feet below grade
M29-T2	Remove 4 foundations to 9.0 feet below grade
M29-T3	Remove 4 foundations to 12 feet below grade
M29-T4	Remove 4 foundations to 12 feet below grade
M30-T1	Remove 4 foundations to 12 feet below grade
M30-T2	Remove 4 foundations to 11.5 feet below grade

Table 2: 500 kV Structure and Foundation Removal

Structure Number	Type of Structure to be Removed	Foundation Removal Activity
M60-T1	LST	Remove 2 foundations to 3 feet below grade; remove 2 foundations to 12 feet below grade
M60-T2	LST	Remove 2 foundations to 5 feet below grade; remove 2 foundations to 15 feet below grade
M60-T3	LST	Remove 1 foundation to 3 feet below grade; remove 1 foundation to 15 feet below grade; remove 2 foundations to 20 feet below grade

Structure Number	Type of Structure to be Removed	Foundation Removal Activity
M61-T1	LST	Remove 2 foundations to 10 feet below grade; remove 1 foundation to 15 feet below grade; remove 1 foundation to 20 feet below grade
M61-T2	TSP	Remove 1 foundation to 10 feet below grade
M61-T3	TSP	Remove 1 foundation to 10 feet below grade
M61-T4	TSP	Remove 1 foundation to 15 feet below grade
M62-T1	TSP	Remove 1 foundation to 10 feet below grade
M62-T2	TSP	Remove 1 foundation to 3 feet below grade
M62-T3	TSP	Remove 1 foundation to 10 feet below grade
M62-T4	TSP	Remove 1 foundation to 10 feet below grade
M62-T5	LST	Remove 4 foundations to 2 feet below grade
M63-T1	TSP	Remove 1 foundation to 3 feet below grade
M63-T2	TSP	Remove 1 foundation to 3 feet below grade
M63-T3	TSP	Remove 1 foundation to 15 feet below grade
M64-T1	TSP	Remove 1 foundation to 20 feet below grade

Biological Resources: SCE submitted a biological review with the NTPR. The Segment 8 T/L Phase 1 Removal of Foundations and Structures (Project Component) is located within previously surveyed and approved work areas of the Segment 8 T/L. The vegetation communities located within the disturbance areas include ruderal grassland, bunchgrass grassland, nonnative woodland, and disturbed/developed. Vegetation communities located within 500 feet of the Project Component include barren/developed, nonnative woodland, ruderal grassland, California annual grassland, bunchgrass grassland, coastal sage scrub, southern arroyo willow riparian forest, southern willow scrub, water, and coast live oak woodland (ICF 2012). These surrounding vegetation communities will not be impacted by the Project Component as all work will occur within CPUC-approved disturbance limits previously developed for the 500 kV foundation and structure installation as well as 220 kV structure removal. Special-status plant species observed in or within 500 feet of the Project Component include Catalina mariposa lily (*Calochortus catalinae*). Regulated trees are also located within 500 feet of the Project Component. Construction began in this area in January 2011. Ongoing biological surveys of the disturbance areas occur on a regular basis.

Occupied habitat for coastal California gnatcatcher (*Poliioptila californica*) would not be impacted by the Project Component. Coastal California gnatcatcher occupied habitat is located west of Structure M60-T1 based on the detection of a single coastal California gnatcatcher foraging in coastal sage scrub (FRED Species Event 2087) in September 2011. Previous protocol-level surveys in 2011 did not detect breeding coastal California gnatcatcher or nests. Subsequent monitoring during construction has not detected the species. The Project Component is outside critical habitat for the species.

Least Bell's vireo (*Vireo bellii pusillus*) occupied habitat is located east of Structure M60-T2 in a detention basin and northeast of Structure M62-T5 in the flood control channel. Least Bell's vireo occupied habitat would not be impacted by the Project Component. Disturbance-free buffers for least Bell's vireo nests and/or territories will be implemented in accordance to Mitigation Measure B-15 and applicable permits.

One active Cassin's kingbird (*Tyrannus vociferans*) nest (FRED Nest Event 5456) is located within the western portion of the disturbance limits for Structure M61-T1. Disturbance-free buffers for these Cassin's kingbird nests have been implemented in accordance with Mitigation Measure B-5.

Special-status wildlife species observed in or within 500 feet of the Project Component include white tailed kite (*Elanus leucurus*), yellow warbler (*Setophaga petechia*), northern harrier (*Circus cyaneus*), merlin (*Falco columbarius*), Cooper's hawk (*Accipiter cooperii*), and migrating Swainson's hawk (*Buteo swainsoni*). Potential bat roost habitat and potential San Diego desert woodrat (*Neotoma lepida intermedia*) middens are also located within 500 feet of the Project Component.

Jurisdictional drainages are located in and adjacent to the Project Component; however, impacts to non-permitted jurisdictional resources will not occur.

Special-status biological resources are demarcated in the field by Environmentally Sensitive Area (ESA) staking, where applicable, and as shown on the FRED Map Viewer. Regular clearance sweeps and monitoring will be performed in support of the Project Component.

- **Cultural and Paleontological Resources:** SCE submitted a report titled *SCE Tehachapi Renewable Transmission Project Cultural and Paleontological Resource Guidelines for Segment 8 T/L Phase I, Notice to Proceed Request – Removal of Foundations and Structures* dated July 26, 2013. The memorandum states that it is anticipated that no cultural or paleontological resources will be impacted by the proposed removal of foundations and structures in support of the TRTP, Segment 8 T/L Phase I. All of the proposed work areas fall within previous surveys in support of the TRTP and one historic period resource was identified (Pacific Legacy 2007; Pacific Legacy 2010a-b). The historic resource is the Chino-Mesa 220 kV transmission line, which was evaluated and determined not eligible for the National Register of Historic Places (Office of Historic Preservation 2010). This line was removed during construction of TRTP's Segment 8 and all that remains of the line are the foundations. There are no other cultural resources located within any of the disturbance areas for this Notice to Proceed Request. Furthermore, the removal of the foundations associated with the Chino-Mesa 220 kV transmission line will not constitute an impact/effect to the resource as the resource no longer exists.

Previous paleontological assessments for TRTP define the geology at the proposed locations as the Puente Formation and Quaternary older alluvium (Gust and Scott 2009; Aron 2010). Structures M60-T1 to M63-T2 are situated in the Puente Formation. Based on the Potential Fossil Yield Classification (PFYC) system, the Puente Formation is considered high sensitivity for harboring significant paleontological resources (PFYC=5). Structures M63-T3 and M64-T1 are situated in Quaternary older alluvium. Based on the PFYC system, the Quaternary older alluvium is considered to have moderate sensitivity for harboring significant paleontological resources (PFYC=3). The TRTP Paleontological Resources Management Plan (PRMP) states that continuous monitoring is required in Segment 8 areas underlain by Puente Formation and Quaternary older alluvium during ground disturbing activities.

Based on the above information, no significant cultural or paleontological resources will be impacted by the proposed work identified in this Notice to Proceed Request.

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

- Prior to commencement of construction activities, disturbance area staking shall be installed and validated by the CPUC EM.
- Per the PRMP, paleontological monitoring shall occur during all ground disturbing activities in areas underlain by Puente Formation and Quaternary older alluvium.
- All conditions required by Notice to Proceed (NTP) #11 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #11, and this Notice to Proceed (NTP) #38 shall be available on site for the duration of construction activities where applicable.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Coontz', with a long horizontal flourish extending to the right.

Jason Coontz
CPUC Environmental Project Manager

cc: V. Strong, Aspen