

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



August 10, 2017

Ryan Stevenson  
Principal Advisor  
Regulatory Affairs  
Southern California Edison  
8631 Rush St, General Office 4 – 235E (2nd Floor)  
Rosemead, CA, 91770

RE: West of Devers Upgrade Project: Notice to Proceed No. 3

Dear Mr. Stevenson,

On June 5, 2017, Southern California Edison (SCE) submitted Notice to Proceed (NTP) Request No. 3 to the California Public Utilities Commission (CPUC) for subtransmission, distribution, and telecommunication improvements in support of the West of Devers Upgrade Project (Project). Under this NTP Request, SCE is seeking CPUC authorization to proceed with subtransmission, distribution, and telecommunication improvements required for the continued operation of SCE's power system during and after Project construction. Additional information was requested by the CPUC on July 5, 2017 and was received on August 1, 2017. None of the NTP No. 3 components are located on BLM lands.

SCE's West of Devers Upgrade Project was evaluated in accordance with the California Environmental Quality Act (CEQA). The mitigation measures described in the Final Environmental Impact Report (FEIR) were adopted by the CPUC as conditions of project approvals. The CPUC voted on August 18, 2016 to approve SCE's West of Devers Upgrade Project (Decision D.16.08.017) and a Notice of Determination was submitted to the State Clearinghouse (SCH# 2014051041). The CPUC also adopted a Mitigation Monitoring, Compliance and Reporting Program (MMCRP) to ensure compliance with all mitigation measures imposed on the West of Devers Upgrade Project during implementation.

As currently proposed by SCE, the West of Devers Upgrade Project includes multiple components (material yards, substation, distribution, telecommunication, and transmission). Separate NTPs were issued for Material Yards and substation upgrades (NTPs No. 1 and No. 2 respectively) and a separate NTP will be issued for the transmission line portion of the project. This is a typical process for projects with multiple components. Given that the West of Devers Upgrade Project has been approved by the CPUC, as described above, this phased construction review process allows SCE to proceed with individual project components where compliance with all applicable mitigation measures and conditions can be documented.

This letter documents the CPUC's thorough evaluation of all activities covered in this NTP, including the Mitigation Measure Requirements and Responsibilities table provided with the subject NTPR. The evaluation process ensures that all mitigation measures applicable to the location and activities covered in the NTP are implemented, as required in the CPUC's Decision.

NTP No. 3 for subtransmission, distribution, and telecommunication improvements for the West of Devers Upgrade Project is granted by the CPUC based on the factors described below.

## SCE NTP Request #3

NOTE: See overview maps in Appendix A for locations of distribution, Subtransmission, and telecommunication improvements.

### Section 1. Distribution System (See Figure 1B in Appendix A.)

#### *Distribution System Improvements*

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The relocation of a portion of the existing Dental and Intern 12-kV distribution circuits and ancillary distribution system improvements within the Project ROW, in the City of Loma Linda, are the subject of this portion of the NTPR, as follows:

- I. Dental 12-kV Distribution Circuit Relocation (FEIR page B-15; CPUC, 2015):
  - The Dental 12-kV Distribution Circuit relocation will be constructed within approximately 7,050 feet of new underground system, from the north side of Mission Road, east of Mountain View Avenue, and extending southeasterly for approximately 6,400 feet to California Street. The 12-kV underground system will extend south along California Street for approximately 500 feet to Barton Road, after which the 12-kV circuit will transition from underground to overhead via a distribution riser pole, and reconnect to the existing Dental 12-kV circuit.
  - A reconductor of approximately 1,520 feet of 3-wire (W) 1/0 aluminum conductor steel-reinforced (ACSR) will be constructed on Juanita Street from Mayberry Street, and a new overhead three-phase bank will be installed in place of the existing overhead three-phase bank removed from the transmission corridor. This reconductor will require approximately four distribution pole replacements. Approximately 11 cross arms will be replaced on existing poles for the reconductor.
  - Approximately 260 feet of underground service will be installed from the west end of the reconductor on Juanita Street to an existing customer account to the west.
- II. Intern 12-kV Distribution Circuit Relocation (FEIR page B-15):
  - The Intern 12-kV Distribution Circuit relocation will be constructed in the same new underground system described for the Dental 12-kV circuit above.
  - The Intern 12-kV circuit will transition from underground to overhead via the same distribution riser pole at Barton Road, then continue west from California Street for approximately 1,310 feet on Mayberry Street as underbuild (distribution circuit facilities installed under the 66-kV subtransmission circuit on the same structures) on existing subtransmission poles. The new underbuild will require the replacement of one subtransmission structure.
- III. Ancillary Distribution Work

The following ancillary distribution work will be conducted to accommodate the relocations described above. Disturbance impacts for these elements are accounted for within subtransmission work area impacts:

- Approximately 5,800 feet of distribution line will be removed along the ROW from approximately 80 feet north of Mission Road, south to approximately 200 feet north of Barton Road, in the City of Loma Linda. The removal and replacement of existing distribution poles along Nevada Street (north of Lugonia Avenue within San Bernardino County and south of Lugonia within the City of Redlands), Citrus Avenue, and Iowa Street in the City of Redlands, in conjunction with the relocation work for the SB–Redlands–Tennessee 66-kV line.

The proposed work to be performed at the distribution improvement locations listed above is consistent with activities described in the FEIR (CPUC, 2015) and the Final Environmental Impact Statement (BLM, 2016a), with details added to reflect modifications made through final design.

## Site Locations and Conditions

The estimated land disturbance for the distribution improvements covered within this NTPR totals approximately 11.187 acres, including temporary work areas, as summarized in the following table.

Distribution Improvement	Associated Construction Activities	Disturbance Impacts	Disturbance Acreage <sup>a</sup>
Dental 12-kV Distribution Circuit (FEIR page B-15)	Major construction activities include approximately 7,050 feet of excavation trenching for the new underground system on the north side of Mission Road, east of Mountain View Avenue to California Street, and Barton Road, conduit and cable installation, backfill, finish paving, transition from underground to overhead on an existing distribution pole, reconnection to the existing Dental 12-kV circuit.	Ground disturbance along disturbed/developed areas, including paved streets, street shoulders, and SCE ROW in the City of Loma Linda. Agriculture .....2.588 acres Developed/Disturbed ..... 5.481 acre	8.069 acres
Reconductor on Juanita Street (FEIR page B-15)	Major construction activities include reconductor of approximately 1,520 feet of 3W 1/0 ACSR on Juanita Street from Mountain Avenue to Mayberry Street and installation of new overhead three-phase bank. Approximately four distribution pole replacements and 11 cross arm replacements (see Figures 8 and 10).  Approximately 260 feet of excavation, conduit installation, and cable installation, to an existing customer from the west end of the conductor arm replacement on Juanita Street, backfill, and finish paving.	Ground disturbance limited within disturbed/developed areas, including paved streets, shoulders, and SCE ROW in the City of Loma Linda.  Developed/Disturbed .....1.831 acres	1.831 acres
Intern 12-kV Distribution Circuit Underbuild (FEIR page B-15)	Major construction activities include relocation of the Intern Distribution Circuit in the same new underground system (impacts accounted for above for the Dental 12-kV circuit and conduit and cable installation). Transition from underground to overhead via a distribution riser pole at Barton Road, approximately 1,360 feet of underbuild on existing subtransmission poles. Removal and replacement of one subtransmission structure.	Ground disturbance for underbuild limited within disturbed/developed areas, including paved streets, street shoulders, and SCE ROW in the City of Loma Linda. Agriculture .....0.007 acres Developed/Disturbed .....1.280 acres	1.287 acres

a - Improvements that will be constructed on foot, with no associated ground disturbance, have no corresponding disturbance acreage or work area buffers.

## Construction Components

### Access Roads

For existing distribution facility relocation work, access to work sites will be from existing paved streets. The transfer of existing distribution conductor and equipment will typically be performed using a line truck.

For the new underground distribution system along Mission Road, California Street, and Barton Road in the City of Loma Linda, access will also be from existing paved streets.

For the portion of distribution underbuild that may result in up to 1 subtransmission structure being replaced along Mayberry Street and Barton Road, access to the site will also be via the existing paved streets.

## Preconstruction Activities

Because construction will largely be contained within established streets, roadways, and the existing ROW, minimal site preparation will be required for distribution improvement construction. Existing power, lighting, water, and finished ground surfacing currently exists along the established streets and roadways, and no clearing or grubbing of vegetation or application of gravel or crushed rock is required. Storm water BMPs will be installed at worksites as required by the Project SWPPP.

## Distribution Construction

Following are general descriptions of the work activities associated with the distribution improvements.

**Underground System.** For the new underground distribution system, excavation will occur in existing paved streets, and the trench width will be approximately 20 to 24 inches. The overall work area for the trenching will be approximately 15 feet wide.

Excavated soil will be temporarily placed next to the trench on previously disturbed land. Construction activities will typically include the use of a backhoe, dump trucks, crew trucks, concrete trucks, and asphalt trucks. Soil excavated will be reused to backfill the trench and area surrounding the vaults, and excess soil would be trucked to an approved disposal facility. New asphalt will be placed over the top of the trench to match the existing asphalt in the street. Once the underground infrastructure is in place, the crews will install the cable in conduits.

**Wood Pole Installation.** Each wood pole will require that a hole be excavated using either an auger, backhoe, or hand tools. Excavated material may be reused as backfill. Depending on the quality of the native soils extracted from the excavation, up to approximately one-third of the material will be reused as backfill, and the remainder will be disposed of offsite. The wood poles will be placed in temporary laydown areas at each pole location. While on the ground, the wood poles may be configured (if not preconfigured) with the necessary cross arms, insulators, and wire-stringing hardware before being set in place. The wood poles will then be installed in the holes, typically by a line truck with an attached boom. If deemed necessary based on field conditions, wood guy stub poles will be installed by direct bury similar to wood poles.

**Topping Off Existing Poles.** Where necessary to support existing underbuild, the top portion of the existing poles will be removed, and existing underbuild will remain.

**Reconductor Activities.** Each stringing operation consists of a puller setup positioned at one end and a tensioner setup with wire reel stand truck positioned at the other end of the wire pull. Pulling and wire tensioning locations may also be used for splicing and field snubbing of the conductors. Temporary splices (e.g., pulling socks) may be necessary because permanent splices that join the conductor together typically cannot travel through the rollers. Splicing setup locations are used to remove temporary pulling splices and install permanent splices once the conductor is strung through the rollers located on each structure. Field snubs (i.e., anchoring and dead-end hardware) will be temporarily installed to sag conductor wire to the correct tension at locations where stringing equipment cannot be positioned. After the wire pulling equipment is in place, rollers will be installed on structures, the old conductor will be unclipped from the supporting structures, placed onto the rollers, and pulled out with a pulling rope and/or cable attached to the trailing end of the conductor. The old conductor wire will be transported to a construction yard where it will be prepared for recycling.

**Removal of Wood Poles.** The existing wood poles will typically be removed after the distribution lines are transferred to the new structures. Both the aboveground and belowground portions of the pole will be removed. Any holes left from the removals will be backfilled with spoils from the new pole installation excavations. If necessary, imported fill will be used to complete the backfill.

**General Activities.** During construction of distribution improvements, workers will arrive and park personal vehicles at a designated substation, project construction yard, or other meeting place, and travel to the worksites together. The number of distribution construction personnel onsite will vary, depending on the activities to be performed that day, but should not exceed 20.

The following is a list of potential equipment used onsite for distribution improvement construction:

- Bucket truck
- Crew truck
- Backhoe-loader
- Dump truck
- Flatbed truck
- Forklift
- Splice lab
- Line truck (e.g., Telsta)
- Bore equipment
- Water truck
- Utility vehicles

Materials associated with the distribution construction efforts would be delivered by truck to designated substations or other facilities where distribution crews will meet and transport the materials to worksites. Distribution construction areas will serve as temporary working areas where project-related equipment and/or materials would be placed at or near each structure location, within SCE ROW or franchise. Materials will include, but not be limited to, construction equipment, conductor reels, hardware, conduit, cable, poles, cross arms, signage, consumables (such as fuel and filler compound), waste materials for salvaging, recycling, or disposal, and BMP materials (straw wattles and silt fences).

Fuel and hydraulic fluids will be located at the existing San Bernardino Substation or other existing SCE facilities. Normal maintenance and refueling of construction equipment will be conducted at these existing locations. All refueling and storage of fuels would be performed in accordance with the SWPPP. BMPs will be implemented to address the handling of hazardous materials during construction activities.

Any land that may be disturbed as a result of distribution improvement construction will be restored to preconstruction conditions following the completion of construction for the Project. It should be noted, however, that the majority of the impacts associated with the distribution activities occur on developed/disturbed lands. Impacts to areas mapped as agricultural are on the fringes of agricultural lands. No impacts to native habitats are anticipated.

### Night Use

No distribution night work is anticipated to occur along the right-of-way or franchise areas. In the unlikely event that night work is required, local noise and construction-hour ordinances will be adhered to; however, if noise or construction-hour ordinances cannot be complied with, authorization from the local jurisdiction will be obtained prior to the construction activity.

### Helicopter Use

The use of helicopters is not anticipated for distribution construction activities.

### Temporary Electrical and Telecommunication Services

It is not anticipated that temporary electrical and telecommunication services will be required for distribution construction work. Workers will use equipment and instrumentation located within their work trucks and vehicles for telecommunication services. If necessary, workers may access existing telecommunication services at the existing substation and other SCE facilities for support.

### Other Activities

No additional construction or operational activities are planned for the distribution scope of work included within this NTPR.

### Compliance with Mitigation Measures, Applicant Proposed Measures, and Conservation Measures

Refer to Appendix A: Preconstruction Mitigation Measures/Applicant Proposed Measures/Biological Opinion Conservation Measures.

### Project Activity Schedule

Distribution work will be completed intermittently over the course of approximately 6 months, including both pre- and post-transmission line and substation work.

## Section 2. Subtransmission System (See Figure 1C in Appendix A.)

### Subtransmission System Improvements

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The removal of approximately 11,100 feet of existing San Bernardino–Redlands–Timoteo and San Bernardino–Redlands–Tennessee 66-kilovolt (kV) subtransmission lines each, from approximately nine double-circuit lattice steel towers (LST) and 28 double-circuit wood poles, from the San Bernardino Substation south along the Project right-of-way (ROW) to Barton Road, and their relocation to new routes within the existing ROW and/or newly acquired ROW, including franchise areas within the City of Loma Linda and Redlands and portions of unincorporated San Bernardino County, are the subject of this portion of the NTPR, as follows:

- IV. The relocated single-circuit San Bernardino–Redlands–Timoteo 66-kV subtransmission line will be approximately 2 miles long, constructed within new ROW or existing franchise, and will include the following components (Final Environmental Impact Report [FEIR], page B-12; California Public Utilities Commission [CPUC], 2015):
- Installation of approximately 34 subtransmission lightweight steel (LWS) or wood poles, with associated guying, and approximately 13 tubular steel poles (TSPs).
  - Installation of approximately 4,000 circuit feet of 3,000-kcmil underground conductor, approximately 6 vaults (10 feet × 20 feet × 11 feet, each), and approximately 4,000 feet of new duct bank.
  - Installation of approximately 7,100 circuit feet of 954 stranded aluminum conductor (SAC) overhead conductor.
  - Removal of approximately eight wood poles, including a double-circuit pole at the substation fence.

This relocated single-circuit San Bernardino–Redlands–Timoteo 66-kV subtransmission line will be installed on existing poles exiting San Bernardino Substation in the City of Redlands, and then transition underground to the east for approximately 805 feet within a new duct bank, requiring the installation of two new vaults. The relocated 66-kV subtransmission line will then rise to an overhead position via a new TSP riser pole, which will be located along the south side of San Bernardino Avenue. From the TSP riser pole, the 66-kV subtransmission line will extend approximately 1,450 feet along San Bernardino Avenue in a double-circuit configuration with the existing Calectric-Homart-Mentone 115-kV line. This portion of the line will extend to the corner of Marigold Avenue and will include the installation of approximately two TSPs, five LWS/wood poles, and the removal of six wood poles.

The 66-kV subtransmission line will continue to the south for approximately 1,230 feet along a private property line to Almond Avenue and will include the installation of approximately seven LWS/wood poles. Then, the 66-kV subtransmission line will turn west on Almond Avenue for approximately 1,100 feet, requiring the installation of approximately five new LWS/wood poles. From here, the 66-kV subtransmission line will then extend south for 1,250 feet along the east side of Research Drive up to Lugonia Avenue, where approximately 6 LWS/wood poles will be installed. The line will then turn east for approximately 625 feet, which will require the installation of approximately 1 TSP and 3 new LWS/wood poles on Lugonia Avenue. From this location, the 66-kV subtransmission line will proceed south for about 1,200 feet to Interstate 10 (I-10), which will require the installation of approximately 3 TSPs and 3 new LWS/wood poles. Two new TSPs will be required to accommodate the crossing of I-10.

On the south side of I-10, the subtransmission line will extend south along Bryn Mawr Avenue into the City of Loma Linda, for approximately 1,200 feet on approximately 2 TSPs and 2 LWS/wood poles on the east side of Bryn Mawr Avenue, followed by 2 TSPs on the north side of Redlands Boulevard. The 66-kV subtransmission line will be installed underground for approximately 2,700 feet from the TSP riser pole, west along Redlands Boulevard (includes installation of one vault), along an alley where it will proceed south (includes installation of one vault), and west along another alley (includes installation of one vault), where it will proceed until it reaches Mountain View Avenue. From Mountain View Avenue, it will rise to an overhead position via a new TSP riser and extend overhead approximately 90 feet west across Mountain View Avenue,

then turn south for approximately 100 feet to connect to the existing Timoteo Substation. This portion of the subtransmission line will include one TSP and two wood poles.

V. The relocated single-circuit San Bernardino–Redlands–Tennessee 66-kV subtransmission line will be approximately 3.5 miles long, constructed within a new ROW or existing franchise, and will include the following components (FEIR, page B-13):

- Installation of approximately 80 subtransmission LWS or wood poles, with associated guying, and approximately 10 TSPs.
- Installation of approximately 800 circuit feet of 3,000-kcmil underground conductor, approximately 4 vaults (10 feet × 20 feet × 11 feet), and approximately 800 feet of new duct bank.
- Installation of approximately 18,000 of circuit feet 954 SAC overhead conductor.
- Removal of approximately 38 wood poles (includes one required inside the substation).

The relocated single-circuit San Bernardino–Redlands–Tennessee 66-kV subtransmission line will exit San Bernardino Substation in the City of Redlands on existing poles and then transition underground to the east for approximately 785 feet in a new duct bank requiring the installation of two new vaults. The relocated 66-kV subtransmission line will then rise to an overhead position via a TSP riser pole, which will be located along West San Bernardino Avenue.

From the TSP riser pole, the 66-kV subtransmission line will then extend approximately 1,350 feet along the north side of San Bernardino Avenue to the corner of Marigold Avenue, with the installation of approximately 2 TSPs and 7 LWS/wood poles. There is approximately 40 feet between the existing subtransmission poles and the first of 2 rows of trees. The new poles will be installed adjacent to the existing poles, to avoid trimming and/or removal of trees.

The 66-kV subtransmission line will then transition to the south side of West San Bernardino Avenue in a double-circuit configuration with the Calectric-Homart-Mentone 115-kV line, cross into San Bernardino County at California Street, and continue east for approximately 3,600 feet on approximately 14 LWS/wood poles, 16 removals, and 2 TSPs; then turn south for approximately 1,350 feet along a private property line to Almond Avenue, where approximately 1 TSP and 6 LWS/wood poles will be installed. Then, the 66-kV subtransmission line will extend east on Almond Avenue for approximately 1,100 feet, where approximately 6 new LWS/wood poles will be installed. The 66-kV subtransmission line will then extend south along Nevada Avenue for approximately 2,500 feet on approximately 11 LWS/wood poles and 2 TSPs to I-10, crossing into the City of Redlands south of Lugonia Avenue.

From the south side of I-10, the subtransmission line will extend south along Nevada Street for approximately 4,000 feet on approximately 17 LWS/wood poles, 1 TSP, and 1 removal up to Mission Zanja Creek. The 66-kV subtransmission line will then extend over the channel and east on Citrus Avenue for approximately 1,300 feet on approximately 10 LWS/wood poles and 10 removals before Iowa Street. On Iowa Street, the 66-kV subtransmission line will extend south on approximately 9 LSW/wood poles with 7 pole removals before Orange Avenue, where the line will transition underground at a new TSP, cross underground to a new manhole on the south side of Orange, continue approximately 1,450 feet underground to the south side of Barton Road to a new manhole, where the line will cross Barton Road to connect to a new TSP, with 1 pole removal. Two additional pole replacements will take place on the south side of Barton Road. Of the removals, three are transmission pole removals and four are distribution pole removals.

The proposed work to be performed at the subtransmission improvement locations is consistent with activities described in the FEIR (CPUC, 2015) and the Final Environmental Impact Statement (Bureau of Land Management [BLM], 2016a), with details added to reflect the final design.

## Site Locations and Conditions

Land disturbance for the subtransmission work is associated with structure installation, removal activities, and the installation of new overhead and underground facilities. The estimated land disturbance for the subtransmission improvements covered within this NTPR totals approximately 44.218 acres, including temporary work areas, as summarized in the following table.

Subtransmission Improvement	Associated Construction Activities	Disturbance Impacts	Disturbance Acreage <sup>a</sup>
Removal of San Bernardino–Redlands–Timoteo and the San Bernardino–Redlands–Tennessee 66-kV Lines	Major construction activities include removal of approximately 4.2 miles of existing San Bernardino–Redlands–Timoteo and the San Bernardino–Redlands–Tennessee 66-kV subtransmission lines, and approximately nine double-circuit LSTs and 28 double-circuit wood poles.	Ground disturbance limited within disturbed/developed areas, including paved public shoulders and SCE ROW in the cities of Loma Linda and Redlands. Agriculture ..... 2.490 acres Developed/Disturbed ... 12.051 acres	14.541 acres
Relocation of San Bernardino–Redlands–Timoteo 66-kV Lines	Major construction activities include installation of approximately 34 subtransmission LWS or wood poles, with associated guying, and approximately 13 TSPs; installation of approximately 4,000 circuit feet of 3,000-kcmil underground conductor, approximately 6 vaults (10 feet × 20 feet × 11 feet), and approximately 4,000 feet of new duct bank; installation of approximately 7,100 circuit feet of 954 SAC overhead conductor; and removal of 8 wood poles.	Ground disturbance limited within disturbed/developed areas, including paved public shoulders and SCE ROW in the cities of Loma Linda and Redlands and in unincorporated areas of San Bernardino County. Agriculture ..... 5.124 acres Developed/Disturbed ... 16.204 acres Riparian Woodlandb ..... 0.003 acres	21.331 acres
Relocation of San Bernardino–Redlands–Tennessee 66-kV Lines	Major construction activities include installation of approximately 80 subtransmission LWS or wood poles, with associated guying, and approximately 10 TSPs; installation of approximately 800 circuit feet of 3,000-kcmil underground conductor, approximately 4 vaults (10 feet × 20 feet × 11 feet) and approximately 800 feet of new duct bank; installation of approximately 18,000 circuit feet of 954 SAC overhead conductor; and removal of 38 wood poles.	Ground disturbance limited within disturbed/developed areas, including paved public shoulders and SCE ROW in the cities of Loma Linda and Redlands and in unincorporated areas of San Bernardino County. Agriculture ..... 1.732 acres Developed/Disturbed ..... 6.614 acres	8.346 acres

a - Improvements that will be constructed on foot, with no associated ground disturbance, have no corresponding disturbance acreage or work area buffers.

b - The reported impacts to riparian woodland/riparian bird habitat are temporary impacts. The intersecting geographic information system layers each exist with some level of inherent inaccuracy. During project execution, temporary impact areas will be adjusted in the field to avoid impacting riparian woodland/riparian bird habitat, if possible.

## Construction Components

### Access Roads

For the existing subtransmission facility removal and relocation work, access to the work sites will be from existing paved streets. Transfer of existing subtransmission lines and equipment will typically be performed using a line truck.

For the portion of subtransmission underbuild that may result in up to 21 subtransmission structures being replaced along Mayberry Street and Barton Road, access to the site will also be via the existing paved streets.

### Preconstruction Activities

Prior to the start of construction, SCE will survey existing underground utilities along the proposed underground subtransmission line route, and survey proposed structure locations. In accordance with California law, SCE will notify all applicable utilities via Underground Service Alert to locate and mark existing utilities, and will conduct exploratory excavations (potholing) as necessary to verify the location of existing utilities. SCE will secure encroachment permits

for trenching in public streets. Because construction will be largely contained within established streets, roadways, and the existing ROW, minimal site preparation will be required for subtransmission improvement construction. Existing power, lighting, water, and finished ground surfacing currently exists along the established streets and roadways, and no clearing or grubbing of vegetation or application of gravel or crushed rock is required. Storm water best management practices (BMPs) will be installed at worksites as required by the Project Storm Water Pollution Prevention Plan (SWPPP).

### **Subtransmission Construction**

Following are general descriptions of the work activities associated with the subtransmission improvements.

**Trenching.** An approximately 20- to 24-inch-wide by 63-inch-deep trench will be required to place the 66-kV subtransmission line underground. This depth is required to meet the minimum 36 inches of cover above the duct bank. Trenching may be performed by using the following general steps, including, but not limited to, the following: mark the location and applicable underground utilities, lay out trench line, saw cut asphalt or concrete pavement as necessary, dig to appropriate depth with a backhoe or similar equipment, and install duct bank. The trench for underground construction will be widened and shored where appropriate to meet California Occupation and Safety Health Administration requirements. Trenching will be staged so that open trench lengths will not exceed that which is required to install the duct banks. Where needed, open trench sections will have steel plates placed over them to maintain vehicular and pedestrian traffic. Provisions for emergency vehicle access, where necessary, will be incorporated into the construction plan.

**Duct Bank Installation.** Following completion of trench excavation, duct banks will be installed in the trench, including conduit, spacers, ground wire, and concrete encasement. The duct bank typically consists of six 5-inch-diameter polyvinyl chloride (PVC) conduits fully encased with a minimum of 3 inches of concrete all around. Typical subtransmission (66-kV) duct bank installations will accommodate six cables. All 6 conduits will be used for the first 800 feet (at San Bernardino Substation) and, for the remaining 2,300 feet, only 3 conduits will be used (near Timoteo Substation), leaving 3 spare conduits for any potential future circuit.

The majority of the 66-kV duct banks will be installed in a vertically stacked configuration, and each duct bank will be approximately 21 inches high by 20 inches wide. In areas where underground utilities are highly congested or areas where it is necessary to fan out the conduits to reach termination structures, a flat configuration duct bank may be required. However, it is not anticipated that a flat underground duct bank configuration will be required.

In instances where a subtransmission duct bank will cross or run parallel to other substructures that operate at normal soil temperature (e.g., gas lines, telephone lines, water mains, storm drains, sewer lines), a minimal radial clearance of 6 inches for crossing and 12 inches for paralleling these substructures will be required. Where duct banks cross or run parallel to substructures that operate at temperatures significantly exceeding normal soil temperature (e.g., other underground transmission circuits, primary subtransmission cables, steam lines, heated oil lines), additional radial clearance may be required. Clearances and depths will meet requirements set forth within Rule 41.4 of CPUC General Order 128.

Once the duct bank has been installed, the trench will be backfilled with a two-sack sand slurry mix. Approximately 1,800 cubic yards of material will be removed from the trenches. Depending on the quality of the native soils extracted from the trenches, up to approximately one-third of that material could be used as backfill or fill on other project elements, and the remainder will be disposed of at an offsite disposal facility in accordance with all applicable laws. Should groundwater be encountered, it will be disposed of in accordance with all applicable laws.

**Vault Installation.** The inside dimensions of the underground vaults will be approximately 10 feet wide by 20 feet long with an inside height of 9.5 feet. The vaults will be placed no more than 1,500 feet apart along the underground portion of the subtransmission source line. Initially, the vaults will be used as pulling locations to pull cable through the conduits. After the cable is installed, the vaults will be used to splice the cables together. During operation, the vaults will provide access to the underground cables for maintenance, inspections, and repairs. See FEIR Figure B-20, Typical Subtransmission Vault, for the standard subtransmission vault configuration.

The vault pit will be excavated and shored; a minimum of 6 inches of mechanically compacted aggregate base will be placed to cover the entire bottom of the pit, followed by delivery and installation of the vault. Once the vault is set, grade rings and the vault casting will be added and set to match the existing grade. The excavated area will be backfilled with a 2-sack concrete/sand slurry mix to a point just below the top of the vault roof. Excavated materials, if suitable, will be used to backfill the remainder of the excavation. Finally, the excavated area will be restored as required.

**Cable Pulling, Splicing, Termination.** Following vault and duct bank installation, SCE will pull the electrical cables through the duct banks, splice the cable segments at each vault, and terminate cables at the transition structures where the subtransmission line will transition from underground to overhead. To pull the cables through the duct banks, a cable reel will be placed at one end of the conduit segment, and a pulling rig will be placed at the opposite end. The cable from the cable reel will be attached to a rope in the duct bank and linked to the pulling rig, which will pull the rope and the attached cable through the duct banks. A lubricant will be applied as the cable enters the ducts to decrease friction and facilitate travel through the PVC conduits. The electrical cables for the 66-kV subtransmission line circuit will be pulled through the individual conduits in the duct bank.

After cable pulling is completed, the electrical cables will be spliced together. A splice crew will conduct splicing operations at each vault location and continue until all splicing is completed.

**Transition Structures.** At each end of an underground segment, the cables will rise out of the ground at transition structures, which accommodate the transition from underground to overhead subtransmission lines. Transition structures constructed will be engineered TSP structures (TSP riser poles). The transition structure will support cable terminations, lightning arresters, and dead-end hardware for overhead conductors. Construction methods for these structures will be substantially similar to those described in FEIR Section B.3.3.5, Tubular Steel Pole Installation.

**Subtransmission Insulators and Conductors.** The Proposed Project will use non-specular conductor with polymer insulators on all suspension/dead end structures.

A fault return conductor (FRC) will typically be installed along LWS poles. Due to the combination of proposed wood poles, TSPs, and LWS poles that may be used, FRC may be installed on all poles for the entire length of subtransmission line route relocations. The FRC will be located approximately 1 to 2 feet above the telecommunications facilities, and approximately 4 to 6 feet below the subtransmission facilities. To maintain proper clearances, the telecommunication facilities and subtransmission facilities may need to be rearranged.

The 66-kV subtransmission structures will be designed following the intent of the *Suggested Practices for Raptor Protection on Power Lines: the State of the Art in 2006* (SCE, 2013b).

During construction of subtransmission improvements, workers will arrive and park personal vehicles at a designated substation, project construction yard, or other meeting place, and travel to the worksites together. The number of subtransmission construction personnel onsite will vary, depending on the activities to be performed that day, but should not exceed 100.

The following is a list of potential equipment used onsite for subtransmission improvement construction:

- Bucket truck
- Crew truck
- Backhoe-loader
- Dump truck
- Flatbed truck
- Forklift
- Splice lab
- Line truck (e.g., Telsta)
- Bore equipment
- Water truck
- Utility Vehicles

Materials for subtransmission work will commonly be stored at the substations, project construction yards, or other existing SCE facilities and be transported on work trucks to the work areas. Materials will include, but not be limited to, construction equipment, cable reels, hardware, structure and vault components, conduit, spacers, ground wire, and concrete, conductor, insulators, signage, consumables (such as fuel and filler compound), waste materials for salvaging, recycling, or disposal, and BMP materials (straw wattles and silt fences).

Fuel and hydraulic fluids will be located at the existing San Bernardino Substation or other existing SCE facilities. Normal maintenance and refueling of construction equipment will be conducted at these existing locations. All refueling and storage of fuels will be performed in accordance with the SWPPP. BMPs will be implemented to address the handling of hazardous materials during construction activities.

A majority of materials associated with the construction efforts will be delivered by truck to designated substations or other facilities where subtransmission crews will meet and transport the materials to worksites. Subtransmission construction areas will serve as temporary working areas where project-related equipment and/or materials will be placed at or near each structure location, within SCE ROW or franchise.

Any land that may be disturbed as a result of subtransmission improvement construction will be restored to preconstruction conditions following the completion of construction for the proposed Project.

### **Night Use**

No subtransmission night work is anticipated to occur along the ROW or franchise areas; however, they may be necessary at the San Bernardino Substation. When activities have ceased for the night, and personnel have vacated the substation sites, all security access gates will be secured and substation security lighting will only be employed in the event that a movement sensor is activated. Under normal operating conditions, the substations are not to be illuminated at night. Lighting is manually operated and used only when required for maintenance outages or emergency repairs. The lighting is typically low-intensity Light-Emitting Diode lights located in the switch-yard around the circuit breakers and in areas where operating and maintenance activities may take place during evening hours. Maintenance lights are directed downwards to reduce glare outside the facility. Security personnel may be present at night.

Local noise and construction-hour ordinances will be adhered to; however, if noise or construction-hour ordinances cannot be complied with, authorization from the local jurisdiction will be obtained prior to the construction activity.

### **Helicopter Use**

The use of helicopters is not anticipated for subtransmission construction activities.

### **Temporary Electrical and Communications**

It is not anticipated that temporary electrical and telecommunication services will be required for subtransmission construction work. Workers will use equipment and instrumentation located within their work trucks and vehicles for telecommunication services. If necessary, workers may access existing telecommunication services at the existing substation and other SCE facilities for support.

### **Other Activities**

Work associated with distribution and telecommunication pole and line removals, conducted within subtransmission work areas, may be performed immediately concurrently with subtransmission work, using the same disturbance areas.

### **Compliance with Mitigation Measures, Applicant Proposed Measures, and Conservation Measures**

Refer to Appendix A, Preconstruction Mitigation Measures/Applicant Proposed Measures/Biological Opinion Conservation Measures

### **Project Activity Schedule**

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Subtransmission work will be completed intermittently over the course of approximately 6 months, including both pre- and post-transmission line and substation work.

## **Section 3. Telecommunications System (See Figure 1D in Appendix A.)**

The following section (pages 31 through 47) describes telecommunication system improvements, including a project description, work site locations and conditions, disturbance impacts, construction components, work activities, and applicable mitigation requirements.

## **Telecommunication System Improvements**

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The following additions and modifications to the existing telecommunication system are required to facilitate the connection of existing substations to new optical fiber ground wire (OPGW) installed on new structures, while maintaining continuous telecommunication service during and post-construction, and are the subject of this portion of the NTPR:

VI. San Bernardino Substation associated Telecommunication Improvements:

- Connect the Redlands Inland Empire District Office–San Bernardino fiber optic cable through proposed conduit and on proposed and existing poles (FEIR page B-16 Item #4).

From the mechanical electrical equipment room (MEER) building located inside the San Bernardino Substation in the City of Redlands, approximately 1,750 feet of fiber optic cable will be installed in an existing conduit and cable trench to an existing vault and riser pole located outside of San Bernardino Substation on San Bernardino Avenue. From this location, approximately 1,260 feet of fiber optic cable will be installed on existing subtransmission poles extending east to Marigold Avenue. From this location, the telecommunications facilities will be co-located on the newly relocated San Bernardino–Redlands-Timoteo 66 kV Subtransmission Line, which crosses I-10 along Bryn Mawr Avenue, into the City of Loma Linda. The co-location of telecommunications will require that approximately 6,140 feet of fiber optic cable be installed on new subtransmission structures in private and public ROWs in the City of Redlands, crossing I-10 to a new riser pole on Bryn Mawr Avenue in the City of Loma Linda, where the telecommunications facilities will then transition underground, and require the installation of approximately 350 feet of new conduit and fiber optic cable to a new pole on the south side of Redlands Boulevard. At this location, the new fiber optic cable will transition overhead via a telecommunications riser and connect to the existing fiber optic cable.

VII. Timoteo Substation associated Telecommunication Improvements:

- Connect the Timoteo-Redlands District Office fiber optic cable through existing underground conduit and on existing poles (FEIR page B-17 Item #5).

Approximately 100 feet of fiber optic cable will be installed overhead from an existing pole near the south side of Timoteo Substation in the City of Loma Linda, crossing to the east side of Mountain View Avenue to an existing riser pole, then extending approximately 50 feet south to a new manhole. The fiber optic cable will transition underground for approximately 1,000 feet south in existing conduit on Mountain View and 1,550 feet east on Mission Road in new conduit to a new vault installed near the SCE ROW. Two additional manholes and one riser will be installed along the Mountain View alignment, and one additional manhole and two vaults will be installed along the Mission Road alignment.

- Approximately 4,010 feet of fiber optic cable will be removed from overhead poles between Timoteo Substation, east along Redlands Boulevard, and south along the SCE ROW to a pole on the south side of Mission Road near the SCE ROW in the City of Loma Linda. (FEIR page B-19, Fiber Optic Cable Removals, last bullet)

VIII. El Casco Substation associated Telecommunication Work

- The existing Vista-Moreno fiber optic cable will be connected to the MEER building in El Casco Substation. (FEIR page B-15 and B-16 Item #1)
  - Approximately 9,960 feet of fiber optic cable will be installed on existing poles along San Timoteo Canyon Road from a splice location at Pole 2210878E in the City of Redlands to Live Oak Canyon Road, where the line will cross into Riverside County. The line will extend an additional 31,000 feet along San Timoteo Canyon Road to existing riser pole 4380942E, located outside of El Casco Substation.
  - From the riser pole, the line will transition underground in an existing conduit for approximately 160 feet to an existing manhole. From the manhole, approximately 1,400 feet of fiber optic cable will be installed in existing conduit and cable trench to the El Casco MEER building.

IX. Maraschino Substation associated Telecommunication Work

- The existing Devers-Valley OPGW will be connected to the MEER building in Maraschino Substation (FEIR page B-16 Item #3)

Approximately 430 feet of fiber optic cable and new underground conduit will be installed from existing Devers-Valley No. 2 500-kV structure M24T1 in the City of Beaumont, to a new manhole located on the west side of Highland Springs Avenue and the north boundary of the SCE 500-kV ROW. From this location, approximately 2,630 feet of fiber optic cable will be installed north, in existing conduit, followed by the installation of approximately 2,920 feet of fiber optic cable and new underground conduit installed north to underground vault V5528679, approximately 300 feet north of Potrero Boulevard. North of the vault, another 1,520 feet of fiber optic cable and new underground conduit will be installed to a new manhole on East First Street. From the manhole, another 9,230 feet of fiber optic cable and new underground conduit will be installed on East First Street to riser pole 4201995E, where the line will transition overhead for approximately 4,680 feet along East First Street and north on Veile Avenue on existing subtransmission poles to the northeast corner of the Maraschino Substation. From this location, the fiber optic cable will transition underground for approximately 400 feet in an existing underground conduit and cable trench to the MEER building located in Maraschino Substation.

- The El Casco–Banning Fiber Optic Cable (10132) to Devers-Vista Skywrap (09033) tap. (FEIR page B-17 Item #6)

Approximately 840 feet of fiber optic cable will be installed on existing poles on Oak Valley Parkway in the City of Beaumont, west of the existing splice location at Oak View Drive, to a distribution pole approximately 280 feet east of Golf Club Drive. From this pole, approximately 3,300 feet of fiber optic cable and new conduit will be installed west, crossing Interstate 10 in an existing conduit, to an existing distribution vault east of Desert Lawn Drive.

X. Banning Substation associated Telecommunication Work

- The existing Devers-Valley OPGW will be connected to the MEER building in Banning Substation. (FEIR page B-16 Item #2)

Approximately 630 feet of fiber optic cable will be installed in a new underground conduit between existing Devers-Valley No. 2 500-kV structure M21T1, located in Riverside County, and existing distribution pole 256815S, along the Coyote Trail approximately 3,200 feet west of Old Idyllwild Road, in the City of Banning. The new underground conduit will be installed by directional bore to minimize impacts to Smith Creek. From pole 256815S, approximately 4,120 feet of new fiber optic cable will be installed to the east on existing distribution poles (combination of public and private lands) along the unpaved ROW to distribution pole 1589126E to the north, within the city limits. From pole 1589126E, approximately 480 feet of new fiber optic cable will be installed to the north in new underground conduit, across the existing Devers-Valley 500-kV ROW, and will transition aboveground to distribution pole 4767682E, on the paved north-south-oriented portion Old Idyllwild Road. From pole 4767682E, fiber optic cable will be installed overhead on a combination of distribution and subtransmission poles for approximately 2,100 feet to Wesley Street. The fiber optic cable will then extend east along Wesley Street for approximately 1,300 feet to Durward Street, and then north along SCE ROW for approximately 3,300 feet to East Lincoln Street. The cable will then transition underground and approximately 280 feet of fiber optic cable and new conduit will be installed in an existing trench to Banning Substation. Approximately 170 feet of fiber optic cable trench will be installed to reach the Banning Substation MEER building, in the City of Banning.

***Ancillary Telecommunications Work (FEIR pages B-19 and B-20)***

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The following ancillary work will be conducted to accommodate the new OPGW connections and other modifications necessary to facilitate construction of the Project:

- New telecommunication equipment will be installed in the MEER buildings at Banning, Devers, El Casco, Etiwanda, Maraschino, Mira Loma, Moreno, San Bernardino, Timoteo, Valley, Vista, and Zanja substations and at the Redlands Service Center to compensate for the losses created by the redirected fiber optic routes.
- During construction, temporary fiber optic jumpers (i.e., connectors) will be installed between the equipment inside the MEER buildings and/or communications enclosures at Banning, Devers, El Casco, Etiwanda, Maraschino, Mira Loma, Moreno, San Bernardino, Timoteo, Valley, Vista, and Zanja substations and at the Redlands Service Center to maintain telecommunication services, systems, and circuits during Project construction.
- New fiber optic terminal equipment will also be installed to compensate for the losses created by the redirected fiber optic routes.

The proposed work to be performed at the telecommunication improvement locations is consistent with activities described in the Final Environmental Impact Report (CPUC, 2015) and the Final Environmental Impact Statement (BLM, 2016).

### Site Locations and Conditions

Land disturbance impacts for the new telecommunication system improvements located outside of the substations and service center buildings will include OPGW installation, wire stringing, and new conduit installation. The estimated land disturbance for the telecommunication improvements covered within this NTPR totals approximately 27.069 acres, including temporary work areas, as summarized in the following table.

Telecommunication Improvement	Associated Construction Activities	Disturbance Impacts	Disturbance Acreage <sup>a</sup>
San Bernardino Substation Connection to Redlands Inland Empire District Office (FEIR page B-16 Item #4)	Major construction activities include splicing and work with associated electrical instrumentation within the substation property; 1,750 feet of fiber optic cable installation in existing conduit and cable trench to an existing vault and riser pole located outside of San Bernardino Substation; 1,260 feet of fiber optic cable installation on existing subtransmission poles extending east to Marigold Avenue; installation of telecommunications facilities on newly relocated San Bernardino–Redlands–Timoteo 66 kV Subtransmission Line, including approximately 6,140 feet of fiber optic cable installation on new subtransmission structures in private and public ROWs; transition underground; installation of approximately 350 feet of new conduit and fiber optic cable to an existing pole on Redlands Boulevard; new fiber optic cable transition overhead via a telecommunications riser and connection to existing fiber optic cable.	Ground disturbance confined to disturbed/developed areas, including existing San Bernardino Substation, located north of San Bernardino Avenue and east of Mountain View Avenue in the City of Redlands and paved private and public streets. Developed/Disturbed .....0.51 acres	0.51 acres
Timoteo-Redlands District Office fiber optic cable connection (FEIR page B-17 Item #5).	Major construction activities include splicing and work with associated electrical instrumentation within the substation; installation of approximately 420 feet of fiber optic cable overhead from an existing pole on the south side of Timoteo Substation crossing to the east side of Mountain View Avenue then extending 105 feet south to a new manhole; transition underground for approximately 1,000 feet south in existing conduit on Mountain View and 1,550 feet east on Mission Road to new vault; Cable removal from Timoteo Substation to the side of Mission Road at the SCE ROW.	Ground disturbance confined to disturbed/developed areas along Mountain View Avenue, Mission Road, and inside the existing substation. Developed/Disturbed ...1.014 acres	1.014 acres

Telecommunication Improvement	Associated Construction Activities	Disturbance Impacts	Disturbance Acreage <sup>a</sup>
El Casco Substation Connection to Vista-Moreno OPGW (FEIR page B-15 and B-16 Item #1)	Major construction activities include splicing and work with associated electrical instrumentation within the substation; installation of approximately 41,000 feet of fiber optic cable on existing poles along San Timoteo Canyon Road from pole 2210878E to existing riser pole 4380942E outside of El Casco Substation within a 15-foot work area buffer, transition underground in existing conduit for approximately 160 feet to an existing manhole; installation of approximately 1,380 feet of fiber optic cable in existing conduit and cable trench to the El Casco MEER building.	Disturbance limited to aboveground cable stringing on existing poles along a rural public road within a work area buffer of 15 feet and underground cable pulling through existing conduit to and within El Casco Substation.  Disturbed/Developed .12.413 acres Grassland/Forbland .....0.766 acres Riparian Woodland.....0.026 acres	13.205 acres
Maraschino Substation Connection to Devers-Valley OPGW (FEIR page B-16 Item #3)	Major construction activities include splicing and work with associated electrical instrumentation within the substation; approximately 430 feet of fiber optic cable and new underground conduit installed from existing structure M24T1 to an existing distribution vault on Highland Springs Avenue, approximately 2,630 feet of fiber optic cable installed in existing conduit, followed by the installation of approximately 2,920 feet of fiber optic cable and new underground conduit installed north to underground vault V5528679. North of the vault, another 1,520 feet of fiber optic cable and new underground conduit will be installed to a new manhole on East First Street. From the manhole, another 9,230 feet of fiber optic cable and new underground conduit will be installed on East First Street to riser pole 4201995E, where the line transitions overhead for approximately 4,680 feet along East First Street and north on Veile Avenue on existing subtransmission poles to the northeast corner of the Maraschino Substation. Fiber optic cable transition underground for approximately 400 feet in an existing underground conduit and cable trench to the MEER building located in Maraschino Substation.	Ground disturbance limited to disturbed/developed lands within the substation, along public street ROWs within a work area buffer of 15 feet, and the existing Devers-Valley #2 Tower M24-T1 structure location, in the City of Beaumont.  Developed/Disturbed ...5.677 acres Grassland/Forbland .....1.614 acres Riparian Woodland.....0.018 acres	7.309 acres
El Casco–Banning connection to Devers-Vista Skywrap (FEIR page B-17 Item #6)	Installation of approximately 840 feet of fiber optic cable will be installed on existing poles on Oak Valley Parkway, west of the existing splice location at Oak View Drive, to a distribution pole approximately 280 feet east of Golf Club drive. From this pole, approximately 3,300 feet of fiber optic cable and new conduit will be installed west, crossing under Interstate 10 to an existing distribution vault east of Desert Lawn Drive.	Ground disturbance limited to disturbed/developed public streets within work area buffer of 25 feet.  Developed/Disturbed ...2.122 acres	2.122 acres

Telecommunication Improvement	Associated Construction Activities	Disturbance Impacts	Disturbance Acreage <sup>a</sup>
Banning Substation Connection to Devers-Valley OPGW (FEIR page B-16 Item #2)	Major construction activities include splicing and work with associated electrical instrumentation within the substation, installation of approximately 630 feet of fiber optic cable in a new underground conduit between Structure M21-T1 and existing distribution pole 256815S on Coyote Trail via directional bore, installation of approximately 4,120 feet of new fiber optic cable on existing distribution poles (combination of public and private lands), installation of approximately 480 feet of new fiber optic cable in new conduit under the existing Devers-Valley 500-kV ROW, installation of 6,700 feet of fiber optic cable overhead on existing poles on paved Old Idyllwild Road, Wesley Street, Durward Street, on SCE ROW, to East Lincoln Street, installation of 280 feet of fiber optic cable and new conduit to Banning Substation and approximately 170 feet of fiber optic cable trench inside the substation to reach the Banning Substation MEER building.	Ground disturbance limited to two 50-foot-by-50-foot directional bore pits at Devers-Valley No. 2 500-kV structure M21-T1 and across Smith Creek, 23,000 square feet of work area for open cut conduit installation on unpaved Coyote Trail, combination of public/private lands stringing work areas, 8,000 square feet of work area for open cut conduit installation on paved city streets, and substation work.  Alluvial Scrub .....0.272 acres Coastal Sage Scrub .....0.045 acres Grassland/Forbland .....1.373 acres Disturbed/Developed ...1.678 acres	3.368 acres

a - Improvements that will be constructed on foot, with no associated ground disturbance, have no corresponding disturbance acreage or work area buffers.

## Construction Components

### Access Roads

Existing public roads and existing utility routes will be used to access all telecommunication work locations included within this NTPR.

### Preconstruction Activities

Because construction will largely be contained within active substation facilities and along established streets and roadways, minimal site preparation will be required for telecommunication improvement construction. Existing power, lighting, water, security, finished ground surfacing, walls, and perimeter fencing is provided within the substations. All work performed within the substations will occur within the existing substation perimeter walls/fences; therefore, no clearing or grubbing of vegetation or application of gravel or crushed rock is required. In telecommunication improvement work areas outside of existing substations, work will occur on existing public roads and utility roads, with minimal clearing and grading required. Storm water BMPs will be installed at work sites as required by the Project SWPPP.

### Telecommunication Construction

Following are general descriptions of the work activities associated with the telecommunication improvements.

**Telecommunications Equipment Installation.** All new communication equipment installations and upgrades at the existing substations will occur within existing MEER buildings; therefore, no additional ground disturbance is associated with this work. Installation of new telecommunication equipment will consist of fiber optic terminals with increased optical range, multiplexers, and other telecommunication equipment devices installed at each of the identified substations. Temporary fiber optic jumpers will be used within each MEER building to redirect and route the fiber optic systems and services during Project construction.

**Overhead Fiber Optic Cable Telecommunications Facilities Installation.** Overhead telecommunication facilities will be installed by attaching cable to structures. A truck with a cable reel will be set up at one end of the section to be pulled, and a truck with a winch will be set up at the other end. Fiber optic cable pulls are the length of any given continuous cable installation process between two selected points along the existing overhead or underground

structure line. The dimensions of the area needed for stringing set ups varies depending upon the terrain; however, a typical stringing set up is 40 feet by 60 feet. Cable would be pulled onto the pole and permanently secured. Fiber strands in the cable from one installed section of cable will be spliced to fiber strands in the cable from the next installed section to form one continuous path.

**Underground Fiber Optic Cable Telecommunication Facilities Installation.** New underground conduit and structures will typically be installed using a backhoe. The trench will be excavated to approximately 12 to 18 inches wide and a minimum of approximately 36 inches deep. The ground disturbance area for the trenching will be approximately 25 feet wide by the specific length of the excavation. Polyvinyl chloride conduit will be placed in the trench and covered with approximately 8 inches of concrete slurry, then backfilled and compacted. For manholes and pull boxes, a hole will be excavated between approximately 4 to 10 feet deep, 5 to 8 feet long, and 4 to 8 feet wide. The ground disturbance area for the manhole installation will be approximately 40 feet wide by 50 feet long for activities associated with the conduit and structure installation and concrete encasement. The manhole or pull box will be lowered into place, connected to the conduits, and backfilled with 2-sack concrete/sand slurry. Excess soil will be hauled to an approved disposal facility in accordance with all applicable laws or may be used as fill material for transmission, subtransmission, distribution, or substation project elements. Construction activities will typically include the use of a backhoe, dump trucks, crew trucks, and concrete trucks.

New underground conduit may also be installed by directional bore to minimize ground disturbance areas and potential impacts to environmental resources. Existing utilities that will be crossed or are near the bore will be physically located by digging a pot hole with a backhoe or vacuum truck. The ground disturbance area for directional drilling consists of approximately 50-foot by 50-foot work areas at each bore pit location. A bore pit approximately 2 feet wide and 10 feet long will be dug with a backhoe on each end of the proposed bore. The horizontal bore rig will be set up at one of the bore pits. Setup includes anchoring the rig to the ground with augers attached to the front. The bore machine spins the drill head while inserting drilling rods behind the head as it is pushed through the ground. Drilling fluid under high pressure assists in drilling, moves the dirt loosened by the drill head, and holds the hole formed in the drilling process. Excess drilling fluid accumulated in the bore pits is vacuumed up and disposed of at a safe site. The depth and direction of the bore is monitored and controlled by telemetry between the bore head, and a device held on the surface by a worker. The bore head is guided to the second bore pit where the drill head is removed and a reamer is installed on the drilling steel. The conduit that has been glued together and laid in line with the bore is then attached to the reamer. The conduit is installed in the bore as the reamer is pulled back to the bore rig. The bore pits are used for other bores going the opposite direction or will be part of the excavation for a manhole.

The fiber optic cable will be installed throughout the length of the underground conduit and structures by first installing an innerduct, which provides for protection and identification of the cable. The innerduct will be pulled in the conduit from structure to structure using a pull rope and pulling machine, or truck-mounted hydraulic capstan. After installation of the innerduct, the fiber optic cable will be pulled through the innerduct using similar equipment.

During construction of telecommunication improvements, workers will arrive and park personal vehicles at a designated substation or other meeting place and travel to the worksites together. The number of telecommunication construction personnel onsite will vary, depending on the activities to be performed that day, but should not exceed 14.

The following is a list of potential equipment to be used onsite for telecommunication improvement construction:

- Bucket Truck
- Crew Truck
- Backhoe-loader
- Dump Truck
- Flatbed truck
- Forklift
- Splice Lab
- Line truck (e.g., Telsta)
- Bore equipment
- Water Truck
- Refueling equipment
- Utility Vehicles

Materials associated with the telecommunication construction efforts will be delivered by truck to designated substations or other SCE facilities where telecommunication crews will meet and transport the materials to worksites. Telecommunication construction areas will serve as temporary working areas where project-related equipment and/or materials would be placed at or near each structure location, within SCE ROW or franchise. Materials will include, but

not be limited to, construction equipment, OPGW reels, hardware, conduit, OPGW cable, insulators, cross arms, signage, consumables (such as fuel and filler compound), waste materials for salvaging, recycling, or disposal, and BMP materials (straw wattles and silt fences).

Fuel and hydraulic fluids will be stored at the existing substations or other existing SCE facilities. Normal maintenance and refueling of construction equipment will be conducted at these existing locations. All refueling and storage of fuels will be performed in accordance with the SWPPP. BMPs will be implemented to address the handling of hazardous materials during construction activities.

Any land that may be disturbed as a result of telecommunication improvement construction will be restored to preconstruction conditions following the completion of construction for the Project.

### **Night Use**

No telecommunication night work is anticipated to occur along the ROW or franchise at night; however, night work may be necessary at the substations. When activities have ceased for the night and personnel have vacated the substation sites, all security access gates will be secured, and substation security lighting will only be employed in the event that a movement sensor is activated. Under normal operating conditions, the substations will not be illuminated at night. Lighting is manually operated and used only when required for maintenance outages or emergency repairs. The lighting is typically low-intensity Light Emitting Diode (LED) lights located in the switchyard around the circuit breakers and in areas where operating and maintenance activities may take place during evening hours. Maintenance lights are directed downwards to reduce glare outside the facility. Security personnel may be present at night for manned substations.

Local noise and construction-hour ordinances will be adhered to; however, if noise or construction-hour ordinances cannot be complied with, authorization from the local jurisdiction will be obtained prior to the construction activity.

### **Helicopter Use**

The use of helicopters is not anticipated for telecommunication construction activities.

### **Temporary Electrical and Communications**

It is not anticipated that temporary electrical and telecommunication services will be required for telecommunication construction work. Workers will use equipment and instrumentation located within their work trucks and vehicles for telecommunication services. If necessary, workers may access existing telecommunication services at the existing substations and other SCE facilities for support.

### **Other Activities**

No additional construction or operational activities are planned for the telecommunication scope of work included within this NTPR.

### **Compliance with Mitigation Measures, Applicant Proposed Measures, and Conservation Measures**

Refer to Appendix A: Preconstruction Mitigation Measures/Applicant Proposed Measures/Biological Opinion Conservation Measures

### **Project Activity Schedule**

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Telecommunications work will be completed intermittently over the course of approximately 6 months, including both pre- and post-transmission line and substation work.

## **CPUC Evaluation of Preconstruction Mitigation Implementation**

All applicable project mitigation measures(MMs), APMs, compliance plans, and permit conditions shall be implemented. Some measures have on-going/time-sensitive requirements and are required to be implemented prior to and during construction where applicable. Appendix A in SCE's NTP request provides

preconstruction compliance information for the issue areas addressed by the West of Devers Upgrade Project Final EIR/Final EIS. The following contains a status of applicable mitigation measures and APM required submittals, including any outstanding requirements:

**Agricultural:** 4.1 acres of Prime Farmland will be impacted by the subtransmission and distribution activities. Coordination with affected agricultural property owners will occur no less than 60 days prior to construction. Agreements between SCE and the affected agricultural property owners will be provided to CPUC for review and approval prior to the start of construction.

**Air Quality:** As required by MM AQ-1a, SCE submitted a Fugitive Dust Control Plan on February 10, 2017 and the Plan was approved by the CPUC on May 22, 2017. The plan includes restrictions for vehicle traffic speeds on unpaved roads, watering frequencies for staging areas, stabilization of inactive areas and stockpiles, minimizing drop heights from excavators and loaders, covering soil truck loads, and the discontinuation of construction activities on unpaved areas if visible dust plumes cannot be avoided by approved dust suppression methods.

SCE prepared an Exhaust Emissions Control Plan as required in APM AIR-1 to establish a goal of project-wide fleet average reduction of 20 percent NO<sub>x</sub> compared to the estimated unmitigated emissions as presented in the PEA for applicable diesel-fueled off-road construction equipment of more than 50 horsepower. SCE's Exhaust Emissions Control Plan was approved by CPUC on June 8, 2016. In addition, in compliance with MM AQ-1b, off-road equipment with engines larger than 50 horsepower shall have engines that meet or exceed U.S. EPA/CARB Tier 3 Emissions Standards.

**Biological Resources:** Consistent with MM VEG-1a, SCE submitted the resume for the Lead Biologist for CPUC and BLM concurrence. A Worker Environmental Awareness Program (WEAP) has been prepared to educate on-site workers about the proposed Project's sensitive environmental issues in accordance with MM VEG-1b. Throughout the duration of construction, SCE shall be responsible for ensuring that all on-site project personnel receive this training prior to beginning work. SCE shall maintain a list of all personnel who have completed the WEAP training. This list shall be provided to the CPUC and BLM upon request. The WEAP was approved by the CPUC on June 26, 2017.

SCE prepared a Nesting Bird Management Plan consistent with MM WIL-1c. This plan was developed during the EIR/EIS preparation process in coordination with the CPUC, BLM, USFWS, and CDFW, and was included in Appendix 14 of the Final EIR and EIS.

SCE prepared a Habitat Restoration and Revegetation Plan (HRRP) in accordance with MM VEG-1d to outline the restoration or revegetation of all temporary disturbance areas. The HRRP was submitted in April 2017 for CPUC review and comments were provided to SCE on May 22. A revised HRRP was provided on July 19, 2017 and is currently under review.

An Integrated Weed Management Plan (IWMP) required by MM VEG-2a was submitted by SCE on February 10, 2017 and comments were provided to SCE on March 23, 2017. A revised Plan was submitted on August 4, 2017 and is under review. No construction, equipment or crew mobilization, or project-related ground-disturbing activity shall proceed until the IWMP is approved.

SCE shall prepare an HMMP [Habitat Mitigation and Monitoring Plan] consistent with the requirements of MM VEG-3a which will include restoration or compensation mitigation to assure no net loss of wetland acreage or wetland habitat value from direct or indirect project impacts, including reduction of wetland acreage, and downstream or upstream effects to channels or their associated habitat. An HMMP has not yet been submitted to the CPUC.

SCE submitted a Raven Monitoring, Management, and Control Plan (WIL-2b) on February 10, 2017 and the Plan was approved by the CPUC on June 26, 2017.

A Wildlife Noise Monitoring Plan was prepared by SCE to satisfy requirements of MM WIL-2c and WIL-2e, and was submitted on April 6, 2017. If active nests or territories are identified within 500-feet of any of the construction work, SCE will implement protective measures outlined in the Wildlife Noise Monitoring Plan if construction activities are expected to occur within 500-feet of active nests or territories of listed riparian birds or coastal California gnatcatchers. CPUC approved the subject plan on June 8, 2017.

As required by MM WIL-2g, SCE submitted a Burrowing Owl Management and Passive Relocation Plan to the CPUC on February 10, 2017 and the Plan was approved by the CPUC on June 26, 2017.

Preconstruction surveys for special-status plants and wildlife will be conducted consistent with MMs VEG-4a, WIL-1a, WIL-1c, WIL-2a, WIL-2e, WIL-2f, WIL-2g, WIL-2h, WIL-2i, WIL-2j, and WIL-2k. SCE will ensure wildlife impact avoidance and minimization through measures outlined in MM WIL-1b during subtransmission, distribution, and telecommunication upgrades.

**Cultural Resources:** As required by MM CL-1b, a Cultural Resources Management Plan (CRMP) was submitted by SCE on February 2, 2017 and was approved by the CPUC on April 2, 2017. A total of five historic-era resources located within the Area of Potential Effects (APE) have been determined eligible for listing in the National Register of Historic Places (NRHP). No direct impacts are to occur to these resources and/or historic features within the resource; protection will be ensured by use of barriers and monitoring in the vicinity of the Historic Properties. The remaining resources located within the APE have been determined not eligible for listing in the NRHP. Consistent with MM CL-1d, cultural resource monitoring will be scheduled prior to construction and conducted at sites requiring monitoring for sensitive cultural resources.

**Geology and Soils:** SCE will conduct geotechnical studies to evaluate faults, landslides and unstable slopes, and soil characteristics as outlined in MMs G-1a, G-2a, and G-5a. The geotechnical survey reports will be submitted to the CPUC for review and approval prior to construction.

**Hazards and Hazardous Materials:** As required by MM HH-1a, SCE has prepared a Hazardous Materials and Waste Management Plan for CPUC review and approval on February 2, 2017. Hazardous materials used and stored on site for the duration of construction activities and will be managed according to the Plan. A Soil Management Plan has been developed consistent with MM HH-2a to provide guidance for the proper handling, onsite management, and disposal of impacted soil that might be encountered during construction activities. SCE's Soil Management Plan was combined with the Hazardous Materials and Waste Management Plan described above. Soil sampling will be conducted as described in MM HH-3a to identify pesticide/herbicide contamination in areas with current or past agricultural activity. CPUC approval of SCE's plan is pending the submittal of contractor information including the following: written procedures for fueling and maintenance of construction equipment; an Emergency Response Plan; and soil samples to be collected in construction areas where the land has historically or is currently being used for agriculture and would be subject to ground disturbance by the project.

**Land Use.** As required by MM LU-1a, a Construction Notification Plan was prepared by SCE and approved by CPUC on May 22, 2017. The Plan identified the procedures to ensure that SCE will inform property and business owners of the location and duration of construction. The Plan includes provisions for public noticing including mailers, newspaper advertisements, public venue notices, and includes the establishment of a public liaison and toll-free information hotline.

**Noise.** Best Management Practices for construction noise management will be implemented as outlined in MM N-1a to reduce construction noise exposure at noise-sensitive receptors and to avoid possible violations of local rules, standards, and ordinances during construction. Construction noise shall be confined to daytime, weekday hours (7:00 a.m. to 6:00 p.m.) or an alternative schedule developed by SCE

based on its coordination with local jurisdiction. Construction traffic and helicopter flights shall be routed away from residences and schools, where feasible.

**Paleontological Resources:** A Paleontological Resource Mitigation and Monitoring Plan (PRMMP) has been completed for the West of Devers (WOD) Project and was submitted to the CPUC and BLM for review and approval. The PRMMP was approved by the CPUC on May 9, 2017. Monitoring for paleontological resources will be conducted in compliance with MM PAL-1d and the PRMMP requirements.

**Traffic and Transportation.** Consistent with MM T-1a and MM T-1b, Construction Transportation and Traffic Control Plans will be developed. The Construction Transportation Plan will describe timing of commutes, methods of reducing crew-related traffic, and other methods for reducing construction-generated additional traffic on regional and local roadways. A Final Helicopter Use Plan will be developed prior to using helicopters to transport personnel, materials, or equipment for the deconstruction of existing facilities or construction of new or replacement project facilities. Construction Transportation Plan and Traffic Control Plans will be submitted 15 and 30 days prior to construction, respectively.

**Visual Resources.** As required in MM VR-1a, construction yards, staging areas, and material and equipment storage areas shall be visually screened using temporary screening fencing. In addition, SCE shall avoid night lighting where possible and minimize its use under all circumstances. To ensure this, SCE prepared a Night Lighting Management Plan for both construction and operation, consistent with MM VR-7a. The Night Lighting Management Plan was approved by the CPUC on May 22, 2017. SCE submitted a Surface Treatment Plan in accordance with MM VR-9a describing the application of colors and textures to all new facility structures, buildings, walls, fences, and components comprising all facilities to be constructed. The Surface Treatment Plan was approved by the CPUC on June 5, 2017. As required by MM VR-8a, SCE provided a draft Project Design Plan describing the siting, placement, and other design considerations to be employed to minimize Proposed Project contrast to the CPUC on May 22, 2017. Comments were provided to SCE on June 13, 2017 and a revised Plan was submitted on August 3, 2017.

**Water Resources.** As required by MM WR-2a, SCE developed and submitted an Erosion Control Plan to the CPUC and BLM at least 60 days prior to construction. The Erosion Control Plan was incorporated into the Stormwater Pollution Prevention Plan, which will be kept onsite and readily available on request. SCE submitted the Stormwater Pollution Prevention Plans to the CPUC on May 25, 2017.

**Wildland Fire.** SCE submitted a Fire Management Plan on February 10, 2017 to satisfy the conditions of MM WF-1a and the Plan was approved by the CPUC on July 18, 2017.

## Conditions of NTP Approval

The conditions noted below shall be met by SCE and its contractors prior to the start of construction:

- 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.
- Copies of all relevant permits, compliance plans, and this NTP shall be available on site for the duration of construction activities. All permits and plans shall be made available to the CPUC Environmental Monitors (EMs) upon request.
- Prior to the start of construction, SCE shall provide updated maps with legend clarifications discussed on August 7, 2017. To capture ongoing project and resource changes during construction, updated construction and resource maps, and digital spatial data (KML/KMZ or GIS data viewable from mobile device) shall be made available to SCE/contractor field monitoring staff and the CPUC EMs as changes occur.

- **MMs VEG-1c, WIL-1a, VR-2a:** Prior to any construction, equipment or crew mobilization at each work site, resource and work areas will be marked with staking or flagging to identify the limits of work and will be verified by project environmental staff and the CPUC Environmental Monitor (EM). Written authorization will be provided within 24 hours to SCE that the CPUC EM verification of work area and any Environmentally Sensitive Area (ESA) delineation has been completed. If work area or resource boundary delineation was found to be inadequate, the CPUC EM will provide written documentation to SCE within 24 hours identifying the flagging deficiencies identified during verification.
- **MM AG-3a:** Sixty days prior to the start of project construction, SCE shall coordinate with property owners of Important Farmland (Prime Farmland, Farmland of Statewide Importance, Unique Farmland) that currently is being used for agricultural purposes and that will be used for construction and operation of the project, access and spur roads, staging areas, and other project-related activities. SCE shall provide signed agreements to the CPUC for review and approval prior to the start of construction.
- **MMs VEG-1a, WIL-1a, WIL-2i, WIL-1j, and PAL-1d:** Resumes of all biological and paleontological monitors, including specialty monitors (including but not limited to bat, nesting bird, and special-status species monitors), shall be provided for concurrence by the CPUC and BLM, at least 10 working days prior to the monitor commencing field duties. The resumes shall demonstrate, to the satisfaction of the CPUC and BLM, the appropriate education and experience to accomplish the assigned biological and paleontological resources tasks.
- **MM VEG-1c:** Prior to beginning any ground-disturbing activities, SCE shall provide CPUC and BLM with final engineering GIS shapefiles depicting all temporary and permanent disturbance areas, as well as summary data on temporary and permanent disturbance for each vegetation or habitat type within each jurisdictional area (San Bernardino County, WR-MSHCP, CV-MSHCP, reservation, and BLM).
- **MM VEG-2a:** No preconstruction activities (e.g., for geotechnical borings, hazardous waste evaluations, etc.), construction, equipment or crew mobilization, or project-related ground-disturbing activity shall proceed until the IWMP is approved.
- **MM VEG-3a:** SCE shall not proceed with any alteration or fill activities in potentially jurisdictional waters until obtaining applicable permits or authorizations, or written agency confirmation that no permit or authorization is required.
- **MM VEG-3a:** SCE shall prepare an HMMP [Habitat Mitigation and Monitoring Plan] consistent with the requirements of MM VEG-3a which will include restoration or compensation mitigation to assure no net loss of wetland acreage or wetland habitat value from direct or indirect project impacts, including reduction of wetland acreage, and downstream or upstream effects to channels or their associated habitat.
- **MM VEG-5a:** SCE shall obtain permits from local jurisdictions for tree removal and other plant removal or harvest, in accordance with each applicable ordinance or policy, prior to removal or other impacts to regulated trees or other plants.
- **MM WIL-2j:** Prior to initiating construction-related activities, SCE shall prepare and implement construction minimization measures and habitat conservation measures for review and approval by CPUC and BLM in consultation with USFWS and CDFW to minimize habitat loss and potential take.
- **MM G-1a, G-2a, G-5a:** No subsurface construction (except for the removal of existing poles) can occur until the required geotechnical studies/surveys have been approved by the CPUC.
- **MM HH-1a:** No activities described in this Notice to Proceed are authorized until the Hazardous Materials, Waste Management, and Soil Management Plan has been finalized. Additional information required includes: (1) written procedures for fueling and maintenance of construction equipment added to this plan as an Appendix; (2) an Emergency Response Plan (which must include specific

methods and materials used to minimize and respond to frac-outs caused by horizontal directional drilling operations) added to this plan as an Appendix; and (3) soil samples to be collected in construction areas where the land has historically or is currently being used for agriculture and would be subject to ground disturbance by the project. The sampling is to identify the possible presence of and to delineate the extent of pesticide and/or herbicide contamination. Results of the soil sampling will be included in this Plan as an Appendix. As required by the Plan, all spill of hazardous materials greater than 1-gallon (or a spill of any size that entered any waterway or environmentally sensitive area) will be immediately reported by phone to the CPUC EM and will be followed by a written final spill incident report.

- **MM LU-1a: Public Notice Mailer.** No less than 15 days prior to construction that would affect property access, a public notice mailer shall be distributed. The notice shall identify construction activities that would restrict, block, or require a detour to access existing residential properties, retail and commercial businesses, wilderness and recreation facilities, and public facilities (e.g., schools and memorial parks). Documentation of compliance with this measure shall be provided to the CPUC. If construction delays of more than seven days occur, SCE shall notify residents or property owners of the delay and provide an estimated of when construction would occur.
- **MM LU-1a: Newspaper Advertisements.** Fifteen days prior to construction within a route segment, a newspaper advertisement shall be placed in local newspapers and bulletins of general circulation in the area. The advertisement shall state when and where construction will occur and provide information on the public liaison person and hotline identified below. If construction is delayed as noted above, an additional round of newspaper ads shall be placed to discuss the status and schedule of construction. Documentation of compliance with this measure shall be provided to the CPUC.
- **MM LU-1a: Public Venue Notices.** Thirty days prior to construction, notice of construction shall be posted at public venues such as trail crossings, rest stops, desert centers, resource management offices (e.g., Bureau of Land Management field offices, San Bernardino National Forest Ranger Station), and other public venues to inform residents and visitors of the purpose and schedule of construction activities. For public trail closures, SCE shall post information regarding the closure and any related trail detour at applicable resource management offices and post the notice within 2 miles north and south of any such point of trail closure and detour. For recreation facilities, the notice shall be posted along the access routes to known recreational destinations that would be restricted, blocked, or detoured and shall provide information on alternative recreation areas that may be used during the closure of these facilities. Documentation of compliance with this measure shall be provided to the CPUC.
- **MM LU-1a: Public Liaison Person and Toll-Free Information Hotline.** SCE shall identify and provide a public liaison person before and during construction to respond to concerns of neighboring property owners about noise, dust, and other construction disturbance. Procedures for reaching the public liaison officer via telephone or in person shall be included in notices distributed to the public. SCE shall also establish a toll-free telephone number for receiving questions or complaints during construction and shall develop procedures for responding to callers. Documentation of compliance with this measure shall be provided to the CPUC.
- **MM N-1b, T-7a:** In the event that helicopter use is planned for subtransmission, distribution, or telecommunication improvement activities, SCE will submit a Helicopter Use Plan at least 60 days prior to helicopter activities.
- **MM R-1a:** No less than 30 days prior to construction that would affect recreation areas, SCE shall coordinate construction activities and the project construction schedule with a representative of the recreation areas listed in MM R-1a that are affected by construction.

- **MM R-1b:** SCE shall coordinate with the local parks and recreation departments regarding construction activities at the park and recreation facilities listed in MM R-1a, in order to identify alternative recreation sites that may be used by the public. SCE shall post a public notice at recreation facilities to be closed or have limited access during construction consistent with MM LU-1a (Prepare Construction Notification Plan) as allowed by the facility representative and identify any alternative recreation sites. SCE shall document its coordination with the parks and recreation departments, and shall submit this documentation to the CPUC and the BLM 30 days prior to initiating project construction.
- **MM T-1a:** SCE shall provide a letter or email to the CPUC confirming that MM T-1a has been executed and shall provide a copy of the Final Construction Transportation Plan at least 15 days prior to construction.
- **MM T-1b:** Prior to the start of construction and as part of the required traffic encroachment permits, SCE shall submit Traffic Control Plans (TCPs) to agencies with jurisdiction over the public roads that would be affected by overhead or under-ground construction. Copies of the TCPs shall be provided to the CPUC, Caltrans, the planning or traffic departments of the affected local jurisdictions, and all affected police departments, fire departments, and ambulance and paramedic services. Documentation of coordination with service providers shall be provided to the CPUC at least 30 days prior to the start of construction.
- **MM T-1d:** SCE shall coordinate with local and regional agencies or organizations providing regular bus or transit service in the project area at least 30 days prior to construction to reduce potential interruption of these services. At least 15 days prior to construction, SCE shall provide a letter or email to CPUC and BLM confirming that the mitigation measure has been executed.
- **MM T-3a:** Prior to final project design SCE shall review project plans with Caltrans and local traffic departments or public works departments of the counties and the individual cities through which the proposed transmission route. At least 15 days prior to construction, SCE shall provide a letter or email to CPUC and BLM confirming that the mitigation measure has been executed.
- **MM T-4a:** Prior to construction, SCE shall confer with agencies having jurisdiction over the roads anticipated to be used by delivery vehicles and equipment. Unless an alternative method for determining roadway condition is required by a given jurisdiction, at least 30 days prior to construction, SCE shall photograph or video record all construction route public roads within 500 feet in each direction of project access points (i.e., locations where vehicles leave public roads to reach project sites) and roadways where the road surface will be damaged by project-related trenching or digging, and shall provide the respective local jurisdictions, CPUC, BLM, and Caltrans (if applicable) with a copy of these images. At least 15 days prior to construction, SCE shall provide a letter or email to CPUC confirming that the mitigation measure has been executed.
- **MM T-6a:** As required in Mitigation Measure LU-1a, prior to construction activity on major roadways, using media such as local newspapers and onsite postings, SCE shall notify the public of the potential for public parking spaces to be temporarily eliminated and identify where temporary parking spaces would be located. This requirement shall apply when more than five parking spaces are affected. Documentation of compliance with this measure shall be provided to the CPUC.
- **MM T-8a:** SCE shall submit required forms and information to the FAA for its review and approval of transmission structures and conductor spans that may require installation of safety devices or other restrictions. Copies of FAA's review and approval shall be provided to CPUC and BLM at least 60 days prior to erection of structures or installation of conductors that would be in violation of FAA standards and requirements. These structures and spans shall be identified to CPUC and BLM, and the planned installation of required lighting and marker balls described.

- **MM UPS-1a:** The Applicant shall provide a letter describing the availability of non-potable water and efforts made to obtain it for use during construction to the CPUC and BLM a minimum of 60 days prior to the start of construction.
- **MM UPS-2a:** Prior to commencing construction, SCE shall perform engineering studies to determine whether and what cathodic protection would be required on pipelines potentially affected. SCE shall submit to the CPUC written documentation of coordination efforts, protective measures, emergency contacts, and compliance with local requirements.
- **MM WR-2a:** SCE shall submit to the CPUC and BLM Grading Plans that define the locations of the specific features listed in the Erosion Control Plan. SCE shall submit to the CPUC and BLM evidence of possession of applicable required permits for the representative land disturbance prior to engaging in soil-disturbing construction/demolition activities constructing. Such permits may include, but are not limited to: a CWA Section 402 NPDES California General Permit for Storm Water Discharges Associated with Construction Activities (General Permit) from the applicable Regional Water Quality Control Board(s) (RWQCBs), and the Federal General Permit for Storm Water Discharges Associated with Construction Activities on Tribal Land.
- **MM WR-3a:** SCE shall provide the determination of lateral erosion and scour potential, and documentation of corrective actions and the engineering basis thereof, to the CPUC and BLM prior to the start of construction.
- **MMs VEG-4a, WIL-1a, WIL-1c, WIL-2a, WIL-2e, WIL-2f, WIL-2g, WIL-2h, WIL-2i, WIL-2j, and WIL-2k:** Pre-construction surveys consistent with these Mitigation Measures shall be conducted and survey results will be submitted to the CPUC and BLM for review and approval. No work shall occur until the CPUC EM has validated the survey results and any applicable resource and work area boundary staking. The preconstruction survey report format and contents shall be subject to CPUC and BLM review and approval.
- **MMCRP:** SCE will prepare and distribute a weekly environmental compliance status report for distribution to the CPUC consistent with project permits, mitigation measures, and the Mitigation Monitoring, Compliance and Reporting Plan (MMCRP). Prior to the start of monitoring activities, SCE shall provide a proposed format describing content and organization of Weekly Compliance Reports for CPUC and BLM review and approval.
- **MMCRP:** 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 in technique and mitigation implementation to a lesser level are required, a Temporary Extra Work Space (TEWS) or Minor Project Refinement (MPR) request shall be submitted for CPUC review (MMCRP Section 4.6). In addition, all water sources and disposal sites not previously identified shall require a TEWS or an MPR.

Sincerely,

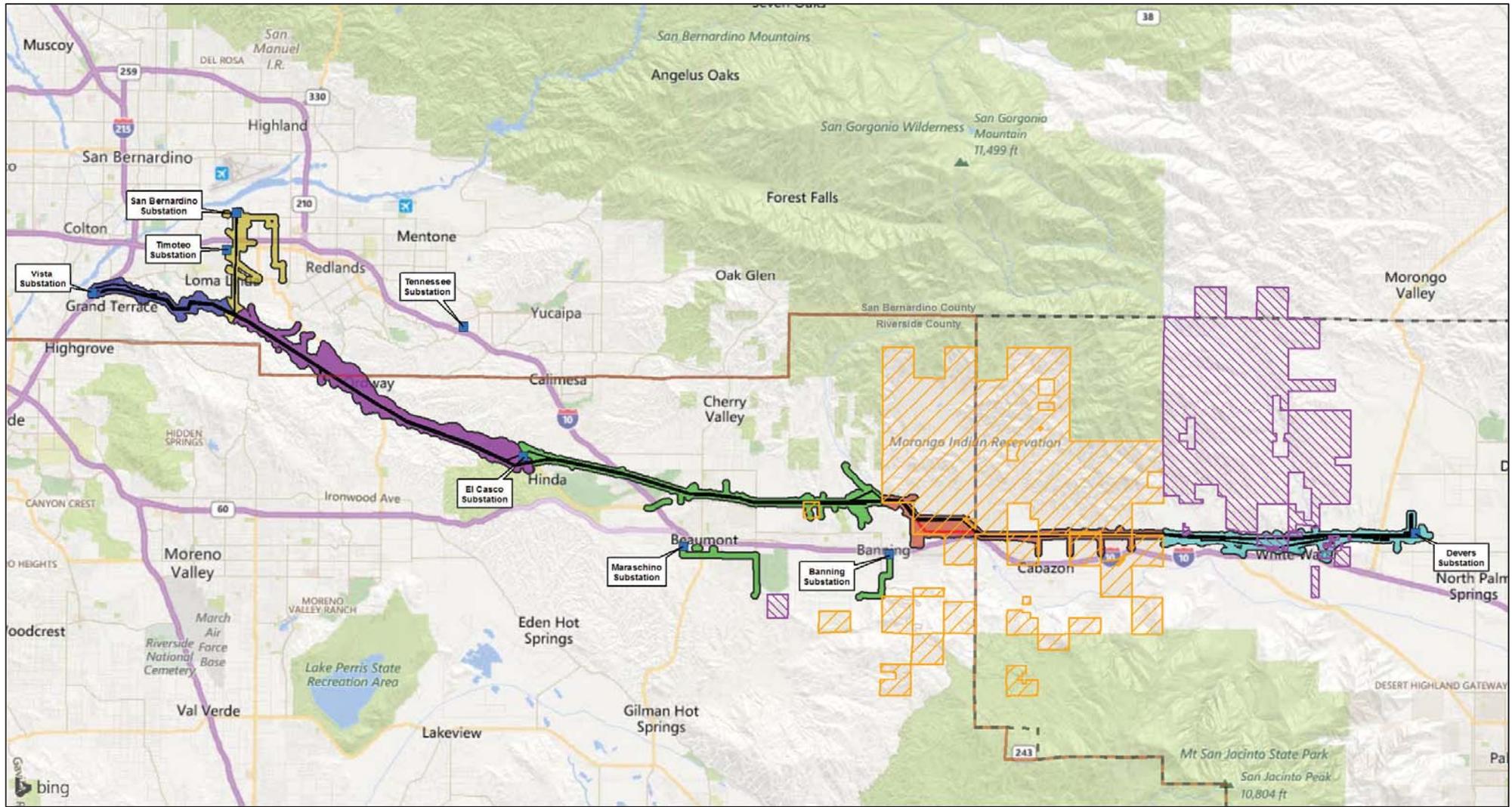


Billie Blanchard  
CPUC Environmental Project Manager

cc: v. Strong, Aspen

**ATTACHMENT A**

**DISTRIBUTION, SUBTRANSMISSION & TELECOMMUNICATION  
OVERVIEW MAPS**



**LEGEND**

- Project Study Area
- Existing Transmission Line Right of Way
- Proposed Right of Way
- Substation
- Segment 1
- Segment 2
- Segment 3
- Segment 4
- Segment 5
- Segment 6
- U.S. Bureau of Land Management
- Morongo Reservation
- Western Riverside County MSHCP
- Coachella Valley MSHCP

Source: SCE, Bing Maps

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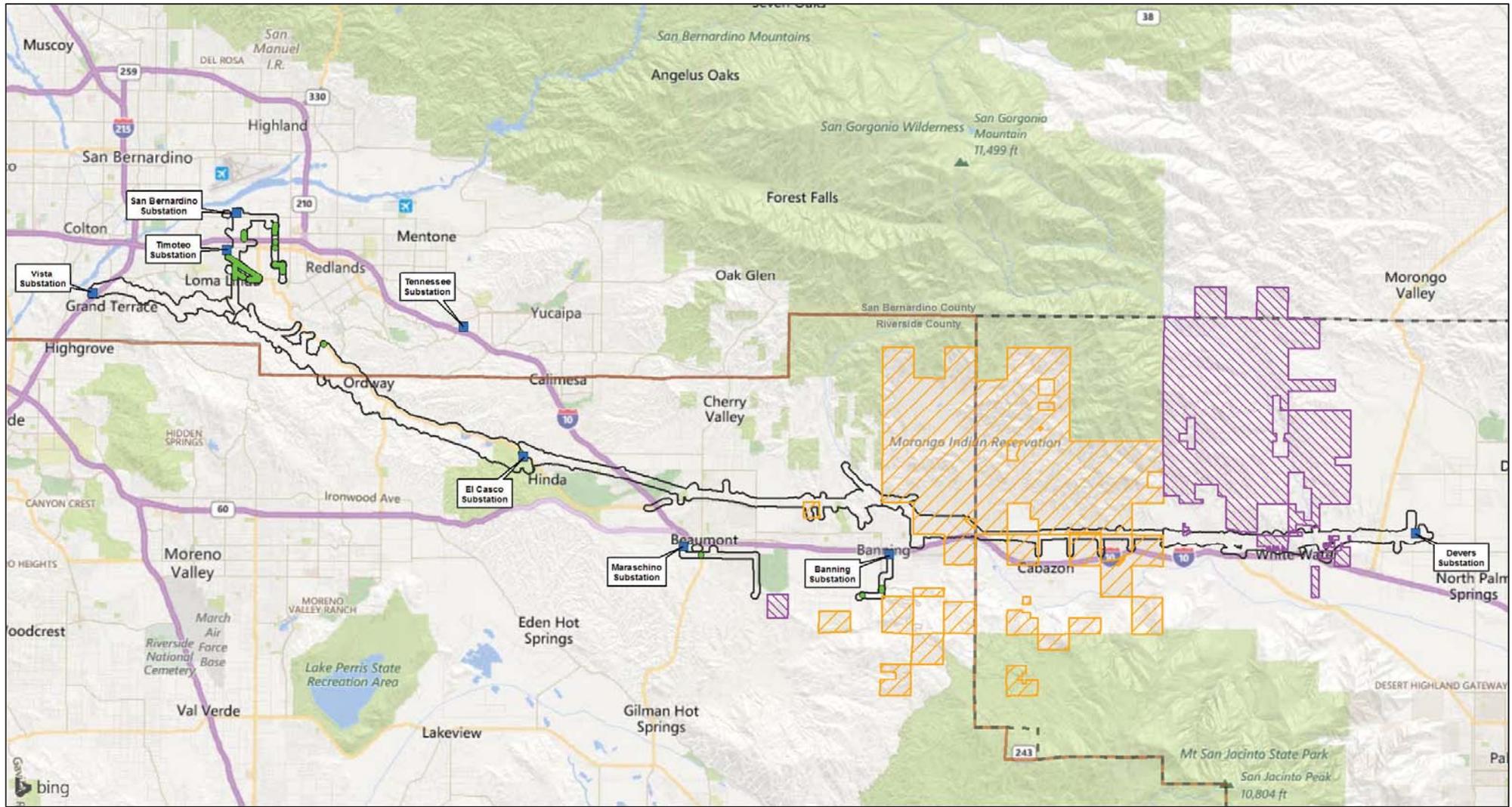


FIGURE 1a

**DRAFT**

Southern California Edison  
West of Devers Upgrade Project  
**Project Overview and Study Area**  
NTPR Distribution, Subtransmission & Telecom





**LEGEND**

- Project Study Area
- Distribution
- Substation
- U.S. Bureau of Land Management
- Morongo Reservation
- Western Riverside County MSHCP
- Coachella Valley MSHCP



Source: SCE, Bing Maps

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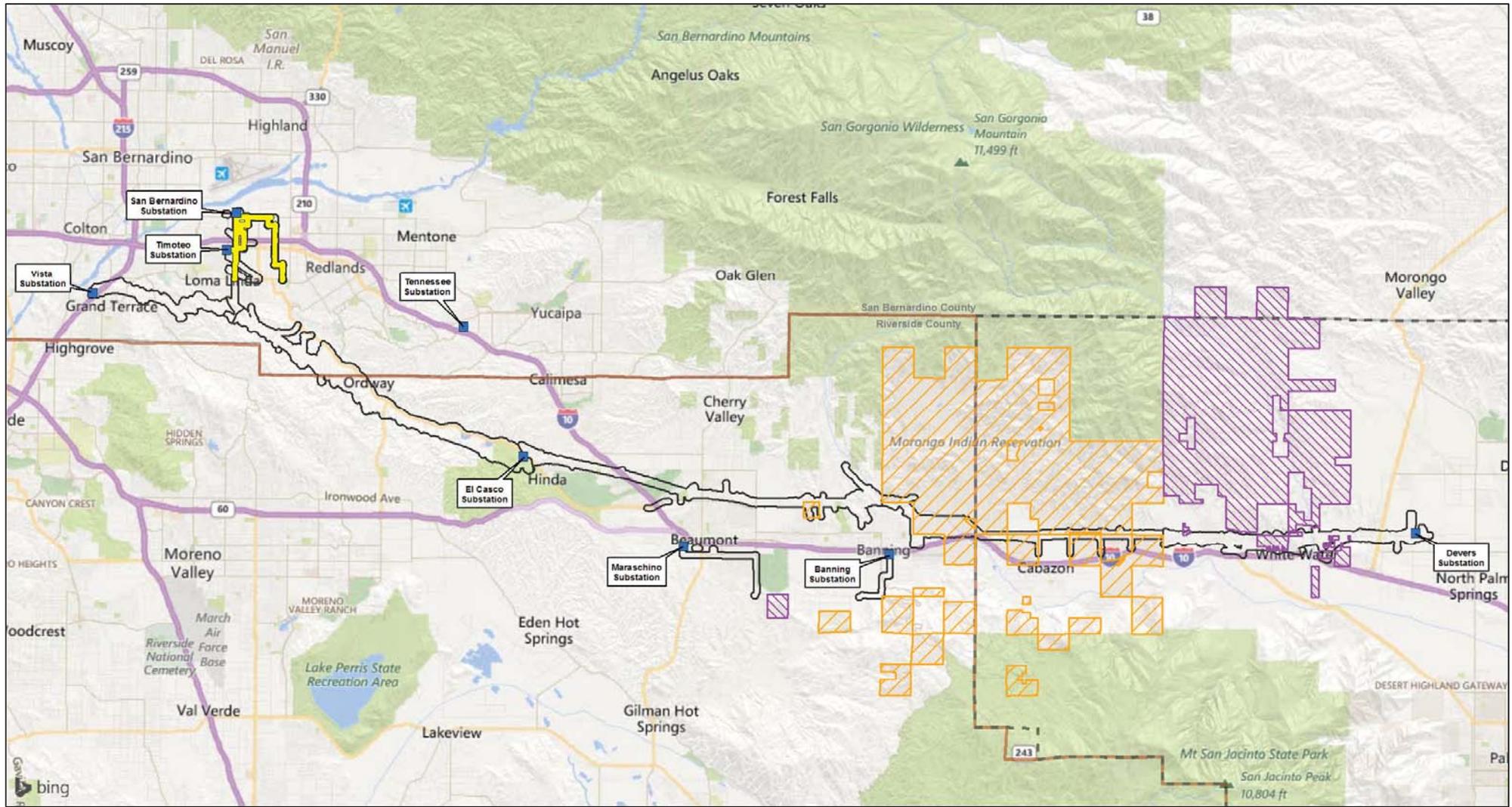
FIGURE 1b

**DRAFT**

Southern California Edison  
West of Devers Upgrade Project  
Distribution Project Element

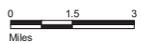
NTPR Distribution, Subtransmission & Telecom





**LEGEND**

- Project Study Area
- Subtransmission
- Substation
- U.S. Bureau of Land Management
- Morongo Reservation
- Western Riverside County MSHCP
- Coachella Valley MSHCP



Source: SCE, Bing Maps

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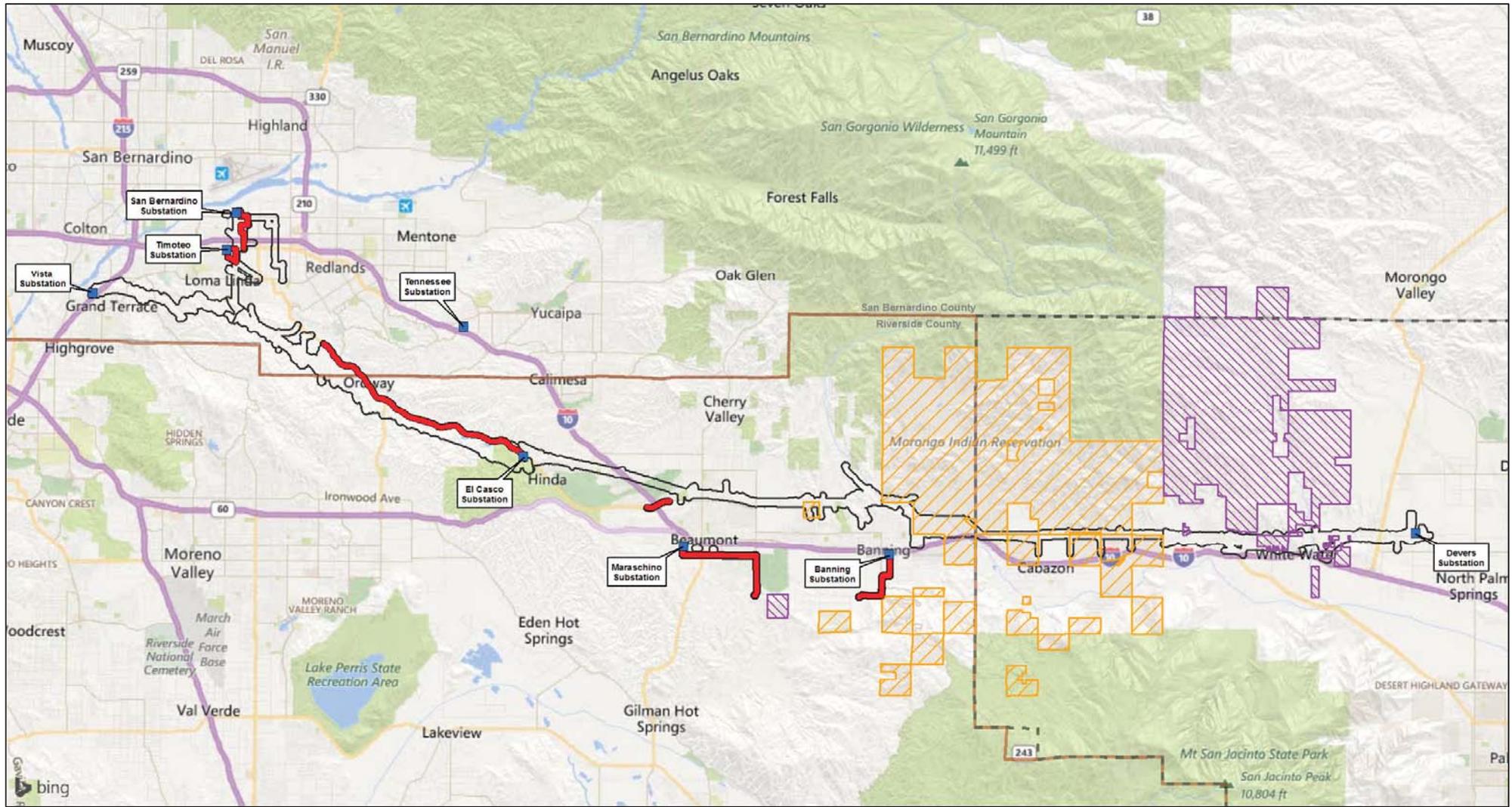


FIGURE 1c

**DRAFT**

Southern California Edison  
West of Devers Upgrade Project  
**Subtransmission Project Element**  
NTPR Distribution, Subtransmission & Telecom





**LEGEND**

- Project Study Area
- Telecom
- Substation
- U.S. Bureau of Land Management
- Morongo Reservation
- Western Riverside County MSHCP
- Coachella Valley MSHCP



Source: SCE, Bing Maps

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FIGURE 1d

**DRAFT**

Southern California Edison  
West of Devers Upgrade Project  
**Telecom Project Element**

NTPR Distribution, Subtransmission & Telecom

