STATE OF CALIFORNIA ARNOLD SCHWARZENEGGER, Governor
PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

April 27, 2009

Donald Johnson
Project Manager
Southern California Edison
2131 Walnut Grove Ave.
Rosemead, C 911770

RE: SCE Antelope Transmission Project (Antelope-Vincent 500 kV Transmission Line) Wilderness Line Limited - Segment 3B Notice to Proceed (NTP # 21)

Dear Mr. Johnson,

Southern Californian Edison (SCE) has requested authorization from the California Public Utilities Commission (CPUC) for a Limited Notice to Proceed for the modification of the Wilderness Line, an existing 220 kV transmission line that crosses between Construction Towers 61 and 62 of Segment 3B of the Antelope Transmission Project (Antelope-Vincent 500 kV Transmission Line).

The SCE Antelope 500 kV Transmission Project (Project) was evaluated in accordance with the California Environmental Quality Act and a Certification of Public Convenience and Necessity (CPCN) was granted by CPUC Docket #A.04-12-008, SCH #2006041160 on March 15, 2007. **NTP # 21 is granted by CPUC for the proposed activities based on the following factors:**

- SCE submitted the following information in their NTP request:

Project Description
Segment 3 of the Project is comprised of a southern segment (3A) and a northern segment (3B). Segment 3B involves the construction of a new 9.6 mile 220 kV transmission line connecting the proposed Windhub Substation to a new proposed Highwind Substation south of Tehachapi Boulevard in the Tehachapi area of Kern County. This LNTP request is for the modification of the Wilderness Line that crosses the Construct 3B-61 to Construct 3B-62 span of Segment 3B.

The following is a description of the new 220kV transmission line route, approaching Construction Towers 61 and 62 from Highwind Substation. This description was derived from the Antelope Transmission Project Final Environmental Impact Report (FEIR, Aspen 2006): "Just before Mile S3-7.9, the new 220-kV transmission line would turn east, cross over Oak Creek Road and the existing 66-kV transmission corridor, and continue along the south side of Oak Creek Road paralleling the existing private Sagebrush-Skyriver 220-kV [Wilderness] transmission line."

The LNTP request is for lowering the existing Wilderness Transmission line. This modification must be performed in order for Segment 3B to cross the Wilderness Transmission line in the Construct 3B-61 to Construct 3B-62 span. Without lowering the line, structures in excess of 200 feet would be required and it is possible that a steel pole dead-end h-frame could not technically be designed to handle the ice loading criteria in this region. Additionally, this would have negative visual impacts at this location and would force adjacent structures to increase in height and the structures would have to be lighted to meet Federal Aviation Administration requirements.

The Wilderness Transmission Line is also a wind generation line and scheduling an outage is difficult due to technical constraints during high wind times. Due to uncertainties with the outage schedule, the decision was made to utilize specialized construction crews that can perform these modifications while the Wilderness Transmission Line is energized. These crews have been mobilized to perform similar work at approved Sagebrush Transmission Line modification locations on TRTP Segment 2. It is therefore desired to utilize the crews and perform the Wilderness modification at this time due to the high cost of re-mobilizing these specialized crews and equipment at a later date.

The Wilderness transmission line modification will consist of removing an existing single steel pole (No. 8) and installing a new 118-foot 2-steel pole H-frame and a single 110-foot steel pole structure (No. 8A) east of the H-frame structure. There is no road preparation necessary for the Wilderness modification. The site is located just north of Oak Creek Road and will utilize existing transmission line access roads.

Construction Methodology
The Wilderness line modification will include four sequential phases: site preparation, foundation installation and removal, structure installation (includes assembly and erection), and conductor and overhead ground wire work.

Site Preparation
A work area with an approximate 90-foot radius circle will be prepared at each construction structure site to provide a fairly level and safe working platform. Each structure location will also have an associated crane pad approximately 160 feet by 200 feet. Where necessary, structure sites, or an associated crane pad, would be graded or cleared of vegetation to provide a construction pad that is free of vegetation or any obstacles hindering structure construction. Preparation of the Structure Construction Sites will provide a stable area of sufficient size to assemble structure components and to properly set up the erection crane so that the crane boom can be located transverse to the structure to the greatest distance possible.

Foundation Installation and Removal
Once a Structure Construction Site has been prepared, the foundations will be installed using standard "poured-in-place" augured excavation techniques. Typically, installation of the foundation requires: final surveying to establish elevations and orientation, fabrication and installation of rebar cages, installation of anchor bolt cages, concrete pouring, and structure site recontouring. Spoils resulting from augured excavations for tubular steel poles (TSP) structures will be spread within an area 25 feet outside the foundation footprint. Spoils resulting from augured excavations for TSP structures located in agricultural land will be hauled off site to approved locations.

Foundations for TSP structures will be of a single shaft drilled pier concrete foundation design. Single shaft foundations for the 2 pole H-frame TSPs will be approximately 7 feet in diameter and 35 feet in depth. For the single shaft steel pole the foundation will be approximately 5 feet in diameter and 16 feet in depth. A drilled shaft of this size generates more spoils than can be effectively used to recontour the site upon completion of the foundation. Excess spoils will be hauled to an approved disposal site to be recycled as clean fill on other projects in accordance with the stipulations of both the Vegetation Removal and Excavation Plan and Disposal and Waste Characterization Plan approved for the Project.

Installation of the concrete TSP foundations at this site requires the use of heavy construction equipment, including: auger units, rough terrain cranes, rock drills, air compressors, crawler excavator, front-end loaders, dump trucks, water trucks, concrete trucks, boom trucks, flatbed trucks, crew hauling trucks, and tractor trailers.

Structure Installation
Once the foundations have been cured and deemed ready for structure installation, several truck tractor/trailer units, flatbed trucks and on-site loaders/forklifts, will haul and unload pole components at each pole location. An assembly crew will assemble the pole components ahead of a pole erection crew that will erect the assembled structures.

Tower/Pole Assembly
The pole components will be assembled on-site. Assembly crews will use various pieces of heavy equipment to complete their portion of the work. Assembled components will be placed on wood blocking for the erection crew to facilitate the lifting capacity of the erection cranes. Equipment required for tower/pole assembly includes: material hauling trucks, crew hauling trucks, air compressors, rough terrain hydraulic crane – 30 - 40-ton capacity, crawler tractor with dozer, boom trucks, water truck, and fire fighting tool box.

Tower/Pole Erection
The poles will be erected in stages using conventional and rough terrain hydraulic cranes with the lifting capacity for the components being erected, such as pole sections and arms. During the erection operations, the erection crew may opt to install insulators and wire rollers. Upon completion of pole erection, the construction pad will be left in place for use by the structure modification crew for the purpose of setting up wire handling and high-reach man lift equipment. Equipment required for pole erection includes: material hauling trucks, 4x4 forklift, boom truck(s), flatbed rigging truck, crew hauling

truck, water truck, air compressors, fire fighting tool box, truck tractor/trailer pole hauling units, and 250-ton hydraulic erection crane with 230-foot boom.

Wire Stringing

Wire pulling sites will not be needed to accomplish the structure modification work. Established predetermined disturbance locations for wire stringing will not be needed at this time. Conductor and overhead ground wire work associated with this structure modification operation consist of the following activities: install insulator assemble on the poles, hang stringing sheaves, haul and set up wire handling equipment (movement of wire handling equipment in many cases will require transporting heavy equipment on lowboy trailers to and from the site using public roads), transfer and dead-end overhead groundwire (OHGW), transfer conductor wire from existing structures to the new positions on the newly installed H-structure and single pole structure, sag conductors and OHGW, install conductor wire dead-end assemblies, remove wire stringing sheaves, dead-end wires (install compression dead-end assemblies), and install jumper wires on dead-end structures. The equipment required for the wire modification work at this site is as follows: rigging truck, crew hauling trucks, rough terrain cranes with attached energized conductor handling equipment, high-reach man lift boom trucks, flat-bed boom trucks, water truck, fire fighting tool box, and 6X6 wire splicing truck.

- **CULTURAL RESOURCES.** A report titled "Supplemental Archaeological and Paleontological Resources Assessment, Segment 3B, TRTP, Variance for the Modification of Wilderness Transmission Line at Wilderness Structure 8A, Kern County, CA" by Cogstone Resource Management Inc., dated April 2009 was submitted to the CPUC. A search for archeological and historic records for this area was previously conducted (Ahmet et al. 2006). The Southern San Joaquin Valley Information Center, the National Register of Historic Places, the California Inventory of Historic Resources, California Points of Historical Interest and the California Historical Landmarks and the California Native American Heritage Commission were consulted. The proposed project area falls within the one-mile search radius of the previous record search. The area was surveyed as part of the same study (Ahmet 2006) and one isolate consisting of a prehistoric mano was discovered (AP3-1011-I); no primary or trinomial has yet been assigned. In addition, a previously recorded prehistoric archaeological site consisting of a cooking feature was noted to have been destroyed by the installation of the All American Pipeline. The only resource known is Oak Creek Road itself (CA-KER-3537). No paleontological localities are known. The sediments consist of recent Quaternary alluvium and Quaternary older alluvium; the former has little sensitivity for paleontological resources but the latter may be highly sensitive for paleontological resources.

  Cogstone Resource Management conducted the survey of the proposed project area on April 3, 2009. The survey consisted of a one person crew walking the project area while closely inspecting the ground surface. Transects were walked at 5 meter intervals. Survey location data was recorded using a Garmin Etrex handheld GPS. The survey area around Wilderness Structure 8A is approximately 400 feet by 600 feet. The elevation ranges from about 3,691 to 3,697 feet. The guard pole survey area is southeast of Wilderness Structure 8A and is approximately 75 feet by 200 feet. The elevation ranges from about 3,656 to 3,690 feet. Historic objects were noted in both areas, including glass fragments and cans, and the sites were recorded. The boundaries for the second site, recorded south of Oak Creek Road, fall outside the boundaries of either survey area. However, the survey areas were not staked off, so the site was recorded in case a portion of it did fall within the boundaries. No paleontological resources were observed and nothing was collected. By implementing avoidance measures in the form of monitoring and flagging of the resource boundaries, it is anticipated that both archaeological resources will be avoided and will not be impacted during construction activities. An archaeological monitor will be present during ground disturbing activities. In addition, work at the Wilderness crossing modification will require paleontological monitoring during earthmoving activities in the presence of older alluvial soils that may contain fossils. With the implementation of the conditions noted below, no significant impacts to cultural or paleontological resources are anticipated.

- **BIOLOGICAL RESOURCES.** SCE submitted a report by LSA dated April 8, 2009 and titled "Preconstruction Biological Survey for the 220 kV Wilderness Transmission Line Modification to Support the Antelope Transmission Project, Segment 3B in Kern County, CA". Biological surveys were conducted of the 220 kV Wilderness Transmission Line Modification area for Towers 8 and 8A on April 1, 2009 and surveyed during the 2008 preconstruction surveys (April, May, and June of 2008) (LSA 2008a). The survey area included Towers 8 and 8A, their crane pads, nearby guard poles, and all areas within the right-of-way subject to disturbance for the 200 kV Line (i.e., access roads, turn around areas). The survey focused on potentially occurring biological resources, as described in the mitigation measures of the Final EIR (Aspen 2006). Any special-status or focus biological resources were noted. All LSA personnel walked slowly through all habitat types looking for special-status plants, reptiles, bird nests, raptors, burrowing owl, bat habitat, and American badgers. The nesting bird survey (MM B-17) requires a 500 foot buffer survey to document breeding birds. A clearance survey will take place within 7 days prior to any construction activities. No special-status plant and special-status animal species were found during the preconstruction survey conducted April 1, 2009. Two California Species of Concern (CSC) were observed and included a loggerhead shrike and a dead yellow-headed blackbird. Joshua tree and juniper woodland is present within and outside the disturbance areas. At least six California juniper trees and approximately 104 Joshua trees of varying sizes were observed within the disturbance areas of the crane pads and tower locations, with additional Joshua trees in the guard pole areas. Joshua tree woodland occurs along the north and south sides of Oak Creek Road.

  In 2008, an active American badger burrow was found adjacent to the access road approximately 75 feet west of Construction Tower 3B-16, and one badger in a burrow was seen 190 feet west of Construction Tower 3B-67, just south of Oak Creek Road. Construction Towers 61 and 62 are located over 1,600 feet west of the badger burrow near Construction Tower 67 and will be avoided during the Wilderness Line modifications. The subject Wilderness Line work area is located within both burrowing owl and desert tortoise habitat.

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

- All project mitigation measures, compliance plans, and permit conditions shall be implemented during construction activities. Some measures are on-going/time-sensitive requirements and shall be implemented prior to and during construction where applicable.

- Per Mitigation Measure V-15, SCE shall submit all permits and approvals from Kern County and other affected local agencies. Copies of all relevant permits, compliance plans, and this Notice to Proceed shall be available on site for the duration of construction activities.

- All work boundaries shall be flagged prior to occupation. In addition, all approved access roads, spur roads and overland travel routes to be used shall be flagged prior to construction.

- All sensitive resources buffers shall be flagged for avoidance by a qualified biologist and approved by the CPUC EM prior to construction.

- All culturally sensitive areas shall be flagged for avoidance by a qualified archaeologist and approved by the CPUC EM prior to construction.

- Construction of new access and spur roads shall be done in accordance with approved project mitigation measures.

- Several sensitive resources were identified during the preconstruction surveys and noted in LSA's biological report dated April 8, 2009. Prior to work in the vicinity of those areas, CDFG must be consulted on how the resource protection is to be handled. This information shall be submitted to the CPUC prior to work in the area.

- As identified in the Biology Mitigation Measures and Applicant Proposed Measures (APMs) in the EIR/EIS, SCE would assign Biological Monitors to the Project. They would be responsible for ensuring that impacts to special-status species, native vegetation, wildlife habitat, or unique resources would be minimized to the fullest extent possible. The Biological Monitor shall be on-site to monitor all work and will conduct sweeps of the approved areas, especially areas with high burrow concentrations which will be impacted. Monitors would flag the boundaries of areas where activities need to be restricted in order to protect wildlife including special-status species. These restricted areas would be monitored to ensure their protection during construction. This will include protecting species covered under the Migratory Bird Treaty Act (MBTA) and CDFG codes regarding the protection of nests and eggs. If breeding birds with active nests are found, a biological monitor shall establish a 300-foot buffer around the nest and no activities will be allowed within the buffer until the young have fledged from the nest or the nest fails. The 300-foot buffer may be adjusted to reflect existing conditions including ambient noise and disturbance with the approval of the CDFG and USFWS (as well as CPUC notification). The biological monitor shall conduct regular monitoring of the nest to determine success/failure and to ensure that project activities are not conducted within the buffer until the nesting cycle is complete or the nest fails.

- Biological survey sweeps shall be conducted and results submitted to the CPUC for review and approval prior to equipment and vehicles mobilizing into an area. After complete surveys have been submitted and approved by the CPUC, site occupation can occur; however, if occupation does not occur within seven calendar days of survey submittals, biological clearance sweeps shall be re-conducted prior to site occupation, including nesting bird surveys during the breeding season.

- Per Mitigation Measure B-4b, CDFG and CPUC shall field verify temporary and permanent impacts to Joshua tree woodland and Juniper woodland habitat. SCE shall coordinate with CDFG and CPUC to acquire and ensure permanent protection of mitigation lands.

- Per Mitigation Measure B-13d, CDFG and CPUC shall field verify temporary and permanent impacts to montane scrub and Juniper woodland habitat. SCE shall coordinate with CDFG and CPUC to acquire and ensure permanent protection of mitigation lands.

- A preconstruction survey for western burrowing owls, in conformance with CDFG protocol, shall be completed no more than 30 days prior to the start of construction within suitable habitat at the project site(s) and buffer zone(s). The survey results shall be submitted to CDFG and CPUC for review and approval prior to the start of construction within suitable burrowing owl habitat.

- Per Mitigation Measure B-26, occupied American badger dens shall be flagged for avoidance. Un-occupied dens located in the ROW shall be covered to prevent the animal from re-occupying the den prior to construction. Occupied dens in the ROW shall be hand-excavated if avoidance is not possible. Dens shall only be hand–excavated before or after the breeding season (February-May). Any relocation of badgers shall take place after consultation with the CDFG.

- Prior to construction in areas identified as desert tortoise habitat, focused pre-construction (protocol level as determined by USFWS and CDFG) surveys for desert tortoise shall be submitted to the USFWS, CDFG, and the CPUC for review and approval. USFWS and CDFG shall be consulted on

tortoise protection measures required during construction and documentation of the consultation shall be submitted to the CPUC prior to construction. Any sighting of desert tortoise, burrow, or sign during construction shall be immediately reported to USFWS, CDFG, and the CPUC.

- If special-status plant or animal species are observed within the project area, the CPUC EM and CDFG shall be notified immediately.

- Per Mitigation Measure A-1f, prior to its use on the project, SCE shall provide to the CPUC the following information for all diesel equipment used on the project: Tier rating, CARB registration, where applicable Smoke Check Test results, and in the case of Tier 1 engines, where the contractor plans to install VEDEC retrofit exhaust system, verification of installation shall be provided to the CPUC.

- The Cultural Resources Management Plan shall be followed by SCE and its contractors.

- Per Cogstone Resource Management Inc. recommendation, an archaeological monitor shall be present during ground disturbing activities around Wilderness Structure 8A, and the sites will be flagged for avoidance.

- Per Mitigation Measure G-8, a certified paleontological monitor will monitor compliance at construction areas where excavation is being conducted in geologic units of moderate to high sensitivity. Areas of low sensitivity will be spot-checked periodically. Paleontological monitoring reports will be submitted to the CPUC for review on a monthly basis.

- Per Mitigation Measure H-1d, construction activities, particularly roadway installations and improvements, must not occur when precipitation events are expected. As stated by SCE, parameters for road building activities may include, but are not limited to the following: 1) precipitation event expected in excess of 0.5-inch, 2) excessive rutting and/or soil mixing, 3) evidence of erosion and sediment runoff, 4) significant soil compaction, 5) significant soil adhesion to vehicles and construction equipment.

- Per Mitigation Measure H-4, if it is determined that known groundwater resources would be unavoidable during construction, SCE will submit a Groundwater Remediation Plan to the CPUC and RWQCB for review and approval prior to the onset of any construction activities. If unknown groundwater resources are encountered, SCE will stop the disruptive excavation activity and submit a site-specific remediation plan to the CPUC and RWQCB for review and approval. Water may not be discharged on site, but may be held in a Baker Tank until the Plan is approved.

- Table A: Drainage Assessment for Impact Areas and Access Roads (Existing Overland, New Permanent, Temporary, to Improved) from the SCE Segment 3B August 2008 submittal for Mitigation Measure APM BIO-3 (Avoid Impacts to Streambed and Banks) shall be followed. If project plans and/or access road plans change, or conditions at the stream crossings/drainages change, the CPUC and CDFG shall be consulted regarding those changes and avoidance of potential impacts.

- Prior to the commencement of construction activities, all crew personnel including haul truck and concrete truck drivers shall be appropriately WEAP trained on environmental issues including protocols for air quality, hazardous materials, biological resources, known and unanticipated cultural materials, as well as SWPPP BMPs. A log shall be maintained on-site with the names of all crew personnel trained.

- No movement or staging of construction vehicles or equipment shall be allowed outside of the approved areas. If additional temporary workspace areas or access routes, or changes to construction technique or mitigation implementation to a lesser level are required, a Variance Request shall be submitted for CPUC review and approval.

- All fueling for equipment and helicopters shall be conducted using saddle trucks at least 100 feet from aquatic resource areas. No fuel may be stored on Project sites.

- If construction debris or spills enter into environmentally sensitive areas, the jurisdictional agencies and CPUC EM shall be notified immediately.

- In the case of a hazardous materials spill, the CPUC EMs shall be immediately notified and an incident report shall be submitted to the CPUC within five (5) working days of the spill incident and shall include spill volumes and any resource damage that may have occurred.

Sincerely,

John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen