

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

January 5, 2010

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), Notice to Proceed (NTP) #27

Dear Mr. Johnson,

Southern Californian Edison (SCE) has requested authorization from the California Public Utilities Commission (CPUC) for construction of the new microwave telecommunication paths between the Oak Peak Communication Site, approximately 2.8 miles southeast of Monolith, the Windhub Substation, and the Antelope Substation, in Segment 3, unincorporated Kern County, California.

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 # 27 is granted by CPUC for the proposed activities based on the following factors:**

- SCE submitted the following information:

SCE requests a Notice to Proceed (NTP) for construction of the new microwave telecommunication paths between the Oak Peak Communication Site, located in unincorporated Kern County approximately 2.8 miles southeast of Monolith, the Windhub Substation, and the Antelope Substation. Two telecommunication paths are required for redundancy by the Western Electricity Coordinating Council (WECC) to ensure adequate protection along the entire length of the Segment 3 Antelope Transmission Line Project.

The construction of new microwave telecommunication paths will be the primary path for Segment 3 and will involve new microwave paths between the following facilities:

- Oak Peak Communication Site and Antelope Substation
- Oak Peak Communication Site and Winhub Substation
- Oak Peak Communication Site and the proposed Highwind Substation, located south of Tehachapi Boulevard in unincorporated Kern County

The Oak Peak Communication Site will require the installation of three new microwave radios in the existing communication room. New microwave antennas will be installed on a new 190-foot tall tower located immediately outside the communication room, adjacent to the existing 50-foot tall tower, which is not sufficient to support the additional antennas. With the antennas installed on the top of the new tower, the maximum tower height will be 205 feet. All of the antennas on the existing 50-foot tower will be moved to the new tower and the old tower will be removed. Additionally, a fence will be installed along the perimeter of the Oak Peak Communication site. No new roads will be required. The construction laydown of materials will utilize both the tower work area and associated crane pad area. The total disturbance area for the Oak Peak Communication

facility and tower work area will measure 90 feet by 90 feet (8100 square feet), with an additional 50 feet by 50 feet (2500 square feet) for the crane pad.

Installation of the new microwave path telecommunication towers and antennas will include the following construction activities: road preparation, site preparation, foundation installation, structure installation (includes assembly and erection), and antenna and radio transmission line installation.

Existing access roads to the Oak Peak Communication Site and substations will be used to the greatest extent feasible in constructing the new microwave paths. Existing access roads that are too narrow to accommodate equipment or require maintenance for constructability or safety reasons will be modified. This may involve something as simple as smoothing ruts to widening the road to 15 feet to accommodate large construction equipment.

A tower footprint area of approximately 37 feet by 37 feet will be graded and cleared to provide a fairly level and safe site for the new tower. Where necessary, additional disturbance area, and associated crane pad, will be graded or cleared of vegetation or any obstacles hindering structure construction. Preparation of the tower site 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 at the greatest distance possible.

Once a tower site has been prepared, the foundation(s) will be installed using standard "poured-in-place" augured excavation techniques. Typically, installation of the foundation requires: final surveying to establish elevations and orientation, installation of prefabricated rebar cages, installation of anchor bolt cages, concrete pouring, and structure site recontouring. Spoils resulting from augured excavation will be spread at the site within an area 15 feet outside of the foundation footprint or hauled off site to an approved location.

Each foundation is augured to the required depth and a full length reinforcing steel (rebar) cage is placed inside the excavated hole. The tower leg stub angle is set to its required dimensions and then held in place with a template while concrete is being poured. The final step is forming and finishing the reveal (exposed) portion of the foundation. The foundations will have a reveal ranging from six inches to 90 inches.

The tower will be constructed on four concrete foundations. The dimensions for each foundation will be six feet in diameter and have a depth of 36 feet.

Concrete piers will also be installed to support the feedline support system used to support radio transmission lines on the tower and from the tower to the nearby telecommunications building. These piers can be up to two feet square and have a depth of up to 30 inches.

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

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, unload and stack bundles of steel at each tower location and pole components at each pole location. An assembly crew will assemble the tower/pole components ahead of a tower/pole erection crew that will erect the assembled structures.

The tower components will be assembled on-site. Assembly crews will use various pieces of heavy equipment to complete their portion of the work, which may include setting tower legs. 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 w/dozer, boom trucks, water truck, and fire fighting tool box.

The towers will be erected in stages using conventional and rough terrain hydraulic cranes with the lifting capacity for the components being erected, such as preassembled tower panels, boxed sections, and bridges. Upon completion of tower/pole erection, the construction pad will be left in place for the purpose of setting up antenna installation, radio transmission line installation and high-reach man lift equipment. Equipment required for structure erection includes: crawler tractor w/dozer (Cat D8 Size), material hauling trucks, 250-ton hydraulic erection crane with 230-foot boom, 4x4 forklift, boom truck(s), flatbed rigging truck, crew hauling truck, water truck, air compressors, and fire fighting tool box.

Antennas will be attached to the tower using the appropriate mounting hardware. Radio transmission line will be used to connect the antennas to equipment inside the telecommunications building near the tower. Equipment required for antenna and radio transmission line installation includes: material hauling trucks, crane with 230-foot boom, forklift, boom truck(s), flatbed rigging truck, crew hauling truck, air compressors, and fire fighting tool box.

Construction of the microwave paths is anticipated to begin in January 2010 and continue through February 2010.

- **Biological Resources:** SCE submitted a report from Burns & McDonnell dated December 8, 2009 titled *Biological Survey for the newly proposed Oak Peak Microwave Tower for the Antelope Transmission Project, Segment 3 in Kern County, California*. The proposed site is located on the ridge of a steep hill and can be characterized as heavily cattle grazed *Poa secunda* Herbaceous Alliance mixed with non-native grasses (Sawyer, Keeler-Wolfe and Evens 2008). The current habitat is dominated by cheat grass (*Bromus tectorum*), red brome (*Bromus rubens*), redstem storks bill (*Erodium cicutarium*), rancher's fire weed (*Amsinckia menziesii*), and common sandaster (*Corethrogyne filaginifolia*). Rocky outcrops adjacent to the site support beavertail cactus (*Opuntia basilaris* ssp. *Basilaris*), Mexican elderberry (*Sambucus Mexicana*) and blazing star (*Mentzelia* sp.). Native annuals are abundant on the site and annual buckwheat (*Eriogonum* sp.), lupines (*Lupinus* sp.) and butterweed (*Senecio flaccidus*) are present.

The mapped disturbance area for the Oak Peak Microwave Tower with a 500-foot buffer was surveyed for biological resources. The site was not flagged in the field, so the biologist surveyed an approximate size and location. In addition, the presence of Joshua trees (*Yucca brevifolia*) and juniper trees (*Juniperus californica*) within the proposed site and the surrounding buffer was surveyed for as required by EIR mitigation.

No sensitive resources were found within the project area or the 500-foot buffer. No Joshua or juniper trees were located with the project area or the 500-foot buffer area. The closest known occurrence of a sensitive species was reported approximately 2.5 miles northwest of the proposed site through the CNDDDB database, Tehachapi pocket mouse (*Perognathus alticolus inexpectatus*). The species is found in native and non-native grasslands, Joshua tree woodlands, pinyon-juniper woodlands, yellow pine woodlands, and oak savannahs. The project area is located in a disturbed site with no potential burrows observed. The burrows identified outside of the disturbed area were determined to be primarily California ground squirrel and Botta's pocket gopher. There is moderate potential for CNPS List 2 golden violet (*Viola purpurea* ssp. *aurea*) to occur within the project area. While no suitable habitat occurs in the disturbance area, suitable habitat consisting of foothill slopes with grasslands does occur in the 500 foot buffer area. While this is a perennial species, it is difficult to identify outside of the flowering period. Populations of this species have been reported within a half mile west of the construct area in similar habitat. Common wildlife observed on the site or determined to be present from sign (scat, tracks, burrows) included coyote, Botta's pocket gopher,

California ground squirrel, and dusky-footed woodrat. Birds observed included common raven, white crowned sparrow and European starling. The total disturbance area for the Project is 10,600 square feet (0.24 acres), which includes 8,100 square feet (0.19 acres) for the Oak Peak Communication Facility/Tower site disturbance area and 2,500 square feet (0.06 acres) for the associated crane pad. Approximately 6,400 square feet (0.15 acres) will remain as a permanent impact for the Oak Peak Communication Facility; however, approximately 2500 square feet (0.06 acres) were previously impacted by the existing facility. With the implementation of the conditions below, biological resources impacts are not expected to occur during this phase of construction.

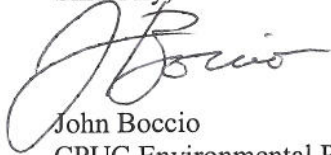
- **Cultural Resources:** SCE submitted a report from Pacific Legacy dated December 18, 2009 titled *Results of the Archaeological Survey for the Construction of a New Oak Peak Microwave Transmission Tower Project, Kern County, California*. Results of the records search indicate that there are no cultural resources previously recorded within the project area, and no cultural resources are listed in the National Register of Historic Places, California Points of Historical Interest, or the California State Historic Landmarks. An archaeological reconnaissance of the ground surface conducted December 15, 2009 by K. Ross Way yielded negative results for cultural resources. A paleontological resources investigation for the Oak Peak Communication Tower disturbance area was conducted by Cogstone Resources Management (Gust and Scott 2008). Results of the study indicate that the proposed disturbance area is located within quartz monazite (qm), sediment with a low paleontological sensitivity. As a result of the low paleontological sensitivity, no impacts to paleontological resources are anticipated. With the implementation of the conditions below, cultural resources impacts are not expected to occur during this phase of construction.
- As proposed, the new microwave tower with antenna would be 205 feet in height. The Oak Peak Communication Site is approximately 5 miles from Edwards Air Force Base and is located within the military flight test pathways. In accordance with the Kern County Zoning Ordinance, Title 19, Section 19.64, height restrictions within this portion of the military flight pathways are 400 feet. In addition, in February 2009 SCE notified the military of their plans to install the new microwave tower at the Oak Peak Communication Site. No response from the military was received.

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

- 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.
- Desert tortoise mitigation shall be implemented in accordance with approved CDFG and USFWS protocols for Segment 3A and Windhub Substation.
- If special-status plant or animal species are observed within the project area, the CPUC EM and CDFG shall be notified immediately.
- Unanticipated archaeological discoveries shall be treated in accordance with approved plans. If unanticipated archaeological discoveries occur, the CPUC EM shall be notified immediately.
- Work will generally be scheduled in daylight hours (6:30 a.m. to 5:00 p.m.), Monday through Friday. In the event that construction is required outside of the specified hours in order to meet schedule requirements, a variance shall be obtained from Kern County if necessary and provided to the CPUC.
- All project mitigation measures, compliance plans, and permit conditions shall be implemented during construction activities and use of the proposed yard spaces. Some measures are on-going/time-sensitive requirements and shall be implemented prior to and during construction where applicable. In addition, restoration of temporarily disturbed areas shall occur in accordance with project restoration plans.
- Copies of all relevant permits, compliance plans, and this Notice to Proceed shall be available on site for the duration of construction activities.
- 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.
- All work boundaries shall be flagged prior to occupation.
- 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 shall be conducted in approved refueling locations.
- 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,

A handwritten signature in black ink, appearing to read 'J. Boccio', written over the printed name.

John Boccio

CPUC Environmental Project Manager

cc: V. Strong, Aspen