

PUBLIC UTILITIES COMMISSION505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

March 2, 2010

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

RE: SCE Antelope-Pardee 500 kV Transmission Project, Segment 1 - Notice to Proceed (NTP #29)

Dear Mr. Johnson,

On February 10, 2010, Southern Californian Edison (SCE) requested authorization from the California Public Utilities Commission (CPUC) for the relocation of the Eastwind-Vincent-Westwind-Wilderness 220 kV overhead transmission line, commonly known as the Sagebrush 220 kV transmission line located at SCE's Antelope Substation in the City of Lancaster, California.

The SCE Antelope-Pardee 500 kV Transmission 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.04-12-007, SCH #2005061161 on March 1, 2007. The Forest Service is the federal Lead Agency for the preparation of the Project's EIR/EIS in compliance with NEPA. The proposed work and yard locations do not occur on Forest Service land thus no approval from the Forest Service is required. **NTP #29 is granted by CPUC for the proposed activities based on the following factors:**

- SCE submitted the following information:

SCE is requesting a Notice to Proceed (NTP) for the relocation of the Eastwind-Vincent-Westwind-Wilderness 220 kV overhead transmission line, commonly known as the Sagebrush 220 kV transmission line located at SCE's Antelope Substation in the City of Lancaster, California. This relocation is necessary due to the future expansion of the Antelope Substation within the existing SCE owned property boundary. The expansion of the Antelope Substation was included in the CPCN application for Segment 1 and the Final EIR/EIS (Aspen 2006). In addition to the relocation of the Sagebrush 220 kV transmission line, the expansion will include site preparation and grading and the relocation of the existing 66 kV transmission lines. Relocation of the 66 kV transmission lines and preparation and grading for the proposed substation expansion have already been addressed and approved under NTP #24 and NTP #26 respectively.

PROJECT OVERVIEW

Existing and proposed routes for the Sagebrush 220 kV transmission line are on SCE owned property, in an area of open fields with no existing city infrastructure or improvements. The existing Sagebrush transmission line is positioned along the east and southeast side of the existing substation and within the proposed disturbance area for the substation expansion. The existing line will be re-routed around the proposed expanded substation. The new proposed route for the transmission line will run along the south, east, and northern perimeter of the proposed expanded substation.

The relocation of the Sagebrush 220 kV transmission line will start approximately 1,700 feet south of the existing Antelope Substation at a tubular steel pole (TSP) to be installed on the existing right-of-way of the Sagebrush 220 kV transmission line and will continue to a new TSP located approximately 600 feet east of the existing substation.

CONSTRUCTION METHODOLOGY

The relocation of the Sagebrush 220 kV transmission lines will require the following:

- Overhead construction including the installation of approximately 15,000 feet of new 1590 kcmil ACSR conductors and approximately 5000 feet of overhead ground wire on approximately six tubular steel poles single-circuit construction.
- Line removal of the existing facilities which consist of approximately 7,000 feet of existing overhead 220 kV conductors, 2000 feet of overhead ground wire and five poles.

OVERHEAD CONSTRUCTION SPECIFICATIONS

Installation of Core Tin Steel Poles. The new pole line will be placed on unimproved land within the SCE property. Access to the new pole line will be from an access road adjacent to the line that was addressed under an EIR Addendum approved by the CPUC on January 11, 2010. The installation of poles will temporarily impact an area with a 50-foot radius around the center of the pole location. Poles will be delivered and placed next to the access road where they will be framed.

Installation of Tubular Steel Poles (TSP) and Footings. The footings may range in diameter from six (6) to ten (10) feet and will vary from 20 to 40 feet in depth depending on soil conditions. A steel cage with footing bolts will be inserted into the hole and then the hole will be filled with cement and left to cure. The TSP will be set on the footing when the cement has cured. Spoils from foundation excavation will be spread into the pad of the substation expansion area.

Conductor Installation. Disturbance during conductor installation will consist of wire stringing sites (WSS). The wire stringing site dimensions will be approximately 50 feet wide by 200 feet long. The wire installation crew may use helicopters for pulling sockline cables and monitoring the wire pulling portion of the wire stringing operation. The wire stringing operation may consist of the following activities:

- Prepare wire pulling and wire stringing sites
- Install insulator assembly on the poles
- Hang stringing sheaves
- Haul and set up wire pulling and tensioning equipment. Movement of wire stringing equipment in many cases will require transporting heavy equipment on lowboy trailers from site to site
- Install wire catch-off snubs
- String in conductor wire
- Splice conductor wire
- Remove string sheaves and attach conductor wire to insulators (clipping)
- Dead-end wires (install compression dead-end assemblies)
- Install jumper wires on dead-end structures

The wire stringing sites will include buried wire snubbing devices, tensioning equipment, wire reel trailers and wire sagging winch tractors. Buried wire snubbing devices are only required when the stringing setup is between two tangent structures. All wire-pulling equipment will be removed upon completion of conductor installation activities.

LINE REMOVAL

Removal of the existing Sagebrush 220 kV transmission line located within the expansion area of the Antelope Substation will start south of the Substation. The existing pole line, within the SCE right-of-way, currently has an existing minimum 14-foot dirt access road adjacent to the line. Conductors will be lowered at each span onto the dirt access road and coiled into empty reels. Poles will be disassembled from the foundations except directly embedded poles in concrete backfill, which will be pulled from the ground. Poles will be placed in the existing road where they will be hauled away. Each pole hole or concrete pier will have a diameter of five (5) to ten (10) feet and a depth of 20 to 30 feet. The concrete pier for existing Structure 168 will be demolished to three feet below existing grade and backfilled with excess native spoils excavated from the nearby relocated transmission line foundations. All other foundations will be removed and the holes backfilled and re-contoured as

necessary as part of the substation expansion. There will be a temporary disturbance area with a 50-foot radius around the center of the poles that are to be removed.

The reels of old conductor will be recycled. All waste materials not recycled will be characterized as outlined with the Waste Characterization and Management Plan approved by the CPUC on November 14, 2007. Materials will be disposed of at an approved facility using appropriate transportation and documentation protocol.

SITE PREPARATION AND ACCESS

The location of the existing 220 kV transmission line is within an already disturbed area on SCE owned property. Additionally, the location of the new overhead 220 kV transmission line is within an open field on SCE owned property. Light grading may be required within the disturbance areas discussed above to facilitate movement of equipment, and staging and assembly of materials.

Access to the relocated Sagebrush 220 kV transmission line along the boundary of the proposed expanded Antelope Substation will be from an access road adjacent to the new transmission line. This permanent access road was addressed under an EIR Addendum approved by the CPUC on January 11, 2010.

CONSTRUCTION EQUIPMENT

The equipment required for the removal of the existing Sagebrush 220 kV transmission line, and the installation of the new Sagebrush 220 kV transmission line, may include the following: crew hauling trucks, tractor trailer units, 90-foot aerial man-lift trucks, digger derrick trucks, crawler tractors (Cat D6 size), crawler excavator, conductor rewind equipment, stringing sheaves, rough-terrain crane – 40 ton capacity, material hauling trucks and trailers, rope machine to hold back and control conductor as its being removed, portable cutting equipment (cutoff saw or acetylene torch), water truck – 4000 gallon, and fire fighting tool boxes.

Construction activities will include the following:

- Pole location staking
- Disturbance area marking/flagging
- Access road grading
- Pole hauling
- Pole framing
- Hole digging
- Foundation and pole setting
- Installation of stringing sheaves
- String and sag conductor and overhead ground wires
- Clip and dead-end wires
- Energize circuits
- Final site restoration

Relocation of the Sagebrush 220 kV transmission line at the Antelope Substation is anticipated to begin March 2010 and continue through June 2010.

- **Biological Resources:** Burns & McDonnell submitted the following report dated January 20, 2010: *Biological Survey Report for the Relocation of the Eastwind-Vincent-Westwind-Wilderness 220 kV Overhead Transmission Line, Commonly Known as the Sagebrush 220 kV transmission Line to Accommodate the Expansion of Antelope Substation for the Antelope-Pardee 500kV Transmission Project, Segment 1, Los Angeles County, California.* The site has been surveyed many times, with the latest survey being conducted on September 21-22, 2009 by ECORP. The proposed construction area consists mainly of disturbed California annual grassland series with small pockets of rubber rabbitbrush series (Sawyer and Keeler-Wolfe 1995) located on relatively flat topography. The area is grazed by sheep annually and also has disturbances associated with existing utility facilities (roads

and poles/towers). The survey area included a 500-foot buffer around the Project Site and all of its proposed components (with the exception of the developed area within the existing substation boundaries). Meandering transects were walked throughout the proposed construction area and the buffer area at a spacing of approximately 50 feet apart in the grassland areas and 20 feet apart in the rabbitbrush scrub areas, with an emphasis on locating California ground squirrel (*Spermophilus beechyi*), American Badger (*Taxidea taxus*), and canid burrows that could potentially be used by western burrowing owls (*Athene cunicularia*).

A brief assessment of potential nesting habitat and impacts to additional wildlife was also conducted during the survey. Breeding bird surveys were conducted throughout the 2009 nesting season in and near the existing Antelope Substation and the vicinity of the project site. Those surveys found nests of a number of species in structures at the existing substation, in existing transmission towers near the substation, in construction equipment staged at adjacent marshalling yards, and in non-native vegetation planted for screening along the existing Antelope Substation fence line. Therefore, there is potential for nesting birds in the area during the spring breeding season.

No special-status species were observed during the survey. Two small areas were found with concentrations of active California ground squirrel burrows. Only one of these areas contained burrows of suitable size for use by burrowing owls, but the biologist stated that they did not exhibit any owl sign (whitewash, feathers, pellets, etc.). Surveys for burrowing owls were conducted in 2007 and 2008 on the adjacent Segment 1 right-of-way of the Antelope-Pardee 500 kV Transmission Project (LSA 2007c, 2008a). No potential burrowing owl locations were found during those surveys. Biological clearance surveys were conducted in the vicinity of the project site throughout 2009 for Segment 1 (Burns & McDonnell 2009d) and Segments 2 and 3 (Burns & McDonnell 2009e, 2009f). No active burrowing owl burrows or potential burrowing owl burrows were found during those surveys. No American badger burrows or signs were found. Peirson's morning-glory (CNPS List 4) can be difficult to find during the fall season, and is potentially present on the project site. However, the 2007 and 2008 surveys did not find any occurrences of Peirson's morning-glory in the vicinity of the project site, and none were observed during the current survey.

- **Cultural Resources:** The proposed Antelope Substation expansion area, including the Sagebrush 220 kV relocation area were investigated for cultural and paleontological resources by Cogstone Resources Management (Harper and Sikes 2009; Scott and Gust 2008); Pacific Legacy (Jackson 2007; O'Neil et al 2008) and ECORP (Ahmet, Mason, and Bholat 2006). The results of these studies indicate that two historic resources, the Antelope Substation and the Antelope Transmission Line, are located within the proposed disturbance area. Both resources have been evaluated and found not eligible for the National Register of Historic Places (NRHP) and the California Register of Historic Resources (CRHR). In addition, one historic can scatter has been identified adjacent to the proposed disturbance area. The can scatter will not be impacted by the proposed construction activities.

Paleontological background contexts were developed for Antelope Substation under the Paleontological Resources Management Plan Segments 2 and 3 of the TRTP prepared by Cogstone Resource Management, Inc. (Gust and Scott 2008). A search for paleontological records was completed at the Natural History Museum of Los Angeles County (Gust and Scott 2008). The record search included the SCE right-of-way and a one-mile perimeter. No paleontological localities are known within the project boundaries and the sediments in the project area consist of Quaternary alluvium, which is low in sensitivity for paleontological resources (Gust and Scott 2008).

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

- As identified in **APM BIO-5** and **Mitigation Measure B-6**, 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 Monitors 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 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 Monitors 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 Environmental Monitor, 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.
- All open trenches shall have ramps installed at the ends of the trench at the end of each day to allow trapped wildlife to escape. All installed open-ended conduit shall be covered (capped) at the end of each day to discourage wildlife from entering the conduit. All holes for new tubular steel poles (TSP) shall be covered at the end of each day so no wildlife may fall into the holes. The biological monitor shall inspect open trenches and holes every morning for trapped wildlife.
- On June 20, 2008, Dan Blankenship of CDFG provided: “All Pierson’s morning glory and other sensitive plants shall be delineated with flagging and avoided. If avoidance is determined not possible, consultation with CDFG is required to minimize impacts. Consultation with CDFG is required prior to construction that will impact any wetland areas in order to determine on site mitigation measures.”
- If groundwater is encountered during construction, construction activities at that location shall be halted and SCE shall submit a Groundwater Remediation Plan to the CPUC and RWQCB for review and approval. Until the Plan is approved, groundwater may not be discharged, but shall be pumped into baker tanks for holding.
- All work boundaries shall be flagged prior to occupation of the project area. 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 prior to construction.

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

Sincerely,

John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen