

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 22, 2014

Thomas Diaz
Regulatory Affairs
Southern California Edison Company
2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770

RE: Downs Substation Expansion Project: Notice to Proceed #1

Dear Mr. Diaz,

On September 4, 2014, Southern California Edison (SCE) submitted a Notice to Proceed (NTP) request to the California Public Utilities Commission (CPUC) for the Downs Substation Expansion Project. On October 9, 2014, SCE notified the CPUC that at this time they are requesting an NTP for only the Downs Substation expansion; a second NTP will cover the remainder of the project at a later date. The substation is located in the City of Ridgecrest, Kern County.

The SCE Downs Substation Expansion Project was evaluated in accordance with the California Environmental Quality Act (CEQA). The mitigation measures and applicant-proposed measures (APMs) described in the Final Mitigated Negative Declaration (MND) were adopted by the CPUC as conditions of project approval. The CPUC also adopted a Mitigation, Monitoring, Compliance and Reporting Program (MMCRP) to ensure compliance with all mitigation measures imposed on the Downs Substation Expansion Project during implementation. The CPUC voted on November 29, 2012 to approve the Final MND for the SCE Downs Substation Expansion Project (Decision D.12-11-027) and a Notice of Determination was submitted to the State Clearinghouse (SCH#2012011044).

The Downs Substation Expansion Project will be constructed in two phases. The Downs Substation expansion is covered by NTP #1. NTP #2 will be issued at a later date for the associated construction activities for the 115 kilovolt (kV) subtransmission line pole installation, and replacement and stringing of fiber optic telecommunication cable for the Project when all mitigation and permit compliance requirements have been met. This is a typical process for transmission line projects. Given that the Downs Substation Expansion 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 compliance table provided with the subject NTP. 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 #1 for the Downs Substation expansion is granted by the CPUC based on the factors described below.

SCE NTP #1 Request

The CPUC has carefully reviewed the NTP request (NTPR) submitted by SCE, and verified that it incorporates compliance with all applicable mitigation measures and APMs. Excerpts from the SCE NTPR dated September 4, 2014 are presented as follows (indented):

As previously discussed with CPUC, SCE intends to construct the project in phases to coincide with construction phasing, environmental restrictions, and implementation of the preconstruction mitigation measures. SCE is proposing to begin construction on the Downs Substation Expansion in Ridgecrest (see MND Figures B 1-4, B 1-5 and B 1-6). The first Notice to Proceed (NTP #1) is being sought for all work on the Proposed Downs Substation Expansion.

Work will include:

Access Roads and Gate

A new automatic entry gate and a personnel gate to Ridgecrest Boulevard would be installed in the existing northern fence line for both construction and operations. A new access road approximately 55 feet long and 24 feet wide with a 2-foot shoulder on each side would be constructed by compacting the sub-soil and placing a six-inch thick layer of compacted aggregate road-base over the surface or by paving in asphalt.

Site Preparation

The site would be prepared by clearing existing vegetation within the boundaries of the proposed Downs Substation expansion footprint. Once vegetation clearance is completed, the location would be graded in accordance with approved grading plans. A chain link fence would be installed around the proposed Downs Substation expansion perimeter. Site preparation will include installation of BMPs, which will be maintained throughout the remaining construction activities described below.

Below Grade Major Activities

Major below-grade construction activities associated with the substation expansion include but are not limited to:

- Installation of associated ground grid
- Installation of foundations for structures associated with the expansion
- Installation of cable trenches, conduits, duct banks, and utilities
- Installation of an uncovered detention basin
- Installation of footings for the perimeter fence

Above Grade Major Activities

Major aboveground activities associated with the substation expansion are as follows:

- Construction of a Mechanical Equipment Electrical Room (MEER)
- Installation of busses, capacitors, disconnect switches, switchracks and circuit breakers
- Installation of transformers
- Installation of steel support structures
- Installation of perimeter fencing
- Installation of restroom facilities

Other Activities

The Downs Substation expansion location would serve as a temporary staging yard for construction activities and would have a construction trailer, security guard trailer, construction equipment, and electrical equipment located thereon. Preparation may include grading the area prior to use. Temporary perimeter fencing would be installed for security and theft control purposes. Existing substation control power will be upgraded by removing and replacing the existing 33 kV below and above grade infrastructure within the substation and the MEER.

CPUC Evaluation of Preconstruction Mitigation Implementation

All applicable project mitigation measures, 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. For biological resources, those additional conditions are discussed and defined in this section. The Compliance Status Table in SCE's NTPR provides preconstruction compliance information for the other issue areas addressed by the Downs Substation Expansion MND.

Following the discussion of biological, cultural, paleontological, and water resources, and land use/noise/traffic a list of bulleted conditions is presented to define additional information and clarifications regarding outstanding requirements. In some cases, these items exceed the requirements of the Mitigation Measures and Applicant Proposed Measures, and are based on specific site conditions. In these cases, the conditions will not appear in the NTPR mitigation compliance table.

Biological Resources: The proposed Downs Substation expansion site is a highly disturbed site adjacent to the site of the current Downs Substation. Some minimal vegetation exists within the site. SCE submitted the following surveys for the subject area:

- Botanical Surveys – conducted between March 26 and April 2, 2014 and on July 15, 2014.
- Mojave Ground Squirrel Survey – conducted between April 4 and June 29, 2014.
- Desert Tortoise Survey – conducted on May 6, 2014.
- Downs Substation Preconstruction Survey Report (APM BR 3; MM B-3, MM B-7, MM B-9, MM B-11) – submitted October 17, 2014.

Results of these surveys include the following:

- No state or federally listed plants or plants identified as CNPS or California Rare Plant Rank (CRPR) List 1 or 2 were observed in or adjacent to the Downs Substation expansion area.
- No Mojave ground squirrel (MGS) was observed during the course of the MGS trapping surveys. No further trapping efforts for MGS are required.
- No desert tortoise or desert tortoise sign was observed during the May 2014 desert tortoise survey. A second desert tortoise survey will be conducted at the Downs Substation site in October of 2014.

Prior to the start of construction, all construction personnel will receive biological resource training prior to starting work. Nesting bird surveys will be conducted between February 1 and August 31.

In accordance with Mitigation Measures B-4 and B-8, off-site compensation for permanent and temporary impacts to special-status plant species, and to desert tortoise and MGS habitat that is not already public land under resource protection shall be preserved and managed in perpetuity. SCE has proposed to utilize off-site mitigation lands for the Tehachapi Renewable Transmission Project (TRTP) that are in excess of the required amount of land for TRTP. SCE shall submit for review and approval documentation that demonstrates Downs Substation Expansion Project biological resource impacts are satisfied through the use of TRTP off-site mitigation lands no later than 90 days prior to substation energization.

Cultural: The Construction Phase Management Plan (CPMP) was prepared to assist in identifying and managing cultural resources within the Downs Substation Expansion Project Area of Potential Effect (APE) during construction. The CPMP was submitted to the Bureau of Land Management (BLM), the Naval Air Weapons Station (NAWS) China Lake, and the CPUC for review. The BLM and NAWS China Lake will

coordinate the implementation of the CPMP on BLM-administered lands and NAWS China Lake-administered lands, respectively. The CPUC will coordinate implementation of the CPMP on non-federal lands. Management Measures for the identified cultural resource that should be implemented for each site have been identified in the CPMP and will be implemented prior to construction.

All construction personnel will receive cultural resource training prior to starting work. In the event that an unanticipated discovery of cultural materials is made within the Downs Substation site, the find shall be managed in compliance with the CPMP.

Paleontological Resources: Mitigation Measure C-3 in the MND states that a Paleontological Resource Management Plan will be produced for those portions of the Project in the Searles Valley area where ground disturbing activities will occur; however, no paleontological resources are expected to occur at the Downs Substation expansion site.

Water Resources: The Regional Water Quality Control Board has issued a Waste Discharge Identification (WDID) number for the Project (WDID# 6B15C371098). Erosion control and pollution prevention measures in the Stormwater Pollution and Prevention Plan (SWPPP) address elements such as track-out controls, stock-pile handling, dewatering discharge, drain inlet protection, and replacement of any disturbed pavement or landscaping. The SWPPP shall be implemented prior to and during project construction.

Land Use/Noise/Traffic: The land parcels surrounding the Downs Substation are zoned for commercial and industrial use. A hardware store/lumber yard occupies the northeast corner of the intersection; an automobile recycling operation is located to the east; the northwest corner is vacant land (with a large, single-story light industrial-type building just to the north and visible from the intersection); and the existing Downs Substation occupies the southwest corner. Immediately south and west of the proposed Downs Substation expansion area lies a sports park and vacant land, respectively. The subject site is fenced.

Mitigation Measure N.2 requires SCE to inform property owners within 300 feet of the project area of anticipated noise disturbances at least two to four weeks prior to construction, including a contact number to register noise complaints. SCE will provide a project hotline where residents can call with questions or issues. All calls shall be returned by SCE and/or its contractor within 24 hours to answer noise questions and handle complaints. Documentation of the complaint and resolution shall be submitted to the CPUC monthly.

In accordance with Mitigation Measure T-1, SCE has submitted the Traffic Control Plan and Implementation Program to the City of Ridgecrest for approval. The City of Ridgecrest has also approved the grading plan for the subject site.

Conditions of NTP Approval

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

- 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 #1 shall be available on site for the duration of construction activities.

- The City of Ridgecrest approved grading plan shall be available on site during the duration of grading activities.
- In accordance with Mitigation Measure APM BR-3, monitoring shall be performed during construction to avoid or minimize impacts on special status plants, breeding birds, or wildlife species.
- In accordance with Mitigation Measures B-4 and B-8, off-site compensation for permanent and temporary impacts to special-status plant species, and to desert tortoise and MGS habitat that is not already public land under resource protection shall be preserved and managed in perpetuity. SCE has proposed to utilize off-site mitigation lands for the Tehachapi Renewable Transmission Project (TRTP) that are in excess of the required amount of land for TRTP. SCE shall submit for review and approval documentation that demonstrates Downs Substation Expansion Project biological resource impacts are satisfied through the use of TRTP off-site mitigation lands no later than 90 days prior to substation energization.
- In accordance with Mitigation Measure B-10, prior to any on-site construction-related disturbance during the nesting season (February 1 through August 31) SCE shall retain a CPUC qualified biologist to conduct pre-construction surveys for nesting birds.
- The approved Storm Water Pollution Prevention Plan (SWPPP) shall be implemented during construction.
- The approved Construction Phase Management Plan (CPMP) for cultural resources, which was developed to address Mitigation Measures C-1, C-2 and C-4, shall be implemented during construction.
- If previously unidentified cultural resources are unearthed during construction activities, construction work in the immediate area of the find shall be halted and directed away from the discovery until a qualified archaeologist assesses the significance of the resource. For the Downs Substation expansion site, SCE in consultation with the CPUC shall make the necessary plans for treatment of the find(s) and for the evaluation and mitigation of impacts if the finds are found to be historically significant according to CEQA.
- In accordance with Mitigation Measure N-1, SCE shall obtain a temporary variance for construction activities that would exceed allowable hours of construction equivalent to those of the Kern County Municipal Code Section 8.36.020 – Prohibited Sounds.
- In accordance with Mitigation Measure N-2, SCE will inform property owners within 300 feet of the project area of anticipated noise disturbances at least two to four weeks prior to construction, including a contact number to register noise complaints. SCE will provide a project hotline where residents can call with questions or issues. All calls shall be returned by SCE and/or its contractor within 24 hours to answer noise questions and handle complaints. Documentation of the complaint and resolution shall be submitted to the CPUC monthly.
- The Traffic Control Plan and Implementation Program shall be implemented during construction.
- In accordance with Mitigation Measure V-1, the Landscaping Plan shall be approved by the CPUC and the City of Ridgecrest at least 90 days prior to installation.
- In accordance with Mitigation Measure V-3, the Lighting Mitigation Plan shall be submitted to the City of Ridgecrest for review and comment prior to submitting the plan to the CPUC for review and approval. The plan shall be submitted to the CPUC at least 90 days prior to ordering and permanent exterior lighting fixtures or components.

Sincerely,

Eric Chiang
CPUC Environmental Project Manager

cc: V. Strong, Aspen