

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 14, 2020

Tom Diaz
Project Manager
Major Environmental Projects
Southern California Edison
2244 Walnut Grove Avenue
Rosemead, CA, 91770

RE: Eldorado-Lugo-Mohave Upgrade Project: Notice to Proceed #1

Dear Mr. Diaz,

On July 31, 2020, with a revision submitted on September 23, 2020, Southern California Edison (SCE) submitted Notice to Proceed (NTP) Request #1 to the California Public Utilities Commission (CPUC) for the construction of the Eldorado-Lugo-Mohave Upgrade Project (ELM Project). The Project would increase the amount of power delivered on the existing Eldorado-Lugo and Lugo-Mohave 500-kV transmission lines, address line clearance discrepancies, facilitate communication between substations, and modify substations to accommodate the Proposed Project. SCE's Eldorado-Lugo-Mohave Upgrade Project was evaluated in accordance with the California Environmental Quality Act (CEQA). The mitigation measures described in the Final Mitigated Negative Declaration (MND) were adopted by the CPUC as conditions of project approvals. The CPUC voted on August 27, 2020 to approve SCE's Eldorado-Lugo-Mohave Upgrade Project (Decision D.20-08-032) and a Notice of Determination was submitted to the State Clearinghouse (SCH# 2019089033). The CPUC also adopted a Mitigation Monitoring, Compliance and Reporting Program (MMCRP) to ensure compliance with all mitigation measures imposed on the ELM Project during implementation.

NTP Request #1 includes portions of the project components that are located on lands under CPUC's jurisdiction; monitoring of project construction on federal lands will be conducted by the respective federal agencies. SCE anticipates requesting additional NTP authorizations in a phased approach. Given that the ELM 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 applicable to the subject NTP Request. 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 construction of the requested portions of the ELM Project is granted by the CPUC based on the factors described below.

SCE provided the following information:

Notice to Proceed Request Summary

SCE is requesting notice to proceed from the CPUC with improvements to the following components:

- Substation Modifications at the Lugo Substation
- Mid-Line Series Capacitor Construction at Ludlow Series Capacitor 5 (SC5)
- Distribution and Telecommunications Construction for Mid-Line Series Capacitors and the Barstow Repeater
- Staging Yard construction at the Ludlow Series Capacitor Yard

These activities are described in the Final Mitigated Negative Declaration (dated November 2019) developed by the CPUC and are consistent with the proposed work to be performed at the upgrade locations of the project. Site Locations and Conditions

Site Locations and Conditions

The Lugo Substation is located in Hesperia, California and is an interconnection point of several overhead transmission lines, including the Lugo-Mohave 500 kV transmission line and the Eldorado-Lugo 500 kV transmission line. Work will be performed at this existing facility within the previously disturbed footprint.

The mid-line series capacitor is located within the existing easement of the Lugo-Mohave 500 kV transmission line in Ludlow, California. The new permanent facility and graded pads will be constructed in previously undisturbed desert scrub.

Distribution and telecommunications will be installed at the mid-line series capacitor and the repeater site to provide station power and line protection at the facilities. Distribution and telecommunications at the mid-line series capacitors will utilize an existing gas-line easement as well as the overhead 500 kV easements. At the Barstow repeater, distribution and telecommunications will utilize the existing overhead Lugo-Mohave 500 kV easements. The new facilities will be installed in previously disturbed areas as well as undisturbed areas.

The Ludlow staging yard is located southeast of and adjacent to the Ludlow series capacitor site near Ludlow, California.

See Table 1 for more site-specific details:

Table 1: Existing Site Conditions and Anticipated Disturbance.

Lugo Substation – Hesperia, California				
Construction Location	Site Conditions	Approximate Disturbed Acres	Vegetation Impacts	
			Vegetation Type	Acres
No Impacts				
Existing Substation	Existing developed substation site	58.84	Developed	58.84
Lugo Staging Yard IV	Existing staging yard actively used for staging of equipment and materials.	12.39	Developed	12.39
Mid-Line Series Capacitor – Ludlow (SC5) Construction*				
Construction Location	Site Conditions	Approximate Disturbed Acres	Vegetation Impacts	
			Vegetation Type	Acres
Permanent Disturbance				
Access Road	The Proposed Project area is characterized by mostly	2.75	Developed	0.03
Access Road			Larrea tridentata –	0.70

Mid-Line Series Capacitor – Ludlow (SC5) Construction*				
Construction Location	Site Conditions	Approximate Disturbed Acres	Vegetation Impacts	
			Vegetation Type	Acres
	undeveloped and open lands, utilities and infrastructure, and some low-density residential land uses in San Bernardino County		Ambrosia dumosa Shrubland Alliance	
Access Road			Larrea tridentata Shrubland Alliance	0.07
Series Capacitor			Developed	0.90
Series Capacitor			Larrea tridentata – Ambrosia dumosa Shrubland Alliance	1.34
Grading Limit			Developed	0.02
Grading Limit			Larrea tridentata – Ambrosia dumosa Shrubland Alliance	0.49
Temporary				
Temporary Work Area	The Proposed Project area is characterized by mostly undeveloped and open lands, utilities and infrastructure, and some low-density residential land uses in San Bernardino County	1.65	Developed	0.09
Temporary Work Area			Larrea tridentata – Ambrosia dumosa Shrubland Alliance	1.47
Temporary Work Area			Larrea tridentata Shrubland Alliance	0.09
Distribution and Telecommunication Construction				
Construction Location	Site Conditions	Approximate Disturbed Acres	Vegetation Impacts	
			Vegetation Type	Acres
Permanent Disturbance				
Barstow Access Road	The Proposed Project area is characterized by mostly undeveloped and open lands, utilities and infrastructure, and some low-density residential land uses in San Bernardino County	0.14	Atriplex polycarpa Shrubland Alliance	0.01
Barstow Telecommunication Repeater			Atriplex polycarpa Shrubland Alliance	0.13
Barstow UG Telecommunication manholes		.0002	Atriplex polycarpa Shrubland Alliance	.0002
Lugo Substation UG Telecommunication manhole	Existing developed tower location	.0001	Developed	.0001
Temporary				
Barstow Distribution Work area	The Proposed Project area is characterized by mostly undeveloped and open lands, utilities and infrastructure, and some low-density residential land uses in San Bernardino County	9.34	Atriplex polycarpa Shrubland Alliance	0.34
Barstow Distribution Work Area			Developed	0.02
Barstow Telecommunication Work Area			Atriplex polycarpa Shrubland Alliance	0.65
Barstow Telecommunication Work Area			Developed	0.06
Ludlow Distribution and Telecommunications Work Area			Developed	0.98
Ludlow Distribution and Telecommunications Work Area			Larrea tridentata – Ambrosia dumosa Shrubland Alliance	5.66
Ludlow Distribution and Telecommunications Work Area			Larrea tridentata Shrubland Alliance	1.63
Lugo Substation UG Telecom Work Area	Existing developed tower location	2.19	Developed	0.65
Lugo Substation UG Telecom Work Area			Ericameria cooperi Provisional Shrubland Alliance	1.39

Distribution and Telecommunication Construction				
Construction Location	Site Conditions	Approximate	Vegetation Impacts	
Lugo Substation UG Telecom Work Area				
Staging Yards				
Construction Location	Site Conditions	Approximate Disturbed Acres	Vegetation Impacts	
Temporary Disturbance				
Ludlow Series Capacitor	The Proposed Project area is characterized by mostly undeveloped and open lands, utilities, and infrastructure.	3.96	Larrea tridentata Shrubland Alliance	3.96

*Note: The work areas associated with the mid line capacitors may overlap with other project components; therefore, the cumulative vegetation impact acreage in this table may slightly overstate the total project impacts.

Project Activity Schedule

Construction will be completed sporadically over the course of several months, based on many construction outages that will occur throughout the duration of the Project.

Project Component	Construction Start Date	Operation Start Date
Lugo Substation	January 2021	March 2022
Ludlow Series Capacitor (SC5)	October 2020	June 2022
Distribution and Telecommunication at Mid-Line Series Capacitors	October 2020	March 2022
Distribution and Telecommunication (with repeater) at Barstow Repeater	October 2020	March 2022
Staging Yard at Ludlow Series Capacitor Site	October 2020	June 2022

Construction Activities

The major construction activities associated with construction activities associated with NTP 1 are listed in the table below.

Table 2: Construction Activities Associated with each Project Component:

Location	Major Construction Activities
Lugo Substation	<ul style="list-style-type: none"> Disassemble existing equipment Erection of new structures Installation of new foundations Installation of new equipment Relocation of overhead lines to new positions Reconfigure two existing 500 kV positions: Relocate the Eldorado and Mohave 500 kV transmission lines to two new positions Install new foundations, steel structures, grounding, and conduits for the new equipment Upgrade existing 500 kV Eldorado series capacitor bank (SC1) and Mohave series capacitor bank (SC4) Install underground conduit, manhole and fiber optic cable between M0-T1 and Lugo

Location	Major Construction Activities
	<p>Substation Communication Room</p> <p>Install additional telecommunications equipment — including channel equipment, light wave equipment, and fiber tie cables between buildings and existing MEER</p>
<p>SC5 500 kV Mid-line Series Capacitor</p>	<p>Site development (pad grading, drainage feature construction, access road construction, surfacing)</p> <p>Below grade installations (conduits, foundations, and grounding)</p> <p>Structure and MEER erections</p> <p>Installation of series capacitor equipment</p> <p>Installation of emergency power equipment</p> <p>Relocation of overhead lines</p> <p>Install underground conduit, manholes and fiber optic cable from Towers to SC5</p> <p>Install light and power service</p> <p>Electrical Construction (Wiring, Terminating, and Testing)</p> <p>Site restoration or revegetation</p>
<p>Distribution/ Telecommunication</p>	<p>Provide two communication paths between the series capacitor sites:</p> <ul style="list-style-type: none"> • Install approximately 2 miles of overhead and 500 feet of underground telecommunications facilities as one path to connect the proposed series capacitors to SCE's existing communication system. • Install approximately 2 miles of underground telecommunications facilities as a second communication path to connect the series capacitors to SCE's existing communication system. <p>Provide station light and power to the proposed series capacitors by extending and/or rerouting existing lines to create approximately 2 miles of overhead and 700 feet of underground 12 kV distribution circuits. (The new distribution poles would support overhead telecommunication facilities as well as the electric distribution lines.)</p> <p>Construct new fiber optic repeater facility (Barstow Repeater) within and adjacent to the Lugo-Mohave 500kV transmission line ROW. The repeater site will include a prefabricated building, emergency generator with an above ground propane fuel tank surrounded by a block wall.</p> <p>Install distribution lines for light and power at the Barstow fiber optic repeater site.</p> <p>Install underground telecommunications facilities from existing transmission structures to the Barstow fiber optic repeater site.</p>
<p>Staging Yard</p>	<p>Typical daily construction activities will include use of construction trailers and portable restrooms and personal parking for construction personnel. Other construction activities may include refueling and equipment maintenance and repair, material stockpiling, containment of waste disposal, and structure assembly.</p>

Restoration Activities

Any temporarily disturbed lands resulting from construction will be restored in accordance with the Habitat Restoration Revegetation Plan after project completion.

Night Work

In the event that night work is conducted, night lighting will comply with MM AES-4.

Water Use

Construction water to be used for the substation modifications will be supplied from the nearest water purveyor within the water basin, as available. San Bernardino County Public Works could potentially provide water for construction activities at the Lugo Substation. Construction water will be provided from a potable-water hydrant, as available, within the purveyor's service district. The proposed water supply setup located at the northeast corner of the Escondido Avenue and Whitehaven Street intersection, approximately 200 feet north of the Lugo Substation entrance.

Construction water to be used for the mid-line series capacitor construction will come from the nearest water purveyor within the water basin, as available. The Fort Cady California Corporation in Newberry Springs could potentially provide water for construction activities at the Ludlow Series Capacitor. This groundwater source is a private groundwater well. The proposed water extraction setup operated by Fort Cady is located adjacent to the Lugo-Mohave 500 kV TL, 500 feet southwest of LST M66-T4 (116.397058, 34.763499).

CPUC Evaluation of Preconstruction Mitigation Implementation

All applicable project mitigation measures (MMs), Applicant Proposed 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. Section 7.1.1 in SCE's NTP request provides the required environmental submittals for the issue areas addressed by the Eldorado Lugo Mohave Upgrade Project Final MND. The following contains a status of applicable MM and APM required submittals and requirements. Any outstanding requirements are also included:

Aesthetics: As required by MM AES-1, design fundamentals that reduce the visual contrast of new facilities with the characteristic landscape were used by SCE in the final design of the approved project. SCE prepared a Project Design and Surface Treatment Plan for CPUC review and approval. The Plan includes details of how the design will minimize visual intrusion and contrast by effectively blending earthwork, vegetation manipulation, and facilities with the landscape. The Project Design and Surface Treatment Plan was approved by the CPUC on September 10, 2020. In compliance with MM AES-2, SCE shall screen construction activities from view. To reduce significant impacts associated with construction yards, staging areas, and material and equipment storage areas shall be visually screened using temporary screening fencing, with the exception of construction yards, staging areas, and material and equipment storage areas on existing substation properties.

As required by MM AES-3, only the minimum amount of vegetation necessary for the construction of structures and facilities shall be removed during construction. As required by MM AES-4, SCE shall avoid all night lighting where possible and minimize its use under all circumstances.

Air Quality: As required by MM AQ-1, SCE shall prepare and implement Dust Control Plan that describes all measures that will be implemented for the project. The plan includes restrictions for vehicle traffic speeds on unpaved roads, watering frequencies for disturbed areas, covering loaded haul vehicles or provide adequate freeboard, and the reduction of non-essential earth-moving activity under high wind conditions. In addition, in compliance with APM AIR-03, off-road diesel construction equipment with a rating between 100 and 750 horsepower would be required to use engines compliant with the U.S. Environmental Protection Agency's final Tier 4 non-road engine standards. Additionally, as required by APMs AIR-03, AIR-04, and AIR-05, limitations on equipment idling would be implemented, ridesharing

would be encouraged, and construction diesel engines would be maintained in good working order. The Dust Control Plan was approved by the CPUC on November 17, 2020.

Biological Resources: A Worker Environmental Awareness Program (WEAP) will be prepared to educate on-site workers about the proposed Project's sensitive environmental issues in accordance with MM BR-2. 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. The WEAP was approved by the CPUC on September 10, 2020.

SCE prepared a Habitat Restoration and Revegetation Plan (HRRP) in accordance with MM BR-4 to outline the restoration or revegetation of all temporary disturbance areas. The HRRP was approved by the CPUC on December 11, 2020.

An Integrated Weed Management Plan (IWMP) was developed in compliance with MM BR-5 to propose methods of preventing or controlling project-related spread or introduction of weeds. The IWMP was approved by the CPUC on September 10, 2020.

As required by MM BR-6, a Cacti and Yucca Salvage Plan was developed and approved by the CPUC on December 11, 2020. Also a requirement of MM BR-6, a Special-Status Plant Salvage and Relocation Plan was developed. This plan is currently under review and no work shall occur in areas of special-status plants prior to plan approval.

As required by MM BR-8, SCE is required to compensate for all desert tortoise habitat loss. SCE prepared a Habitat Conservation Plan documenting the mitigation strategy for impacts to desert tortoise habitat. The HCP was approved by the CPUC on October 30, 2020.

Consistent with the requirements of MM BR-9, a Raven Management Plan developed and approved by the CPUC on November 24, 2020.

SCE prepared a Nesting Bird Management Plan (NBMP) consistent with MM BR-10. This plan was developed to describe methods to minimize potential project effects to nesting birds, and to avoid any potential for unauthorized take. The plan was developed in coordination with CDFW and USFWS and was approved by the CPUC on December 11, 2020.

As required by Mitigation Measure BR-11, a Burrowing Owl Passive Relocation Plan was developed and approved by the CPUC on November 24, 2020.

Preconstruction surveys for special-status plants and wildlife will be conducted consistent with MMs BR-6, BR-9, BR-11, BR-12, and BR-13. SCE will ensure wildlife impact avoidance and minimization through measures outlined in MM BR-7 during project construction.

Cultural Resources: As required by MM CR-3, a Cultural Resources Management Plan (CRMP) was prepared by SCE. The CRMP was approved by the CPUC on December 9, 2020. A Tribal Engagement Plan was prepared and included in the CRMP and the CRMP was provided to the tribes for review, consistent with APM-TCR-2.

Hazards and Hazardous Materials. SCE prepared and will implement a Project-specific Hazardous Materials and Waste Management Plan pursuant to Title 24, Part 9 of the California Code of Regulations (CCR) that identifies hazardous materials to be transported, used, and stored on site for the proposed construction activities as well as hazardous wastes generated onsite as a result of the proposed construction activities and appropriate management procedures. The Hazardous Materials and Waste Management Plan was approved by the CPUC on October 30, 2020.

Hydrology and Water Quality. SCE submitted Erosion Control Plans included in the Storm Water Pollution Prevention Plans developed for the project.

Noise. Best Management Practices for construction noise management will be implemented as outlined in MM N-1 to reduce construction noise levels to the extent feasible. Construction noise shall be confined to days and hours consistent with local jurisdiction regulations. Construction traffic shall be routed away from residences, recreational facilities, and schools to the maximum extent feasible.

Consistent with Applicant Proposed Measures APMs NOI-01 and NOI-02, SCE will ensure that helicopter operations at landing zones at landing zones within 700-feet of occupied residences are limited to 2 hours per day and that helicopters maintain a height of at least 500-feet when passing over residential areas, except at temporary construction areas or when actively assisting with conductor stringing.

Paleontological Resources: A Paleontological Resource Mitigation and Monitoring Plan (PRMMP) was prepared for the Eldorado-Lugo-Mohave Upgrade Project. The PRRMP was approved by the CPUC on November 17, 2020.

Traffic and Transportation. Consistent with MM T-1, SCE will prepare and implement a Construction Traffic Control Plan. A Helicopter Use Plan was prepared for CPUC approval to identify the specific locations requiring deconstruction of existing project facilities or construction of new or replacement project facilities as outlined in MM T-3. The plan identifies the specific locations requiring deconstruction or construction work using helicopters. The Helicopter Use Plan was approved by the CPUC on November 17, 2020.

Wildfire. SCE prepared a Fire Management Plan as required by MM WF-1. The Plan requires that a qualified Fire Marshal be established to implement and enforce all provisions of the Fire Management Plan. The Fire Management Plan was approved by the CPUC on November 17, 2020.

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.
- 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.
- SCE shall coordinate with the National Park Service (NPS) to review project plans prior to work on NPS lands
- **BR-1:** SCE shall submit resumes of biological monitors to the CPUC for approval at least 10 working days prior to the monitor commencing field duties.
- **BR-3:** Prior to 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. CPUC EM to verify site staking.
- **MM BR-6:** No work shall occur in areas of special status plants, until review and approval of the Special-Status Plant Salvage and Relocation Plan for impacts to any state or federally listed plants or CRPR 1 or Nevada ranked S1, S2, or S3 species occurs.

- **MM BR-13:** SCE shall conduct pre-construction surveys for desert kit fox, ringtail, and American badger no more than 30 days prior to initiation of construction activities and submit to CPUC and BLM for review and approval.
- **MMs BR-6, BR-9, BR-11, BR-12, and BR-13:** Conduct reconstruction surveys for special-status plants and wildlife. Results of preconstruction surveys shall be provided to the CPUC for review and approval.
- **APM-CUL-1:** SCE shall perform surveys prior to construction for any Proposed Project areas not yet surveyed (e.g., new or modified staging areas, pull sites, or other work areas).
- **MM PAL-1:** Prior to the start of ground disturbance, a qualified paleontologist to serve as Project Paleontologist shall be retained by SCE. The qualifications of the Project Paleontologist shall be submitted to CPUC and BLM for approval.
- **MM HWQ-2:** If Horizontal Directional Drilling (HDD) is required, an HDD Fluid Management Plan shall be prepared and implemented.
- **MM N-2:** No less than 15 days prior to construction that would occur within 500 feet of residences, businesses, or other occupied structures, SCE shall distribute a public notice mailer. SCE shall also establish a toll-free telephone number for receiving questions or complaints during construction and develop procedures for responding to callers. SCE shall address all complaints within one week of when the complaint is filed, and shall provide to the CPUC, within 15 days of the end of each month, a monthly report with records of all complaints and responses. SCE shall mail the notice to all residents or property owners within 500 feet of the right-of-way or within 1,000 feet of helicopter fly yards and flight paths.
- **MM T-1:** Prior to the start of construction of a project component that could affect traffic (e.g., OPGW reconductoring over public roadways), SCE shall submit a Construction Traffic Control Plan for review and approval by state and local agencies responsible for public roads that would be directly affected by the construction activities and/or would require permits and approvals.
- **MM T-2:** Prior to construction, SCE shall establish the pre-construction conditions of the roads within 500 feet in each direction of project access points and confer with State and local agencies.
- **APM-TCR-1:** Provide monitoring reports to the CPUC on a monthly basis.
- **MM UT-1:** Prior to commencing construction or as soon as such data are available, if it is not available before construction, SCE shall determine and report to CPUC and BLM the location of adjacent utilities and other metallic or conducting objects susceptible to induced voltages and currents. Prior to the in-service date of the Proposed Project series capacitors, SCE shall ensure that the necessary grounding or other appropriate measures to provide appropriate cathodic protection has been installed and shall confirm this to the CPUC and BLM.
- **MM UT-3:** SCE shall provide CPUC and BLM metallic object locations that may present a shock hazard as soon as available and prepare an Induced Current Touch Study for CPUC and BLM review and approval.
- **MMCRP:** Once preconstruction survey reports are submitted, the CPUC EMs shall conduct site reviews to verify that the required site boundary and resource staking has been installed in work areas. Typically, each work site shall be delineated by markers (usually wooden stakes) which define the approved work area boundaries. Any Environmentally Sensitive Area (ESA) identified during preconstruction surveys shall also be delineated for avoidance. Only after the preconstruction survey reports and staking verification reviews occur, is construction permitted to begin.
- **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 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 Change (MPC) 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,



Eric Chiang
CPUC Environmental Project Manager

cc: V. Strong, Aspen