

PUBLIC UTILITIES COMMISSION

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September 5, 2017

Ryan Stevenson
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Regulatory Affairs
Southern California Edison
8631 Rush St, General Office 4 – 235E (2nd Floor)
Rosemead, CA, 91770

RE: West of Devers Upgrade Project: Notice to Proceed #4

Dear Mr. Stevenson,

On July 13, 2017, Southern California Edison (SCE) submitted Notice to Proceed (NTP) Request #4 to the California Public Utilities Commission (CPUC) for 220-kV transmission line improvements in support of the West of Devers Upgrade Project (Project). Under this NTP Request, SCE is seeking CPUC authorization to proceed with the 220-kV transmission line improvements required for the continued operation of SCE's power system during and after Project construction. Additional information was requested by the CPUC on August 2, 2017 and was received on August 22, 2017. SCE has submitted a separate NTPR for transmission construction within BLM lands to BLM on August 7, 2017.

SCE's West of Devers Upgrade Project was evaluated in accordance with the California Environmental Quality Act (CEQA). The mitigation measures described in the Final Environmental Impact Report (FEIR) were adopted by the CPUC as conditions of project approvals. The CPUC voted on August 18, 2016 to approve SCE's West of Devers Upgrade Project (Decision D.16.08.017) and a Notice of Determination was submitted to the State Clearinghouse (SCH# 2014051041). The CPUC also adopted a Mitigation Monitoring, Compliance and Reporting Program (MMCRP) to ensure compliance with all mitigation measures imposed on the West of Devers Upgrade Project during implementation.

As currently proposed by SCE, the West of Devers Upgrade Project includes multiple components (material yards, substation, distribution, telecommunication, and transmission). Separate NTPs were issued for Material Yards (NTP #1); substation upgrades (NTP #2); subtransmission, distribution, and telecommunications required for construction (NTP #3); and this NTP #4 being issued for the transmission line and associated telecommunications portion of the project. This is a typical process for large-scale projects with multiple components. Given that the West of Devers Upgrade 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 and Responsibilities table provided with the subject NTPR. 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 #4 for the 220-kV transmission line improvements for the West of Devers Upgrade Project is granted by the CPUC based on the factors described below.

SCE NTP Request #4

NOTE: See overview maps in Appendix A for locations of the six separate 220-kV transmission line segment improvements.

Section 1—Transmission Line Improvements

Approximately 181 circuit miles of existing 220-kV line facilities (approximately 48 corridor miles) will be removed and upgraded primarily within the existing SCE transmission line corridor. The transmission line upgrades will be constructed along the following six transmission line segments (FEIR page B-3 [CPUC, 2015]):

- Segment 1—San Bernardino (Milepost [MP] SB 0 to MP SB 3.5);
- Segment 2—Colton, Grand Terrace, and Loma Linda (MP 0 to MP 5.2);
- Segment 3—San Timoteo Canyon (MP 5.2 to MP 15.2);
- Segment 4—Beaumont and Banning (MP 15.2 to MP 27.4);
- Segment 5—Morongo Tribal Lands and Surrounding Areas (MP 27.4 to MP 36.9);
- Segment 6—Whitewater and Devers (MP 36.9 to MP 45);

To facilitate sustained transmission capacity while system upgrades are constructed, all or portions of the following existing 220-kV lines, will be removed and replaced:

- Devers-Vista No. 1
- Devers-Vista No. 2
- Devers—El Casco
- El Casco—San Bernardino
- Devers—San Bernardino
- San Bernardino—Vista
- Etiwanda—San Bernardino

The Project will be constructed on a combination of 220-kV double-circuit lattice steel towers (LSTs), double-circuit tubular steel poles (TSPs), and single-circuit TSPs. Each of the proposed 220-kV transmission lines will consist of overhead wires (conductors), which form three electrical phases. These conductors will be supported by LSTs and/or TSPs and will be electrically isolated from the structures by insulators. In addition to the conductors, structures, and insulators, the new transmission structures will be equipped with overhead ground wires (OHGW) and/or optical fiber ground wires (OPGW) for shielding and/or telecommunication purposes.

220-kV Transmission Line Segments

The following is a description each of the six 220-kV transmission line segments.

Segment 1: San Bernardino (MP SB0 to MP SB3.5); FEIR page B-4

Segment 1 is approximately 3.5 miles long and will extend south from the San Bernardino Substation in the City of Redlands, cross Interstate 10 (I-10) into the City of Loma Linda, and proceed south to the San Bernardino Junction in San Bernardino County.

The newly rebuilt 220-kV transmission lines in this segment will connect to the existing 220-kV switchrack inside San Bernardino Substation. The Segment 1 right-of-way (ROW) consists of two existing lattice 220-kV towers, which include the following 220-kV transmission circuits: Devers—San Bernardino, Etiwanda—San Bernardino, San Bernardino—Vista, and El Casco—San Bernardino. Three sets of 66-kV towers support six separate 66-kV lines in the corridor near the substation, and the 66-kV lines diverge from the corridor as the corridor extends to the south.

North of the I-10 crossing, the majority of the ROW consists of a corridor of agricultural land, but there are residences adjacent to Segment 1 in several areas south of the I-10 crossing, immediately adjacent to the corridor near Mission Road; north of Beaumont Avenue where the corridor has homes on both sides and a park within the corridor; and its southernmost segment between San Timoteo Wash and Beaumont Avenue.

In addition to the 220-kV transmission line upgrades, telecommunications system upgrades will occur along this segment. Overhead ground wire (OHGW), including optical ground wire (OPGW), will be installed on 220-kV transmission structures at or near the top of each structure. Where required, OHGW may also be used in addition to OPGW for more shielding.

Refer to Table 1-1 for a list of 220-kV Transmission Line Structure Removals, Installations, and Modifications per Segment.

Table 1-1, 220-kV Transmission Line Structure Removals, Installations, and Modifications per Segment

Project Installation	Segment 1	Segment 2	Segment 3	Segment 4	Segment 5	Segment 6	Total
New LSTs	42	18	86	99	62	79	386
Modified LSTs	1	1	2	3	—	—	7
Removed LSTs	44	26	118	97	67	63	415
Existing LSTs	—	24	2	3	—	—	29
New TSPs	4	9	16	12	36	6	83
Removed TSPs	—	—	—	—	5	—	5
Wood Pole Removals	—	—	—	63	65	54	182

Segment 2: Colton, Grand Terrace, and Loma Linda (MP 0 to MP 5.2); FEIR page B-4

Segment 2 will extend from the Vista Substation in Grand Terrace to the San Bernardino Junction in San Bernardino County, and pass through Colton, portions of San Bernardino County, and Loma Linda along the route. Segment 2 will connect to the existing 220-kV switchrack inside Vista Substation in Grand Terrace, cross Interstate 215 (I-215) heading east for approximately 5 miles through the city of Colton, crossing portions of San Bernardino County west of Barton Road and through Reche Canyon, extend through the hills of Colton and Loma Linda, to the San Bernardino Junction in San Bernardino County.

The Segment 2 ROW contains three separate sets of existing lattice structures, supporting various 220-kV and 115-kV lines. Upgrades will only occur on the structures supporting the existing Devers-Vista No. 1 and No. 2 220-kV transmission lines.

Most of the corridor in Segment 2 is located in the hills south of Loma Linda and is not visible from public roads. The westernmost 1.5 miles, nearest the Vista Substation, extend through the City of Grand Terrace and pass residences along Grand Terrace Road, east of I-215. Several residences are located northwest of the substation on Grand Terrace Road and across from the substation entrance on Newport Avenue.

In addition to the 220-kV transmission line upgrades, telecommunications system upgrades will occur along this segment. OHGW, including OPGW, will be installed on 220-kV transmission structures at or near the top of each structure. Where required, OHGW may also be used in addition to OPGW for more shielding.

Refer to Table 1-1 for a list of 220-kV Transmission Line Structure Removals, Installations, and Modifications per Segment.

Segment 3: San Timoteo Canyon (MP 5.2 to MP 15.2); FEIR page B-5

Segment 3 will be approximately 10 miles long and extend east from the San Bernardino Junction in San Bernardino County to El Casco Substation in Riverside County, crossing through the southwest corner Redlands between Refuse Road and Smiley Boulevard. The San Bernardino Junction, where the transmission lines diverge south of Loma Linda, is located in open space. Along the western several miles of the San Timoteo Canyon, the corridor is barely visible on the ridgelines south of the canyon. The corridor in Segment 3 roughly parallels San Timoteo Canyon Road for much of its length where it crosses from San Bernardino County into Riverside County.

Segment 3 consists of a set of three existing structures at varying distances of separation: one double-circuit LST and two single-circuit 220-kV structures (mixture of steel or wood; each with the circuits arranged horizontally). The set of three structures supports the following existing 220-kV transmission lines: Devers-Vista No. 1, Devers-Vista No. 2, El Casco–San Bernardino, and Devers–San Bernardino. The existing structures will be removed and replaced with double-circuit structures that will include both LSTs and TSPs.

Along Oak Valley Parkway just south of Woodhouse Road, the newly rebuilt El Casco–San Bernardino 220-kV transmission line in Segment 3 will loop into El Casco Substation and connect to the existing 220-kV switchrack. There are residential developments near the El Casco Substation and scattered agricultural and residential properties along the route.

In addition to the 220-kV transmission line upgrades, telecommunications system upgrades will occur along this segment. OHGW, including OPGW, will be installed on 220-kV transmission structures at or near the top of each structure. Where required, OHGW may also be used in addition to OPGW for more shielding.

Refer to Table 1-1 for a list of 220-kV Transmission Line Structure Removals, Installations, and Modifications per Segment.

Segment 4: Beaumont and Banning (MP 15.2 to MP 27.4); FEIR page B-5

Segment 4 will be approximately 12 miles long and will extend east from the El Casco Substation through unincorporated Riverside

County and the southern portion of Calimesa, crossing I-10 to the northeast into the City of Beaumont. The corridor continues due east for about 2 miles north of central Beaumont and I-10, and then parallels Oak Valley Parkway to the north. There are some residential areas on either side of the corridor until the east end of Beaumont at Highland Springs Avenue where the route will continue through open fields. From this point, east through Banning, the corridor is in open space in the hills north of Banning with no adjacent residences. Segment 4 ends at San Gorgonio Avenue in the City of Banning.

Segment 4 consists of three sets of existing structures at varying distances of separation: one double-circuit LST and two single-circuit 220-kV structures (mixture of steel or wood; each with the circuits arranged horizontally). The structures support the following existing 220-kV transmission lines: Devers-Vista No. 1, Devers-Vista No. 2, Devers–El Casco, and Devers–San Bernardino. The existing structures will be removed and replaced with double-circuit structures that will include both LSTs and TSPs.

In addition to the 220-kV transmission line upgrades, telecommunications system upgrades will occur along this segment. OHGW, including OPGW, will be installed on 220-kV transmission structures at or near the top of each structure. Where required, OHGW may also be used in addition to OPGW for more shielding.

Refer to Table 1-1 for a list of 220-kV Transmission Line Structure Removals, Installations, and Modifications per Segment.

Segment 5: Morongo Tribal Lands and Surrounding Areas (MP 27.4 to MP 36.9); FEIR page B-6

Segment 5 will be approximately 9.5 miles long and extend east from San Gorgonio Avenue in the City of Banning across the Morongo Band of Mission Indians Reservation to Rushmore Avenue. The route will also cross through an existing gravel mine. Within this segment, approximately 3 miles of existing SCE ROW through the Morongo Reservation will be abandoned, after the existing structures are removed, and replaced with a new 3-mile ROW alignment south of the current alignment, pursuant to the SCE-Morongo ROW agreement. Approximately 10.5 miles of transmission line will be located on Segment 5 Tribal land. Approximately 9 miles of transmission line will be located on Segment 5 private lands.

Segment 5 includes the following existing 220-kV transmission lines: Devers-Vista No. 1, Devers-Vista No. 2, Devers–El Casco, and Devers–San Bernardino. The existing structures will be replaced with double-circuit structures that will include both LSTs and TSPs. (Most of the new structures will be LSTs, except for the TSPs specified in the SCE–Morongo ROW agreement.) In addition to the 220-kV transmission line upgrades, telecommunications system upgrades will occur along this segment. OHGW, including OPGW, will be installed on 220-kV transmission structures at or near the top of each structure. Where required, OHGW may also be used in addition to OPGW for more shielding.

Refer to Table 1-1 for a list of 220-kV Transmission Line Structure Removals, Installations, and Modifications per Segment.

Segment 6: Whitewater and Devers (MP 36.9 to MP 45); FEIR page B-6

Segment 6 will be approximately 8 miles long, from the eastern boundary of the Morongo Reservation at Rushmore Avenue to Devers Substation north of Palm Springs, in Riverside County. The segment will pass through land administered by the Bureau of Land Management along the route. From the Morongo Band of Mission Indians Reservation, the line will extend east along the foothills of the San Bernardino Mountains, passing residences off Haugen-Lehmann Way and crossing Whitewater Canyon Road. Segment 6 will pass scattered residences and wind-generation projects, and will cross Highway 62 into the Devers Substation. The newly rebuilt 220-kV transmission lines in this segment will connect to the existing 220-kV switchrack inside Devers Substation. Approximately 2.5 miles of transmission line will be located on Segment 6 BLM land. Approximately 15.5 miles of transmission line will be located on Segment 6 private lands.

The existing transmission corridor in Segment 6 includes three sets of separate structures at varying distances of separation, for the existing 220-kV transmission circuits: Devers-Vista No. 1, Devers-Vista No. 2, Devers–El Casco, and Devers–San Bernardino. In addition to the 220-kV transmission line upgrades, telecommunications system upgrades will occur along this segment. OHGW, including OPGW, will be installed on 220-kV transmission structures at or near the top of each structure. Where required, OHGW may also be used in addition to OPGW for more shielding.

Refer to Table 1-1 for a list of 220-kV Transmission Line Structure Removals, Installations, and Modifications per Segment.

Transmission Insulators and Conductors

Each transmission circuit typically includes three separate electrical phases. Each phase will consist of double-bundled (bundle of two conductors for each phase) 1,590-kcmil (one thousand circular mils) aluminum conductor steel-reinforced (ACSR) conductor, which is made of aluminum strands with internal steel reinforcement and a non-specular finish. Polymer insulators will typically be used on all structures.

Transmission Ground Wires

OHGW, including OPGW, will be installed on 220-kV transmission structures at or near the top of each structure. Where required, OHGW may also be used in addition to OPGW for more shielding. The overhead steel ground wire will typically be 0.5-inch-diameter extra-high-strength galvanized steel.

Ancillary Telecommunications Work

The following telecommunications work will be conducted to reconnect existing telecommunications circuits to the new OPGW:

- Connect Devers-Vista OPGW to the MEER in Banning Substation (FEIR Page B-17, Item 8)

From new 220-kV Structure 4S01 in Segment 4, approximately 500 feet of fiber cable and new underground conduit will be installed to an existing distribution pole located approximately 660 feet north of Summit Drive on San Gorgonio Avenue. The new fiber-optic cable will connect to an existing fiber-optic cable that extends approximately 13,000 feet to the MEER in Banning Substation.
- Connect Devers-Vista OPGW to the MEER in Maraschino Substation (FEIR Page B-18, Item 9)

From new 220-kV Structure 4S35 in Segment 4, approximately 2,012 feet of fiber-optic cable and new underground conduit will be installed to an existing distribution pole located on Oak View Parkway, approximately 690 feet east of Noble Creek across from Noble Creek Park. The new fiber-optic cable will rise up the distribution pole and connect to an existing fiber-optic cable that extends approximately 16,000 feet to the MEER in Maraschino Substation.
- Connect the Devers-Vista OPGW to the MEER in El Casco Substation (FEIR Page B-18, Item 10)
 - From new 220-kV Structure 3S02 in Segment 3, approximately 200 feet of fiber-optic cable and new underground conduit will be installed to an existing manhole located in the existing SCE ROW immediately south of the El Casco Substation. The new fiber-optic cable will connect to an existing fiber-optic cable that extends approximately 800 feet to the MEER in El Casco Substation.
 - From new 220-kV Structure 3S25 in Segment 3, approximately 200 feet of fiber-optic cable and new underground conduit will be installed to an existing distribution pole. The new fiber-optic cable will connect to an existing fiber-optic cable that extends to the MEER in El Casco Substation.
- Connect the Devers-Vista OPGW and Devers-El Casco OPGW to the MEER in Devers Substation. (FEIR page B-18, Item 11)
 - From new 220-kV Structure 6N09 in Segment 6, approximately 1,000 feet of fiber-optic cable and new underground conduit will be installed to an existing telecommunications manhole located beside the driveway to the Devers Substation. The fiber-optic cable will then continue in existing conduit to the 220-kV MEER in Devers Substation.
 - From new 220-kV Structure 6S09 in Segment 6, approximately 800 feet of fiber-optic cable and new underground conduit will be installed to an existing manhole located inside the West of Devers Interim Reactors. The fiber-optic cable will then continue in existing conduit to the 200-kV MEER in Devers Substation.
- Connect the Devers–El Casco OPGW and El Casco–San Bernardino OPGW to the MEER in El Casco Substation (FEIR page B-18, Item 12)
 - From new 220-kV Structure 4N64 in Segment 3, approximately 850 feet of fiber-optic cable and new conduit will be installed to an existing distribution manhole located outside El Casco Substation. From the manhole, the fiber-optic cable will continue approximately 550 feet in existing conduit to the 200-kV MEER in the El Casco Substation.
 - From modified 220-kV Structure 3N02 in Segment 3, approximately 350 feet of fiber-optic cable and new underground conduit will be installed to an existing cable trench located inside the El Casco Substation. The fiber-optic cable will then continue to the El Casco 220-kV MEER.
 - From modified 220-kV Structure 3N02 in Segment 3, approximately 115 feet of fiber-optic cable and new underground conduit will be installed to new 220-kV Structure 4N64.
- Connect the El Casco–San Bernardino OPGW and San Bernardino–Vista OPGW to the MEER in San Bernardino Substation (FEIR page B-18, Item 13)
 - From new Structure 1E26 in Segment 1, approximately 40 feet of fiber-optic cable and new underground conduit will be installed to a new manhole. From the new manhole, approximately 550 feet of fiber-optic cable and new conduit will be installed to an existing manhole inside the San Bernardino Substation. From the existing manhole, the fiber-optic cable will continue in existing conduit to the MEER inside San Bernardino Substation.
 - From new 220-kV Structure 1W26 in Segment 1, approximately 85 feet of fiber-optic cable and new underground conduit will be installed to the same new manhole for the route from Structure 1E26. From the new manhole, the fiber-optic cable will continue in the existing conduit to the MEER inside San Bernardino Substation.
- Connect the Devers-Vista OPGW to the MEER in Vista Substation (FEIR Page B-18, Item 14)

From new 220-kV Structure 2N36 in Segment 2, approximately 1,460 feet of fiber-optic cable and new conduit will be installed to an existing manhole inside the Vista Substation. From the existing manhole, fiber-optic cable will be installed in the existing conduit to the MEER inside Vista Substation.
- Approximately 250 feet of fiber-optic cable will be removed from the conduit and 600 feet from a cable trench within Vista Substation in Segment 2.

- Approximately 325 feet of fiber-optic cable will be removed from the conduit between existing Structure M17-T2 (existing Devers–Vista No. 2 220-kV structure) and a riser pole in Segment 4, 660 feet north of Summit Drive on San Gorgonio Avenue.
- Approximately 2,595 feet of fiber-optic cable will be removed from the conduit between existing Structure M24-T2 (existing Devers–Vista No. 2 220-kV structure) and the riser pole located on Oak View Drive and Oak Valley Parkway in Segment 4.
- Approximately 120 feet of fiber-optic cable will be removed from conduit between existing Structure M29-T2 (existing Devers–Vista No. 2 220-kV structure) and an existing manhole located in Segment 3 SCE ROW immediately south of El Casco Substation.
- Approximately 100 feet of fiber-optic cable will be removed from the existing conduit between Structure M32-T3 (existing Devers–Vista No. 2 220-kV structure) and a nearby riser pole in Segment 3.
- Approximately 60 feet of fiber-optic cable will be removed from conduit between existing Structure M1-T1 (existing Devers–San Bernardino 220-kV structure) and a riser pole on Redlands Boulevard in Segment 1.

The proposed work to be performed at the above transmission line improvement locations is consistent with activities described in the FEIR (CPUC, 2015) and the Final Environmental Impact Statement (Bureau of Land Management [BLM], 2016a), with details added to reflect the final design.

Section 2—Site Locations, Conditions, and Disturbance Impacts

Land disturbance for the transmission line work is associated with structure installation, removal and modification activities, and the installation of new overhead and underground facilities. The estimated land disturbance for the transmission line improvements covered within this NTPR totals approximately 1,043.5 acres, as summarized in Table 2-1 below.

Table 2-1, Transmission Line Disturbance Impacts

Transmission Segment	Associated Construction Activities	Disturbance Impacts	Disturbance Acreage ^{a, b}
Segment 1 San Bernardino MP SB0 to MP SB3.5	Major construction activities include the removal, installation, and modification of 220-kV LSTs and structures, 220-kV transmission line upgrades, and telecommunications upgrades within the existing ROW and San Bernardino Substation. Work will occur near an agricultural corridor and will pass residences south of the I-10 crossing, adjacent to Mission Road, north of Beaumont Avenue, the San Timoteo Wash, and Beaumont Avenue.	Ground disturbance limited to developed areas within San Bernardino Substation, SCE ROW, and access roads from the San Bernardino Junction and through the cities of Loma Linda and Redlands. Agricultural 8.9 acres Coastal Sage Scrub 3.9 acres Developed/Disturbed 44.8 acres Grassland/Forbland 1.4 acres	59 acres
Segment 2 Colton, Grand Terrace, and Loma Linda MP 0 to MP 5.2	Major construction activities include removal and installation of LSTs and structures, modifications to existing structures, 220-kV transmission line upgrades, and telecommunications upgrades in the hills south of Loma Linda, passing residences along Grand Terrace Road, east of I-215 and northwest of the connection into Vista Substation on Grand Terrace Road and across from the substation entrance on Newport Avenue.	Ground disturbance limited to developed areas within Vista Substation, SCE ROW, and access roads from San Bernardino Junction, and through the cities of Colton, Grand Terrace, and Loma Linda. Agricultural 1.5 acres Coastal Sage Scrub 13.8 acres Developed/Disturbed 25.5 acres Grassland/Forbland 33.5 acres	74.3 acres
Segment 3 San Timoteo Canyon MP 5.2 to MP 15.2	Major construction activities include access roads improvements, removal, installation, and modification of LSTs and structures, 220-kV transmission line upgrades, and telecommunication upgrades from the San Bernardino Junction (MP 5.2) to El Casco Substation (MP 15.2) roughly paralleling San Timoteo Canyon Road for much of its length where it crosses from San Bernardino County into Riverside County and loops into El Casco Substation and connects to the existing 220-kV switchrack.	Ground disturbance limited to SCE ROW and access roads to San Bernardino Junction and San Timoteo Canyon to El Casco Substation. Agricultural 5.2 acres Chaparral 8.1 acres Coastal Sage Scrub 34.4 acres Developed/Disturbed 46.8 acres Grassland/Forbland 104 acres	198.6 acres

Table 2-1, Transmission Line Disturbance Impacts, cont.

Transmission Segment	Associated Construction Activities	Disturbance Impacts	Disturbance Acreage ^{a, b}
<p>Segment 4 Beaumont and Banning MP 15.2 to MP 27.4</p>	<p>Major construction activities include access roads improvements, the removal, installation, and modifications to existing structures and LSTs, 220-kV transmission line upgrades, and telecommunication upgrades from the El Casco Substation through unincorporated Riverside County and south Calimesa, crossing I-10 to the northeast into Beaumont, east to Oak Valley Parkway, to the north through open fields east through Banning, and open space in the hills north of Banning to San Gorgonio Avenue.</p>	<p>Ground disturbance limited to access roads to SCE ROW to El Casco Substation and through Beaumont and Banning to San Gorgonio Avenue.</p> <p>Agriculture 4.6 acres Alluvial Scrub 0.2 acre Chaparral 22.9 acres Coast Live Oak Woodland 0.5 acre Coastal Sage Scrub 3.8 acres Desert Scrub 0.4 acre Developed/Disturbed 114.1 acres Grassland/Forbland 107.5 acres Riparian Woodland 1.6 acres</p>	<p>255.7 acres</p>
<p>Segment 5 Morongo Tribal Lands and Surrounding Area MP 27.4 to MP 36.9</p>	<p>Major construction activities include access road improvements, the removal, installation, and modifications to structures, 220-kV transmission line upgrades, and telecommunication upgrades from San Gorgonio Avenue in the City of Banning across the Morongo Band of Mission Indians Reservation, crossing through the existing gravel mine, and the eastern limit of the Morongo Indian Reservation at Rushmore Avenue.</p>	<p>Ground disturbance limited to access roads to SCE ROW from San Gorgonio Avenue in Banning and to Morongo Tribal Lands and Rushmore Avenue.</p> <p>Alluvial Scrub 6.4 acres Coastal Sage Scrub 16.8 acres Desert Scrub 141.6 acres Developed/Disturbed 55.4 acres Grassland/Forbland 20 acres</p>	<p>240.2 acres</p>
<p>Segment 6 Whitewater and Devers MP 36.9 to MP 45</p>	<p>Major construction activities include access road improvements, the removal, installation, and modifications to structures, 220-kV transmission line upgrades, and telecommunication upgrades from the eastern boundary of the Morongo Reservation at Rushmore Avenue to Devers Substation, along the foothills of the San Bernardino Mountains passing residences off Haugen-Lehmann Way, crossing Whitewater Canyon Road, and passing wind-generation projects and Highway 62 to connect to the existing 220-kV switchrack inside Devers Substation.</p>	<p>Ground disturbance limited to access roads to SCE ROW from eastern boundary of the Morongo Reservation at Rushmore Avenue through Whitewater Canyon Road and connecting to Devers Substation.</p> <p>Alluvial Scrub 7.9 acres Desert Scrub 161.4 acres Developed/Disturbed 46.4 acres</p>	<p>215.7 acres</p>

^a Improvements that will be constructed on foot, with no associated ground disturbance, have no corresponding disturbance acreage or work area buffers.

^b During project execution, temporary impact areas will be adjusted in the field to minimize impacts to sensitive habitats, if possible.

Section 3—Construction Components and Activities

Access Roads

Typical construction activities associated with rehabilitation of existing dirt access roads include vegetation clearing, blade-grading, and recompacting to fill potholes and remove ruts and other surface irregularities, to provide a smooth dense riding surface capable of supporting heavy construction and maintenance equipment. During rehabilitation, underground utilities will be protected in place, and roads will be widened to a 14-foot width for safe vehicle passage. Road repairs and stabilization of slides, washouts, and other slope failures will be conducted to prevent future failures. (FEIR page B-30)

Typical construction activities for new roads include those described for the rehabilitation of existing dirt roads and may also require the following, depending upon the existing land conditions:

- Relatively flat terrain (approximately 0 to 4 percent grade) generally requires grubbing and constructing drainage improvements (e.g., wet crossings, water bars, and/or culverts).
- Existing rolling terrain (approximately 5 to 12 percent grade) typically requires cut and fill in excess of 2 feet in depth, benched grading, drainage improvements (e.g., v-ditches, down drains, and energy dissipaters), and slope stability improvements such as retaining walls and mechanically stabilized earth walls. The extent of slope stability improvements and structure type will be determined in accordance with site-specific geotechnical investigations.
- Existing mountainous terrain (over 12 percent grade) generally requires significant cut-and-fill depths, benched grading, drainage improvements, and slope stability improvements, such as retaining walls and mechanically stabilized earth walls. In some cases, paving of the road may be necessary.

Dirt access roads will be improved to have a minimum 14-foot drivable width with 2 feet of shoulder on each side to accommodate required drainage features depending on existing topography. Curves will generally have a minimum radius of curvature of 50 feet measured from the center line of the drivable road width. Along a curved section, the drivable road width will typically be widened an additional 1 to 8 feet, depending on the radius of the curvature, to accommodate construction and maintenance vehicles. Access road gradients may be modified so that sustained grades do not exceed 12 percent. Grades greater than 12 percent may be used when such grades do not exceed 40 feet in length and are located more than 50 feet from other excessive grades. Refer to Table 3-1 for a list of 220-kV Transmission Line Improved Access Road quantities per Segment.

Retaining walls may be required along some access roads to support grading and long-term operations. Retaining walls will range between 2 and 18 feet in exposed height. Impact pile-driving equipment may be used for the installation of soldier pile-type retaining walls, though most will use drilled piers. Refer to Table 3-1 for a list of 220-kV Transmission Line Retaining Wall Quantities per Segment.

Table 3-1, 220-kV Transmission Line Construction Features per Segment

Project Installation	Segment 1	Segment 2	Segment 3	Segment 4	Segment 5	Segment 6	Total
Guard Structure Setup Locations	21	5	7	26	2	26	87
Wire/Splice Sites	9	7	21	42	29	15	123
Shoo-fly Work Areas	3	4	6	3	5	-	21
Shoo-fly Structures	37	15	10	28	1	18	109
Down-guy Anchors	14	20	4	26	1	13	78
Improved Access and Spur Roads (miles)	4.8	15	50.3	31.2	36.7	41.7	179.7
New Access and Spur Roads (miles)	2.1	1	2.6	3.3	4.5	2.5	16
Retaining Walls (feet)	-	955	1,096	332	-	192	2,575

New spur roads will be constructed similar to access roads described above. New spur roads will typically have circle-type turnaround areas around each structure location. Where a circle-type turnaround is not practical, an alternative turnaround configuration will be constructed to provide safe ingress/egress of vehicles to the structure location.

Temporary construction roads will be constructed solely for the purpose of facilitating construction activities when use of existing or proposed permanent roads is not be feasible. Temporary and permanent roadways will be a minimum of 12 feet wide. Refer to Table 3-1 for a list of 220-kV Transmission Line New Access Road Quantities per Segment.

Land disturbance related to access/spur roads and retaining walls includes temporary construction work areas and permanent areas to be maintained for ongoing operations and maintenance. Project-related foot travel between structures and along the SCE ROW may be necessary during construction. Crews walking from structure to structure at times may be more efficient than using vehicle or helicopter travel to and from structure sites.

Preconstruction Activities

Structure Site Preparation (FEIR page B-31)

Prior to ground-disturbance activities, SCE or its contractor, will contact Underground Service Alert to identify any underground utilities in the construction zone. If an underground utility is identified as being potentially affected by SCE's construction or operation procedures, a method to mitigate conflicts will be implemented as agreed to by SCE and the affected underground utility owner/operator. Storm water best management practices (BMPs) will be installed at worksites as required by the Project Storm Water Pollution Prevention Plan (SWPPP).

Temporary structure work areas are, on average, consistent with typical transmission projects, approximately 200-feet by 200-feet. However, to minimize impacts to sensitive habitats, SCE's engineering and construction teams worked closely with SCE environmental staff to reduce disturbance areas to the minimum area needed to safely conduct the construction activities. Where removal or replacement structures are immediately adjacent to one another, SCE designed shared work areas with the intention of minimizing the overall footprint. Where contiguous with structure work areas, similar considerations were made in designing wire, splice, and shoo-fly areas. Further, topographical limitations, structure type, distance of wire pull, and other factors affect the number and size of the work areas. All temporary and permanent disturbance areas are accounted for among the impact calculations.¹

New structure pad locations and laydown/work areas will be graded and/or cleared of vegetation as required to provide a vegetation-free surface for structure installation. Sites will be graded to enable water to flow in the direction of the natural drainage, and to prevent ponding and erosion that could cause damage to structure footings. The graded area will be compacted to be capable of supporting heavy vehicular traffic. Structures will be erected adjacent to a crane pad. The crane pad will occupy an area of approximately 50 feet by 50 feet and be located adjacent to each applicable structure within the laydown/work area used for structure assembly and erection. Any crane pads installed for permanent structures will remain for operations and maintenance activities. The pad will be cleared of vegetation and/or graded as necessary to provide a relatively level surface.

Benching may be required to provide access for footing construction, assembly, erection, and wire-stringing activities during line construction.

Transmission Line Construction

The following are general descriptions of the work activities associated with the 220-kV transmission line improvements.

Foundation Installation (FEIR page B-32)

Structure foundations for each LST will typically consist of four poured-in-place concrete footings². Foundations for each TSP typically consist of a single drilled poured-in-place concrete footing. Truck- or track-mounted excavators with various-diameter augers will be used to drill holes to match the diameter for each structure type. LSTs typically require an excavated hole approximately 3 feet to 7 feet in diameter and approximately 15 feet to 50 feet deep; TSPs typically require an excavated hole approximately 5 feet to 14 feet in diameter and approximately 30 feet to 60 feet deep. Each footing for an LST structure will project approximately 2 to 5 feet above ground level; TSP footings will project approximately 1 to 3 feet above ground level within franchise areas and approximately 2 to 5 feet above ground level in uninhabited areas. Rock blasting, or some other form of fracturing, may be necessary for in specific locations. Excavated material will be distributed at each structure site for use as Project backfill or the rehabilitation of existing access roads. The remaining spoils will be disposed of at an offsite disposal facility in accordance with all applicable laws.

Following excavation of the foundation footings, steel-reinforced rebar cages and stub angles (for LSTs) or anchor bolts (for TSPs) will be set, and survey positioning will be verified. The steel-reinforced rebar cages may be assembled at staging yards or vendor facilities and delivered to each structure location by flatbed truck, or they may be delivered loose and assembled at the job site. Water, fluid stabilizers, drilling mud, and/or casings will be used to control ground caving and to stabilize the sidewalls from sloughing. If fluid stabilizers are used, mud slurry will be added in conjunction with the drilling. The concrete for the foundation will be pumped to the bottom of the hole, displacing the mud slurry. Mud slurry brought to the surface will be contained adjacent to the foundation in a pit and/or vacuumed directly into a truck to be reused or discarded at an offsite disposal facility in accordance with all applicable laws. Concrete samples will be drawn at time of pour and tested to ensure engineered strengths are achieved. Once an acceptable value of cured strength of the sample has been achieved, crews will be allowed to start erecting the structure.

In some cases, equipment and material may be deposited at structure sites using helicopters or by workers on foot, and crews may prepare the foundations using hand labor assisted by hydraulic or pneumatic equipment, or other methods.

¹ Text in paragraph was in response to a data request.

² There are three LST structures north of El Casco Substation that will require additional grade beams incorporated into their foundations as a result of identified elevated groundwater levels and the potential for liquefaction.

Lattice Steel Tower Installation (FEIR page B-34)

LSTs will primarily be assembled within the construction areas at each tower site. Steel bundles will be transported from material staging yards to each structure location. Crews will assemble leg extensions, body panels, boxed sections, and the cages/bridges. Assembled sections will be lifted into place with a crane and secured by a combined erection and torquing crew. When the steelwork is completed, the construction crew may install insulators and wire rollers (travelers).

If the LST is located in terrain inaccessible by a crane, a helicopter may be used for the installation of the structure per the methods detailed in Institute of Electrical and Electronic Engineers (IEEE) 951-1996, Guide to the Assembly and Erection of Metal Transmission Structures, Section 9, Helicopter Methods of Construction. This approach is not currently anticipated for this Project.

Tubular Steel Pole Installation (FEIR page B-35)

TSP sections will be placed in temporary laydown areas at each pole location. Top sections may come preconfigured, may be configured on the ground, or may be configured after pole installation with the necessary cross arms, insulators, and wire stringing hardware. A crane will then be used to set each steel pole base section on top of the previously prepared foundations. If existing terrain around the TSP is not suitable to support crane activities, a crane pad will be constructed within the laydown area. When the base section is secured, the subsequent section of the TSP will be slipped together into place onto the base section. The pole sections may also be spot-welded together for additional stability. The pole sections may also be preassembled into a complete structure prior to setting the poles, depending on the site conditions.

Counterpoise (FEIR page B-36)

Transmission structures located within the substation boundary will be grounded to the substation ground grid. Foundations for 220-kV structures located more than 700 feet outside a substation will require separate grounding.

If adequate foundation-to-ground resistance criteria cannot be met with ground rods, a counterpoise system will be installed. An additional ground wire will be installed below ground, adjacent to and attached to the structure, to increase conductivity between the structure and the ground so that adequate grounding can be achieved. This additional ground wire will be installed within the approximate laydown/work area.

Guard Structures (FEIR page B-36)

Temporary guard structures may be installed at transportation, flood control, and utility crossings for wire stringing/removal activities. Guard structures are typically constructed from standard wood poles. Where guard structures are needed, approximately two to four guard poles will be required on either side of a road crossing. In some cases, the wood poles will be substituted with the use of specifically equipped boom trucks or, sometimes at highway crossings, temporary netting may be installed, if required by the governing transportation agency. Guard structures will be removed after all new conductor is secured into place. Refer to Table 3-1 for a list of 220-kV Transmission Line Guard Structure Quantities per Segment. Additional guard structures may be needed at the time of construction based upon changes in field conditions (e.g., newly identified environmental resources, additional transportation, flood control, and utility crossings).

Wire Stringing (FEIR page B-36)

Wire stringing activities will be conducted in accordance with SCE common practices and similar to process methods detailed in the IEEE Standard 524-2003 (SCE, 2013a). Safety devices such as traveling grounds, guard structures, radio-equipped public safety roving vehicles, and linemen will be in place prior to the initiation of wire-stringing activities. Advanced planning by supervision is required to determine circuit outages, pulling times, and safety protocols for ensuring that the safe installation of wire is accomplished.

Wire stringing includes the installation of conductor, ground wire (OHGW/OPGW), insulators, stringing sheaves (rollers or travelers), vibration dampeners, weights, and suspension or dead-end hardware assemblies for the entire length of the route.

The following five steps describe typical wire-stringing activities:

- Step 1: A wire-stringing plan will be developed to determine the sequence of wire pulls and the setup locations for the wire pull/tensioning/splicing equipment.
- Step 2, Sock Line Threading: A helicopter will fly a lightweight sock line from structure to structure, which will be threaded through rollers in order to engage a camlock device, which will secure the pulling sock in the roller. This threading process will continue between all structures through the rollers of a particular set of spans selected for a wire pull.
- Step 3: Pulling: The sock line will be used to pull in the conductor pulling rope and/or cable. The pulling rope or cable will be attached to the conductor using a special swivel joint to prevent damage to the wire and to allow the wire to rotate freely to prevent complications from twisting as the conductor unwinds off the reel.
- Step 4: Splicing, Sagging, and Dead-Ending: Once the conductor is pulled in, if necessary, all mid-span splicing will be performed. Once the splicing has been completed, the conductor will be sagged to proper tension and dead-ended to structures.
- Step 5: Clipping-In: After the conductor is dead-ended, the conductors will be secured to all tangent structures. Once this is complete, spacers will be attached between the bundled conductors of each phase to keep uniform separation between each conductor.

Transmission Wire Pulling and Splicing Locations (FEIR page B-37)

Temporary puller, tensioner, and splicing setup locations will require reasonably level areas to allow for maneuvering of the equipment. When possible, these locations will be located on existing roads and level areas to minimize the need for grading and cleanup. The approximate area needed for stringing setups associated with wire installation is variable and depends upon terrain. Splicing may require the use of explosives for implosive sleeves to fuse wire segments. On relatively straight alignments, typical wire pulls for transmission occur approximately every 3 miles and wire splices every 1.5 miles on flat terrain. Each stringing operation consists of a puller setup positioned at one end and a tensioner setup with wire-reel stand truck positioned at the other end of the wire pull. Pulling and wire tensioning locations may also be used for splicing and field snubbing of the conductors. Temporary splices (e.g., pulling socks) may be necessary since permanent splices that join the conductor together typically cannot travel through the rollers. Splicing setup locations are used to remove temporary pulling splices and install permanent splices once the conductor is strung through the rollers located on each structure. Field snubs (i.e., anchoring and dead-end hardware) will be temporarily installed to sag conductor wire to the correct tension at locations where stringing equipment cannot be positioned in back of a dead-end structure. Refer to Table 3-1 for a list of 220-kV Transmission Line Wire Pulling and Splice Locations per Segment.

Transfer/Removal of Existing Structures/Facilities

Removal of LSTs and TSPs

LSTs and TSPs will be removed in the following sequence (FEIR page B-38):

1. **Road Work:** Existing access roads will be used to access structures, but some rehabilitation and grading may be necessary before removal activities to establish temporary crane pads for structure removal.
2. **Wire-pulling Locations:** Wire pulling sites will be located according to the Pulling Plan.
3. **Conductor Removal:** After the wire-pulling equipment is in place, rollers will be installed on structures, the old conductor will be unclipped from the supporting structures, placed into the rollers, and pulled out with a pulling rope and/or cable attached to the trailing end of the conductor. After the conductor is removed, it may be necessary to tail out the pulling rope as it is rewound to the pulling drum. The old conductor wire will be transported to a construction yard where it will be prepared for recycling.
4. **Structure Removal:** For each structure to be removed, a laydown/work area equivalent to the structure type being removed will be required. Most structure-removal activities will use the crane pad or other previously disturbed area established for structure installation. If previously disturbed areas adjacent to the structure site are not available, an area will be cleared of vegetation and graded if the ground is not level. The crane will be positioned approximately 60 feet from the structure location to dismantle the structure. LSTs and TSPs will be dismantled down to the foundations, and the materials will be transported to a recycling center. In the event that constructing a crane pad is not feasible, a helicopter will be used for removal of the structure.
5. **Footing/Foundation Removal:** Foundations/footings will be crushed by mechanical means such as a pneumatic hammer. Footings from LSTs and TSPs will be removed to a depth approximately 1 to 2 feet below grade and all wooden poles would be removed entirely. When removal is completed, the holes remaining will be filled with excess soil and smoothed to match the surrounding grade. Where new tower footings will be located in the same footprint as an existing structure, the existing footing will be removed to a depth that does not conflict with the new footing. Footing materials and pole sections will be transported to a construction yard where they will be prepared for disposal or reuse.

Existing transmission lines, subtransmission lines, distribution lines, and telecommunication lines (where applicable) will be transferred to the new structures prior to removal of existing structures. Any remaining facilities that are not reused by SCE will be removed and delivered to an authorized facility for recycling and/or disposal.

Shoo-Flies

Shoo-fly facilities will be used to maintain continuous power flow in the Project corridor/ROW during construction (see Table 3-1 for a summary of shoo-flies per segment). Shoo-fly structures will be removed after construction is completed. Shoo-fly work areas are temporary disturbance areas designed to facilitate the work activities associated with shoo-fly structures. The number of shoo-fly structures varies depending on the complexity of the circuitry in each area. Shoo-fly structures will consist of steel and/or wood poles that may be guyed for stability with down-guy anchors.

Shoo-fly structures will range in height from approximately 40 to 145 feet above ground. Shoo-fly structures will be direct buried and will be installed similar to wood poles as described in FEIR page 35. Removal of the shoo-fly facilities will be similar to the removal of wood poles described in FEIR page B-38.

Refer to Table 3-1 for a list of 220-kV Transmission Line Shoo-fly work areas, structures, and down-guy anchors per Segment.

During construction of transmission line improvements, workers will arrive and park personal vehicles at a designated project construction yard, or other meeting place, and travel to the worksites together in company vehicles. The number of transmission construction personnel onsite will vary, depending on the activities to be performed that day, but should not exceed 300 personnel.

The following is a list of potential equipment used onsite for transmission improvement construction:

- Bucket truck
- Crew truck
- Backhoe-loader
- Dump truck
- Flatbed truck
- Forklift
- Splice lab
- Line truck (e.g., Telsta)
- Bore equipment
- Water truck
- Utility Vehicles
- Puller
- Tensioner
- Dozer
- Motor Grader
- Drill
- Sag Cat
- Crane
- Boom Truck

A majority of materials associated with the construction efforts will be delivered by truck to designated construction yards where transmission crews will meet and transport the materials to worksites. Transmission construction areas will serve as temporary working areas where project-related equipment and/or materials will be placed at or near each structure location, within SCE ROW or franchise. Materials will include, but not be limited to, temporary guard structures, LSTs, TSPs, wood poles, wood guy poles, stringing/pulling/tensioning equipment, splices, construction equipment, cable reels, hardware, structure and vault components, conduit, spacers, ground wire, and concrete, conductor, insulators, signage, consumables (such as fuel and filler compound), waste materials for salvaging, recycling, or disposal, and BMP materials (straw wattles and silt fences).

Fuel and hydraulic fluids will be located at the project construction yards, substations, and other existing SCE facilities. Normal maintenance and refueling of construction equipment will be conducted at these existing locations and approved work areas along the ROW. Refueling and storage of fuels will be performed in accordance with the SWPPP. BMPs will be implemented to address the handling of hazardous materials during construction activities.

Night Use

It is not anticipated that lighting will be used at construction sites unless a permit condition, an outage requirement, critical work activity, and/or an emergency situation requires work to be conducted during off hours. In those instances, lighting will consist of temporary construction lighting systems that use shielding to direct the light away from sensitive receptors, to the extent feasible. Maintenance lights in construction yards will be directed downwards to reduce glare outside the facility, in accordance with the Construction Lighting Plan.

Local noise and construction-hour ordinances will be adhered to; however, if noise or construction-hour ordinances cannot be complied with, authorization from the local jurisdiction will be obtained prior to the construction activity.

Helicopter Use

Helicopter-based erection of the transmission structures is not anticipated. However, if a structure is located in terrain inaccessible by a crane, it is possible that a helicopter may be used for the installation of some or all of the structure. Helicopters will also be used for installation of aerial safety markers.

In the event that helicopter-based structure construction is deemed necessary, the following will apply (FEIR B-40):

1. Structure sections will be assembled at the construction staging yards and hauled by helicopter to the designated structure sites and lowered into place.
2. Structure site and foundation preparation equipment and materials will be ferried to the site by helicopter or delivered by vehicle.
3. SCE may temporarily stage materials and/or assemble structure sections at previously approved structure and wire pull sites that are road-accessible.
4. SCE will provide CPUC monitors with a list of the areas to be used for this temporary purpose and identify the material or assemblages to be staged at each site and the structure sites where the materials or assemblages will be used.

Structure construction activities performed by helicopter will be based out of local airports/airfields located within the vicinity of the ROW and staging yards, where possible. Otherwise, the helicopter will be located along the ROW and existing access roads, as needed. Mobile fueling apparatus will be required where helicopters will be staged along the ROW during construction. Use of the mobile fueling equipment will be operated in accordance with proper spill containment requirements. Project-related helicopter activities for the construction of the transmission lines could include delivery of equipment and materials from staging yards to structure sites, structure placement, hardware installation, and conductor and/or OPGW stringing operations, and conductor and

structure deconstruction and removal. The specific helicopter models anticipated to be used include the Bell 500 (MD 500), Hughes, and Kaman Kmax, though other equivalent light and medium duty helicopter models may be used. The total time within any given hour of the day that the helicopters will be used at one location outside of the staging areas is expected to be approximately 15 minutes. Helicopters may travel back and forth between sites and staging yards multiple times within the hour. Depending upon the specific needs, project-related helicopter activities for the construction of the transmission lines will occur across the entire project area. However, helicopters will not be used at night for construction. The approved detailed Project-Specific Helicopter Use Plan will govern the planned usage of helicopters or other aircraft in the performance of this work. Implementation of the plan will ensure that Federal Aviation Administration regulations/guidance and/or industry best management practices are met. Flight routes and altitudes will be used to minimize flight into sensitive areas and avoid aircraft congestion.

The operations area of the helicopters will be limited to the Proposed Project area, including staging areas, ground locations in close proximity to conductor and/or OPGW pulling, tensioning, and splice sites, including locations in previously disturbed areas near construction sites. In addition, helicopters must be able to land within SCE ROWs, which could include landing on access or spur roads. All helicopter refueling in the staging areas, ROWs, or access or spur roads, will be in accordance with the SWPPP. At night or during off days, helicopters and their associated support vehicles and equipment may be based at a local airport.

The majority of deconstruction will be performed with ground-based equipment (i.e., cranes and hauling vehicles); however, helicopters will also be used across the entire project area to remove transmission hardware, poles, structural assemblies, conductor, and ground wire. In addition, helicopters will be used to stage materials and personnel required to support deconstruction. Project-related helicopter activities for the deconstruction of the existing transmission lines, towers, and poles will include the removal of equipment and materials from structure sites to approved project laydown areas for removal by locally staged hauling vehicles. Helicopters may land in any approved disturbance area, including structure sites, pull sites, and access or spur roads.

Prior notice will be given in the daily helicopter flight information provided to agency monitors regarding the specific sites that will be used for helicopter picks that day and the destination of the materials being lifted out. Dust-control measures will be implemented to assure that fugitive dust is not generated during picking operations. Fly Yard Coordinators (FYCs) will be responsible for coordinating all helicopter activities at yards, and all pilots entering an area of operations will communicate with both the FYCs and other pilots to establish the location of other helicopter traffic, establish traffic patterns, and yard and worksite conditions.

Aerial Safety Markers

To the extent practicable, Federal Aviation Administration recommendations, including the installation of marker balls on appropriate infrastructure where necessary, will be incorporated into the design of the Project. In most cases, marker balls will be installed by helicopter because of this method's efficiency, minimal ground disturbance, and ability to operate in rugged terrain. In limited circumstances, marker balls may be installed using a spacer cart, but this method is generally less efficient and may result in additional ground disturbance.

SCE will select the most suitable installation method for a particular span. SCE will generally use a light-duty helicopter to install the marker balls. Installation by helicopter may require a short-term outage to nearby energized subtransmission lines and transmission lines.

Helicopter installation requires staging at a landing zone where the helicopter will pick up the construction worker and a marker ball(s), and travel to the installation location. To minimize ground disturbance, SCE will propose to use previously disturbed areas as landing zones.

In limited circumstances, SCE may employ a spacer cart to install marker balls and associated hardware. The spacer cart will be installed on the overhead wire by installation crews, either by helicopter or by using a crane placed on an existing crane pad created during the construction of the structure. Because any installation of spacer carts by crane will take place during construction, it is not expected that installation or use of spacer carts will cause any additional ground disturbance.

Due to the terrain in the areas where marker balls may be required, installation by crane will likely be infeasible, and may entail significant additional ground disturbance. Federal Aviation Administration structure lighting, if necessary, will be installed on the appropriate transmission structures during construction of the structure using similar equipment.

Temporary Electrical and Communications

It is not anticipated that temporary electrical and telecommunication services will be required for transmission construction work. Workers will use equipment and instrumentation located within their work trucks and vehicles for telecommunication services. If necessary, workers may access existing telecommunication services at the existing construction yards and other SCE facilities for support.

Other Activities

Work associated with transmission line work areas may be performed concurrently with telecommunication work, using the same disturbance areas.

Project Activity Schedule

Transmission line work will be completed intermittently over the course of approximately 48 months.

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. Appendix A in SCE's NTP request provides preconstruction compliance information for the issue areas addressed by the West of Devers Upgrade Project Final EIR/Final EIS. The following contains a status of applicable MM and APM required submittals, including any outstanding requirements:

Agricultural: 3.3 acres of Prime Farmland will be impacted by the transmission line construction activities (1.8 acres in Segment 1 and 1.5 acres in Segment 2). Coordination with affected agricultural property owners will occur no less than 60 days prior to construction. Agreements between SCE and the affected agricultural property owners will be provided to CPUC for review and approval prior to the start of construction.

Air Quality: As required by MM AQ-1a, SCE submitted a Fugitive Dust Control Plan on February 10, 2017 and the Plan was approved by the CPUC on May 22, 2017. The plan includes restrictions for vehicle traffic speeds on unpaved roads, watering frequencies for staging areas, stabilization of inactive areas and stockpiles, minimizing drop heights from excavators and loaders, covering soil truck loads, and the discontinuation of construction activities on unpaved areas if visible dust plumes cannot be avoided by approved dust suppression methods.

SCE prepared an Exhaust Emissions Control Plan as required in APM AIR-1 to establish a goal of project-wide fleet average reduction of 20 percent NO_x compared to the estimated unmitigated emissions as presented in the PEA for applicable diesel-fueled off-road construction equipment of more than 50 horsepower. SCE's Exhaust Emissions Control Plan was approved by CPUC on June 8, 2016. In addition, in compliance with MM AQ-1b, off-road equipment with engines larger than 50 horsepower shall have engines that meet or exceed U.S. EPA/CARB Tier 3 Emissions Standards.

Biological Resources: Consistent with MM VEG-1a, SCE submitted the resume for the Lead Biologist for CPUC and BLM concurrence. A Worker Environmental Awareness Program (WEAP) has been prepared to educate on-site workers about the proposed Project's sensitive environmental issues in accordance with MM VEG-1b. 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. This list shall be provided to the CPUC and BLM upon request. The WEAP was approved by the CPUC on June 26, 2017.

SCE prepared a Nesting Bird Management Plan consistent with MM WIL-1c. This plan was developed during the EIR/EIS preparation process in coordination with the CPUC, BLM, USFWS, and CDFW, and was included in Appendix 14 of the Final EIR and EIS.

SCE prepared a Habitat Restoration and Revegetation Plan (HRRP) in accordance with MM VEG-1d to outline the restoration or revegetation of all temporary disturbance areas. The HRRP was submitted in April 2017 for CPUC review and comments were provided to SCE on May 22, 2017. A revised HRRP was provided on July 19, 2017 for CPUC review and comments were provided August 21, 2017.

An Integrated Weed Management Plan (IWMP) required by MM VEG-2a was submitted by SCE on February 10, 2017 and comments were provided to SCE on March 23, 2017. A revised Plan was submitted on August 4, 2017 and was approved on August 22, 2017.

SCE shall prepare an HMMP [Habitat Mitigation and Monitoring Plan] consistent with the requirements of MM VEG-3a which will include restoration or compensation mitigation to assure no net loss of wetland acreage or wetland habitat value from direct or indirect project impacts, including reduction of wetland acreage, and

downstream or upstream effects to channels or their associated habitat. An HMMP has not yet been submitted to the CPUC.

SCE submitted a Raven Monitoring, Management, and Control Plan (WIL-2b) on February 10, 2017 and the Plan was approved by the CPUC on June 26, 2017.

A Wildlife Noise Monitoring Plan was prepared by SCE to satisfy requirements of MM WIL-2c and WIL-2e, and was submitted on April 6, 2017. If active nests or territories are identified within 500-feet of any of the construction work, SCE will implement protective measures outlined in the Wildlife Noise Monitoring Plan if construction activities are expected to occur within 500-feet of active nests or territories of listed riparian birds or coastal California gnatcatchers. CPUC approved the subject plan on June 8, 2017.

As required by MM WIL-2g, SCE submitted a Burrowing Owl Management and Passive Relocation Plan to the CPUC on February 10, 2017 and the Plan was approved by the CPUC on June 26, 2017.

As required by MM WIL-2j, the Special-status Small Mammals Avoidance and Minimization Measures Plan was submitted August 3, 2017 for CPUC review and comments were provided August 21, 2017.

As required by MM WIL-1b, the Wildlife and Snake Handling Guidelines document was submitted August 28, 2017 and is under CPUC review.

Preconstruction surveys for special-status plants and wildlife will be conducted consistent with MMs VEG-4a, WIL-1a, WIL-1c, WIL-2a, WIL-2e, WIL-2f, WIL-2g, WIL-2h, WIL-2i, WIL-2j, and WIL-2k. SCE will ensure wildlife impact avoidance and minimization through measures outlined in MM WIL-1b during subtransmission, distribution, and telecommunication upgrades.

Cultural Resources: As required by MM CL-1b, a Cultural Resources Management Plan (CRMP) was submitted by SCE on February 2, 2017 and was approved by the CPUC on April 2, 2017. A total of five historic-era resources located within the Area of Potential Effects (APE) have been determined eligible for listing in the National Register of Historic Places (NRHP). No direct impacts are to occur to these resources and/or historic features within the resource; protection will be ensured by use of barriers and monitoring in the vicinity of the Historic Properties. The remaining resources located within the APE have been determined not eligible for listing in the NRHP. Consistent with MM CL-1d, cultural resource monitoring will be conducted at sites requiring monitoring for sensitive cultural resources.

Geology and Soils: SCE conducted geotechnical studies to evaluate faults, landslides and unstable slopes, and soil characteristics as outlined in MMs G-1a, G-2a, and G-5a. The required geotechnical and fault investigation reports were submitted on August 17, 2017 and are under review. No subsurface construction (except for the removal of existing poles) shall occur until the required geotechnical reports have been approved by the CPUC.

Hazards and Hazardous Materials: As required by MM HH-1a, SCE has prepared a Hazardous Materials and Waste Management Plan for CPUC review and approval on February 2, 2017. Hazardous materials used and stored on site for the duration of construction activities and will be managed according to the Plan. A Soil Management Plan has been developed consistent with MM HH-2a to provide guidance for the proper handling, onsite management, and disposal of impacted soil that might be encountered during construction activities. SCE's Soil Management Plan was combined with the Hazardous Materials and Waste Management Plan described above. Soil sampling will be conducted as described in MM HH-3a to identify pesticide/herbicide contamination in areas with current or past agricultural activity. CPUC approval of SCE's plan is pending the submittal of contractor information including the following; Written procedures for fueling and maintenance of construction equipment; an Emergency Response Plan; and soil samples to be collected in construction areas where the land has historically or is currently being used for agriculture and would be subject to ground disturbance by the project.

Land Use. As required by MM LU-1a, a Construction Notification Plan was prepared by SCE and approved by CPUC on May 22, 2017. The Plan identified the procedures to ensure that SCE will inform property and busi-

ness owners of the location and duration of construction. The Plan includes provisions for public noticing including mailers, newspaper advertisements, public venue notices, and includes the establishment of a public liaison and toll-free information hotline.

Noise. Best Management Practices for construction noise management will be implemented as outlined in MM N-1a to reduce construction noise exposure at noise-sensitive receptors and to avoid possible violations of local rules, standards, and ordinances during construction. Construction noise shall be confined to daytime, weekday hours (7:00 a.m. to 6:00 p.m.) or an alternative schedule developed by SCE based on its coordination with local jurisdiction. Construction traffic and helicopter flights shall be routed away from residences and schools, where feasible.

Paleontological Resources: A Paleontological Resource Mitigation and Monitoring Plan (PRMMP) has been completed for the West of Devers (WOD) Project and was submitted to the CPUC and BLM for review and approval. The PRMMP was approved by the CPUC on May 9, 2017. Monitoring for paleontological resources will be conducted in compliance with MM PAL-1d and the PRMMP requirements.

Traffic and Transportation. Consistent with MM T-1a and MM T-1b, Construction Transportation and Traffic Control Plans will be developed. The Construction Transportation Plan will describe timing of commutes, methods of reducing crew-related traffic, and other methods for reducing construction-generated additional traffic on regional and local roadways. A Final Helicopter Use Plan will be developed prior to using helicopters to transport personnel, materials, or equipment for the deconstruction of existing facilities or construction of new or replacement project facilities. Construction Transportation Plan and Traffic Control Plans will be submitted 15 and 30 days prior to construction, respectively, for each jurisdiction as applicable.

Visual Resources. As required in MM VR-1a, construction yards, staging areas, and material and equipment storage areas shall be visually screened using temporary screening fencing. In addition, SCE shall avoid night lighting where possible and minimize its use under all circumstances. To ensure this, SCE prepared a Night Lighting Management Plan for both construction and operation, consistent with MM VR-7a. The Night Lighting Management Plan was approved by the CPUC on May 22, 2017. SCE submitted a Surface Treatment Plan in accordance with MM VR-9a describing the application of colors and textures to all new facility structures, buildings, walls, fences, and components comprising all facilities to be constructed. The Surface Treatment Plan was approved by the CPUC on June 5, 2017. As required by MM VR-8a, SCE provided a draft Project Design Plan describing the siting, placement, and other design considerations to be employed to minimize Proposed Project contrast to the CPUC on May 22, 2017. Comments were provided to SCE on June 13, 2017 and a revised Plan was submitted on August 3, 2017, which was reviewed and approved August 8, 2017.

Water Resources. As required by MM WR-2a, SCE developed and submitted an Erosion Control Plan to the CPUC and BLM at least 60 days prior to construction. The Erosion Control Plan was incorporated into the Stormwater Pollution Prevention Plan, which will be kept onsite and readily available on request. SCE submitted the Stormwater Pollution Prevention Plans to the CPUC on May 25, 2017.

Wildland Fire. SCE submitted a Fire Management Plan on February 10, 2017 to satisfy the conditions of MM WF-1a and the Plan was approved by the CPUC on July 18, 2017.

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.
- For existing right-of-way access roads that will not be subsequently used for Project operations and maintenance, these roads shall be restored to vegetation conditions consistent with adjacent/nearby habitat. In addition, SWPPP and dust stabilization requirements shall be implemented. Monitoring of restoration and/or stabilization measures shall be done in accordance with approved mitigation measures and plans.
- **MMs VEG-1c, WIL-1a, VR-2a:** Prior to any construction, equipment or crew mobilization at each work site, resource and work areas will be marked with staking or flagging to identify the limits of work and will be verified by project environmental staff and the CPUC Environmental Monitor (EM). Written authorization will be provided within 24 hours to SCE that the CPUC EM verification of work area and any Environmentally Sensitive Area (ESA) delineation has been completed. If work area or resource boundary delineation was found to be inadequate, the CPUC EM will provide written documentation to SCE within 24 hours identifying the flagging deficiencies identified during verification.
- **MM AG-3a:** Sixty days prior to the start of project construction, SCE shall coordinate with property owners of Important Farmland (Prime Farmland, Farmland of Statewide Importance, Unique Farmland) that currently is being used for agricultural purposes and that will be used for construction and operation of the project, access and spur roads, staging areas, and other project-related activities. SCE shall provide signed agreements to the CPUC for review and approval prior to the start of construction.
- **MMs VEG-1a, WIL-1a, WIL-2i, WIL-ij, and PAL-1d:** Resumes of all biological and paleontological monitors, including specialty monitors (including but not limited to bat, nesting bird, and special-status species monitors), shall be provided for concurrence by the CPUC and BLM, at least 10 working days prior to the monitor commencing field duties. The resumes shall demonstrate, to the satisfaction of the CPUC and BLM, the appropriate education and experience to accomplish the assigned biological and paleontological resources tasks.
- **MM VEG-1c:** Prior to beginning 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 within each jurisdictional area (San Bernardino County, WR-MSHCP, CV-MSHCP, reservation, and BLM).
- **MM VEG-3a:** SCE shall not proceed with any alteration or fill activities in potentially jurisdictional waters until obtaining applicable permits or authorizations, or written agency confirmation that no permit or authorization is required.
- **MM VEG-3a:** SCE shall submit for CPUC review and approval an HMMP [Habitat Mitigation and Monitoring Plan] consistent with the requirements of MM VEG-3a which will include restoration or compensation mitigation to assure no net loss of wetland acreage or wetland habitat value from direct or indirect project impacts, including reduction of wetland acreage, and downstream or upstream effects to channels or their associated habitat.
- **MM VEG-5a:** SCE shall obtain permits from local jurisdictions for tree removal and other plant removal or harvest, in accordance with each applicable ordinance or policy, prior to removal or other impacts to regulated trees or other plants.
- **MM WIL-2j:** Prior to initiating construction-related activities, SCE shall prepare and implement construction minimization measures and habitat conservation measures for review and approval by CPUC and BLM in consultation with USFWS and CDFW to minimize habitat loss and potential take.
- **MM G-1a, G-2a, G-5a:** No subsurface construction (except for the removal of existing poles) can occur until the required geotechnical reports have been approved by the CPUC.

- **MM HH-1a:** No activities described in this Notice to Proceed are authorized until the Hazardous Materials, Waste Management, and Soil Management Plan has been finalized. Additional information required includes: 1) written procedures for fueling and maintenance of construction equipment added to this plan as an Appendix; 2) an Emergency Response Plan (which must include specific methods and materials used to minimize and respond to frac-outs caused by horizontal directional drilling operations) added to this plan as an Appendix; and 3) soil samples to be collected in construction areas where the land has historically or is currently being used for agriculture and would be subject to ground disturbance by the project. The sampling is to identify the possible presence of and to delineate the extent of pesticide and/or herbicide contamination. Results of the soil sampling will be included in this Plan as an Appendix. As required by the Plan, all spill of hazardous materials greater than 1-gallon (or a spill of any size that entered any waterway or environmentally sensitive area) will be immediately reported by phone to the CPUC EM and will be followed by a written final spill incident report.
- **MM LU-1a: Public Notice Mailer.** No less than 15 days prior to construction that would affect property access, a public notice mailer shall be distributed. The notice shall identify construction activities that would restrict, block, or require a detour to access existing residential properties, retail and commercial businesses, wilderness and recreation facilities, and public facilities (e.g., schools and memorial parks). Documentation of compliance with this measure shall be provided to the CPUC. If construction delays of more than seven days occur, SCE shall notify residents or property owners of the delay and provide an estimated of when construction would occur.
- **MM LU-1a: Newspaper Advertisements.** Fifteen days prior to construction within a route segment, a newspaper advertisement shall be placed in local newspapers and bulletins of general circulation in the area. The advertisement shall state when and where construction will occur and provide information on the public liaison person and hotline identified below. If construction is delayed as noted above, an additional round of newspaper ads shall be placed to discuss the status and schedule of construction. Documentation of compliance with this measure shall be provided to the CPUC.
- **MM LU-1a: Public Venue Notices.** Thirty days prior to construction, notice of construction shall be posted at public venues such as trail crossings, rest stops, desert centers, resource management offices (e.g., Bureau of Land Management field offices, San Bernardino National Forest Ranger Station), and other public venues to inform residents and visitors of the purpose and schedule of construction activities. For public trail closures, SCE shall post information regarding the closure and any related trail detour at applicable resource management offices and post the notice within 2 miles north and south of any such point of trail closure and detour. For recreation facilities, the notice shall be posted along the access routes to known recreational destinations that would be restricted, blocked, or detoured and shall provide information on alternative recreation areas that may be used during the closure of these facilities. Documentation of compliance with this measure shall be provided to the CPUC.
- **MM LU-1a: Public Liaison Person and Toll-Free Information Hotline.** SCE shall identify and provide a public liaison person before and during construction to respond to concerns of neighboring property owners about noise, dust, and other construction disturbance. Procedures for reaching the public liaison officer via telephone or in person shall be included in notices distributed to the public. SCE shall also establish a toll-free telephone number for receiving questions or complaints during construction and shall develop procedures for responding to callers. Documentation of compliance with this measure shall be provided to the CPUC.
- **MM N-1b, T-7a:** SCE shall submit to CPUC a Final Helicopter Use Plan at least 60 days prior to helicopter activities.
- **MM R-1a:** No less than 30 days prior to construction that would affect recreation areas, SCE shall coordinate construction activities and the project construction schedule with a representative of the recreation areas listed in MM R-1a that are affected by construction.

- **MM R-1b:** SCE shall coordinate with the local parks and recreation departments regarding construction activities at the park and recreation facilities listed in MM R-1a, in order to identify alternative recreation sites that may be used by the public. SCE shall post a public notice at recreation facilities to be closed or have limited access during construction consistent with MM LU-1a (Prepare Construction Notification Plan) as allowed by the facility representative and identify any alternative recreation sites. SCE shall document its coordination with the parks and recreation departments, and shall submit this documentation to the CPUC and the BLM 30 days prior to initiating project construction.
- **MM T-1a:** SCE shall provide a letter or email to the CPUC confirming that MM T-1a has been executed and shall provide a copy of the Final Construction Transportation Plan at least 15 days prior to construction to the subject jurisdiction.
- **MM T-1b:** Prior to the start of construction and as part of the required traffic encroachment permits, SCE shall submit Traffic Control Plans (TCPs) to agencies with jurisdiction over the public roads that would be affected by overhead or under-ground construction. Copies of the TCPs shall be provided to the CPUC, Caltrans, the planning or traffic departments of the affected local jurisdictions, and all affected police departments, fire departments, and ambulance and paramedic services. Documentation of coordination with service providers shall be provided to the CPUC at least 30 days prior to the start of construction.
- **MM T-1d:** SCE shall coordinate with local and regional agencies or organizations providing regular bus or transit service in the project area at least 30 days prior to construction to reduce potential interruption of these services. At least 15 days prior to construction, SCE shall provide a letter or email to CPUC and BLM confirming that the mitigation measure has been executed.
- **MM T-3a:** Prior to final project design SCE shall review project plans with Caltrans and local traffic departments or public works departments of the counties and the individual cities through which the proposed transmission route traverses. At least 15 days prior to construction, SCE shall provide a letter or email to CPUC and BLM confirming that the mitigation measure has been executed.
- **MM T-4a:** Prior to construction, SCE shall confer with agencies having jurisdiction over the roads anticipated to be used by delivery vehicles and equipment. Unless an alternative method for determining roadway condition is required by a given jurisdiction, at least 30 days prior to construction, SCE shall photograph or video record all construction route public roads within 500 feet in each direction of project access points (i.e., locations where vehicles leave public roads to reach project sites) and roadways where the road surface will be damaged by project-related trenching or digging, and shall provide the respective local jurisdictions, CPUC, BLM, and Caltrans (if applicable) with a copy of these images. At least 15 days prior to construction, SCE shall provide a letter or email to CPUC confirming that the mitigation measure has been executed.
- **MM T-6a:** As required in Mitigation Measure LU-1a, prior to construction activity on major roadways, using media such as local newspapers and onsite postings, SCE shall notify the public of the potential for public parking spaces to be temporarily eliminated and identify where temporary parking spaces would be located. This requirement shall apply when more than five parking spaces are affected. Documentation of compliance with this measure shall be provided to the CPUC.
- **MM T-8a:** SCE shall submit required forms and information to the FAA for its review and approval of transmission structures and conductor spans that may require installation of safety devices or other restrictions. Copies of FAA's review and approval shall be provided to CPUC and BLM at least 60 days prior to erection of structures or installation of conductors that would be in violation of FAA standards and requirements. These structures and spans shall be identified to CPUC and BLM, and the planned installation of required lighting and marker balls described.
- **MM UPS-1a:** The Applicant shall provide a letter describing the availability of non-potable water and efforts made to obtain it for use during construction to the CPUC and BLM a minimum of 60 days prior to the start of construction.

- **MM UPS-2a:** Prior to commencing construction, SCE shall perform engineering studies to determine whether and what cathodic protection would be required on pipelines potentially affected. SCE shall submit to the CPUC written documentation of coordination efforts, protective measures, emergency contacts, and compliance with local requirements.
- **MM WR-2a:** SCE shall submit to the CPUC and BLM Grading Plans that define the locations of the specific features listed in the Erosion Control Plan. SCE shall submit to the CPUC and BLM evidence of possession of applicable required permits for the representative land disturbance prior to engaging in soil-disturbing construction/demolition activities constructing. Such permits may include, but are not limited to: a CWA Section 402 NPDES California General Permit for Storm Water Discharges Associated with Construction Activities (General Permit) from the applicable Regional Water Quality Control Board(s) (RWQCBs), and the Federal General Permit for Storm Water Discharges Associated with Construction Activities on Tribal Land.
- **MM WR-3a:** SCE shall provide the determination of lateral erosion and scour potential, and documentation of corrective actions and the engineering basis thereof, to the CPUC and BLM prior to the start of construction.
- **MMs VEG-4a, WIL-1a, WIL-1c, WIL-2a, WIL-2e, WIL-2f, WIL-2g, WIL-2h, WIL-2i, WIL-2j, and WIL-2k:** Preconstruction surveys consistent with these Mitigation Measures shall be conducted and survey results will be submitted to the CPUC and BLM for review and approval. No work shall occur until the CPUC EM has validated the survey results and any applicable resource and work area boundary staking. The preconstruction survey report format and contents shall be subject to CPUC and BLM review and approval.
- **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 and BLM 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 Refinement (MPR) 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,

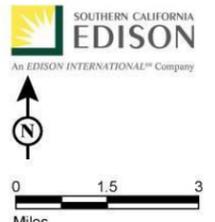
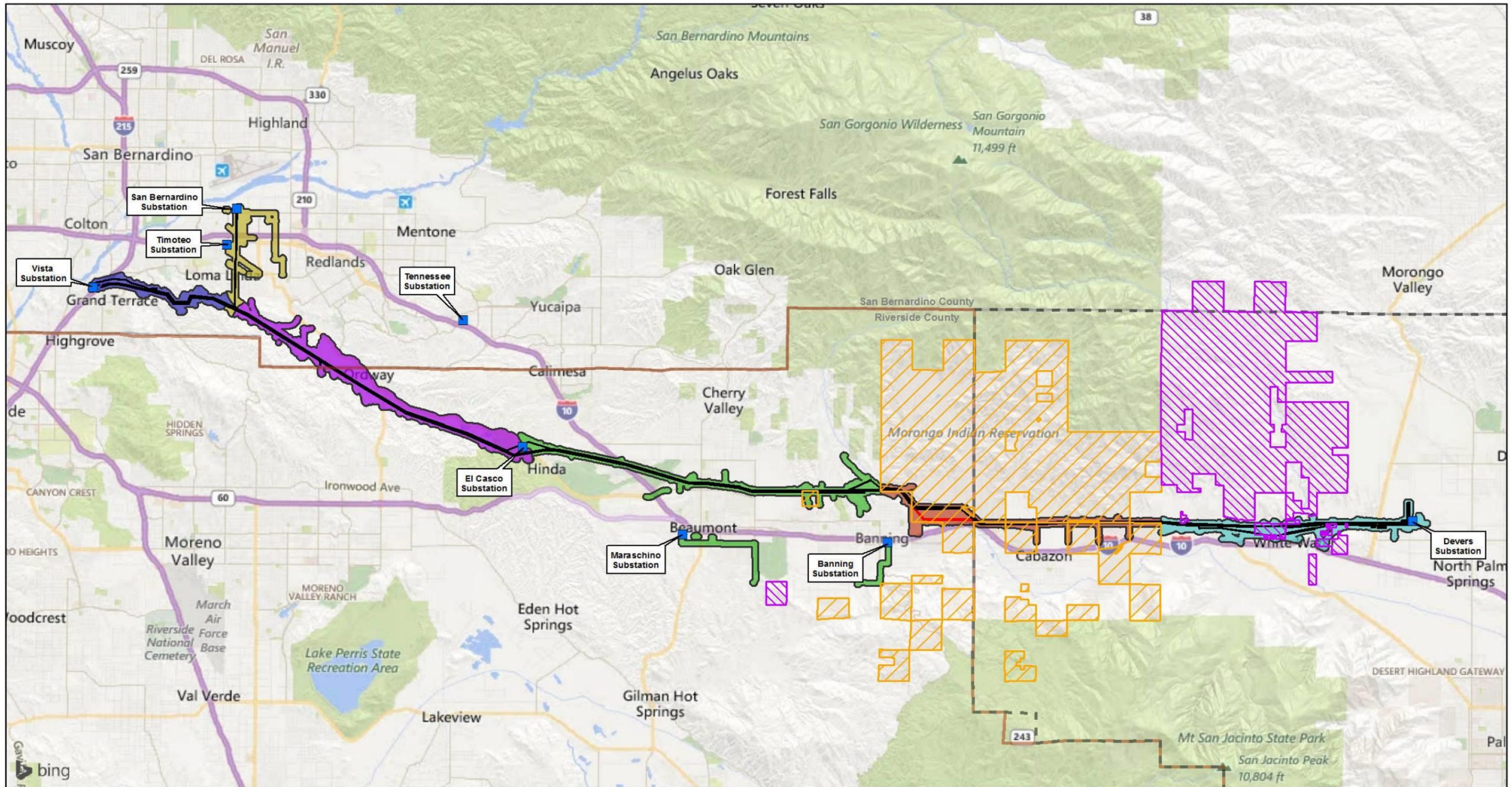


Billie Blanchard
CPUC Environmental Project Manager

cc: V. Strong, Aspen

ATTACHMENT A

**Transmission Line Segments
OVERVIEW MAP**



LEGEND

- Project Study Area
- Existing Transmission Line Right of Way
- Proposed Right of Way
- Substation
- Segment 1
- Segment 2
- Segment 3
- Segment 4
- Segment 5
- Segment 6
- U.S. Bureau of Land Management
- Morongo Reservation
- Western Riverside County MSHCP
- Coachella Valley MSHCP

Source: SCE, Bing Maps

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FIGURE 1-1

Southern California Edison
West of Devers Upgrade Project
Project Overview and Study Area
NTPR Transmission

