# PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298

November 21, 2008

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

RE: SCE Antelope Transmission Project (Antelope-Vincent 500 kV Transmission Line), 500/220 kV Windhub Substation, Notice to Proceed (NTP # 19)

Dear Mr. Johnson,

On October 31, 3008, Southern Californian Edison (SCE) requested authorization from the California Public Utilities Commission (CPUC) for construction of the Antelope Transmission Project (Antelope-Vincent 500 kV Transmission Line), 500/220 kV Windhub Substation.

The SCE Antelope 500 kV Transmission Project (Project) was evaluated in accordance with the California Environmental Quality Act and a Certification of Public Convenience and Necessity (CPCN) was granted by CPUC Docket #A.04-12-008, SCH #2006041160 on March 15, 2007. NTP # 19 is granted by CPUC for the proposed activities based on the following factors:

• SCE submitted the following information in their NTP request:

### **Project Description**

The Windhub Substation, in the Tehachapi Wind Resource Area, will be located at Mile S3-9.6 of the Project route on Oak Creek Road in Kern County. The site is desert terrain with a three to four percent slope from northwest to southeast that is diagonal to the Substation equipment layout. In order to bring the grade into a slope that is parallel with the equipment and to reduce the slope to a workable one and one half to two percent, it will be necessary to alter the existing topography through grading.

The Substation property measures 1,660 feet by 2,317 feet and contains 88.3 acres of land. The total area of land disturbance within the property associated with the construction of Windhub Substation will be 83.7 acres. The total area inside of the perimeter wall will measure 1,310 feet by 2,000 feet and contains 60.1 acres. A graded terraced pad (the area containing the enclosed substation and a minimum 10-foot wide safety buffer around all sides) will measure 1,330 feet by 2,020 feet and contains 61.7 acres. The Substation will be oriented north-to-south with two vehicular access roads connecting to Oak Creek Road to the north. Also provided will be two emergency access roads, one on the east side and one on the south side.

A 12 kV source line for temporary construction power and permanent power for the future Substation expansion will be installed. The 12 kV line will consist of the extension of an existing wood pole line. The 12 kV line will extend south along 70 Street West within an existing wind farm, cross Oak Creek Road and continue along the south side of Oak Creek Road in franchise. The 12 kV line will dip underground east of the main entrance to the Substation and enter the Substation underground. Final design for the 12 kV line is currently underway and further information including results of surveys for biological and cultural resources will be submitted as soon as they become available. The 12 kV source line will be covered under a separate NTP and is not covered under this NTP.

The Substation will be initially equipped with the following: one concrete control building including a basement; one micro wave tower and telecommunication facility (approximately 180 feet); four 220 kV breaker and one half bays; four 220 kV bus dead-end structures; seven 220 kV line/AA bank interface dead-end structures; one 220 kV rated 79.2/156-MVAR each

shunt capacitor banks; and two main 125V batteries with 2 charger, and two main distribution panel boards. Additional facilities and equipment will be installed in the future as necessary, to accommodate additional wind energy projects that may apply for interconnection facilities agreements. Facilities and equipment that may be installed in the future includes the following: one administration building; six 500 kV breaker and one half bays; eight 500 kV bus dead-end structures; four 500 kV line/AA bank interface dead-end structures; four sets of 156-MVAR 500 kV shunt capacitor banks; four sets of 1120 MVA AA transformer banks; four sets of 13.8 kV AA transformer bank tertiary buses; sixteen 13.8 kV 15-kVA shunt reactor; nine 220 kV breaker and half bays; ten 220 kV bus dead-end structures; three 220 kV rated 79.2/156-MVAR each shunt capacitor banks; four 280 MVA three-phase 220/66 kV transformer banks; twelve 66 kV lines; four sets of 66 kV shunt capacitor banks; one station light and power system with companion equipment (one distribution class transformer, one diesel emergency generator and one distribution class transformer each rated 750-kVA three-phase capacity); four sets of 66/12 kV transformers; four sets of 12 kV shunt capacitor banks; and sixteen 12 kV circuits.

Construction of the Substation is anticipated to begin November 2008 and continue through December 2009.

### Construction Methodology

Construction of the Substation consists of three major activities: 1) grading of the entire Substation pad and installation of the perimeter walls, 2) installation of the 220 kV switchyard and associated equipment, 3) installation of the Control Building. The equipment required for the Substation construction includes the following: five-ton truck, 980 loader/scraper, compactor, crane, crane 150-ton, crew hauling trucks, trenching equipment, truck mounted auger for drilling, dump truck, forklift, grader, man-lift, soils test crew truck, support truck, survey truck, tractor/backhoe, truck crane, and water truck.

Substation construction will occur within the Substation perimeter area in accordance with accepted construction industry standards. Work will generally be scheduled in daylight hours (6:30 a.m. to 5:00 p.m.), Monday through Friday. In the event that construction is required outside of the specified hours in order to meet schedule requirements, a variance will be obtained from Kern County if necessary. All materials associated with Substation construction will be delivered by truck to the site. As applicable, truck traffic will use major streets and will be scheduled for off-peak traffic hours. All construction debris associated with the construction effort will be placed in appropriate onsite containers and periodically disposed of according to all applicable regulations.

#### Site Preparation

Within the 88.3 acre Substation property a two tier pad consisting of 61.7 acres will be graded, and a perimeter wall constructed to enclose the Substation. Additional side-slope grading is required beyond the Substation boundaries in order to blend existing terrain with the new Substation pad and to accommodate perimeter surface drainage improvements. The following elements of site preparation will be required for Windhub Substation: grade the entire 1,330-foot by 2,020-foot Substation pad; grade the cut and fill side slopes to blend the existing terrain with the new pad; grade and install the Substation access road; install 6,620 feet of eight-foot-high perimeter wall with barbed wire, two 40-foot-wide rolling gates and two 30-foot-wide rolling gates; and install new 350-MCM copper conductor ground grid system.

# Grading

The grading design establishes a high point at the northern edge of the Substation pad and slopes down at a two percent slope towards the southern edge of the pad. Approximately 1,120 feet from the northern wall line is an eight- to ten-foot drop in the pad, creating a two terrace site. Prior to grading, the entire area to be graded will be stripped of all organic matter and loose rocks. Any waste materials encountered will be removed as required by the environmental and geotechnical investigations. Waste material collected from the stripping operations will be tested for contaminants, if site conditions, such as evidence of prior use involving hazardous materials, warrant additional investigation. An estimated quantity of approximately 21,000 cubic yards of soil mixed with stones and organic matter will be transported from the site and disposed of at an appropriate waste disposal facility. Once the surface has been cleared, the grading operations will begin. An estimated 600,000 cubic yards of soil will be cut from the higher elevations and relocated to the lower elevation as fill. A portion of the cut soil will be used to form a protective earthen berm barrier along the upslope boundaries to prevent surface storm water runoff from entering the Substation. Included within the protective berm area will be a concrete lined drainage channel to redirect surface rainwater flow around the perimeter of the site. If excessive cut or fill results, minor alterations to the site elevation and/or slopes might be needed in an attempt to achieve an overall balance. During grading operations, dust will be controlled by watering. The following represents the estimated waste that will be disposed of due to construction of Windhub Substation: 13,000 pounds of soil vegetation waste, 6,000 pounds of steel/aluminum/copper, 2000 pounds of wood waste, 1500 pounds of sanitation waste, 1000 pounds of concrete waste, and 1500 pounds of miscellaneous waste.

#### Foundation Installation

Approximately 80 foundations of various sizes would be constructed throughout the area to support equipment and steel structures. In addition, a network of partially buried concrete trenches will be installed throughout the Substation area. Excavation of these foundations and trenches will commence following completion of grading and other yard improvements, and will continue for several weeks. An estimated 5,000 cubic yards of soil will be excavated for foundations and trenches. Approximately 440 columns required to support the pre-cast modular perimeter wall will generate an estimated 500 cubic yards of soil. The anticipated total spoils of 5,500 cubic yards will be spread and compacted on a portion of the Substation property.

#### Drainage

The site drainage will be developed during final engineering design to control surface runoff. In compliance with the Clean Water Act, all new site drainage installations will be consistent with the National Pollutant Discharge Elimination System (NPDES) and the SWPPP. NPDES requirements focus on the protection of water quality, through such provisions as the definition of allowable discharge materials, monitoring requirements, reporting requirements, and mitigation measures. Offsite surface runoff will be directed into a trapezoidal shaped concrete lined channel around the perimeter of the Substation directing surface water away from the graded pad and discharging it through the employment of rock lined energy dissipation fields. Surface runoff generated within the site will be directed through a water quality detention basin and discharged over a rock lined channel to the existing drainage channel. Surface runoff will be mitigated as needed through the use of earthen berms and energy dissipation devices, such as filter cloths, slope drains, and riprap placed near drain openings. All of these methods are designed to minimize the velocity of surface water runoff and protect the landscape from erosion.

#### Access

The main facility access will be a 30-foot wide, 240-foot long asphalt concrete paved road connecting Oak Creek Road to a 40-foot wide rolling gate. A secondary access gate with 240-foot long asphalt concrete paved road will also connect to Oak Creek Road. An internal network of asphalt concrete paved driveways will provide access to the various major sections of the switchyard and the control building. To facilitate access to the adjacent transmission towers/poles, two additional 30-foot gates will be located in the east and south walls. The external access roads will not be paved.

At the request of the Kern County Traffic Engineer, SCE will be making improvements to Oak Creek Road for safety while entering and exiting the site. These road improvements include providing a left turn pocket lane into the main Substation entrance and increasing the radius of curb returns to allow for easier truck turning.

# **Geotechnical Testing**

A licensed Geotechnical Engineer or Geologist has tested and analyzed the results of a complete geotechnical soils investigation to determine existing soil conditions. The type of soils present have been identified and tested and the results utilized in final engineering.

#### Paving

Asphalt concrete paving will be applied to the facility access road and to all designated internal driveways over an aggregate base material and a properly compacted sub-grade, as recommended by the geotechnical investigation. These paving activities will take place after major construction.

# Rock Surfacing

Those areas within the Substation perimeter that were not paved or covered with concrete foundations or trenches will be surfaced with a four-inch layer of untreated, %-inch nominal crushed run rock. The rock will be applied to the finished grade surface after all grading and below grade construction has been completed.

### Spill Prevention Control and Countermeasures (SPCC)

An SPCC plan will not initially be required for Windhub Substation. Under federal regulation by the EPA, the owner of a facility is required to implement an SPCC plan if the facility meets the following three criteria: (1) The facility is not related to transportation; (2) The facility has an aggregate aboveground storage capacity of at least 1,340 gallons (only considering containers that are 55 gallons or more) or an in ground storage capacity of at least 42,000 gallons; (3) There is a reasonable expectation of discharge into or upon navigable waters of the United States or adjoining shorelines. In addition, more stringent regulations by the State of California independently require that an SPCC plan be implemented for any facility with

an aboveground storage capacity of at least 10,000 gallons. Storage capacity of the 220 kV interconnection facilities at Windhub Substation is not anticipated to equal or exceed 10,000 gallons, thereby not triggering the threshold for avoiding the California requirement for an SPCC plan. However, an SPCC plan will be prepared and implemented in SPCC thresholds for oil volume are ever reached.

# Storm Water Pollution Prevention Plan (SWPPP)

During construction, measures will be in place to ensure that contaminates are not discharged from the construction site. A SWPPP will be developed that will define areas where hazardous materials will be stored; where trash will be placed; where rolling equipment will be parked, fueled and serviced; and where construction materials, such as reinforcing bars and structural steel members, will be stored. Erosion control during grading of the unfinished site and during subsequent construction will be in place and monitored as specified by the SWPPP. A silting basin(s) will be established to capture silt and other materials, which might otherwise be carried from the site by rainwater surface runoff. Site improvements at Windhub Substation will result in impervious areas from all concrete foundations used for equipment and structures, the concrete foundation for the MEER facility, and asphalt and concrete on access driveways. These impervious areas are estimated to total 11,250 square feet, or approximately one percent of the total Substation enclosed area.

# Perimeter Security

The entire site will be enclosed by a perimeter wall. The wall will conform to the requirements for electrical substations and have a minimum height of eight feet above the adjacent finished grade to the outside of the substation. The wall will be fitted with barbed wire from inside. SCE has requested that the perimeter wall suffice for screening rather than an evergreen vegetative screen as described in Mitigation Measure V-1f.

- CULTURAL RESOURCES. A document titled "Supplemental Archaeological Investigations, Evaluation of California Register of Historic Resources Eligibility of Archaeological Resources at the Windhub Substation Site, Antelope Transmission Project, Segments 2 and 3, Kern County, California" by Pacific Legacy, Inc. dated October, 2008, was submitted to the CPUC. There are two (2) archaeological sites (CA-KER-7050; PL-SCE-Tehachapi 56) and two (2) cultural isolates (PL-SCE-Tehachapi-ISO 15 and 16) located within the footprint of the Windhub Substation site. Pacific Legacy Inc. developed a testing program that tested all these locations for subsurface deposits with hand excavated units and a backhoe trenching program for possible buried archaeological materials. These two programs yielded no subsurface deposits or any other archaeological remains within the footprint of the substation. Thus, no archaeological materials found appear to meet any of the eligibility criteria of listing in the CRHR, specifically Criterion 4, because they lack the potential to yield information important in studies of prehistory. Based on the findings of this study, further archaeological investigation of the Windhub Substation site prior to construction is not recommended. Archaeological and Native American monitoring during initial ground disturbing activities (depths to 1 meter) is required as noted below.
- BIOLOGICAL RESOURCES. Biological surveys were conducted in 2007 and in April, May, and June of 2008, along the approximately 35-mile-long, 500 kV and 220 kV transmission lines with two 500/220/66 kV substations (Windhub and Highwind). A survey with the same 200 foot buffer was also conducted for access roads, guard poles, wire stringing, and turn-around areas. Other areas were also surveyed that are outside of this right-of-way as identified on the disturbance maps. In addition, the areas between Avenue D to just north of Oak Creek Road were also surveyed according to the Field Survey Protocol for any Non-Federal Action that May Occur within the Range of the Desert Tortoise (USFWS 1992), which describes coverage of the zone of influence (ZOI) buffer (i.e. belt transects at 100 feet, 300 feet, 600 feet, 1,200 feet and 2,400 feet from the project area). The desert tortoise survey area was based on suitable habitat (creosote bush scrub, saltbush scrub, desert scrub, Joshua tree woodland, and nonnative grasslands associated with these habitats) within the study area and the vegetation maps and desert tortoise information in the EIR. All surveys focused on biological resources, as described in the mitigation measures of the Final EIR.

No special-status plant species were observed within the survey area.

No California desert tortoise or desert tortoise sign (i.e. burrows, scat, tracks, shells) were detected within the survey area corridor or the ZOI during protocol-level surveys. Protocol-level surveys conducted by LSA in 2007 were also negative, with the exception of some old, unoccupied potential burrows which did not show evidence of tortoise use or sign. No potential burrows were detected during the 2008 surveys.

No incidental Mohave ground squirrels were detected by LSA in 2007. Protocol trapping surveys were not conducted in 2007, in part due to the low rainfall. In 2008, Mojave ground squirrel surveys were done in accordance with California Department of Fish and Game Mojave Ground Squirrel Survey Guidelines (January 2003) by wildlife biologist William J. Vanherweg. No Mojave ground squirrels were seen or trapped during the 2008 surveys.

Two special-status bird species and one special-status mammal species were identified: Swainson's hawk (*Buteo swainsoni*), western burrowing owl (*Athene cunicularia*), and American badger (*Taxidea taxus*). Surveys for Swainson's hawks conducted in 2007 and 2008 had positive results. In 2007, potential burrowing owl burrows were detected during surveys. In 2008 surveys, both burrowing owls and burrows were found. A preconstruction survey for burrowing owls, in conformance with CDFG protocol, shall be completed no more than 30 days prior to the start of construction within suitable habitat at the project site(s) and buffer zone(s). During 2007 surveys, four potential American badger burrow locations were noted. No individual badgers were observed, but signs of their presence were noted near some of the burrows and the vicinity surrounding the burrows (e.g. diggings, claw marks). During the 2008 surveys, one American badger in a burrow and two American badger burrows were detected. Per Mitigation Measure B-26, and in consultation with CDFG, badgers will be passively relocated from the project area during the non-breeding season.

 Screening of Substation. SCE has proposed to build a wall around the substation for screening purposes instead of an evergreen vegetative screen. The proposed change and wall is approved by the CPUC as part of NTP #19.

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

- Construction of new access and spur roads shall be done in accordance with approved project mitigation measures.
- This NTP does not cover the 12 kV line source for temporary construction power and permanent power for the future substation expansion. The 12 kV line work will require a separate NTP.
- As identified in the Biology Mitigation Measures and Applicant Proposed Measures (APMs) in the EIR/EIS, SCE would assign Biological Monitors to the Project. They would be responsible for ensuring that impacts to special-status species, native vegetation, wildlife habitat, or unique resources would be minimized to the fullest extent possible. The Biological Monitor shall be on-site to monitor all work and will conduct sweeps of the approved areas, especially areas with high burrow concentrations which will be impacted. Monitors would flag the boundaries of areas where activities need to be restricted in order to protect wildlife including special-status species. These restricted areas would be monitored to ensure their protection during construction. This will include protecting species covered under the Migratory Bird Treaty Act (MBTA) and CDFG codes regarding the protection of nests and eggs. If breeding birds with active nests are found, a biological monitor shall establish a 300-foot buffer around the nest and no activities will be allowed within the buffer until the

young have fledged from the nest or the nest fails. The 300-foot buffer may be adjusted to reflect existing conditions including ambient noise and disturbance with the approval of the CDFG and USFWS (as well as CPUC notification). The biological monitor shall conduct regular monitoring of the nest to determine success/failure and to ensure that project activities are not conducted within the buffer until the nesting cycle is complete or the nest fails.

- Biological survey sweeps shall be conducted and results submitted to the CPUC for review and approval prior to equipment and vehicles mobilizing into an area. After complete surveys have been submitted and approved by the CPUC, site occupation can occur; however, if occupation does not occur within seven calendar days of survey submittals, biological clearance sweeps shall be reconducted prior to site occupation, including nesting bird surveys during the breeding season.
- Per Mitigation Measure B-3b, CDFG and CPUC shall field verify temporary impacts to desert wash habitat. SCE shall coordinate with CDFG and CPUC to acquire and ensure permanent protection of mitigation lands.
- Per Mitigation Measure B-4a, SCE shall photo document the number of Joshua and juniper trees removed during project construction and provide a letter report to the CPUC and CDFG at the conclusion of construction
- Per Mitigation Measure B-4b, CDFG and CPUC shall field verify temporary and permanent impacts
  to Joshua tree woodland and Juniper woodland habitat. SCE shall coordinate with CDFG and CPUC
  to acquire and ensure permanent protection of mitigation lands.
- Per Mitigation Measure B-13c, SCE will submit final Project design plans and specifications to the CPUC for review and approval of protective measures for montane scrub, juniper woodland, and chaparral habitats
- Per Mitigation Measure B-13d, CDFG and CPUC shall field verify temporary and permanent impacts to montane scrub and Juniper woodland habitat. SCE shall coordinate with CDFG and CPUC to acquire and ensure permanent protection of mitigation lands.
- Per Mitigation Measure B-6a, the applicants shall request technical assistance from the USFWS and CDFG to review the potential for desert tortoise to occupy suitable habitat within the Project area and obtain concurrence that the applicants proposed measures along with mitigation measures listed below would avoid impacts to this listed species. Prior to construction, SCE will submit documentation to USFWS and CDFG describing applicant proposed measures and Mitigation Measure B-6b for review and approval. SCE shall submit documentation that desert tortoise survey results have been submitted to CDFG and USFWS.
- As stated in the LSA Final Preconstruction Biological Survey for the Antelope Transmission Project, Segment 3 in Los Angeles and Kern Counties, California dated August 20, 2008, and the Preconstruction Swainson's Hawk Survey Report for Segments 2 and 3, dated August 2008, surveys conducted in 2007 and July of 2008 had positive results with several sightings. The August 2008 Swainson's hawk survey results shall be submitted to CDFG for review and approval prior to construction. Clearance surveys shall include investigations for Swainson's hawk nests. If a nest site if found during the time period of March 1 and September 15, consultation with CDFG shall be required prior to commencement of construction activities within ½ mile of the subject nest.

- A preconstruction survey for western burrowing owls, in conformance with CDFG protocol, shall be
  completed no more than 30 days prior to the start of construction within suitable habitat at the project
  site(s) and buffer zone(s). The survey results shall be submitted to CDFG and CPUC for review and
  approval prior to the start of construction within suitable burrowing owl habitat.
- Per Mitigation Measure B-26, occupied American badger dens shall be flagged for avoidance. Unoccupied dens located in the ROW shall be covered to prevent the animal from re-occupying the den prior to construction. Occupied dens in the ROW shall be hand-excavated if avoidance is not possible. Dens shall only be hand-excavated before or after the breeding season (February-May). Any relocation of badgers shall take place after consultation with the CDFG.
- Per Mitigation Measure B-27a, to avoid creating barriers to desert tortoise movements within areas designated in the WMP s desert tortoise "Survey Areas", roadbeds shall not be lowered and berms shall not exceed 12 inches (30 cm) or a slope of 30 degrees. SCE has stated that the Project has no plans to lower roadbeds in DTSAs or to upgrade berms so that they exceed 12 inches in height or a 30 degree slope. However, over time, access road roadbeds may be lowered as a result of normal wear and tear associated with construction activities involving heavy equipment. A biological monitor will inspect access roads in DTSAs to ensure they continue to comply with the specifications of Mitigation Measure B-27a. If during the routine use of the roads it is noted that the roadbed has been lowered and the berms exceed 12 inches in height or a 30 degree slope, these locations will be regraded to comply with the specifications provided in Mitigation Measure B-27a.
- If special-status plant or animal species are observed within the project area, the CPUC EM and CDFG shall be notified immediately.
- Per Mitigation Measure A-1f, prior to its use on the project, SCE shall provide to the CPUC the
  following information for all diesel equipment used on the project: Tier rating, CARB registration,
  where applicable Smoke Check Test results, and in the case of Tier 1 engines, where the contractor
  plans to install VEDEC retrofit exhaust system, verification of installation shall be provided to the
  CPUC.
- Per Mitigation Measure A-1i, SCE will submit a monthly helicopter use log including expected hours of operation, type of helicopter, and purpose of use to the CPUC for review and approval.
- The Cultural Resources Management Plan shall be followed by SCE and its contractors.
- Archaeological and Native American monitoring during initial ground disturbing activities (depths to 1 meter) shall be conducted.
- Per Mitigation Measure G-8, a certified paleontological monitor will monitor compliance at construction areas where excavation is being conducted in geologic units of moderate to high sensitivity. Areas of low sensitivity will be spot-checked periodically. Paleontological monitoring reports will be submitted to the CPUC for review on a monthly basis.
- SCE shall submit a Spill Prevention, Countermeasure, and Control Plan (SPCC), which addresses Mitigation Measure HAZ-2a, 60 days prior to the operation of the Windhub Substation with equipment containing oil at sufficient quantity to trigger the requirement for an SPCC. This level will not be triggered with the installation of equipment and facilities included in this NTP.

- Per Mitigation Measure H-1d, construction activities, particularly roadway installations and improvements, must not occur when precipitation events are expected. As stated by SCE, parameters for road building activities may include, but are not limited to the following: 1) precipitation event expected in excess of 0.5-inch, 2) excessive rutting and/or soil mixing, 3) evidence of erosion and sediment runoff, 4) significant soil compaction, 5) significant soil adhesion to vehicles and construction equipment.
- Per Mitigation Measure H-4, if it is determined that known groundwater resources would be unavoidable during construction, SCE will submit a Groundwater Remediation Plan to the CPUC and RWQCB for review and approval prior to the onset of any construction activities. If unknown groundwater resources are encountered, SCE will stop the disruptive excavation activity and submit a site-specific remediation plan to the CPUC and RWQCB for review and approval. Water may not be discharged on site, but may be held in a Baker Tank until the Plan is approved.
- Table A: Drainage Assessment for Impact Areas and Access Roads (Existing Overland, New Permanent, Temporary, to Improved) from the SCE Segment 3A August 2008 submittal for Mitigation Measure APM BIO-3 (Avoid Impacts to Streambed and Banks) shall be followed. If project plans and/or access road plans change, or conditions at the stream crossings/drainages change, the CPUC and CDFG shall be consulted regarding those changes and avoidance of potential impacts.
- SCE has submitted a Streambed Alteration Notification to CDFG for a drainage within the Windhub Subsation site. No work shall be done on the drainage until approval from CDFG has been granted. A buffer zone of 50 feet around the drainage shall be established before other work at the Windhub Substation site may begin.
- Per Mitigation Measure V-15, SCE shall submit all permits and approvals from Los Angeles County, Kern County and other affected local agencies.
- All project mitigation measures, compliance plans, and permit conditions shall be implemented during construction activities and use of the proposed yard spaces. Some measures are ongoing/time-sensitive requirements and shall be implemented prior to and during construction where applicable.
- Copies of all relevant permits, compliance plans, and this Notice to Proceed shall be available on site for the duration of construction activities.
- Prior to the commencement of construction activities, all crew personnel including haul truck and concrete truck drivers shall be appropriately WEAP trained on environmental issues including protocols for air quality, hazardous materials, biological resources, known and unanticipated cultural materials, as well as SWPPP BMPs. A log shall be maintained on-site with the names of all crew personnel trained.
- All work boundaries shall be flagged prior to occupation. In addition, all approved access roads, spur
  roads and overland travel routes to be used shall be flagged prior to construction.
- All sensitive resources buffers shall be flagged for avoidance by a qualified biologist and approved by the CPUC EM prior to construction.
- All culturally sensitive areas shall be flagged for avoidance by a qualified archaeologist and approved by the CPUC EM prior to construction.

- No movement or staging of construction vehicles or equipment shall be allowed outside of the approved areas. If additional temporary workspace areas or access routes, or changes to construction technique or mitigation implementation to a lesser level are required, a Variance Request shall be submitted for CPUC review and approval.
- All fueling for equipment and helicopters shall be conducted using saddle trucks at least 100 feet from aquatic resource areas.
- If construction debris or spills enter into environmentally sensitive areas, the jurisdictional agencies and CPUC EM shall be notified immediately.
- In the case of a hazardous materials spill, the CPUC EMs shall be immediately notified and an incident report shall be submitted to the CPUC within five (5) working days of the spill incident and shall include spill volumes and any resource damage that may have occurred.

Sincerely,

John Boccio

CPUC Environmental Project Manager

cc: V. Strong, Aspen