In Reply Refer to:
2800(P)
CACA 55285
CAD066.32

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

Dear Mr. Stevenson,

On August 7, 2017, Southern California Edison (SCE) submitted Notice to Proceed (NTP) Request #5 to the Bureau of Land Management (BLM) for 220-kV transmission line improvements in support of the West of Devers Upgrade Project (Project). Under this NTP Request, SCE is seeking BLM authorization to proceed with the 220-kV transmission line improvements granted in right-of-way (ROW) CACA 55285, which was fully executed December 8, 2017.

As currently proposed by SCE, the 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); transmission line and associated telecommunications portion of the project on non-federal lands (NTP #4); and this NTP (NTP #5) for the transmission line portion of the Project on BLM lands. The description of activities presented in Attachment A was provided by SCE in their request for NTP #5. The overview maps in Attachment B identify the location of the 220-kV transmission line improvements on BLM lands.

The BLM approves NTP #5 for the 220-kV transmission line improvement activities for the Project as identified in Enclosure A.

If you have any questions, please contact Mark DeMaio, Project Manager, at (760)833-7124 or via email mdemai@blm.gov.

Sincerely,

Douglas J. Herrema, J.D.
Field Manager
Enclosures:

Enclosure A- Right-Of-Way Notice to Proceed

cc:  B. Blanchard, CPUC
     V. Strong, Aspen
     M. DeMaio, BLM (via email)
     J. Cheek, BLM (via email)
Enclosure A

Southern California Edison
West of Devers Project
BLM Right-Of Way
Notice to Proceed on BLM Lands
UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

RIGHT-OF-WAY NOTICE TO PROCEED

Certified/Registered Mail-Return Receipt Requested

INSTRUCTIONS — Use Certified or Registered Mail or hand deliver. Send or give original to Holder. Distribute other copies as indicated after receipt date.

Holder: Southern California Edison

In accordance with the terms and conditions of the above referenced right-of-way grant or TUP you are hereby authorized to proceed with the activities noted below in the locations specified. Map(s) are attached. ☐ Yes ☐ No

<table>
<thead>
<tr>
<th>Activity</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>This Notice to Proceed allows for 220-kV transmission line improvements in support of the West of Devers Upgrade Project on BLM land. For a complete list of actions authorized on BLM lands, please refer to Attachment A, SCE NTP Request #5, Description of Construction Activities. Compliance with the terms, conditions, and stipulations identified in the ROW grant for CACA 55285, as well as the conditions of NTP approval presented in Attachment C is required.</td>
<td>BLM lands Identified in Transmission Line Segments Overview Map and Segment 6 (Attachment B)</td>
</tr>
<tr>
<td>Please refer to Attachment B, for a Transmission Line Segments Overview Map and Segment 6.</td>
<td></td>
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<tr>
<td>A Summary of Mitigation Measures, and NTP Conditions of Approval is provided in Attachment C</td>
<td></td>
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</tbody>
</table>

Authorized officer is:

Douglas J. Herrera

(Name)

Field Manager, Palm Springs South Coast Field Office

(Title)

Onsite inspection and compliance of the Right-of-Way or TUP stipulations will be conducted by the authorized officer’s representative.

Mark DeMaio, Janet Cheek, or Victoria Hernandez

(Name of Authorized Officer’s Representative)

760.833.7100

(Office Phone Number)

(Authorized Officer’s or Representative’s Signature)

1201 Bird Center Drive, Palm Springs, CA 92262

(Office, Street Address, City, State, Zip)

(MAR 29 2018)

(Date)

(Holders Acknowledgement when notice is delivered in person).

(Firm Name)

(Data)
Attachment A- SCE NTP Request #5 Description of Construction Activities

The following text was provided by SCE in their request for NTP #5.

Section 1—Transmission Line Improvements

In total, the Project involves removal and upgrade of approximately 181 circuit miles of existing 220-kv transmission line facilities (approximately 48 corridor miles) within the existing SCE transmission line corridor, located on public, Tribal, and private land in incorporated and unincorporated parts of Riverside and San Bernardino Counties. The transmission line upgrades will be constructed along the six transmission line segments shown in Figure 1. BLM lands in the Project area are limited to Segment 6 (Whitewater and Devers [MP 36.9 to MP 45]; FEIS page B-6 - B7), and activities on BLM lands include upgrade of transmission line components only.

Segment 6 is approximately 8 miles long, extending from the eastern boundary of the Morongo Reservation at Rushmore Avenue (MP 36.9) to Devers Substation (MP 45). Within Segment 6, the Project will cross approximately 3.5 miles of land managed by the BLM as a designated utility corridor. The existing 200 kV transmission line towers within the existing BLM/SCE ROW will be removed and replaced. Temporary disturbance outside of the existing BLM/SCE ROW will include construction work areas, temporary access roads, cut/fill slopes, and pulling locations. Permanent disturbance outside of the existing BLM ROW will include new access road construction, crane pads, and existing access roads to be continually maintained during operation.

Two upgraded 200 kV transmission lines will be constructed on BLM land in parallel corridors between 1,000 and 1,500 feet apart. The upgraded lines will be in or immediately adjacent to existing transmission corridors, where the existing towers and conductors will be removed and replaced with new towers and conductors. In the northern corridor, 8 existing lattice steel towers (LSTs) would be replaced by 3 new LSTs and 2 tubular steel poles (TSPs). In the southern corridor, 9 existing wood poles would be replaced by 5 new LSTs.

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.

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.

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 FEIS (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 affected BLM parcels are located north of the I-10, east of Rushmore Avenue, and west of State Route 62 (see Attachment A of NTP #5).

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 State Route 62; along the foothills of the San Bernardino Mountains passing residences off Haugen-Lehmann Way, crossing Whitewater Canyon Road, and passing wind-generation projects to Highway 62. (see Attachment A of NTP #5, pages 1-17.)

Ground disturbance on BLM land will be limited to access road improvements required for access to the SCE ROW and those associated with transmission tower removals and replacements. The estimated land disturbance for the transmission line improvements to BLM land covered within this NTPR totals approximately 20.4 acres, including 16.07 acres of desert scrub and 4.29 acres of developed/disturbed land.
Section 3—Construction Components and Activities

Access Roads

Approximately 5.7 miles of existing access and spur roads will be improved on BLM land for access to and from the transmission corridors. Approximately .4 miles of new access and spur roads will be constructed on BLM land and maintained for operation and maintenance of the towers on BLM land. Typical construction activities associated with rehabilitation of existing dirt access roads include vegetation clearing, blade-grading, and recomping 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. (FEIS 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, bench 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, bench 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.

Approximately 192 feet of retaining walls will be constructed along the access roads south of structure M4-T2 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.

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 feasible. Temporary and permanent roadways will be a minimum of 12 feet wide.

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 (FEIS 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 work sites as required by the Project Storm Water Pollution Prevention Plan (SWPPP).

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 (FEIS page B-32)

Structure foundations for each LST will typically consist of four poured-in-place concrete footings. 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, crilling 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.

Lattice Steel Tower Installation (FEIS 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 (FEIS 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 (FEIS 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.
Wire Stringing (FEIS 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 (OHWG/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:** Socket 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 rope 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 (FEIS 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.

Transfer/Removal of Existing Structures/Facilities

Removal of LSTs and TSPs

LSTs and TSPs will be removed in the following sequence (FEIS 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 taut 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 and telecommunication lines 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.

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 will likely not exceed 25 personnel.

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

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

A majority of materials associated with the construction efforts will be delivered by truck to designated construction yards located on non-BLM land, 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 (FEIS 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 attitudes 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 pits, and access or spur roads.

Prior notice will be given to 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 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.
Attachment B

Transmission Line Segments
Overview Map and Segment 6
Attachment C - Summary of Mitigation Measures, and NTP Conditions of Approval

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, including the compliance plans noted in Table 1. These plans have been reviewed and approved by BLM, as well as resumes for biological, cultural, and paleontological specialists and monitors during construction. Mitigation requirements and other conditions of approval are noted below.

<table>
<thead>
<tr>
<th>Mitigation Plan Description</th>
<th>Mitigation Measure</th>
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<td>Nesting Bird Management Plan MM</td>
<td>MM WIL-1c</td>
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<td>Wildlife Noise Monitoring Plan</td>
<td>MMWIL-2c, WIL-2e</td>
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<tr>
<td>Paleontological Resource Mitigation and Monitoring Plan (Includes Paleontological Monitoring Report and Paleontological Resource Report)</td>
<td>MM PAL-1b, APM PAL-1, MM PAL-1a, MM PAL-1a</td>
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<tr>
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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 BLM/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 BLM/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 BLM/CPUC Environmental Monitor (EM). Written authorization will be provided within 24 hours to SCE that the BLM/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 BLM/CPUC EM will provide written documentation to SCE within 24 hours identifying the flagging deficiencies identified during verification.

- MMs VEG-1a, WIL-1a, WIL-2i, WIL-lj, 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 BLM and CPUC, at least 10 working days prior to the monitor commencing field duties. The resumes shall demonstrate, to the satisfaction of BLM and CPUC, the appropriate education and experience to accomplish the assigned biological and paleontological resources tasks.

- Herbicide Use of BLM Lands: SCE shall implement mitigation developed in the Environmental Assessment for Herbicide as Weed Management on BLM Lands.

- MM VEG-1c: Prior to beginning any ground-disturbing activities, SCE shall provide BLM and CPUC 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 BLM and CPUC review and approval a Habitat Mitigation and Monitoring Plan (HMMP) 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 W1-2j: Prior to initiating construction-related activities, SCE shall prepare and implement construction minimization measures and habitat conservation measures for review and approval by BLM and CPUC in consultation with USFWS and CDFW to minimize habitat loss and potential take.

MM G-1a, G-2a, and G-5a: No subsurface construction (except for the removal of existing poles) can occur until the required geotechnical reports have been approved by CPUC.

MM HH-1a: As required by the Hazardous Materials, Waste Management, and Soil Management Plan/Emergency Response Plan for BLM Lands, 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 BLM/CPUC EM and the BLM Resources Branch Chief of the Palm Springs Field Office and will be followed by a written final spill incident report.

MM LU-1a: Public Notice Mailing. 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 BLM and 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 BLM and 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. No more than five public parking spaces would be needed during construction. Documentation of compliance with this measure shall be provided to BLM and 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 BLM and CPUC.

MM N-1b, T-7a: SCE shall submit to BLM and CPUC a Final Helicopter Use Plan at least 60 days prior to helicopter activities.

MM T-1a: SCE shall provide a letter or email to BLM and 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 BLM and 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 BLM and 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 BLM and CPUC 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 BLM and CPUC 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, BLM, CPUC, 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 BLM and CPUC confirming that the mitigation measure has been executed.

- 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 BLM and CPUC 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 BLM and CPUC, 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 BLM and CPUC 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 BLM and CPUC written documentation of coordination efforts, protective measures, emergency contacts, and compliance with local requirements.

- MM WR-2a: SCE shall submit to BLM and CPUC Grading Plans that define the locations of the specific features listed in the Erosion Control Plan. SCE shall submit to the BLM and CPUC 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 Discharge 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 BLM and CPUC prior to the start of construction.
- **MMS VEG-4a, Wil-1a, Wil-1c, Wil-2a, 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 BLM and CPUC for review and approval. No work shall occur until the BLM/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 BLM and CPUC review and approval.

- **MMC RP:** SCE will prepare and distribute a weekly environmental compliance status report for distribution to BLM and CPUC consistent with project permits, mitigation measures, and the Mitigation Monitoring, Compliance and Reporting Plan (MMC RP). Prior to the start of monitoring activities, SCE shall provide a proposed format describing content and organization of Weekly Compliance Reports for BLM and CPUC review and approval.

- **MMC RP:** 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 BLM and CPUC review (MMC RP Section 4.6). In addition, all water sources and disposal sites not previously identified shall require a TEWS or an MPR.