

PUBLIC UTILITIES COMMISSION505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

December 10, 2007

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

RE: SCE Antelope-Pardee 500 kV Transmission Project, Segment 1 Project - Notice to Proceed (NTP #2)

Dear Mr. Johnson,

On November 16, 2007, Southern Californian Edison (SCE) requested authorization from the California Public Utilities Commission (CPUC) for Antelope Substation construction and expansion, as well as the use of two adjacent contractor laydown yards.

The SCE Antelope-Pardee 500 kV Transmission 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.04-12-007, SCH #2005061161 on March 1, 2007. The Forest Service is the federal Lead Agency for the preparation of the Project's EIR/EIS in compliance with NEPA. The proposed work and yard locations do not occur on Forest Service land thus no approval from the Forest Service is required. **NTP #2 is granted by CPUC for the proposed activities based on the following factors:**

- Per the SCE NTP #2 request (including background materials submitted with the request) dated November 16, 2007:
 1. SCE is requesting an NTP for the scope of work described in the Final EIR/EIS for the Antelope Substation. This scope of work includes the Mechanical Electrical Equipment Room (MEER), the expansion area (approximately 33 acres), grading work, relocation of three double circuit 66-kV sub transmission lines, and other items described under Section B.2.1 in the Final EIR/EIS.
 2. In addition, this request is also for Burns and McDonnell construction trailer yard, and PAR marshalling yard as depicted in the attached figure. The PAR Antelope Substation yard (61.5 acres) will serve as a material and equipment storage yard, and will support project construction activities. The Burns and McDonnell portion (7.8 acres) will serve primarily as a field office site with room for parking both trucks and some limited equipment parking, mostly trailers or smaller pieces of equipment. Activities and items that will possibly be present or active at this yard site throughout the duration of the project include: office trailers, vehicle parking, equipment storage, steel delivery and shake out, tower construction, spill kit storage, fire equipment storage, concrete washout and batch plant, wire storage, roll-off trash container, roll-off steel disposal container, portable toilets, tower lay down area (from 66kV line), steel stub angles, rebar and rebar cages, setup, form cans and associated foundation items, tower pick-up, fueling from saddle tanks and fuel trucks, welding and torch work. Welding and torch work activities will be limited to emergency and mechanical needs only. Open flame activities that may be performed on this property will have a water truck and fire watch present at all times. Portions of the yard containing equipment at risk for theft may be fenced or, alternatively, patrolled by security.

3. Per the NTP #2 request “SCE is requesting an NTP for the entire scope of work at Antelope Substation, although SCE does not currently own all of the parcels needed for the expansion area and subtransmission relocation. Once NTP #2 is issued, SCE would commence work only on property which is currently owned in fee by SCE. This scope would include the MEER, the Burns and McDonnell construction trailer yard, a portion of the 66kV line relocations, and a portion of the PAR marshalling yard.” Work on the remaining parcels would not begin until SCE submits written documentation of ownership and compliance documentation of mitigation measure requirements to the CPUC.
4. Per the NTP #2 request “no sensitive plant or wildlife species were observed during the two biological field surveys conducted at the Antelope Marshalling yard during April and October 2007. No sensitive plant species are expected to occur on or adjacent to the yard. Burrows of a suitable size to accommodate burrowing owl, a special interest wildlife species, were recorded from the survey area. However, no burrowing owl sign was associated with these burrows. To help ensure that use of the Antelope Substation yard does not impact burrowing owls, within 30 days prior to use of the yard, a pre-construction survey will be conducted to evaluate burrowing owl use of appropriately-sized burrows. If no evidence of burrowing owl use is discovered during this pre-construction survey, the openings will be collapsed to temporarily preclude owl use.” Please note that the burrows must be collapsed immediately following the negative findings survey and occur with the biological monitor present. “Open non native grassland vegetation does provide moderate quality habitat for foraging raptors and certain small mammals, reptiles and birds.”
5. Per the NTP #2 request “no grading is anticipated to prepare the site for use, restoration and rehabilitation efforts will consist of discing the areas that may have become compacted through use as a marshalling yard. The non-native grassland vegetation is expected to become re-established in these areas. The small amount of rabbit brush scrub to be disturbed will be revegetated per the methods described in the Revegetation Report currently being prepared for the Project.”
6. Per the NTP #2 request “the surface reconnaissance of both proposed Antelope Substation yards was conducted in September 2007. No cultural resources or potential historic properties were observed at or near the yard or within the confines of its immediate approach corridors. Temporary use of the area adjacent to the Antelope Substation will not alter the substation itself. Therefore, use of the yard will not affect any potential historic properties in accordance with 36 CFR Part 800, and no impacts to cultural resources or paleontological resources are expected to occur.” In regard to paleontologic issues, since the substation is located in a geologic unit with generally low sensitivity (likely to contain only a limited number of fossils), use of a paleontologic monitor during excavation and other ground disturbance activities would be sufficient. If any fossils are identified, then the remainder of Mitigation Measure G-10 including submission of a Paleontology Monitoring Plan would be required.
7. Per the NTP #2 request “what appears to be a single family residence is located on the north side of Avenue J, across the street from both Antelope Substation yards...There are no other homes, hospitals or schools located in the vicinity of both Antelope Substation yards. The existing substation is completely surrounded by open space used for sheep grazing and is located just south of the 2-lane Avenue J.” Please note that proper notifications within the appropriate timeframes are required by Mitigation Measure N-1b.

8. Per the NTP #2 request “the Antelope Substation yard sites consist of unpaved open space, the majority of which appears to be routinely used for extensive sheep grazing. The soil is fine and easily disturbed, necessitating watering for dust suppression as per the conditions of the Fugitive Dust Permit from the Antelope Valley Air Quality Management District. Equipment on site will not be idled for more than 10 minutes. Use of equipment will be conducted according to the air quality mitigation measures specified in the Final EIR/EIS.” Please note that prior to site construction the Antelope Valley Air Quality Management District Fugitive Dust Permit will be submitted to the CPUC.
- A geotechnical report for the substation expansion was provided December 6, 2007. The report is currently under review by a technical expert. Comments and requests for revisions may arise. SCE may not start construction of the Substation components until the geotechnical report is approved and SCE has been notified by the CPUC.
 - The Antelope-Pardee 500 kV Transmission Project EIR/S defined required mitigation measures to be implemented prior to commencement of project construction. The relevant mitigation measures for construction activities requested under NTP #2 have been satisfied by SCE with the exception of the measures noted below.

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

- No work authorized under NTP #2 shall commence until the following are provided for review and approved by CPUC: 1) Proper property owner notifications within the appropriate timeframes are required by Mitigation Measure N-1b, 2) Antelope Valley Air Quality Management District Fugitive Dust Permit, and 3) geotechnical report (currently under review).
- As proposed, SCE shall commence work only on property which is currently owned in fee by SCE. Work on the remaining parcels shall not begin until SCE submits written documentation of ownership and compliance documentation of mitigation measure requirements to the CPUC.
- 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 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 Notice to Proceed shall be available on site for the duration of construction activities.
- A paleontological monitor shall be on-site to monitor all ground disturbing operations. If any fossils are identified, then the remainder of Mitigation Measure G-10 including submission of a Paleontology Monitoring Plan shall be required.
- As required by biological resource mitigation measures, a biologist 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. If rodents arise as with all other encountered wildlife on project areas, the monitor will stop work in the area and move them to an appropriate location outside of the work area.
- Prior to the commencement of construction activities, all crew personnel including haul truck and concrete truck drivers shall be appropriately trained on environmental issues including protocols for air quality, hazardous materials, biological resources, known and unanticipated cultural materials, as

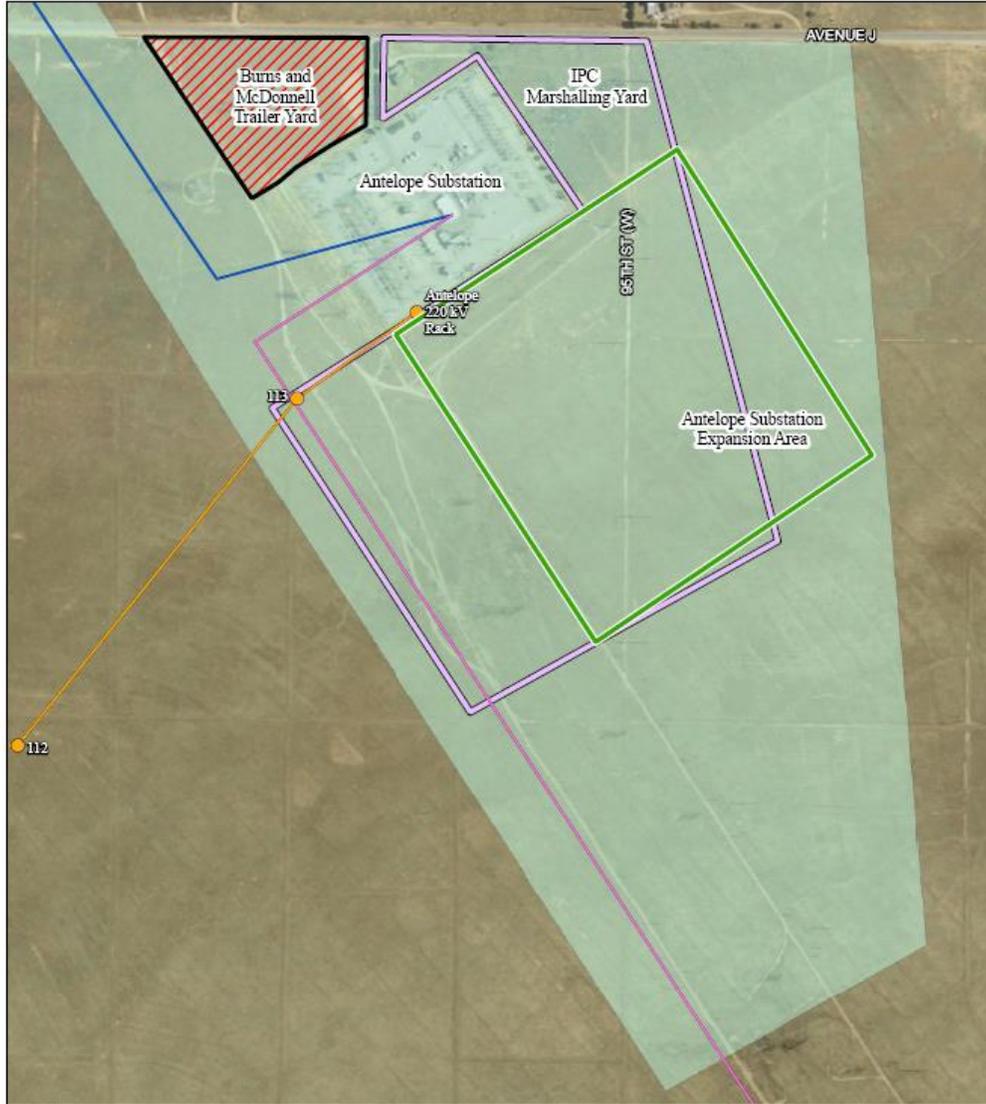
well as SWPPP BMPs. A log shall be maintained on-site with the names of all crew personnel trained.

- 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.
- Project related vehicles and equipment with diesel engines shall limit idle times to no more than 10-minutes.
- If construction debris or spills enter into environmentally sensitive areas, the jurisdictional agencies and CPUC EM shall be notified immediately.

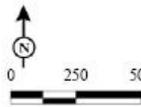
Sincerely,

John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen



LSA



Source: Segment-SCE (2007), Image-NAIP (2005)

- Survey Area
- Burns and McDonnell Trailer Yard
- IPC Marshalling Yard
- Antelope Substation Expansion Area

- Proposed Transmission Tower
 - Antelope-Pardee 500kV Segment 1
 - Antelope Transmission Project -Segment 2
 - Antelope Transmission Project -Segment 3
- Antelope-Pardee 500-kV Transmission Line Project*
Proposed Antelope Substation Yards and Expansion Area

FIGURE 2