STATE OF CALIFORNIA ARNOLD SCHWARZENEGGER, Governor
PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

March 26, 2008

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

RE: SCE Antelope-Pardee 500 kV Transmission Project, Segment 1 - Notice to Proceed (NTP #5), Modification #2

Dear Mr. Johnson,

On February 15, Southern Californian Edison (SCE) requested authorization from the California Public Utilities Commission (CPUC) to construct the Shoofly portion of Section 1, Segment 1. The request was approved February 28, 2008, as Notice to Proceed (NTP) #5. On March 12, SCE requested modification to NTP #5 for authorization to access and use private land to dispose of project soils. The request was approved March 20. On March 24, SCE requested a second modification to NTP #5 which includes the 66 kV conductor removal on the Del Sur-Saugus line during the outage scheduled for March 27, 2008.

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 locations do not occur in Forest Service land; thus, no approval from the Forest Service is required. **NTP #5 Modification #2 is granted by CPUC for the proposed activities based on the following factors:**

- Per the supporting documentation submitted with the Request:

For safety reasons, the 66kV line is being proposed for removal simultaneous to the construction of the shoofly line to take advantage of a planned outage for March 27 on an intersecting high-voltage line. The project will take place on private property along the southern border of the Angeles National Forest approximately 3.0 miles north of proposed shoofly structures 13 and 14, and will cross an intermittent tributary to Haskell Canyon that is currently dry.

The work entails the removal of the conductors (wires) from Pole Switch #74 on a double circuit 66 kV line that passes over the top of Los Angeles Department of Water and Power (LADWP) 1,000,000 kV Direct Current (DC) and 115 kV Transmission lines. Three towers (Wreck Out (WO) 6-1, 6-5, and 7-1) and two spans of the 66 kV line would be involved, with bucket trucks and a boom truck used to guard (i.e., be placed so as to prevent conductors from falling to the ground or on other transmission lines/facilities) the 115 kV and DC locations. The bucket truck would be located at the middle tower to perform aerial rigging when the wires are removed and secured to the tower legs. Once this done, a winch truck will pull the conductor taut between each pair of towers to facilitate removal from the insulators. This process will be repeated six times for each of three phases for each span. No new roads will be constructed for this activity. Existing roads or overland travel over existing vegetation will occur. (Please note that per the survey reports all roads and the corridor where overland travel is expected to occur has been surveyed).

Once the wire has been removed and tied off onto the tower, it will be slowly lowered to the ground under full control and rewound onto a rewind machine that will be set up under the DC line. The northernmost of the two spans passes over grassland, while the southern span crosses a dry, intermittent drainage with oak riparian woodland. If by chance the wire comes down into

the drainage, the pulling will continue until the wire comes free rather than risking further tree damage by manual removal. (Please note that if the wire comes down on the drainage the CPUC and CDFG will be notified immediately.)

The 66 kV towers (WO 6-1, 6-5, and 7-1) were surveyed during the spring of 2007 as per the above-listed mitigation measures. However, only a 100 foot radius around each tower was included in this effort. Therefore, for this project, a focused survey for sensitive plants, burrowing owls, American badgers, small mammal burrow concentrations, and any other potentially occurring special interest species was conducted within the original buffers and throughout the proposed project disturbance area. The survey was conducted on March 12 and 20, 2008 by Burns and McDonnell senior biologist Kimberly Toal. A 500 foot buffer for nesting birds was surveyed on foot and by binocular around the proposed disturbance areas, along the access roads, and within the drainage under the southernmost of the two spans. Recent heavy rains resulted in a lush growth of new vegetation, although some herbaceous species had not yet bloomed or had only rosettes present. As a result, some species would not have been identifiable to species, but occurrence potential for many of the plant species is low in the disturbed portions of the survey area. Peirson's morning-glory (*Calystegia peirsonii*) a CNPS Category 4 species was observed in an area of approximately 100 square feet near the middle tower (Wreck Out Structure (WO 6-5). The 100 square-foot patch of Peirson's morning-glory will be flagged for avoidance as feasible and adherence to this exclusion ensured by the monitor.

Twenty-two mature canyon live oak (exceeding three inches in diameter at breast height (dbh), and seven saplings with a dbh under three inches were noted within that portion of the drainage that could be impacted in the unlikely event that the conductor is dropped during removal. Every safe and reasonable attempt will be made to keep the conductor out of the channel. If the conductor does fall and damage oak trees, an arborist will assess the damage and determine what measures should be undertaken to trim or otherwise treat the tree to minimize infection by pathogens or parasites. In the event that trees are destroyed, mitigation will be undertaken at a ratio agreed upon by the California Department of Fish and Game and the CPUC.

No evidence of burrowing owls (*Athene cunicularia*) was noted. An unidentified hawk (Buteo) was sitting in a tower adjacent to the project on the first survey, and flew shortly after it was observed. During the second survey, a red-tailed hawk (*Buteo jamaicensis*) was observed wheeling overhead of the ROW, but did not land. In either instance, no nesting behaviour was observed, nor any nests or remnants of nests in the towers affected by or adjacent to the project.

Two passerine nests were observed in oak trees within the north-south drainage, at least 300 feet from the proposed impact area. Neither were occupied or defended, although one had droppings on the branches beneath it. The height of the nests was too great to allow examination for eggs. They could be impacted only if the line falls into those trees during removal. (Please note that if impacts do occur to the nests both the CPUC and CDFG shall be notified immediately.)

Use of the site for removal of the 66kV conductor is expected to have a minimal impact on biological resources present in the project area and the vicinity. Overall, these biological resources are common and widespread throughout the region, and all impacts to native plant communities will be restored according to an approved Habitat Restoration and Revegetation Plan.

A biological monitor will be present during all stages of construction and line removal.

Compass Rose Archaeological, Inc. conducted a Phase I cultural resource investigation for the proposed removal of the portion of conductor along the Del Sur-Saugus 66 kV Transmission Line (Antelope PS 74)
The surface reconnaissance of the project areas was conducted on March 19, 2008. As stated in the report, no cultural resources, either prehistoric or historical, were observed at, or in the vicinity of any of the proposed project staging areas or along their immediate avenues of approach. Based on the results of the investigation, the project as proposed will have no effect on cultural resources, and no additional studies are recommended at this time.

- Guidelines and regulations established by the SWPPP will be implemented at all times during all construction. Implementation of all necessary erosion control devices will be properly installed and maintained throughout the duration construction. A copy of the SWPPP will be available on-site for reference. Inspections of BMP placement and function will also be performed.

- The Fugitive Dust Control Plan addresses specific measures that will be required to control dust during construction.

- Proper noticing shall occur to residences and businesses where applicable, and documentation of noticing shall be submitted to the CPUC as construction progresses.

- Prior to construction in any City or County, all applicable encroachments shall be submitted to the CPUC.

- In a letter dated March 17, 2008, as submitted by CDFG, guidance was provided for expected protocols to be carried out in regard to sensitive resource surveys, reporting, and sensitive resource buffer establishment and handling requirements. All requirements shall be executed by SCE and their contractors.

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

- 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, mitigation measures and this Notice to Proceed shall be available on site for the duration of construction activities.

- As identified in APM BIO-5 and Mitigation Measure B-6 in the EIR/EIS, SCE is required to conduct surveys prior to construction of the project. 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. Results shall be submitted to the CPUC EM prior to entering new areas. SCE shall provide the ongoing sweep/survey results with accurate maps. Where appropriate, 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 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 CPUC and USFWS (as well as CDFG). 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.

- If archaeological remains are discovered in the course of construction activities, construction should be halted and the potential resource evaluated by a qualified archaeologist. The archaeologist will recommend appropriate mitigation measures. If human remains are encountered during construction or any other phase of development, work in the area of the discovery must be halted, the Los Angeles County Coroner notified, and the provisions of Public Resources Code 5097.98-99, Health and Safety Code 7050.5 carried out.

- Prior to the commencement of construction activities, all crew personnel including crane, 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 approved project areas and access routes shall be flagged prior to the commencement of work. 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.

- 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