

**PUBLIC UTILITIES COMMISSION**505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298

February 28, 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)

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 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 is granted by CPUC for the proposed activities based on the following factors:**

## ▪ Per the Request:

1. The Shoofly will be constructed within an existing SCE transmission line right-of-way (ROW), in the City of Santa Clarita and Los Angeles County, from proposed 500 kV Tower 16 within the City of Santa Clarita, to Tower 25 in Los Angeles County. Once the Shoofly structures are installed, the existing 220 kV circuit will be transferred to the new structures. As provided in separate correspondence, the existing line will not be moved over directly. The old line will be completely removed and the new shoofly structures strung with new line. Once the circuit has been transferred, the existing 220 kV circuit and structures will be disassembled and removed to allow for construction of the new Antelope-Pardee 500 kV transmission line within the same ROW in Section I of Segment 1. The work associated with the Shoofly must proceed in order for construction to begin on the remaining portions of Section 1, 2 and 3 of Segment 1.
2. The Shoofly will be constructed at 18 individual sites along the segment of transmission line identified above. Five of these structures will consist of three-pole structures, for a total of 15 poles. There will also be 13 single pole structures for a total of 28 poles on the Shoofly. There will also be one double circuit dead end structure of lattice steel constructed at Shoofly site 25. This will be a permanent structure which will be utilized for the final Antelope-Pardee transmission line to be constructed in Section 1, Segment 1. Because the structure at Shoofly site 25 will require significant soil removal and benching, an area has also been identified for disposal of the soil. Notwithstanding the structure at site 25, the Shoofly will be constructed of slip joint one and two piece galvanized tubular steel poles. These poles will be buried directly into the ground, with no engineered foundations. A hole will be dug for each pole using rubber-tired or tracked drilling rigs, depending on the terrain and location. Once the hole is dug, the pole will be inserted into the hole 35 to 40 feet in depth by a crane and back filled with dirt excavated from

the hole. After the travelers have been hung and obstacles such as roads and energized facilities have been protected with guard poles, the contractor will proceed with pulling the steel pulling line (sock line) from the puller end to the tension machine end with a helicopter. Once the sock line has been flown in, it will be connected to the conductor wire and pulled back through the travelers for the entire length of the designated pull.

3. Existing roads within the SCE ROW corridor will be used to the greatest extent feasible. In some cases, existing roads will need to be improved. The terrain is such that overland travel will be used where no road exists. This will involve vehicles accessing sites by driving over existing vegetation. Some new access or stub roads will be required. These roads will be temporary and will also be used to access individual structure sites for construction of the Shoofly. In all instances, any new roads not required for ongoing maintenance of the new 500 kV transmission line will be restored and re-vegetated.
4. Once the permanent 500 kV towers are installed along this segment, the Shoofly structures will be removed from the corridor following a procedure that is the reverse of the installation process. It is anticipated that the Shoofly will be in place for approximately 6-months.
5. A Class III pedestrian survey was conducted over the project area. The study included a review of site archives, historical maps, and documents relative to the project area, maintained at the South Central Coastal Information Center, California State University Fullerton. The two historical resources that were identified in this area include the Los Angeles Aqueduct, CA-LAN-2105H and the Los Angeles Aqueduct Transmission Line CA-LAN-2132H. As indicated by SCE, neither resource will be affected by the proposed undertaking as the transmission line will cross over both resources. Based on the results of this investigation, the proposed undertaking will have no effect on any potential historic properties in accordance with 36 CFR Part 800.
  - 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. Erosion control measures and BMPs necessitated by mitigation will be applied as directed in the project SWPPP to catch runoff from sheet flow. Daily 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 generated by vehicle and equipment use during construction. The make, model, and environmental constraints of each piece of equipment brought on-site will comply with the list of gas and diesel equipment submitted to the CPUC.
  - 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.
  - As required by Mitigation Measure T-1 "Police departments, fire departments, ambulance services, and paramedic services shall be notified at least one month in advance by SCE of the proposed locations, nature timing, and duration of any construction activities and be advised of any access restrictions that could impact their effectiveness. Documentation of coordination with service providers shall be provided to the CPUC prior to the start of construction."

- In regard to biological resources, surveys of most of the areas proposed under the Shoofly request were conducted in the spring of 2007 with negative survey findings. However since the time of those surveys new project areas, including access roads, were identified. Follow-up surveys were conducted at these new areas in October and December 2007 for sensitive plants, sensitive reptiles and Amphibians, Burrowing Owl, American Badger Small rodent burrow concentrations, and special status plant and wildlife species, again with negative findings; however, the surveys were conducted with no or limited buffers depths surrounding proposed work areas. In addition, the completion of surveys for rare plants and some sensitive wildlife (i.e. annual plants, amphibians, reptiles) during winter months may fail to detect these species; as the species may not be in flower or have a limited surface expression (i.e. annual plants) or have physical constraints (i.e. temperature) that limit or preclude the detection of a particular species.

The previously submitted Biological resource survey reports were approved October 22, 2007 contingent on the following conditions as provided to SCE:

1. The protocol surveys for California gnatcatcher, red legged frog and arroyo toad were conducted in the appropriate time of year as directed by USFWS standards. As defined by the USFS (personnel communication with Chris Delithe USFWS February 26, 2008) Negative survey results are considered current up until the next protocol survey period (generally a year). Given the progress of construction, protocol surveys must remain current prior to the onset of construction at each new location, thus additional protocol surveys may need to be repeated depending on location and schedule.
2. In field bio-sweeps for sensitive wildlife and plant species will be conducted just prior to construction at all new construction locations through out the construction of the project. These sweeps are part of regular field monitoring by qualified biologists. Results shall be submitted to the CPUC EM prior to entering new areas. SCE can decide how they wish to provide the ongoing sweep/survey results i.e. in the weekly report etc.

As discussed during the conference call on February 22, 2008, within suitable habitat, SCE shall provide a map of all new locations which were not known and thus not surveyed during the protocol surveys previously conducted prior to construction. Protocol surveys for California gnatcatcher will be required within a 300 foot buffer of all work areas (see Mitigation Measure B-12) and shall be submitted to the CPUC EM prior to any work in those areas. In addition **any work after March 15<sup>th</sup> within potential habitat through out all areas of the Shoofly shall be re-surveyed** for Californian gnatcatcher with **protocol methods** and shall extend over the required 300 foot buffer. These surveys may occur concurrently with construction (personnel communication with Chris Delithe USFWS February 26, 2008).

Note that on-going breeding bird surveys (MM B-6) shall be conducted prior to work in all areas of proposed work (including the soil disposal site) with a 500-ft buffer. It is acknowledged that due to the timing of construction, work may be occurring in one area while others are being surveyed.

**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, 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. If sensitive rodents are observed, 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. 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. In regard to the proposed laydown area, if nesting birds move into the work area SCE will monitor the nest to ensure that their activities do not result in the loss or failure of the nest. A preliminary buffer area around the nest will be established and SCE shall coordinate with the CPUC, CDFG and/or USFWS regarding the presence of the nest. It is recognized that the imposition of a 300 foot buffer in a staging yard would likely preclude the use of the site however as some species are well adapted to human disturbance the mitigation provides flexibility in reducing this on a case by case basis. The final determination of the buffer will be made by coordination with the CPUC and wildlife agencies.
- 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.
- 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,

Junaid Rahman  
 CPUC Environmental Project Manager