

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

March 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 Project - Notice to Proceed (NTP) #6

Dear Mr. Johnson,

On March 18, Southern Californian Edison (SCE) requested authorization from the California Public Utilities Commission (CPUC) for use of three contractor laydown yards as named Pumpkin Yard No. 3, Blue Cloud Yard and the Rodeo Yard. Due to additional review requirements concerning the Rodeo Yard, on March 27, SCE asked the CPUC to proceed with the processing of the Pumpkin Yard No. 3 and Blue Cloud yards; the Rodeo Yard would be addressed under a future NTP.

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 yard locations do not occur on Forest Service land; therefore, no approval from the Forest Service is required. **NTP #6 is granted by CPUC for the proposed activities based on the following factors:**

- The request to use the Pumpkin Yard No. 3 and Blue Cloud contractor lay down yards was submitted by SCE on March 18. Each yard request included biological and cultural survey reports, a table siting which mitigation measures apply to the use of each area, as well as issue area and resource analysis as applied to site features and surrounding land uses. A detailed description of each yard, as well as pertinent site issues, are detailed below:

**Pumpkin Yard #3**

In January 2008, the CPUC granted a conditional Notice to Proceed (NTP #3) for use of 'Pumpkin upper and lower yards. An extension to the previously identified Pumpkin Yard is being proposed. This newly proposed yard is referred to as Pumpkin Yard No. 3. Pumpkin Yard No. 3 also consists of an upper and lower area. The proposed marshalling yard is located at 29527 Bouquet Canyon Road on a ranch owned by the Lombardi family

Pumpkin Yard No. 3 will consist of two parts: a lower 2.25-acre area adjacent to and northwest of Bouquet Canyon Road which extends the previously considered 'lower' yard across Bouquet Canyon Road, and an upper 7.5-acre area on a cleared plateau northwest of Bouquet Canyon Road which abuts the previously considered 'upper' yard to the northeast. Access to both areas is through the Lombardi Ranch off of Bouquet Canyon Road.

Steel will be hauled up to the upper yard on trucks to the top of the plateau and towers partially assembled before being flown out to tower sites between Santa Clarita and the Angeles National Forest. The lower yard will serve primarily as a material and equipment storage yard, along with supporting any construction activities in progress. The following is a list of activities that are anticipated to occur on one or both yards for the duration of use: office trailers, vehicle parking, equipment storage, spill kit storage, fire equipment storage, wire storage, roll-off trash container, portable toilets, steel stub angles, rebar and rebar cages, setup, form cans and associated foundation items, fueling from saddle tanks, boundary fencing

where needed, helicopter landing, fueling, and maintenance. Activities requiring helicopter transport can include, but are not limited to: excavation support, tower transportation, crew transport, general project support, and possible safety trips. There will be no fuel stored on site.

The two proposed portions of Pumpkin Yard No. 3 consist of compacted soil used for parking and fallow agricultural fields. The lower yard is characterized by a flat, compacted dirt surface and adjacent agricultural fields sloping at a rate of less than 2% towards Bouquet Canyon Road, consists of a fallow pumpkin field recently harvested and disced. Some ruderal and natural vegetation occurs along the borders of the field. Beyond the slope break at the edges of the field, the habitat changes to thin coastal sage scrub that was burned by the October 2007 Buck Weed Fire. There is no vegetation on either the upper or lower Pumpkin Yard No. 3 that will necessitate any form of cutting, clearing, or grubbing. The landowners have requested that the upper yard be ripped prior to vacating.

The yard will be active from February 2008 until October 1, 2008. In addition, yard usage restrictions may be necessary during periods of rainfall (Mitigation Measure H-4) when heavy construction equipment may create large ruts or track excess mud onto Bouquet Canyon Road.

No sensitive plant or wildlife species were observed during the biological survey of Pumpkin Yard No. 3 conducted January 10, 2008. No sensitive plant or wildlife species are expected to occur on either yard, due to the continual disturbance that appears to routinely occur. Pierson's morning glory (*Calystegia piersonii*), a plant included on the California Native Plant Society List 4, has been identified in an approximately 20 foot by 20 foot area on the west side of the previously considered upper yard (this area shall be flagged for avoidance prior to use). However, this plant was not observed on the extension of this upper yard included herein. No burrows of a suitable size to accommodate burrowing owl, a special interest wildlife species, were observed in either yard. No raptor nests were recorded from the area. No American badger burrows were observed.

The upper yard has erosion channels that cut down the face of the side slopes and appear to be the result of irrigating the pumpkin field. These cuts do not appear to conduct water on a regular basis and are not within the proposed impact area. Watering of the upper yard will be necessary as per the Fugitive Dust Emission Plan, and although not expected to be of sufficient amount and duration to cause runoff, straw rolls will be laid across the top of each erosion cut as needed to prevent sheet flow from carrying sediment off of the yard.

Use of Pumpkin Yard No. 3 will result in short-term increases in construction traffic along Bouquet Canyon Road, which is owned and maintained by Los Angeles County. The road has one lane in each direction, and carries a comparatively large volume of commuter traffic mornings and evenings. The lower yard has approximately 120 feet of accessible frontage on the northwest side of the paved road, and large trucks can enter and exit by merging into and out of the flow of traffic. The upper yard requires access from the northwest side of Bouquet Canyon Road via a small dirt parking lot leading into a narrow access road. Trucks entering and leaving this area will require a full stop prior to turning. Traffic control devices and trained 'flaggers' will be located on Bouquet Canyon Road to slow or stop oncoming traffic as required while trucks are negotiating the turn into the access road for the upper yard. Trucks leaving the yard from the northwest will have flaggers stopping traffic on Bouquet Canyon Road to allow trucks to get on the roadway. Trucks hauling material will not enter or exit the yard during the peak traffic times along Bouquet Canyon Road: 7:00 am to 9:00 am and 4:00 pm to 6:00 pm on weekdays.

Any lights to be used at either the upper or lower Pumpkin Yard No. 3 shall be shielded from directing glare towards the road, or residences within view. To reduce visibility from the road, site fencing will be installed as needed.

#### **Blue Cloud Yard**

The Blue Cloud Yard is located in unincorporated Los Angeles County off Bouquet Canyon Road. SCE holds fee title to this land. The proposed Blue Cloud yard area is dominated by non-native grassland vegetation that is routinely mowed. To the north is a fenced movie ranch property and to the south is a fenced trailer park. A small, north-south trending earthen drainage traverses the site along the western boundary, parallel to Blue Cloud Road (a dirt road) which comes off of Bouquet Canyon Road. This narrow, non-vegetated drainage conducts seasonal water flow to Bouquet Canyon.

The Blue Cloud yard will serve as a material and equipment storage yard, and will support Project construction activities. 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, 500-gallon double-walled fuel tanks as no fuel storage will occur on-site

The Blue Cloud yard will be active from March 2008 until Spring of 2009.

No sensitive plant or wildlife species were observed during the two biological field surveys conducted at the Blue Cloud yard during May and September 2007. No sensitive plant species are expected to occur on or adjacent to the yard, due to the mowing that appears to routinely occur, and none were found. No burrows of a suitable size to accommodate burrowing owl, a special interest wildlife species, were recorded from the yard area. Open non-native grassland vegetation does provide low to moderate quality habitat for foraging raptors and certain small mammals, reptiles, and birds.

Because 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.

Crossing of this drainage to access the yard will be achieved through laying down steel plates to avoid disturbance to the bed or banks and avoiding placement of fill into the channel. A steel plate will be placed crossing the drainage from bank top to bank top above the high water mark in such a manner that it can safely support the weight of equipment while minimizing the potential for damage. Adjacent rodent burrows will be avoided to the extent possible by placing the plate within the existing roadway where there are few to no burrows, and flagging adjacent concentrations for avoidance. Regular monitoring of the plate will ensure that it is functioning properly. Per SCE crossing this stream will not require a Streambed Alteration pursuant to the California Department of Fish and Game Code Section 1600 et. seq. as was determined by a CDFG biologist during a February 16, 2008 site visit. Although the channel may fall within the jurisdiction of the U.S. Army Corps of Engineers pursuant to the federal Clean Water Act, the proposed crossing will keep all structures and materials outside of the average high water mark. The drainage will be further protected from incidental encroachment or discharge by establishing a 25-foot buffer along both sides delineated by flagging and straw wattles or other erosion protection materials. **(Please note that if construction related materials and or debris enter the channel, or other impacts occur, both the CDFG and Army Corp of Engineers will be notified immediately.)**

An existing, occupied trailer park is located immediately adjacent to and south of the proposed Blue Cloud yard. Trailer entrance doors, as well as windows, are located within a few feet of the southern yard boundary. The yard is surrounded by unoccupied open space to the west, north and east. SCE contractors propose to use the yard from 5:00 am to 7:00 pm, excluding security. Noise from marshalling activities at the yard, including mobilizing crews and equipment, may represent a potentially significant impact to residents of the adjacent trailer park should the Los Angeles County maximum allowable construction noise levels be exceeded. The maximum allowable noise levels within 600 feet of single-family residences are 60 dBA between 7:00 am and 8:00 pm and 50 dBA between 8:00 pm and 7:00 am. The noise level can be reduced, and as such, this impact can be reduced to less than significant, through application of appropriate mitigation discussed below. If nearby resident complaints arise, SCE shall implement noise reduction technologies and noise monitoring shall be conducted to verify the functioning of said mitigation. No use of the yard (excluding security) shall be allowed between 7:00 pm and 5:00 am. During the use period between 5:00 am and 7:00 am, idling of vehicle engines shall be minimized, and no shouting, calling out, loud talking, or laughing shall be allowed. No playing of music (radio, CD's etc.) or 'talk radio' shall be allowed at any time on the yard, including by security personnel. The portions of the yard furthest to the north (that is, furthest removed from the sensitive noise receptors) shall be used for those activities anticipated to cause the most noise earliest in the day, including but not limited to early morning mobilizing of work crews and warming up vehicle engines. Concurrently, those portions of the yard closest to the trailer park shall be used for the least noise producing activities, such as long-term storage of material. If feasible given the dimensions of the yard, a buffer area (as large as can be accommodated) between the trailer park fence and the southern edge of the yard shall be established. Similarly, should the use of this yard be phased such that the entire yard is not needed early in the Project's schedule, then the earliest uses shall occur furthest from the trailer park. As additional yard areas are required as the Project progresses, those use areas will gradually approach the trailer park. This will allow acclimation by the trailer park residents to the nearby noise source. All personnel using the Blue Cloud yard shall be briefed on the potential for noise impacts to the nearby residents and the restrictions on radios, music and loud talking, and shall be encouraged to show respect to the residents by keeping noise to a minimum at all times. Between two and four weeks prior to construction, SCE shall provide advance notification by mail (or door hangers and sign postings) to all single-family residences within 300 feet of the Blue Cloud yard, implementing noise mitigation measure N-1b outlined in the Final EIR/EIS. In addition, SCE shall coordinate with the adjacent Rene

Veluzat Blue Cloud Movie Ranch at least two weeks prior to use of the Blue Cloud yard. (A log of resident comments including complaints shall be submitted to the CPUC on a weekly basis. If resident complaints occur, noise monitoring results shall be submitted to the CPUC and to Los Angeles County.)

Bouquet Canyon Road is a 2-lane roadway in this area, with 1-lane in each direction. Traffic control devices and trained 'flaggers' will be located on Bouquet Canyon Road to slow or stop oncoming traffic as required while trucks are negotiating the turn into Blue Cloud Road, a dirt road with a relatively narrow entrance. Pilot cars will escort trucks hauling materials from Bouquet Canyon Road to Blue Cloud Road. Two pilot cars will be associated with each truck; one will be located in front of the truck and the other behind the truck. Appropriate signs and lights will be installed on all vehicles involved in the hauling process. Trucks hauling material will not haul during the peak traffic times along Bouquet Canyon Road: between the hours of 7:00 am and 9:00 am and 4:00 pm to 6:00 pm on weekdays.

Any lights to be used at the Blue Cloud yard shall be shielded from directing glare towards the existing trailer park located immediately adjacent to and south of the yard. As such, glare will not reach the trailer park residents.

- With regard to cultural resources for the two yard sites, reviews of site archives, historical maps, and documents maintained at the South Central Coastal Information Center, California State University, Fullerton were conducted. In addition, Class III pedestrian surveys of the sites were conducted. No cultural resources or potential historic properties were observed at or near any of the proposed yard sites, or within the confines of immediate approach corridors. Therefore, use of the Pumpkin Yard No.3 and the Blue Cloud yards 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.
- Biological surveys for the subject yards were conducted in May and September 2007 (Blue Cloud) and January 2008 (Pumpkin Yard No. 3). Due to the many month delay between when the biological surveys were conducted and the current timing of use, as well as the seasonal timing of the biological surveys, the results may not be representative of current conditions. As conditioned below, biological surveys need to be re-conducted and results submitted to the CPUC prior to occupation. In addition to the survey results, SCE must either supply confirmation that habitat does not exist for California gnatcatchers, CRLF or Arroyo toad or submit protocol survey results for those species. Finally, as noted below, nesting surveys shall be ongoing during the next season and CDFG has implemented crossing constraints. With the implementation of these requirements, no significant impacts to biological resources are anticipated.

**The conditions noted below shall be met by PG&E 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.
- Biological surveys shall be re-conducted and results submitted to the CPUC prior to occupation of either yard. In addition to the survey results, SCE must either supply confirmation that habitat does not exist for California gnatcatchers, CRLF or Arroyo toad or submit protocol survey results for those species. After complete surveys are provided, site occupation can occur; however, if occupation does not occur within seven calendar days of survey submittals, biological clearance sweeps shall be conducted prior to occupation, including nest surveys.

- As identified in APM BIO-5 and Mitigation Measure B-6 in the EIR/EIS, SCE is required to 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. Where appropriate, monitors would flag the boundaries of areas where activities need to be restricted in order to protect native plants and wildlife, or 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 USFS (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 areas if a bird decides to move into a yard (i.e. the barn owls in the old structure) SCE will have to 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. Obviously a 300 foot buffer in a staging yard would likely preclude the use of the site but the mitigation provides flexibility in reducing this on a case by case basis. This will be made by coordination with the agencies.
- SCE toured both yard sites with CDFG representative Dan Blankenship on January 16, 2008. CDFG provided the following comments in regard to the yard uses:

  1. The Bouquet Creek/Lombardi Farms crossing onto a vacant lot used for parking: Please use the existing crossing and do not remove or damage any of the adjacent riparian habitat. Please do not cross during stream flows following rains. Please do not allow vehicle fluids to be spilled in or adjacent to the channel. If a spill occurs, please contact the Department.
  2. The SCE easement below the film studio area (Blue Cloud Yard below Veluzat Motion Picture Ranch): Please use the existing crossing and re-contour to stop the erosion potential down slope.
- 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.
- All yard boundaries shall be flagged prior to occupation. In addition all approved access roads to be used for ingress and egress shall be flagged prior to yard occupation.
- 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.

- If not already provided copies of all landowner agreements/lease agreements shall be submitted to the CPUC prior to use.
- Yard use shall adhere to County noise regulations. If nearby resident complaints arise, SCE shall implement noise reduction technologies and noise monitoring shall be conducted to verify the functioning of said mitigation.
- As provided in the request, the Fugitive Dust Control Plan (Mitigation Measure A-1a) shall be implemented at all of the yard locations. 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. If track out occurs, it will be removed before the end of the day per the guidelines established in the Fugitive Dust Emissions Control Plan.
- Per the request, in addition to the site specific conditions provided in the yard discussions, Erosion and sediment controls (for runoff) will be established per the guidelines of the SWPPP. Reducing the potential for contamination will be accomplished by utilizing BMPs (established in the SWPPP) and spill prevention methods (established in the Hazardous Substance Control and Emergency Response Plan). The Hazardous Substance Control and Emergency Response Plan (HSCERP) states. "Petroleum products and other hazardous materials must not be stored or transferred, including fueling of vehicles and equipment within 100 feet of water bodies, wetlands, rare plant or unique natural community locations, and within 200 feet from water supply wells. A copy of the SWPPP and HSCERP will be available on-site for reference. In addition, some restrictions on use may be necessary during periods of rainfall (Mitigation Measure H-4) when heavy construction equipment may create large ruts or track excess mud onto nearby roads. An environmental monitor will regularly inspect installed erosion controls to ensure continued function.
- As provided in the request, 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 and will be undertaken consistent with the project Fire Plan.

Sincerely,

John Boccio  
CPUC Environmental Project Manager

cc: V. Strong, Aspen