

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

May 9, 2008

Donald Johnson
Project Manager
Southern California Edison
2131 Walnut Grove Ave.
Rosemead, C 911770RE: SCE Antelope-Pardee 500 kV Transmission Project, Segment I Project - Notice to Proceed
(NTP) #8

Dear Mr. Johnson,

On May 1, 2008, Southern Californian Edison (SCE) requested authorization from the California Public Utilities Commission (CPUC) for use of a contractor laydown yard as named the 10-acre Yard.

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 location does not occur on Forest Service land; therefore, no approval from the Forest Service is required. **NTP #8 is granted by CPUC for the proposed activities based on the following factors:**

- The yard request included biological and cultural survey reports, as well as issue area and resource analysis as applied to site features and surrounding land uses. A detailed description of the yard, as well as pertinent site issues, are summarized below per the information provided in the request:

The proposed 10-acre marshalling yard and helicopter yard is located on Avenue J West approximately 0.5 miles east of the Antelope Substation, and 4.18 miles to Elizabeth Lake Road, within Lancaster City limits. Proximity to Elizabeth Lake Road and the Antelope Substation make this an ideal site for establishing a primary marshalling yard. The 10-acre Yard will be active from May 2008 until spring of 2009.

The following is a list of features and activities that are anticipated to occur at the yard for the duration of use: 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, helicopter landing, fueling, storage, emergency helicopter maintenance, 500-gal double-walled fuel tanks (once necessary permitting and approvals are complete).

This yard will be the site of helicopter activities that will commence upon construction of the line. Any additional requirements that are necessary for the helicopter operations will be fully disclosed upon the receipt of said information.

The 10-acre Yard site consists of heavily grazed non-native grassland vegetation and is characterized by a relatively level soil surface. Access from Avenue J West also traverses non-native grassland vegetation. No road plans or recontouring and restoration plans were presented as part of the request.

Biological surveys were conducted on 15 November 2007 and 18 February 2008. No sensitive plant or wildlife species were observed during the biological surveys. No burrows of a suitable size to accommodate burrowing owl, a special interest wildlife species, were observed in the yard. The yard's non-native vegetation does provide low quality habitat for foraging raptors and certain small mammals. However, no sensitive species are expected to occur in this grazed non-native grassland vegetation. No concentrations of small mammal burrows were noted during the surveys. Digs of Botta's pocket gopher are present. In addition, a common raven was observed flying over the site, and four side-blotched lizards were observed underneath boards on the site. **(Please note that due to the greater than 2-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. Finally, as noted below, nesting surveys shall be ongoing during the next season. With the implementation of these requirements, no significant impacts to biological resources are anticipated.)**

A review of site archives, historical maps, and documents maintained at the South Central Coastal Information Center, California State University, Fullerton was conducted. An intensive pedestrian survey and reconnaissance of the current study area was conducted on 26 March 2008 by Pacific Legacy, Inc. staff archaeologists. Findings indicated that no cultural resources will be disturbed by use of the yard.

The 10-acre Yard is drained by sheet flow north towards Avenue J West, at a slope of less than 1 percent. Use of the yard will not interfere with this sheet flow; however, SWPPP BMPs shall be implemented as outlined in the conditions section.

Use of the 10-acre Yard will not block access to local land uses or official recreation areas. The land is zoned agricultural and an executed lease agreement with the property owner was submitted with the request. If vehicles or equipment create large ruts within the yard, the level of restoration needed will be determined per landowner agreement and the terms of the lease.

There are no sensitive receptors (homes, schools, hospitals, churches, convalescent homes, parks, recreational areas) within 300 feet that would require notification per Mitigation Measure N-1b. Helicopters would fly from the yard, which is greater than 300 feet from all sensitive receptors. Use of the 10-acre Yard will not block access to businesses, nor result in disruption to businesses.

Traffic control devices and trained "flaggers" will be located on Avenue J West to slow or stop oncoming traffic as required. No encroachment permits or other traffic permits are necessary for the use of this yard.

There are no adjacent or near-by light receptors in the vicinity of the 10-acre Yard. Any lights to be used at the 10-acre Yard shall be shielded from directing glare towards the road (Avenue J West), or residences within view. To reduce visibility from the Avenue J, site fencing shall be installed.

The conditions noted below shall be met by PG&E and its contractors:

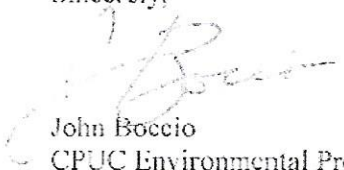
- All project mitigation measures, compliance plans, and permit conditions shall be implemented during construction activities and use of the proposed yard spaces. Some measures are on-

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 the yard. 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.
- Prior to the commencement of construction activities, all crew personnel including haul truck and concrete truck drivers as well as helicopter pilots 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.

- Yard use shall adhere to County noise and work hour 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.
- There will be no fuel stored on site until proper permitting has been completed. A site specific Spill Prevention Control and Countermeasure (SPCC) plan will be submitted and approved by the CPUC and will be made available on-site at all times. In addition, all supervising entities within the construction operations will have a copy on-hand for any field application that is necessary.
- 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