

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

April 2, 2009

Donald Johnson
Project Manager
Southern California Edison
2131 Walnut Grove Ave.
Rosemead, CA 91170

RE: SCE Antelope Transmission Project (TRTP), Segment 2 Project - Notice to Proceed (NTP) #20

Dear Mr. Johnson,

On March 21, 2009, Southern California Edison (SCE) requested authorization from the California Public Utilities Commission (CPUC) for use of the R-8 Marshalling and Helicopter Yard in the City of Palmdale, Los Angeles County near Segment 2 of the SCE Antelope Transmission Project (TRTP). The R-8 Yard consists of approximately nine acres located off of 10th Street at the end of Avenue R-8 within the City of Palmdale, 1.1 miles west of Highway 14, and 5.6 miles northwest of Vincent Substation. SCE plans to utilize the R-8 Marshalling and Helicopter Yard from April 2009 through Winter 2009/2010.

The SCE Antelope 500 kV Transmission Project (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.04-12-008, SCH #2006041160 on March 15, 2007. **NTP #20 is granted by CPUC for the proposed activities based on the following factors:**

- The following information was provided in the NTP request:

The R-8 yard is located within a slightly larger lease area that is bounded by a barbed wire fence and includes low hills on the west and east sides. The property is owned by a company called Waste Management, whose primary operations abut the yard to the north. Access will be along a compact dirt access road 1,900 feet long from the yard to the access gate off of 10th street and averaging about 12 feet wide.

The lease area includes juniper (*Juniperus californica*) woodland and big sagebrush (*Artemisia tridentata*) habitats.

The R-8 Yard will serve as a material and equipment storage yard, along with supporting any construction activities in progress. A list of 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, spill kit storage, fire equipment storage, wire storage, roll-off trash containers, portable toilets, steel stub angles, rebar and rebar cages, setup, form cans and associated foundation items, fueling from saddle tanks and fuel trucks, welding and torch work within the shop, and helicopter use and support.

Welding and torch work activities are 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.

Fuel will not be stored on site, and therefore a Spill Prevention Countermeasure and Control Plan (SPCC) will not be required. However, guidelines and regulations established by the general Storm Water Pollution Prevention Plan (SWPPP) will be implemented at all times during the use and occupation of the yard, as will Best Management Practices (BMPs) included under Segment 2 and 3 Mitigation Measures G-2, H-1a, N-3b, and APM BIO-4. Implementation of all necessary erosion control devices will be properly installed and maintained throughout the duration of yard use. A copy of the SWPPP will be available on-site for reference.

The Fugitive Dust Control Plan (Segment 2 and 3 Mitigation Measure A-1a) is in process and will address specific measures that will be required to control dust generated by vehicle and equipment use.

The make, model, and environmental constraints of each piece of equipment brought to the yard will comply with the list of gas and diesel equipment submitted to the agencies as required by Segment 2 and 3 Mitigation Measures A1-f, g, and h.

The yard area had a scattered cover of rabbitbrush (*Chrysothamnus nauseosus*) which appears to have been recently mowed, leaving only low-growing grass and forbs. So long as the work is confined to this area, no vegetation grubbing will be necessary. Any use of the yard that extends beyond the mowed area will require brush clearance and removal in accordance with the Vegetation Management Plan (MM V-1c, APM VIS-1). Loss of junipers and Joshua trees (*Yucca brevifolia*) will require mitigation as per Segment 2 and 3 Mitigation Measures B-4a and B-4b.

The work area at the R-8 yard has been recently mowed, and is covered by several inches of wood mulch evenly spread. Cribbing with wooden blocks will be the primary technique used to level-up the towers in respect to the ground surface. Therefore, no substantial blade work needs to be done within the R-8 Yard. Furthermore, no additional access roads or significant road grading will be necessary, so road plans will not be required. If blade work for safety purposes does prove necessary, a site specific plan will be created and approved prior to work. All options will be considered before grading is employed.

The proposed yard is nearly flat with only a slight southern slope towards the aqueduct. A channel ranging from three to eight feet deep and averaging four feet wide extends the length of the yard from north to south and passes under the aqueduct through a cement box culvert. Piled earth on both sides of channel suggest past maintenance. Sediment and gravel at the bottom show evidence of recent water flow although the channel was dry during the period of the surveys. The channel effectively divides an upslope area of juniper woodland from the flat, mowed area proposed for use as a yard. A buffer of big sagebrush ranging from ten to 50 feet wide borders the channel on the east side. A 25 foot buffer from the edge of the channel will be established with stakes, flags, and signs, and erosion control measures and BMPs necessitated by the project SWPPP will be employed to prevent any muddy runoff from entering.

The property is currently for lease and is not occupied. Since the owner has consented to the use of the property, no conflicts with recreational or economic uses of this property are anticipated. The parcel is zoned as agricultural (A1-light agriculture), but used for other purposes and therefore would not be subject to the coordination requirements of Segment 2 and 3 Mitigation Measures Ag-3 and Ag-4. There are also no recreational uses on or near the property that would be affected by its use as a marshalling yard.

There are no residences or businesses within 300 feet of the yard or access road that would require advanced notification. Given the high background level of ambient noise from the adjacent landfill, the noise of vehicles and equipment entering and exiting the yard would not be beyond that already experienced in the area.

The use of this yard will not impact any surrounding economic uses or social benefits derived from its current condition.

Use of the R-8 Yard will result in short-term increases in construction traffic along R-8, which is a dirt road and infrequently used by off-road vehicles and owner access to the storage areas south of the landfill. There will also be some increase in traffic on Tierra Subida and Avenue S, but both roads are in an area of Palmdale consisting of mostly residential and vacant land. Observed traffic volumes were low even after 4:00 p.m. on a weekday afternoon. Therefore, the anticipated increase in traffic can be accommodated due to the current low volume of traffic on this roadway in the vicinity of the yard.

Flaggers will be stationed on the highway to slow or stop oncoming traffic should larger or slower trucks, potentially block traffic as they enter or leave R-8 onto Tierra Subida. These flaggers will have received the required State of California, Title 8, Safety Orders, Section 1599 (f) "Training of Construction Site Flaggers." Flaggers will wear highly visible vests, and will use 'stop' and 'slow' paddles to control traffic. In case emergency vehicles approach, an open passage will be created to allow the emergency vehicle through.

Other reports prepared for this project that will address specific traffic concerns include: Traffic Control Plans (TCPs) T-1a, APMs TRA-3, TRA-4; Documentation of coordination with service providers T-1a; Construction Transportation Plan T-2, APMs AQ-3, TRA-2; Documentation of coordination efforts with Kern Regional County Transit T-4; Documentation of

coordination efforts with UPRR and Metrolink T-5; Documentation of coordination efforts with Caltrans and the Los Angeles County MTA T-7. No encroachment permits or other traffic permits are necessary for the use of this yard.

The only light receptor in the vicinity of the yard is the waste disposal facility to the north that closes at night, and a large home approximately 1,500 feet southeast of the yard on the other side of a low hill. Nevertheless, to avoid disturbing the residents, any lights to be used on the yard shall be shielded to direct glare away from this area. The yard is not visible from R-8, Tierra Subida, or the residential area to the southeast and would not need any other visual cover.

- **Biological Resources:** Biological surveys were conducted on February 19, 20, and 22, 2009 by SCE biological subcontractors and focused on the biological issues as described in the Segment 2 and 3 EIR (Aspen 2006). The yard and an additional 500 foot buffer was walked in 10-foot transects. All plant and wildlife species observed were documented and identified sufficiently to determine sensitivity status. No sensitive species were observed during the survey. A single dried stalk of a *Calochortus* sp. outside was noted outside of the barbed wire fence on east side of the yard, but well beyond the proposed impact area. Small colonies of inactive ground squirrel burrows (*Spermophilus beecheyi*) were observed in the juniper habitat to the east of the proposed yard, but none were sufficiently large for burrowing owls and did not show any feathers, scat, or other indicators of owl use.

Woodrat nests (*Neotoma* sp.) were very common, and were mostly associated with junipers on the east side of the yard, and junipers and big sagebrush on the west side. About 20 nests were within 20 feet of the proposed yard and were flagged for avoidance. The channel along the west side of the yard effectively prevents the use of the rest of the lease area to the west. A strip of sagebrush ten to 50 feet wide separates the mowed area of the yard from the edge of the channel, and has woodrat nests scattered throughout. In the interest of providing protection both for woodrats and the drainage, a 25 foot buffer from the top of the bank should be established with stakes, flags, or other visible materials to prevent encroachment. No other nests were observed within the lease area, although an Anna's hummingbird (*Calypte anna*) exhibiting territorial behavior within the junipers in the buffer east of the yard indicating a probable nest. Another Anna's hummingbird was detected on the west side of the yard, but territorial behavior was not observed. The probable nest location will be surveyed during clearance surveys and monitored if needed.

Other wildlife species detected during the surveys are typical of those in disturbed plant communities in proximity to urban development. Species observed included common raven (*Corvus corax*), desert cottontail (*Sylvilagus audubonii*), mockingbird (*Mimus polyglottos*), scrub jay (*Aphelocoma californica*), and Say's phoebe (*Sayornis saya*). Evidence of coyote (*Canis latrans*; scat and tracks) and kangaroo rats (*Dipodomys* sp.; burrows and foraging digs) were also observed.

- **Cultural & Paleontological Resources:** A search for archeological and historic records for Segment 2 of the Tehachapi Renewable Transmission Project was conducted by ECORP Consulting, Inc. (Ahmet et al. 2006). ECORP consulted the South Central Coastal Information Center, the Angeles National Forest Heritage Resources Section, the National Register of Historic Places, the California Inventory of Historic Resources, California Points of Historical Interest and the California Historical Landmarks. The proposed project area falls within the one-mile search radius and no cultural resources are known. The Paleontological Resources Management Plan Segments 2 and 3 of the Tehachapi Renewable Transmission Project was prepared by Cogstone Resource Management Inc. (Gust and Scott 2008). No paleontological localities have been previously discovered in the project vicinity and the surface sediments (Quaternary alluvium) have low sensitivity for paleontological resources.

Cogstone Resource Management conducted the survey of the proposed project area on February 23 and 26, 2009. The survey consisted of two people walking the project area while closely inspecting the ground surface. Transects were walked at 10 meter intervals. The R-8 Yard is approximately 18.6 acres in size and the entire area plus the associated access road was surveyed. Ground visibility was low, and the area was very disturbed. Modern trash was observed in the area, but no archaeological or paleontological resources were observed. Survey along the access road to the R-8 Yard revealed the foundation boards of an old hen house, but it did not meet established significance criteria for historic resources.

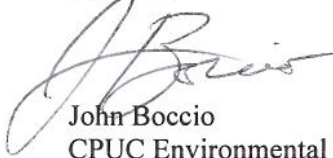
The conditions noted below shall be met by SCE and its contractors:

- All project mitigation measures, compliance plans, and permit conditions shall be implemented during construction activities and use of the proposed yard space. 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.
- If blade work (grading or grubbing) for safety purposes does prove necessary, a site specific plan will be created and approved by the CPUC prior to work.
- Biological surveys shall be re-conducted and results submitted to the CPUC for review and approval prior to equipment and vehicles mobilizing to the yard. After complete surveys have been submitted and approved by the CPUC, 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 site occupation, including nesting bird surveys.
- As identified in Biology Mitigation Measures and Applicant Proposed Measures (APMs) 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 yard, 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 construction 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.
- Per CDFG, biologists shall locate, flag, and avoid all woodrat nests/middens where possible. If avoidance is not possible, SCE and their biologists will work with CDFG to minimize impacts prior to occupation of the yard. Documentation of consultation with CDFG shall be submitted to the CPUC prior to commencement of construction activities.

- As proposed, a 25 foot buffer from the top of the bank of the drainage (west side of the yard), shall be established with stakes, flags, or other visible materials to prevent encroachment. In addition, BMPs necessitated by the project SWPPP shall be employed to protect the channel.
- Loss of junipers and Joshua trees (*Yucca brevifolia*) will require mitigation as per Segment 2 and 3 Mitigation Measures B-4a and B-4b.
- 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 and exclusion zones shall be flagged prior to occupation.
- If unanticipated cultural discoveries occur, work must halt in the immediate vicinity until the find can be evaluated by a qualified archaeologist to determine if it meets significance criteria under CEQA.
- As noted in the NTP request, no fuel shall be stored on-site.
- As noted in the NTP request, welding and torch work activities are limited to emergency and mechanical needs only. Open flame activities that may be performed on this property shall have a water truck and fire watch present at all times.
- 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.
- Storm Water Pollution Prevention Plan (SWPPP) will be implemented at all times during the use and occupation of the yard, as will Best Management Practices. Implementation of all necessary erosion control devices will be properly installed and maintained throughout the duration of yard use. A copy of the SWPPP will be available on-site for reference. A Hazardous Substance Control and Emergency Response Plan and a Waste Characterization Plan have been prepared that includes conditions pertaining to this yard. Fueling will take place from saddle tanks or fuel trucks with appropriate containment measures taken to avoid spills. Fuel trucks will not be parked overnight nor will more than 1,320 gallons of fuel or oil be stored on site.

- To avoid disturbing residents, any lights to be used on the yard shall be shielded to direct glare away from a large home approximately 1,500 feet southeast of the yard on the other side of a low hill.

Sincerely,

A handwritten signature in dark ink, appearing to read "J. Boccio", written in a cursive style.

John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen