

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

June 25, 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 #11)

Dear Mr. Johnson,

On June 3, Southern Californian Edison (SCE) requested authorization from the California Public Utilities Commission (CPUC) for construction of Section 3, 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 construction location does not occur in Forest Service land; thus, no approval from the Forest Service is required. **NTP #11 is granted by CPUC for the proposed activities based on the following factors:**

- A request to begin construction of Segment 1 Section 3 was submitted June 3, 2008. Per the submitted materials and subsequent clarifications via documented e-mail the following Section 3 activities are requested:

Section 3 consists of two major activities: demolition of the existing double circuit Pole Switch 74 Circuit between the northern boundary of the ANF and Wreck Out (W/O) structure number 25-4 north of West Avenue J in the City of Lancaster, including removal of 5.34 miles of overhead transmission line and 36 steel lattice towers; and construction of a new 500 kV transmission line between Antelope Substation (Mile 0) and the northern boundary of the ANF in the County of Los Angeles (approximately Mile 5.7), including addition of a tower to raise the existing Midway-Vincent No. 3 500 kV transmission line outside Antelope Substation and Modification of the existing 220 kV Antelope-Mesa and Antelope-Vincent No. 1 transmission lines outside Antelope Substation.

Construction of Section 3 is anticipated to begin late-May 2008 and continue through December 2008.

A Portion of the area covered by the request falls on private property currently in the condemnation process. The land owners have not been accommodating to having investigation occur on the property. Therefore several pre-construction measures will be completed after SCE gains full access to the property. SCE requested that the CPUC condition the NTP with all outstanding requirements. These outstanding issues are outlined in the conditions section.

POLE SWITCH 74 CIRCUIT DEMOLITION

Demolition of the Pole Switch 74 Circuit will be accomplished in three phases: conductor removal, tower demolition and foundation demolition. Wire pulling/rewind sites will be utilized, typically 200 feet by 200 feet (0.92 acres). Guard structures will be installed prior to demolition in area identified on the submitted access road and disturbance maps. Towers 22/2, 22/3, 22/5, and 22/6 may be removed by helicopter due to terrain limitations. Removal of the conductor wire will be initiated by either placing the conductor in stringing sheaves or lowering it to the ground. The old conductor wire will be wound onto "breakaway" reels as it is removed. In areas where the old wire is placed into sheaves, a 3/8" steel pulling cable, or rope pulling line, will replace the old conductor as it is removed allowing for complete control of the conductor tension during its

removal. A work area of approximately 200 feet by 200 feet will be required for structure demolition. Tower grillage foundation stub angles will be removed to two feet below grade abandoning the remaining portion of the footings in place. The excavated area containing the footings will then be filled with clean fill and recontoured to closely match the existing land surface.

NEW 500 kV TRANSMISSION LINE CONSTRUCTION

Installation of the new 500 kV transmission line will include five sequential phases: road preparation, site preparation, foundation installation, structure installation, and wire stringing.

The Project is located partially in the City of Lancaster and unincorporated portions of Los Angeles County, between Antelope Substation (Mile 0) at Tower Construction Site 113A and the northern boundary of the ANF (Mile 5.7) at Tower Construction Site 89. There are a total of 28 structures consisting of 17 steel lattice towers and 11 tubular steel poles (TSPs). The Project will be constructed on single circuit 500 kV steel lattice towers, except for the portion including Tower Construction Sites 101B through 109 and Tower Construction Sites 113 and 113A which will be constructed on TSPs. The first 0.4 miles of transmission line exiting Antelope Substation will be supported by two 220 kV tubular steel H-frames and one 220 kV lattice tower. At mile 0.4 the transmission line transitions to new single-circuit 500 kV steel lattice towers. The Project also crosses under SCE's existing Antelope-Magunden 220 kV ROW and the Midway-Vincent No. 3 500 kV ROW within the first 0.1 miles outside of Antelope Substation. A new steel lattice tower (Structure M88-T1A) will be inserted in the Midway – Vincent No. 3 line between Structures M88-T1 and M88-T2 to maintain electrical clearances. Additionally, two existing 220 kV steel lattice towers just outside the Antelope Substation fence will be removed and replaced with a double circuit 220 kV tubular steel pole. This structure will support the first spans of the existing Antelope-Mesa 220 kV and Antelope-Vincent No.1 220 kV transmission lines that exit Antelope Substation. Single circuit 500 kV steel lattice towers will be used from Tower Construction Sites 101A through 89. The Project crosses the California Aqueduct in the span between Tower Construction Sites 101B and 102.

Road Preparation

A potential new temporary spur road may be required to access Tower Construction Site 93. Temporary roads will be restored and revegetated in accordance with mitigation measure report B-1a of the Habitat Restoration and Revegetation Plan.

Existing roads within the existing SCE ROW corridor will be used to the greatest extent feasible in constructing Section 3.

In some cases, maintenance of existing roads will be needed. This may involve smoothing the ruts in existing roads or widening them to 15 feet (The 15 foot widening refers to the total width of the road itself. If the road is currently 12 feet, it may be widened to 15 feet total, an addition of 3 feet.) to accommodate equipment ingress and egress. Additionally, in some instances existing curves on roads may not be adequate to allow for the turning radius required by larger equipment. The type of equipment used to construct this project may require additional room where driving and crushing of vegetation may occur at these curves. This may involve an area up to 45 feet beyond the road edge. This may occur at all sharp curves as depicted on the disturbance area maps as provided with the request. No grading of these expanded turn areas will occur, and all roads, including a buffer on each side of the road that would incorporate these expanded turn areas have been surveyed for biological resources. A records search and cultural resources survey was conducted for all roads including a 10 foot buffer on either side, resulting in the identification of no previously recorded or newly identified resources. No new permanent roads will be constructed for overland travel; although where no roads exist, drive-and-crush will be used to access the poles. If these routes of overland travel are heavily disturbed they will be restored. Otherwise, these overland travel routes will be allowed to re-vegetate naturally. Please note that there was an access road proposed for use near a stock pond on the Peterson Property. Adjacent riparian vegetation is present. As documented June 18, in an e-mail from SCE representatives, no road widening is proposed at this location. (In addition overland travel will not be permitted outside of the roadway unless the area is delineated for wetland vegetation and approved by the CDFG and CPUC.)

Site Preparation

A work area of approximately 200 feet by 200 feet will be prepared at each construction tower site to provide a fairly level and safe working platform. Where necessary, tower sites, would be graded or cleared of vegetation.

Foundation Installation

Once a tower construction site has been prepared, the foundations are installed using standard "poured-in-place" augured excavation techniques. Steel lattice towers will be constructed on four concrete foundations. Typically, the foundations will range from four to six feet in diameter and have a depth of 15 to 30 feet. Foundations for tubular steel poles (TSP) will be

of a single shaft drilled pier concrete foundation design. Single shaft foundations for TSPs used in this section of line may range from eight to 10 feet in diameter and from 35 to 60 feet in depth.

Structure Installation

Once the foundations have been cured, tested and deemed ready for structure installation, several truck tractor/trailer units, flatbed trucks and on-site loaders/forklifts will haul, unload and stack bundles of steel at each tower location and pole components at each pole location. An assembly crew will assemble the tower/pole components ahead of a tower/pole erection crew that will erect the assembled structures.

Tower/Pole Assembly and Erection

The tower/pole components will be assembled on-site. The towers/poles will be erected in stages using conventional and rough terrain hydraulic cranes. Upon completion of tower/pole erection, the construction pad will be left in place for use by the wire stringing crew for the purpose of setting up wire stringing and high-reach man lift equipment.

Wire Stringing and Splicing

Wire pulling sites will be established at predetermined disturbance locations as shown on the access road and disturbance maps submitted as part of the request. The wire installation crew will make extensive use of helicopters for movement of crews, movement of tools and equipment, installing insulators, hanging stringing sheaves, pulling sockline cables and monitoring the wire pulling portion of the wire stringing operation. The wire stringing operation consists of the following activities: prepare wire pulling and wire stringing sites, install insulator assembly on the towers/poles, hang stringing sheaves, haul and set up wire pulling and tensioning equipment. Movement of wire stringing equipment in many cases will require transporting heavy equipment on lowboy trailers from site to site, install wire catch-off snubs, string in overhead ground wire (OHGW) and fiber optic cable (OPGW), string in conductor wire, splice conductor wire, sag Conductors, OHGW and OPGW, remove string sheaves and attach conductor wire to insulators, deadend Wires, install jumper wires on deadend towers. The area required for wire stringing and pulling sites will be the entire width of the ROW and 300 feet in length. It is the goal to have the wire pulling sites spaced a distance of two full reel lengths (approximately 3 miles) apart. In rough terrain with limited conventional road access, the degree of angle of dead-end towers limits the choices for wire stringing and pulling locations.

GUARD STRUCTURES

The purpose of a guard structure is to protect the public from pulling cables and wires at road crossings and to protect existing power line crossings. Guard structures will be established prior to wire stringing or splicing.

HELICOPTER USAGE AND STORAGE

Helicopters will be used during construction of the new 500 kV line to support all construction activities. Helicopters supporting Section 3 construction activities will require landing areas at selected locations along the route. These areas will be selected during construction by personnel qualified to assess impacts resulting from their use. (Prior to use of any proposed helicopter area, SCE shall submit maps of the area as well as biological and cultural survey verification for review and approval by the CPUC.)

Biological resource surveys were conducted on April 29th, May 1, 19, 20, and 27, 2008. The Section 3 line was surveyed as a 400 ft wide corridor and the 66 kV line and associated access roads south of Elizabeth Lake Road were surveyed May 27 as a 200 ft wide corridor by LSA biologists. Surveys were also conducted along areas depicted on disturbance area maps developed by PAR engineering including wire stringing sites, guard poles, crane pads, permanent and temporary roads, and overland travel routes. Two special status plant species were found during the pre-construction surveys, the California black walnut and Pierson's morning glory. Four special status animal species were found, the coast horned lizard, a woodrat midden and two raven's nests. (Please note that prior to construction consultation with CDFG is required regarding the sensitive species, see conditions section below for more details). (The pre-construction surveys did not address all of the mitigation requirements, additional pre-construction survey requirements are outlined in the conditions section.)

A Class III Cultural Resources Investigation for TRTP Segment 1 was submitted February 2008. The new disturbance areas pertaining to the Section 3 and 66 kV construction were not covered by the report. On June 11, a Supplemental Archeological Survey Report covering the disturbance areas along the Hughes Lake 15 kV construction (which also covered Section 3 and the 66 kV lines) was submitted. No new prehistoric archeological sites, historic area cultural resources or Native American cultural resources were identified in the area.

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

- On April 26, 2008 SCE submitted a variance request to **Mitigation Measure V-1b** (Construct, Operate, and Maintain with Existing Access/Spur Roads). This variance request requested authority to install new permanent spur roads for the entirety of Segment 1. This request is denied. In addition, all temporary roads shall be restored to their pre-construction width and the expansion areas shall be revegetated in accordance with the approved Habitat Restoration and Revegetation Plan.
- 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 ongoing/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.
- Breeding bird surveys were presented in the Section 3 request, but the surveys were only conducted within 200 and 400 foot wide belt transect corridors. **Mitigation Measure B-6** is clear in that surveys shall be conducted within 500 ft of construction, thus the surveys are incomplete in terms of pre-construction requirements. Pre-construction surveys and reporting to the CPUC are always required prior initiation of work in all areas. In terms of reporting on the Section 3 and 66 kV construction, the CPUC will accept preconstruction survey results via e-mail with the following conditions. An e-mail report shall be submitted prior to construction in any area from only the surveying biologist who conducted the surveys. Date, time, location, results and recommendations as well as biologist qualifications shall be submitted. The CPUC shall review and approve the survey prior to SCE being able to move into an area. A follow-up formal report shall be submitted within two weeks of the e-mail submittal.
- Several biological resources were identified by the CPUC EM during a field tour which had not been identified in the Pre-Construction Survey reports. These include numerous patches of Pierson's Morning Glory along access routes proposed for used. During the breeding bird pre-construction surveys/sweeps, biologists will also survey for sensitive resources and include those findings in reports to the CPUC.
- Several sensitive biological resources were identified during the preconstruction surveys. Prior to work in the vicinity of those areas, CDFG must be consulted regarding the resource protection measures to be implemented. This information shall be submitted to the CPUC prior to work in the area.
- On June 20, 2008, Dan Blankenship of CDFG provided: "All Pierson's morning glory and other sensitive plants shall be delineated with flagging and avoided. If avoidance is determined not possible, consultation with CDFG is required to minimize impacts. Consultation with CDFG is required prior to construction that will impact any wetland areas in order to determine on site mitigation measures."
- As identified in **APM BIO-5** and **Mitigation Measure B-6**, 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 Monitors 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. 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 CDFG and USFWS (as well as CPUC notification). The Biological Monitors 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.

- Information provided in the October 2007 bat roosting report prepared by LSA indicated the following: "impacts to roosting bats would be avoided or minimized by identifying potential locations of roosting bats and colonies of bats, and scheduling work activities to avoid work adjacent to these areas during the maternity season (March through August). Potential bat roosting locations would be flagged and protected by restricting construction activities within 200 feet of roosting locations at dusk and dawn. In areas where potential bat roosts are located adjacent to construction activities, LSA recommends that these potential roosting locations be flagged with a 200 ft buffer, and that noise and dust be minimized as required by the aforementioned mitigation measures. At sites where activities that may impact potential roosting locations are anticipated, such as branch trimming or related activities conducted on adjacent to oak trees along access roads, LSA recommends that a biological monitor be present during these activities." As a condition of this NTP, SCE shall implement biological pre-construction surveys for roosting bats and maternity colonies within 200 feet of each potential roosting site. The surveys will be conducted by a qualified bat biologist with experience in southern California and would include a search of suitable trees that may provide habitat for bats. The biologist will note the presence of guano, roosting bats, or other signs that indicate the presence of these animals. The biologist will conduct the requisite surveys (may include both visual, auditory, and the use of an ANBAT system) to positively identify the species of bats present in the alignment. The résumé of this biologist must be provided to the CPUC for approval prior to conducting the surveys. If bats or their signs are detected, the area will be flagged and protected by restricting construction activities within 200 feet of roosting site. If maternity colonies are found, a buffer of 200 feet shall be established and no work may occur in the area until the conclusion of the breeding season. Only through CDFG consultation and approval may the buffer be reduced.
- Per **APM BIO-3**: "Construction crews would avoid impacting the streambeds and banks of any streams along the route to the extent feasible. If necessary, SCE would secure a Streambed Alteration Agreement (SAA) from California Department of Fish and Game. Impacts would be mitigated based on the terms of the SAA" During a field tour of the project conducted by the CPUC EM, it appears that certain overland access routes may cross stream zones. Prior to construction, SCE shall submit documentation that CDFG has been consulted concerning all potential streambeds and banks along the route.
- If groundwater is encountered during construction, construction activities at the location shall be halted and SCE shall submit a Groundwater Remediation Plan to the CPUC and RWQCB for review and approval. Until the Plan is approved, groundwater may not be discharged, but shall be pumped into a baker tank for holding.
- Per **Mitigation Measure G-10** a certified paleontological monitor will monitor compliance where excavation is being conducted in geologic units of moderate to high sensitivity. Areas of low

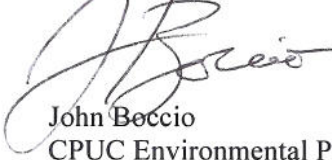
sensitivity will be spot-checked periodically. Paleontological monitoring reports will be submitted to the CPUC for review on a monthly basis.

- Prior to the commencement of construction activities, all crew personnel including 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 work boundaries shall be flagged prior to occupation. In addition, all approved access roads, spur roads and overland travel routes to be used shall be flagged prior to construction.
- All sensitive resources buffers shall be flagged prior to construction.
- An archeologist shall flag all culturally sensitive areas for avoidance prior to construction.
- 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.
- All fueling for equipment and helicopters shall be conducted using saddle trucks at least 100 feet from aquatic resource areas. No fuel may be stored on the Project right-of-way.
- If construction debris or spills enter into environmentally sensitive areas, the jurisdictional agencies and CPUC EM shall be notified immediately.
- A crossing permit from the Department of Water Resources will be submitted for work done over the California Aqueduct, and will be provided to the CPUC prior to the start of construction.
- Prior to use of any proposed helicopter area, SCE shall submit maps of the area as well as verification that biological and cultural surveys have been conducted for review and approval by the CPUC.
- Per **Mitigation Measure N-1b: Advanced Notification of Construction is required.** SCE shall submit verification of notification prior to construction. The CPUC agreed that a newspaper posting would not be necessary do to the limited distribution.
- Due to the condemnation process, the following mitigation measures will be fulfilled when greater access to the condemned area becomes available. Submittal to and approval by the CPUC and any applicable jurisdictional agencies will be required prior to work in the area.
 1. Per **Mitigation Measure H-7 Above Ground structures shall be protected against flood and erosion damage.** At least one, possibly two towers may be in a flood plain (Construction Tower #92 and possibly #91). They appear to be outside of any area containing water. Because of the condemnation process, SCE has not gone on the site to examine the site for possible protective measures. Once condemnation issues have been resolved, SCE will review this site before any construction begins, submit findings to the CPUC and seek approval.
 2. Per **APM HYD-1 Prior to construction, SCE will submit final Project design plans and specification, specifically noting location of towers with respect to known waterways, to the**

CPUC for review and approval. Because of the current difficulty with the condemnation process, SCE has not gone on the site with CDFG to examine this site for possible applicability of Section 1600. Once condemnation issues have been resolved, SCE will review this site with CDFG before any construction begins and seek approval pursuant to Section 1600 if necessary. In addition revised maps depicting all waterways shall be submitted to the CPUC.

3. **Per APM BIO-3: Construction crews would avoid impacting the streambeds and banks of any streams along the route to the extent feasible. If necessary, SCE would secure a Streambed Alteration Agreement (SAA) from California Department of Fish and Game. Impacts would be mitigated based on the terms of the SAA.** Because of the current difficulty with this property owner for Amargosa Creek, SCE has not gone on the site with CDFG to examine this site for possible applicability of SAA. Once condemnation issues have been resolved, SCE will review this site with CDFG before any construction begins and seek approval pursuant to SAA if necessary. All coordination with CDFG shall be submitted to the CPUC.
4. **Per Mitigation Measure L-5: Establish Agreement and Coordinate Construction Activities with Agricultural Landowners.** Reitano is the only property owner which applies to this mitigation measure. SCE is currently in the condemnation process with the property owner.
5. **Per Mitigation Measure L-6: Locate Transmission Towers and Pulling/Splicing Stations to Avoid Agricultural Operations.** Reitano is the only property owner which applies to this mitigation measure. SCE is currently in the condemnation process with the property owner.

Sincerely,



John Beccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen