

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

January 2, 2008

Donald Johnson
Project Manager
Southern California Edison
2131 Walnut Grove Ave.
Rosemead, C 911770RE: SCE Antelope-Pardee 500 kV Transmission Project, Segment 1 Project - Notice to Proceed
(NTP #2) Modification 1

Dear Mr. Johnson,

On November 16, 2007, Southern Californian Edison (SCE) requested authorization from the California Public Utilities Commission (CPUC) for Antelope Substation construction and expansion as well as the use of two adjacent contractor lay down yards. On December 7, 2007, the CPUC granted a conditional NTP for the scope of work provided by SCE. On December 21, SCE requested a modified scope of work to allow grading at the site and for replacement of an existing 80 foot microwave tower with a new 120 foot tower immediately outside of the communications room within the fenced area of the Antelope Substation.

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 and yard locations do not occur in Forest Service land thus no approval from the Forest service is required. **NTP #2-Modification 1 is granted by CPUC for the proposed activities based on the following factors:**

- Per the original request dated November 16, 2007: The Antelope Substation yard is located on Avenue J, west of Lancaster, Los Angeles County, California. The PAR Antelope Substation yard (61.5 acres) will serve as a material and equipment storage yard, and will support Project construction activities. The Burns and McDonnell portion (7.8 acres) will serve primarily as a field office site with room for parking both trucks and some limited equipment parking, mostly trailers or smaller pieces of equipment.
- Per the original request dated November 16, 2007: "No sensitive plant or wildlife species were observed during the two biological field surveys conducted at the Antelope Marshalling yard during April and October 2007. No sensitive plant species are expected to occur on or adjacent to the yard. Burrows of a suitable size to accommodate burrowing owl, a special interest wildlife species, were recorded from the survey area." Per the original request "within 30 days prior to use of the yard, a pre-construction survey will be conducted to evaluate burrowing owl use of appropriately-sized burrows. If no evidence of burrowing owl use is discovered during this pre-construction survey, the openings will be collapsed to temporarily preclude owl use." Please note that the burrows must be collapsed immediately following the negative findings survey and occur with the biological monitor present. On December 21, 2007 a survey was conducted of the Burns

& McDonnell Trailer Yard. No sensitive wildlife or raptor or other bird nests were recorded. No mammal burrows capable of accommodating burrowing owls were observed on the Burns & McDonnell Construction Trailer Yard site. **Please note that the remaining areas covered by NTP # 2 are pending burrowing owls surveys.**

- Per the NTP # 2 Modification request dated December 21 “SCE is requesting a modified scope of work to grade additional areas (Including the Burns and McDonnell construction trailer yard and portions of the PAR marshalling yard) around the Antelope Substation which were not identified in the SCE NTP #2 request dated November 16, 2007. To correct this discrepancy, SCE requests that the CPUC modify the statement that no grading will be done, under bullet point #5, with the understanding that this action will necessitate that the conditions of the SWPPP and the Fugitive Dust Control Plan be implemented to reduce both dust and site runoff in the event of rain and/or high winds. In addition, a biological and paleontological monitor will be present during site grading. The disturbed areas will be revegetation per the methods described in the Revegetation Report currently being prepared for the Project.” **Please note that grading at the marshaling yards will only occur where needed to accommodate trailer installation.**
- Per the original request dated November 16, 2007:“the surface reconnaissance of both proposed Antelope Substation yards was conducted in September 2007. No cultural resources or potential historic properties were observed at or near the yard or within the confines of its immediate approach corridors. In regard to paleontologic issues, since the substation is located in a geologic unit with generally low sensitivity (likely to contain only a limited number of fossils), use of a paleontologic monitor during excavation and other ground disturbance activities would be sufficient. If any fossils are identified then the remainder of Mitigation Measure G-10 including submission of a Paleontology Monitoring Plan would be required.”
- Per the NTP # 2 Modification request dated December 21 “SCE is requesting CPUC approval to begin mobilization and immediately start parking heavy construction equipment approximately 10 feet from the existing substation fence. The proposed parking areas is within the scope of work footprint of NTP # 2. The two nearby property owners, who have already been notified in writing of the construction start date, will be notified verbally that construction equipment will be moved onto the SCE fee owned property and stored on site. Actual construction will not start until after the approved date of December 27.”
- Per the NTP # 2 Modification request dated December 21 “As described under Section B.2.3 of the project description for Segment 3A of the Antelope Segment 2 and 3 Final EIR. SCE will replace an existing 80 foot microwave tower with a new 120 foot tower immediately outside of the communications room within the fenced area at the Antelope Substation. The new 120 foot microwave tower will be built next to the 80 foot existing tower. Concrete footings would be installed for the new tower. A paleontological monitor will be present during foundation excavation activities. Once the new tower construction is complete, all of the antennas on the existing 80 foot tower would be moved to the new 120 foot tower and the existing 80 foot tower would be removed. No new roads or grading would be required. SCE is requesting this scope of work be added into the Segment 1 NTP # 2. This request will allow SCE to utilize Information Technology Facility Construction Crews more effectively throughout the entire Segment 1, 2 and 3 IT construction schedule.”

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.
- A paleontological monitor shall be on-site monitor all ground disturbing operations
- As required by mitigation, a biologist 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 rodents arise 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.
- 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.
- 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.
- Project related vehicles and equipment with diesel engines shall limit idle times to no more than 10-minutes.
- If construction debris or spills enter into environmentally sensitive areas, the jurisdictional agencies and CPUC EM shall be notified immediately.

Sincerely,

John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen