

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 #10)

Dear Mr. Johnson,

On April 6, Southern Californian Edison (SCE) requested authorization from the California Public Utilities Commission (CPUC) for construction of Hughes Lake 12 kV relocation. Additional information to support the request was required by the CPUC, and on June 2 another NTP request with supplemental information was provided.

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 #10 is granted by CPUC for the proposed activities based on the following factors:**

- A request to begin construction of Hughes Lake 12 kV relocation was submitted April 6, 2008. An updated request was submitted June 2, 2008. Per the submitted materials and subsequent clarifications via documented e-mail:
 1. The Project ROW begins at the western edge of the City of Lancaster in Los Angeles County approximately 2000 feet northwest of the Antelope Substation and approximately 1000 feet north of Avenue J. It continues south to the terminus on Elizabeth Lake Road roughly paralleling the proposed Antelope – Pardee 500 kV ROW.
 2. The relocation of the Hughes Lake 12 kV circuit is tentatively scheduled to begin in June 2008 and all but the section (including underground work) on the Brunet property completed by approximately the end of July 2008.
 3. The work will consist of relocating the Hughes Lake 12 kV circuit off the existing Pole Switch #74 66 kV lattice towers. The new distribution line will be mostly placed within the same right-of-way as the new Antelope-Pardee 500 kV. There is a small portion of the new distribution line that departs the transmission line right-of-way, and follows an existing road and is located within franchise property.
 4. At the intersection of 110th St. West and Johnson Road, the Hughes Lake 12 kV circuit will cross over Johnson Road and will proceed in a southeast direction over the Brunet family property. Two underground service taps will be constructed on the Brunet property. One will service the Brunet residence and the other will service the water well on the Brunet property. A significant cultural resource is located on the Brunet property requiring additional cultural resources survey where the underground service taps will be installed. SCE requested that the CPUC approve the NTP with a condition that construction on the Brunet property can not be initiated until all appropriate surveys have been completed, reviewed and approved by the CPUC and other appropriate state agencies. Full SHPO concurrence has not yet been granted, however Adan Sriro of SCE provided the following correspondence report regarding the site on June 6, 2008: "A couple of months ago, I had a conversation with Dave Byrd of the SHPO to

discuss the cultural resources mitigation for the archaeological site (CA-LAN-1334/H) on the Brunet Property. I explained that a recalcitrant land owner will not allow any work outside of the SCE utility easement, and we cannot start negotiations for the environmental mitigation until the easements are acquired. This created a huge conflict with our construction schedule, specifically the installation of four Lake Hughes 12kV poles, which are going to be located within or directly adjacent to LAN-1334/H's previously recorded boundaries. It was decided that we would evaluate the historic component of the site first. The Cochems Ranch site was determined to not meet the eligibility requirements of the National Historic Preservation Act. SHPO concurred with these findings in a letter to SCE (SHPO 4/11/08). For the prehistoric component, SCE proposed to conduct archaeological excavation at all locations of ground disturbance within SCE's easement, including the 12kV poles, anchors, the 500kV Tubular Steel Pole, and the underground conduit servicing the house. To accommodate our schedule, SHPO agreed to let crews install the 12kV poles and anchors after archaeological excavation in those locations PRIOR to SHPO concurrence. SCE will submit a site evaluation, wait for a response from SHPO, and then complete the 500kV and underground trench work on the Brunet Property once Section 106 compliance is complete. To summarize, archaeological excavation will take place at every location where project-related ground disturbance will occur. Excavation units and shovel test probes will be dug at Lake Hughes 12kV pole and anchor locations down to sterile soil. Crews will then set those poles. SHPO agreed to this because the data that would be impacted will have already been removed. The site will be evaluated and that report sent to SHPO for comment. After receiving SHPO concurrence, the remaining project work (500kV and underground service to the house) should be cleared. Archaeological excavation should take no more than six days to complete" --Adam Siro, M.A., RPA

5. From the Brunet property, the Hughes Lake 12 kV circuit will be located on the western edge of the new 500 kV ROW heading south across the California Aqueduct to terminate on the south side of Elizabeth Lake Road.
6. The circuit will consist of four 336 conductors, three phase and one neutral, which will be located on wood poles ranging in height from 40 to 65 feet and buried approximately five to eight feet into the ground. The four conductors will be installed on wood cross arms using a rope pulling machine. The Hughes Lake line will be constructed on the east side of the 66 kV line.
7. Truck-mounted or excavator-type augers are used to excavate an appropriately-sized hole. The wood crossarms may be installed before the wooden poles are installed or after. The wood poles are placed into the excavated holes and secured in place by backfilling the open portions of the hole. The hardware for attaching the conductor wire is then installed. Next, the conductor wire is strung through pulleys. The final step is to connect the conductor wire to the hardware, and installing any dead-ends.
8. Existing roads within the existing SCE ROW corridor will be used to the greatest extent feasible in constructing the reroute. 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. 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 roads (permanent or temporary) will be constructed for overland travel; although where no roads exist, drive-and-crush will be used to access the poles. Please note that there is 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 until a wetland delineation has been conducted and submitted to the CDFG and CPUC for approval.)
9. A rope line used to pull in the conductor will be flown in by helicopter. Helicopter might also be used to pull lines on the section of line in steep terrain on the northern edge of the Peterson's property and over the California Aqueduct. Down guys will be installed at all angle pole locations to support the unbalanced load placed on these poles. There are seven pole installation sites located south of the California Aqueduct where there are significant access issues.

Because of the access issues, the holes to install the wood poles will be dug by hand and each wood pole, complete with crossarms and necessary stringing hardware, will be set using a helicopter. Stringing at these structures will be accomplished as described above. Clipping in the conductor wire will be accomplished through pedestrian access and climbing the poles. There will be only one landing zone on the Hughes Lake 12kV ROW, and that will be at WSS 27. The proposed area is 280' by 700' and is not fully delineated on the disturbance maps. (The CPUC will need verification that both biological and cultural surveys have been complete at the site prior to use.)

10. The conductor will be installed onto the new Hughes Lake 12-kV pole line, it will not be dragged on the ground it will be placed into rollers on the cross arms and pulled in via a rope pulling line. The old Hughes Lake 12-kV circuit that is currently located on the lattice tower line will be placed into rollers on the tower and pulled out without dragging on the ground.
11. Biological resource surveys were conducted on April 29, May 1, 19 and 20, 2008. The 12 kV line was surveyed as a 400 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 Peirson's morning glory. One special status animal species was found the coast horned lizard. (Please note that prior to construction consultation with CDFG regarding the sensitive species will be required, 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.)
12. Per the request all 12 kV structures will be raptor-safe in accordance with the Avian Power Line Interaction Committee's Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006.
13. A Class III Cultural Resources Investigation for TRTP Segment 1 was submitted February 2008. The new disturbance areas pertaining to the Hughes Lake construction was not covered by the report. On June 11, a Supplemental Archeological Survey Report covering the disturbance areas along the Hughes Lake 15 kV construction was submitted. No new prehistoric archeological sites, historic areas, 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 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.
- Breeding bird surveys were presented, but the surveys were only conducted within a 400 foot wide belt transect corridor. **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 Hughes Lake 12 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.

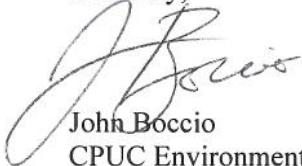
- Several biological resources were identified by the CPUC EM during a field tour which had not been identified in the pre-construction survey reports including numerous patches of Pierson's morning glory along access routes proposed for use. During the breeding bird pre-construction surveys/sweeps, biologist 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 on how the resource protection is to be handled. 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 been consulted concerning any streambed and banks along the route.
- If groundwater is encountered during construction activities, work in the area 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 resource 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.
- SCE has proposed only one helicopter landing zone on the Hughes Lake 12kV ROW, and that will be at WSS 27. The proposed area is 280' by 700' and is not fully delineated on the disturbance maps. Verification that both biological and cultural surveys have been complete at the site shall be submitted to the CPUC and approved prior to use.
- Per **MM N-1b**: Advanced Notification of Construction is required. The CPUC agreed that a newspaper posting would not be necessary do to the limited distribution. Notifications were received April 16 and 17. Due to the elapsed time since the noticing, SCE will re-notice the property owners and submit proof of compliance to the CPUC prior to construction.

Sincerely,



John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen