

**PUBLIC UTILITIES COMMISSION**505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298

July 4, 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 Project - Notice to Proceed (NTP) #12

Dear Mr. Johnson,

On June 27, Southern Californian Edison (SCE) requested authorization from the California Public Utilities Commission (CPUC) for use of the Hydrant Marshalling Yard for the main tower assembly and helicopter staging area for the northern portion of Segment 1 in the ANF. The Hydrant site is located on Bouquet Canyon Road approximately 0.13 miles southeast of the intersection of Bouquet Canyon Road and Spunky Canyon Road. This site is within Los Angeles County and the Angeles National Forest on property owned by the Department of Water and Power of the City of Los Angeles (LADWP) approximately 0.50 miles northeast from the Bouquet Reservoir. SCE plans to utilize the Hydrant Marshalling Yard from July 2008 through December 2009 for construction of Segments 1, 2, and 3.

The SCE Antelope-Pardee 500 kV Transmission Project, Segment 1, 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. The SCE Antelope Project, Segments 2&3, 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, on March 15, 2007.

**NTP #12 is granted by CPUC for the proposed activities based on the following factors:**

The following information was provided in the NTP request:

The Hydrant site is located on Bouquet Canyon Road approximately 0.13 miles southeast of the intersection of Bouquet Canyon Road and Spunky Canyon Road. This site is within Los Angeles County and the Angeles National Forest on property owned by the Department of Water and Power of the City of Los Angeles (LADWP) approximately 0.5 miles northeast from the Bouquet Reservoir. The proposed site is approximately 21 acres in size. The surrounding land is part of the ANF except for a parcel to the south between the proposed yard and Bouquet Canyon Road which is an unused church camp. A full-time groundskeeper lives at that site. The Hydrant site can be accessed through the LADWP entrance off of Spunky Canyon Road. An additional proposed access will be from an existing dirt road adjacent to the camp.

The Hydrant Yard will serve as a material, equipment storage, and helicopter support yard, providing support to construction activities. The following is a list of activities and items that will possibly be present or be occurring at this yard site throughout the duration of the project: office trailers, vehicle parking, equipment storage, steel delivery, and shake out, roll-off trash container, roll-off steel disposal container, concrete washout and batch plant, steel stub angles, fueling from saddle tanks/fuel trucks, tower construction/pick-up, tower lay down area (from 66-kV), rebar and rebar cages, form cans and associated foundation items, wire storage, fire equipment storage, spill kit storage, portable toilets, helicopter support

activities (landing, fueling, and emergency maintenance), Angeles Forest Fire Safety Headquarters (central site for storing fire fighting equipment), paved secondary containment area.

The yard will be active from July 2008 through December 2009, and intended for use throughout the entirety of the project (Segments 1-3).

The Contractor will have a security guard present on the property during the nighttime hours, from the time that construction personnel leave the yard at the end of the day until the time that construction personnel arrive at the yard the next morning. During the daylight hours, construction personnel will normally be present at the site and will prevent access by any unauthorized visitors. For those times when the yard will be unoccupied during the daylight hours, such as holidays, a security guard will be present. Additional security measures will include the installation of gates on access roads to the yard to prevent unauthorized vehicles, and fencing around the paved area of the yard.

Use of the Hydrant Yard will impact both native and non-native vegetation communities. Native plant communities on site include coastal sage scrub with elements of chaparral, while the grasslands are a mixture of native and non-native grasses and forbs. LADWP has requested that all non-native habitats (as well as native habitats) be restored with natives. Therefore, all areas impacted by use of the yard will require restoration. This effort will be conducted in consultation with LADWP.

There are at least 10 mature coast live oak trees along the southern edge of the yard which are suitable for use by species such as the western red bat (*Lasiurus blossevillii*). Mitigation measures to reduce dust, noise, and other impacts will be implemented during use of the yard to minimize impacts to these oaks or any bats that may be roosting there.

Since the oaks are of a size that would require protection under Los Angeles City ordinance, they will be fenced 15 feet beyond the edge of the dripline to prevent equipment parking. This area will not be subject to clearing or grubbing. Branches that reach over the access road on the southern edge of the yard, may require trimming but will be done so only with the supervision of a qualified arborist, and with City approval. Oaks on the east side of the yard will also be fenced, or roped for avoidance. A permit for oak trimming may be necessary. None of the oak trees south of the yard will be removed. The few elderberry trees within the yard are not anticipated to be removed, but if it should occur, replanting will follow guidelines provided by LADWP and container stock will be used to the extent practicable to more quickly return the site to previous conditions.

The yard has a dense stand of California buckwheat (*Eriogonum fasciculatum*) on the west and far eastern ends averaging three feet tall, and a thicket of four-foot tall yerba santa (*Eriodictyon crassifolium*) in the center. These places will need to be cleared with a brush hog or similar equipment prior to use. Fire equipment and a water truck will be onsite during clearing activities. Larger material will be chipped and mulched on site, while smaller material will be left on the ground and/or crushed. The vegetation will not be graded off the site, only cut down to within a few inches of the ground surface.

Cribbing with wooden blocks will be the primary technique used to level-up towers (that are being assembled) in respect to the ground surface. Nevertheless, limited grading to smooth the surface of the yard and remove ruts and holes after grubbing may be necessary for safety reasons and to install the paved containment area. If grading of the yard surface becomes necessary, a grading plan will be prepared and submitted to LADWP detailing the location and extent of soil disturbance along with plans for appropriate BMPs to be applied to reduce soil erosion as called for in the SWPPP. The design drawing and plan for the containment area has already been submitted to LADWP.

At the request of LADWP, a designated "concrete area" will be paved and bermed for containment where fueling activities will occur. In accordance with the SWPPP, in the unlikely event of a large spill, a collection basin created by sloped grading will be located at the easternmost end of the containment area. The "concrete area" will be reinforced with an underlying layer of compacted gravel and will incorporate 4-inch fiberglass-reinforced concrete as the paving material. The strands of fiberglass within the concrete will add to its integrity and reduce cracking or separating. Additionally, fiberglass is used as an alternative to rebar to allow for easier break-up and removal in order to restore and revegetate after construction.

An intermittent drainage enters the site out of a narrow canyon in the hills to the north through a deeply-incised channel. At the site boundary, the channel begins to widen and dissipates before reaching the southern border of the yard. There is no riparian vegetation, and morphology suggests that water flows only during extreme rain events. A 50-foot buffer of intact vegetation will be maintained around the visible channel, and the area will be restricted by use of fencing or roping off to

prevent encroachment into this area. Fueling and other activities involving fluids or hazardous materials will be kept away from this area. Erosion control measures and BMPs will be applied as described in the project SWPPP to prevent excess or contaminated runoff from leaving the yard.

LSA conducted both general and focused plant and wildlife species surveys of the Hydrant yard on May 12, 2008. LSA biologists surveyed for coast live oak trees, nesting birds, special status plant species, special status reptiles and amphibians, burrowing owl, raptors, special status bat species, American badger, and small rodent burrow concentrations.

No raptor or other bird nest locations were detected during the May 12, 2008 survey. Bird nesting surveys will be conducted again prior to equipment and vehicles mobilizing to the site.

During the May 12, 2008 survey, one mariposa lily location was recorded with a GPS unit so that this population would be marked for future reference when the blooming season has ended and only remnant stems and dried fruits (pods) remain. One butterfly mariposa lily (*Calochortus venustus*) was detected within the 200-foot buffer area northwest of the yard, but outside of the proposed boundaries of the yard.

No special status reptile or amphibian species were detected during the May 12, 2008 survey; however, San Diego and/or California coast horned lizard (*Phrynosoma coronatum blainvillii* and/or *P.c. frontale*) were observed by LSA in 2007 and 2008 in the general area in buckwheat and chaparral habitats and are expected to occur in the yard area. Harvester ants (*Pogonomyrmex* spp.) and other native ant species, which were detected occasionally in the yard, are the primary food source for this species of lizard (Lemm 2006). Oak tree (*Quercus* spp.) leaf litter is habitat for yellow-blotched salamander (*Ensatina eschscholtzii croceater*) and rocky chaparral slopes are habitat for San Bernardino mountain kingsnake (*Lampropeltis zonata parvirubra*).

No confirmed western burrowing owl burrows were found during the May 12, 2008 surveys.

No raptor nests were detected within the survey area corridor during the May 12, 2008 surveys, but red-tailed hawks were seen foraging occasionally in the survey area and vicinity.

During the May 12, 2008 surveys, the biologists looked for locations such as rock outcrops and mature trees that might serve as maternity roosting sites for bat species. There are coast live oak trees along the southern edge of the yard which are suitable for use by species such as the western red bat (*Lasiurus blossevillei*). This is a solitary species, which does not have consistent daily or maternity roosting locations. Many tree roosting bats have high overall site fidelity, but often change roosting locations within the vicinity so finding roosts is labor intensive. Mitigation measures to reduce dust, noise, and other impacts will be implemented during the use of the yard.

Potential burrows for American badger were searched for, but were not detected during the May 12, 2008 surveys. Chaparral and scrub habitat within the survey area and general vicinity is suitable for this species.

Small rodent burrows, identified as kangaroo rat species (*Dipodomys* sp.), and Botta's pocket gopher (*Gopherus bottae*) are scattered throughout the project area. Since these species are not protected, these areas have not been flagged for avoidance. Several woodrat nests were located in the eastern portion of the yard. It is assumed that these may be occupied by the San Diego desert woodrat, but several appear to have been constructed by the big-eared woodrat species. SCE, BMcd, and CDFG have discussed ways to minimize impacts to woodrats.

Determinations of cultural and paleontological resources on site were made through a review of site archives, historical maps, and documents relative to the project area, maintained at the USFS Headquarters, ANF in Arcadia and South Central Coastal Information Center, California State University, Fullerton, as well as an intensive surface survey of the subject parcels. SCE's cultural resources group identified a generalized scatter of historical refuse during the pedestrian survey conducted last December. The debris scatter is discussed in further detail in a letter prepared by Mr. James Schmidt, ref. *SCE Tehachapi Renewable Transmission Project, Historical Debris Scatter at the DWP Hydrant Yard Spunky Canyon Road, Los Angeles County, California*. Because of the dense vegetation at the site, LADWP is requiring that SCE conduct another cultural resource survey immediately after mowing and clearing prior to construction.

The Fugitive Dust Control Plan submitted as part of the Segment 1 project 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.

The Pacific Crest Trail (Trail) is approximately 0.86 miles due east of the eastern edge of the proposed yard. The Trail is not visible from the yard, although the yard might be visible from the Trail as it travels along ridgelines east and north of the Hydrant yard. There may be temporary visual and noise impacts to Trail users resulting from activities within the yard.

The closest sensitive receptor is the property on the parcel south of the yard along Bouquet Canyon Road, which is occupied by a full time grounds keeper and is approximately 550 feet away. Activities on the yard are screened from the residence by a grove of mature oaks but helicopter use and traffic passing west of the groundskeeper's residence may be very noticeable, and will have a temporary effect on the rural character of the site. Although the yard is located on property owned by LADWP, the unused camp property, including the groundskeeper's residence and the access road lies within unincorporated Los Angeles County. Therefore, County noise restrictions for mobile construction equipment would apply to ingress and egress along the access road. Restrictions on hours of yard use to between 7:00 am and 8:00 pm Monday through Saturday, and avoidance of equipment idling or parking near the area of the yard nearest the groundskeeper's residence will help to minimize impacts. Noise from helicopter traffic will be significant, but the distance of the yard from the groundskeeper's residence and the limited time of operation and the impermanent nature of the helicopter activities will help to mitigate the noise.

The groundskeeper's residence, approximately 550 feet to the south of the yard, is effectively screened from the yard by a wide grove of mature oaks and by the hill slope. The same trees also prevent the yard from being visible from Bouquet Canyon Road.

Traffic control devices (signs) shall be placed on both sides of Bouquet Canyon Road, and will include the Caltrans or Federal sign number, dimension and description. Warning signs shall be placed so as to provide adequate notice of motorists, bicyclists or pedestrians that they are approaching an obstruction or hazard. Warning signs shall be removed as soon as the obstruction or hazard is removed or cleared. Sign distance from point of restriction to the first, second, and third signs are 500 feet. The sign recommendation for 45 mph or greater is a 48-inch sign minimum. Pilot cars will escort trucks hauling material along Bouquet Canyon Road. Pilot cars will be located one in the front of the truck and one in the back. All signs and lights will be on all vehicles involved in hauling procedures. Pilot car drivers will also act as flaggers. Flaggers will wear highly visible vests and have "stop and slow" paddles to control traffic. Flaggers will have received the State of California Title 8, Safety Orders, Section 1599(f) "Training of Construction Site Flaggers" prior to performing duties. Truck hauling material will not haul during the peak hours of traffic on Bouquet Canyon Road from 7:00 am to 9:00 am and 4:00 pm to 6:00 pm daily. Truck crossing signs will be placed on Bouquet Canyon Road on each side of the road to warn oncoming traffic that trucks may be present. In the event that emergency vehicles approach the area, a clear pathway will be created to allow all associated vehicles time to pass.

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

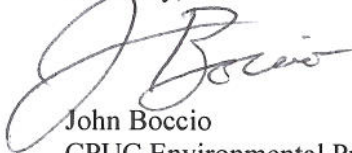
- All project mitigation measures, compliance plans, and permit conditions shall be implemented during construction activities and use of the proposed yard space. Some measures are on-going/time-sensitive requirements and shall be implemented prior to and during construction where applicable.
- Copies of all relevant permits, compliance plans, and this Notice to Proceed shall be available on site for the duration of construction activities.
- 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 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 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.
- If the work schedule changes and night work is scheduled, SCE shall consult with CDFG regarding any impacts that night work may inflict on nearby wildlife (i.e. roosting bats, birds). Documentation of consultation with CDFG shall be submitted to the CPUC prior to the commencement of construction activities.
- Prior to mobilization to the yard and/or the commencement of construction activities, SCE and their biologists shall consult with CDFG regarding minimizing potential impacts to San Diego and/or California coast horned lizard (*Phrynosoma coronatum blainvillii* and/or *P.c. frontale*), yellow-blotched salamander (*Ensatina eschscholtzii croceater*), and San Bernardino mountain kingsnake (*Lampropeltis zonata parvirubra*). Documentation of consultation with CDFG shall be submitted to the CPUC prior to the commencement of construction activities.
- Per LADWP License Agreement dated June 24, 2008, SCE shall flag and avoid sandy soils.
- Per LADWP License Agreement dated June 24, 2008, SCE shall conduct another cultural resource survey immediately after mowing and clearing prior to construction. The cultural survey report shall be submitted to the CPUC and the LADWP's Real Estate Business Group for review and approval.
- In accordance with the requirements of LADWP, all areas affected by vegetation removal, disturbance, or grading will be restored in accordance with the Segment 1 Recontouring and Restoration Plan, and the Habitat Restoration and Revegetation Plan. LADWP is requiring that all disturbed areas be restored and revegetated with native plant species.
- 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.
- 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.
- As provided in the request, the Fugitive Dust Control Plan (Mitigation Measure A-1a) shall be implemented at the yard. 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.
- All open flame activities will be prohibited at all times; including but not limited to welding, torch work, and smoking.
- 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 take 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.

Sincerely,



John Boccio  
CPUC Environmental Project Manager

cc: V. Strong, Aspen