

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

October 9, 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) #16

Dear Mr. Johnson,

On October 1, Southern Californian Edison (SCE) requested authorization from the California Public Utilities Commission (CPUC) for use of a marshalling yard on the property of Roger Reitano (referred to as the Reitano Assembly and Fly Yard) at 12150 Elizabeth Lake Road, 3.5 miles west of the intersection of Bouquet Canyon Road and Elizabeth Lake Road, 2.0 miles southeast of San Francisquito Canyon Road, and about four miles southwest of the Lancaster City limits. The yard is located directly west of the existing 66 kV right-of-way, making it an ideal location for helicopter operations and assembly yard activities related to work on both the Reitano property and the Angeles National Forest (ANF). SCE plans to utilize the yard from September 2008 to September 2009, with the possibility of further lease extensions.

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

- The following information was provided in the NTP request:

The proposed Reitano Assembly and Fly Yard is located on the property of Roger Reitano at 12150 Elizabeth Lake Road, 3.5 miles west of the intersection of Bouquet Canyon Road and Elizabeth Lake Road, 2.0 miles southeast of San Francisquito Canyon Road, and about four miles southwest of the Lancaster City limits. The yard is located directly west of the existing 66 kV right-of-way, making it an ideal location for helicopter operations and assembly yard activities related to work on both the Reitano property and the Angeles National Forest (ANF). The yard is proposed for use from September 2008 to September 2009, with the possibility of further lease extensions.

This area lies within the cross-country track, which is maintained by Mr. Reitano, and will be avoided as an access road. Entry and exist into the yard will be taking place to the west of the yard directly off the driveway from Elizabeth Lake Road. This is to ensure minimal disturbance to the overall integrity of the track.

The following activities are anticipated to occur at the yard for the duration of use: vehicle and equipment staging, water truck/water trailer staging, tower assembly for 500 kV, tower disassembly for 66 kV, helicopter landing and fueling, and personnel loading zone.

The helicopter fueling tank to be used at this yard will be a double-walled 2,800 gallon maximum capacity tanker truck with two shut-off valves. That will be driven onto a mobile secondary containment, which is 12 feet x 36 feet in size, and that can hold up to 3,001 gallons. Fueling activities will take place at a minimum distance of 100 feet from any water resource, in particular, the wetland to the south of the proposed yard, and a small swale that conducts runoff during high rainfall events from the northwest corner of the road southeast to the right-of-way. The landowner already has a barbed-wire fence installed along the south end of the yard that will serve to deter equipment from entering the wetland area. On site, 55 gallon drum spill kits will be present at all times of active helicopter use to ensure that any incidental spills will be handled quickly and efficiently. A water truck will also be used to keep dust to a minimum during all helicopter operations.

The project Hazardous Substance Spill Control Plan has been developed and will be implemented on-site. Additionally, a Worker Environmental Awareness Program will be provided to all personnel working on the site to ensure a clear understanding of how to prevent and respond to spills, fires, or other emergencies.

There is no vegetation on the Reitano Yard that will necessitate any form of cutting, clearing, or grubbing. Additionally, no grading will be necessary for the use of this site as a fly yard. There are no anticipated impacts to subsurface cultural or paleontological resources, or to groundwater resources.

The landowner, Roger Reitano, is currently not utilizing this agricultural area and will be receiving monthly rental payments for its use.

A focused survey for special interest plant species, nesting birds, sensitive reptiles and amphibians, small mammal burrow concentrations, burrowing owls, American badger, roosting bats and all other sensitive wildlife species was conducted on September 9th by Burns & McDonnell biologists at the site of the proposed marshalling yard located on the Reitano Ranch. The proposed marshalling yard site consists of a field that is routinely disced in support of agricultural production. The field is characterized by crop stubble, ruderal and non-native grassland vegetation. Recently, the perimeter of the field has been disced to provide a running route for high school cross country meets. During heavy rainfall events, a shallow swale forms at the corner of the Reitano driveway where it meets Elizabeth Lake Road and directs sheet flow southeast toward the right-of-way. This swale is visible on aerial photos, but the landowner regularly plows the field so it does not have the opportunity to form a defined channel. Since the yard will be used during the winter months, straw wattles, silt fencing, or other preventative measures will be placed along the southern fenceline of the yard to prevent muddy runoff from being directed from the swale into adjacent Armagosa Creek. Furthermore, if the area around the swale should become muddy during winter rainfall, crossing(s) will be established with wood mats for heavy equipment to minimize the amount of silt runoff produced by vehicular use. The habitat on the south end of the Reitano property is primarily chaparral with coastal sage scrub and desert scrub elements, and outside of the known range of the coastal California gnatcatcher. Therefore, no surveys for this species were conducted for MM B-12. Protocol surveys for the arroyo toad (MM B-8a), and the California red-legged frog (MM B-9) were conducted in appropriate habitat at the Armagosa Creek crossing on the main driveway, and within a stock pond between the driveway and the right-of-way in 2007, and were updated during the 2008 season. No arroyo toads or California red-legged frogs were recorded during either of these intensive surveys (LSA, 2008a, b). No target special interest wildlife species or nests were observed during the September 2008 surveys. Several populations of Peirson's morning glory (*Calystegia peirsonii*), a CNPS List 4 species is known to occur to the south of the yard beyond Armagosa Creek, but will not be impacted by the use of the yard.

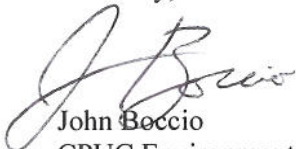
At the request of SCE, Pacific Legacy, Inc., conducted a complete/intensive archaeological survey of a 21.5-acre parcel proposed for use as a marshalling yard. An intensive pedestrian survey and reconnaissance of the current study area was conducted on September 15th by Pacific Legacy, Inc. archaeologists. The yard area surveyed is a cultivated agricultural field. Soils surface visibility during the survey was excellent. No cultural resources were identified within the project area during field work and it is not anticipated that any additional resources will be encountered during the course of the project.

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 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.
- In the case of a hazardous materials spill, the CPUC EMs shall be immediately notified and an incident report shall be submitted to the CPUC within five (5) working days of the spill incident and shall include spill volumes and any resource damage that may have occurred.
- A landowner agreement was submitted to the CPUC for the construction of access roads on the Reitano property to wreck out towers, but has not been submitted for the Reitano Assembly and Fly Yard on the Reitano property. 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.
- 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 onto public roads, 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. The conditions of the Hazardous Substance Control and Emergency Response Plan and a Waste Characterization Plan developed for the Project shall be followed.

Sincerely,



John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen