

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

March 29, 2010

Susan J. Nelson, AIA
Project Manager
Southern California Edison
2244 Walnut Grove Ave.
Rosemead, CA 91770

RE: Tehachapi Renewable Transmission Project (Segments 4-11), Notice to Proceed (NTP # 3)

Dear Ms. Nelson,

On March 9, 2010, Southern Californian Edison (SCE) submitted a Notice to Proceed Request (NTPR) seeking authorization from the California Public Utilities Commission (CPUC) to utilize a marshalling yard referred to as the Rancho Vista Material Storage Yard for the Tehachapi Renewable Transmission Project (TRTP) located at 12408 6th Street, in the City of Rancho Cucamonga, San Bernardino County, California.

The SCE Tehachapi Renewable Transmission Project (Project) was evaluated in accordance with the California Environmental Quality Act and a Certification of Public Convenience and Necessity (CPCN) was granted by CPUC Decision 09-12-044, (Application #07-06-031), SCH #2007081156 on December 17, 2009. **NTP # 3 is granted by CPUC for the proposed activities based on the following factors:**

- SCE submitted the following information:

SCE is requesting to utilize a marshalling yard referred to as the Rancho Vista Material Storage Yard (Rancho Vista Yard) located at 12408 6th Street, in the City of Rancho Cucamonga, San Bernardino County, California. SCE proposes to use the Rancho Vista Yard as a material and equipment storage yard to support construction activities for TRTP.

The proposed yard is approximately 17.7 acres. The existing grade of the yard area is relatively flat. The surface on the southern portion of the yard (approximately 8 acres) is currently rocked. The northern portion of the yard (approximately 10 acres) is disturbed and largely void of vegetation. An abandoned railroad track is present in the northeastern portion of the yard, crossing the yard from the eastern fence line to the northern fence line. The yard will have three access points: one existing gate at the north side, and two new gates at the southeast corner and the southern corner northwest of the Peaker Power Plant.

Site Facilities/Activities

Proposed facilities at the yard include the following: contractor equipment and material storage areas, office trailers, temporary sanitary facilities, roll-off trash containers, fueling areas, spill kit, vehicle parking area, lighting and security.

Proposed activities at the yard include the following: yard development and operation and maintenance; contractor equipment and material receipt, storage, and shipping; equipment and vehicle fueling, vehicle parking; security patrol; and underground duct bank installation.

SCE is not anticipating that helicopter activity will be performed at the Rancho Vista Yard. In the event helicopter activity is needed, SCE will provide supplemental information and appropriate biological survey reports.

Site Work

Site Preparation – SCE proposes to develop the interior of the Rancho Vista Yard in two phases. During Phase 1, all portions of the yard will be developed except for the northwest portion of the yard, which is designated as an Environmentally Sensitive Area (ESA). To protect the ESA, a 50-foot buffer will be established around its perimeter by installing a 3-foot-high construction fence. SCE proposes to develop this fenced area (including the ESA and 50-foot buffer area) during Phase 2 of the site preparation activities, which will not begin until the ESA has been cleared for construction by USFWS.

The southern portion of the yard is currently rocked and will require minimal work prior to the start of material delivery. An additional 2 to 3 inches of road base material (e.g., gravel) will be placed on this area, if needed.

The surface work for the northern, non-rocked portion of the yard will be phased. During Phase 1, the approximate 6-acre area outside the ESA area will be developed. Following receipt of approval from USFWS, Phase 2 would entail development of the approximate 4-acre ESA area. These areas would be cleared and grubbed, and a 6-inch deep layer of road base material applied.

Vehicle and equipment drive lanes across the abandoned railroad tracks in the northeast portion of the yard will be established by mounding soil and road base on the existing culverts to create a smooth transition.

Underground Major Activities – Electrical power and communications services will be provided via underground electrical facilities along the south side of Rancho Vista Yard. An approximate 500-foot long underground utility duct bank will be installed, extending from the northeast corner of the Peaker Power Plant into the yard.

Below grade conduit and power cable will be installed throughout Rancho Vista Yard for work and security lighting. Approximately 5,400 total feet (approximately 3,800 feet for the security lighting and approximately 1,600 feet for the work lighting) of trenching is required to install the conduit.

For new underground utility installation, an approximate 3-foot-deep trench will be excavated, a utility duct bank or conduit installed, and the trench filled with concrete slurry (bottom portion) and native soil (top portion) to existing grade.

Aboveground Major Activities – The entire perimeter of Rancho Vista Yard will be fenced with 6-foot-high, screened chain link fencing to protect material and equipment. Approximately 2,100 linear feet of new chain link fencing will be erected along the southern and eastern perimeter of the yard. The existing fencing along the western and northern edges of the yard will be repaired. New entrance gates will be constructed at the southwest corner and the southern corner, northwest of the Peaker Power Plant.

A breaker box will be installed inside Rancho Vista Yard at the terminal point of the underground electrical facilities described above.

Security lights will be installed at 50- to 100-foot spacing around the perimeter of the yard. These 100- to 400-watt lights will be installed 6 to 15 feet above grade, and will have shields or be directed to reduce illumination outside the yard. These lights will be equipped with light sensors for automated turn-on and manual switches to allow them to be turned off at times if not required.

Work lighting will be installed throughout the Rancho Vista Yard to provide adequate working conditions. The working lights will consist of 100- to 400-watt lights, and will be installed 15 to 30 feet above grade at 100- to 500-foot spacing. The lights will be operated by a manual switch to allow for the lights to be turned on and off as required. The lights will be switched off while the yard is not in operation. The lights will be aimed downward and point into the yard, and shields will be installed, as needed, to reduce illumination outside of the yard. The work lights will be powered by either the electrical service for the yard described above or portable generators.

General operating hours at the Rancho Vista Yard are planned to be from 7:00 AM to 7:00 PM. SCE is planning on leaving this yard rockered and not returning it to pre-construction conditions.

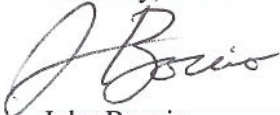
- SCE submitted a Biological Review prepared by ICF International dated February, 2010 for the Rancho Vista Material Storage Yard. The Yard is comprised of bare ground and developed areas along the southern half and ruderal grassland habitat along the northern half. The bare ground area is gravel-covered, with the exception of scattered ruderal plant species. The ruderal grassland habitat is vegetated with a mix of non-native herbaceous annual plants, non-native grasses, and a few scattered native shrubs. A literature review identified the potential for special-status biological resources to occur within the vicinity of the Yard. On January 28, 2010 the Yard was surveyed by ICF biologist Phillip Richards. All areas and vegetation communities within the Yard boundaries were traversed in approximately 20-foot intervals on foot across the survey area to search for special-status flora and fauna, bird nests, and jurisdictional wetlands and waters of the U.S. and State. During the field survey, the only special-status species observed was the San Diego black-tailed jackrabbit (*Lepus californicus bennettii*). Based on observed conditions on and adjacent to the Yard, the vegetated habitat potentially supports the following special status-species: orange-throated whiptail (*Cnemidophorus hyperythra*), Delhi sands flower-loving fly (*Rhaphiomidas terminatus abdominalis*), San Diego coast horned lizard (*Phrynosoma blainvillii*), grasshopper sparrow (*Ammodramus savannarum*), northwestern San Diego pocket mouse (*Chaetodipus fallax fallax*), San Diego desert woodrat (*Neotoma lepida intermedia*), Los Angeles pocket mouse (*Perognathus longimembris brevinasus*), and western burrowing owl (*Athene culicularia*). A separate habitat assessment for Delhi sands flower-loving fly (*Rhaphiomidas terminatus abdominalis*) determined that the northwest portion of the Yard exhibits conditions suitable to support the fly subspecies. Based on these results, SCE, USFWS, USDA Angeles National Forest, and Aspen Environmental Group (CPUC consultant) conducted a site visit on February 3, 2010. The USFWS approved SCE's proposal to avoid the northwest quarter of the Yard to minimize potential impacts to the subspecies. An additional 50-foot buffer (ESA) will be established around the designated sensitive fly habitat during the subspecies' flight season, which is from July 1 to September 30 (see SCE's NTPR Figure 4). Protocol-level surveys for the fly will be conducted in 2010 and the results submitted to USFWS for review.
- SCE submitted a Cultural Resources Inventory Report for the Rancho Vista Material Storage Yard with the NTPR. Based on the results of two previous cultural resources inventory conducted in 2003 and 2006 (Taylor 2003; Williams 2006), the potential for encountering cultural or paleontological finds is low. The results of the records search from these studies indicated that no cultural or paleontological resources are located within the proposed Yard. Outside of the project area and within a one mile radius a total of 14 prior cultural resources studies have been conducted. As a result of these studies, three historic resources (P36-016453, CA-SBR-6847H, and CA-SBR-4131H [CPHI-SBR-71]) are located within a mile radius of the project area, one of which is listed on the California Points of Historic Interest (CPHI). CPHI-SBR-71 is a World War II era steel plant, which was owned and operated by Henry J. Kaiser and became one of the largest steel producers west of the Mississippi River. There are no known archaeological sites located on the subject property or within a mile radius of the property that are listed on the National Register of Historic Places, California Historic Landmarks, or the Historical Resources Inventory (Williams 2006:5). The San Bernardino Sheet geological map was also reviewed for the area of the Etiwanda proposed peaker location to determine whether sensitive paleontological resources are within or adjacent to the project area based on the Roger Thomas' Geological Map of California (Williams 2006:8). The geologic deposits include recent alluvial fan deposits. Alluvium deposits are not conducive to the formation or preservation of paleontological fossils. Additionally, no new resources were discovered during the surface survey of the project site. Also, a request was submitted to the California Native American Heritage Commission (NAHC) to consult their Sacred Lands Files in order to identify other culturally significant properties. In a letter dated July 24, 2003, the NAHC reported that no sacred lands were known to the NAHC within the project area (Taylor 2003).

- SCE will be issuing an Authorization to Proceed (ATP) to the yard contractor which will specify the allowed improvements and activities at the yard, and required mitigation prior to occupation and during use of the yard.

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

- All work boundaries shall be flagged and the ESA area fenced prior to yard occupation.
- Rancho Vista Yard shall be included in the project Habitat Restoration and Revegetation Plan required by MM B-1a, subject to review and approval by CPUC.
- Prior to SCE's proposed Phase 2 development of the Rancho Vista Yard, SCE shall provide the CPUC documentation of USFWS concurrence.
- If helicopters will be using the yard, a biological report shall be submitted regarding potential impacts to sensitive species.
- Biological pre-construction and clearance surveys shall be submitted to and approved by the CPUC prior to site occupation/disturbance.
- If unanticipated biological or cultural resources are detected at the yard, the CPUC EM shall be notified immediately.
- Prior to fuel storage on the subject site, a Fuel Storage Plan shall be submitted to CPUC for review and approval. The Plan shall specify method and location of fuel storage, volumes, demonstration of compliance with regulatory requirements regarding fuel storage, and spill containment and response measures. All fueling of equipment shall be conducted in approved refueling locations only.
- Copies of all relevant permits, compliance plans, and this Notice to Proceed shall be available on site for the duration of construction activities.
- 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.

Sincerely,



John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen