

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

December 9, 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 # 22)

Dear Ms. Nelson,

On November 18, 2010, Southern Californian Edison (SCE) submitted a Notice to Proceed Request (NTPR) seeking authorization from the California Public Utilities Commission (CPUC) to utilize a contractor yard described as the Vincent South Material Storage Yard (Vincent South Yard) during construction of Segments 4 - 11 of the Tehachapi Renewable Transmission Project (TRTP) located in the unincorporated City of Vincent, Los Angeles 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 # 22 is granted by CPUC for the proposed activities based on the following factors:**

- Following are excerpts from SCE's NTPR:

SCE is requesting to utilize a contractor yard described as the Vincent South Material Storage Yard (Vincent South Yard) during construction of Segments 4 – 11 of the TRTP located in Los Angeles County, California.

Site Locations and Conditions

Vincent South Yard is SCE-owned property and consists of approximately 23 acres located in the unincorporated City of Vincent, Los Angeles County, California. The Vincent South Yard is located at the intersection of Vincent View Road and West Carson Mesa Road. The Vincent South Material yard is vegetated and has slopes that are between 0-8 percent with prevailing soil types of coarse sandy loam and gravelly sandy loam. One new double swing access gate will be established along Vincent View Road at the north side of the yard.

Project Components

Vincent South Yard will serve as one of the daily operating locations for transmission line construction crews associated with Segments 6 and 11. Operating hours for Vincent South Yard are planned to be from 7:00 a.m. to 7:00 p.m. SCE has established a TRTP toll-free information line (877-795-8787) and website (www.sce.com/tehachapi). The information line is the designated public notification contact for the TRTP.

Site Facilities/Activities

Proposed site facilities at the Vincent South Yard that will possibly be present or active throughout the duration of the project include the following: contractor equipment and material storage areas, office trailers, tool storage trailers, shipping containers, roll-off trash containers, helicopter landing area, temporary sanitary facilities (which may include aboveground water and sanitary waste holding

tanks), fueling areas, fire equipment and spill kit, vehicle parking area, wash stations, temporary power pole and line, electrical generators, welder, lighting and security, and roll-off steel disposal container.

Proposed activities at the Vincent South Yard that will possibly be present or active throughout the duration of the project include the following: yard development, operation and maintenance; general office and security activities; contractor equipment and material receipt, storage, and shipping; vehicle parking; equipment repair; helicopter operations, welding and torch work; installation of temporary power; steel fabrication and disassembly; equipment, helicopter, and vehicle fueling; vehicle and equipment washing; and contaminated soil storage.

Site Work

Site Preparation – Site preparation activities at the Vincent South Yard will include clearing and removal of weeds, brush, and trees as well as soil compacting. High traffic areas of the yard, such as the entrance, exit, and parking areas, will be stabilized (e.g., roadbase).

Underground Major Activities – No underground major activities are planned at Vincent South Yard.

Aboveground Activities – Secondary spill containment will be utilized for a mobile fueling truck that will be kept onsite overnight. Secondary spill containment will also be installed at the onsite fueling area. Electrical power and communication services will be provided to the office trailers. The installation of approximately 4,270 linear feet of new 6-foot high chain link fence and fence screen will be required at Vincent South Yard. One double swing access gate will be installed at the north side of the yard.

Other Activities – Helicopters will be used for Segment 6 and Segment 11 construction activities. The final location of helicopter landing zones and support areas will be provided upon approval of the contractor's Congested Area Flight Plan by the Federal Aviation Administration. Any additional surveys or analysis required once landing zones are identified will be conducted and the results provided to the CPUC.

- **Biological Resources:** SCE submitted a biological report titled *Vincent South Material Storage Yard Biological Review* prepared by ICF International dated November 2010. The Project Component (proposed Material Storage Yard) is approximately 23 acres in size and is bordered on the west by Carson Mesa Road and to the north by Vincent View Road. The Angeles Forest Highway is located approximately 300-900 feet to the east. The Biological Study Area (BSA) was defined as the Project Component plus a 500-foot buffer. The Yard occurs near the southern end of TRTP Segment 5 and directly southeast of the Rodeo Contractor Yard. The biological report summarizes results of prior surveys conducted for Segment 5 and the Rodeo Yard, as well as a literature review and field survey specific to the Project Component.

The Project Component supports primarily native vegetation communities including Mojavean mixed woody scrub and Mojavean juniper woodland and scrub. Habitats within the buffer area include disturbed/developed, Mojavean juniper woodland and scrub and Mojave mixed woody scrub, disturbed Mojavean juniper woodland and scrub, ruderal grassland, and a small strip of rabbitbrush scrub along Carson Mesa Road. Results of the completed 2010 focused surveys for rare plants that included the Project Component were reviewed, and results were negative. No special-status species were identified on the Project Component. Potential burrowing owl habitat was previously identified north of the Vincent Substation and within a portion of the Project Component, and potential burrowing owl burrows were detected. Additional potential burrows are scattered throughout the Project Component and buffer. The 2010 focused surveys for burrowing owl included the Project Component and were negative, but confirmed the presence of potentially suitable habitat. Preconstruction burrowing owl surveys will be performed within 30 days prior to the start of yard construction to ensure impacts on the species are avoided. The silvery legless lizard (*Anniella pulchra*

pulchra) and coast horned lizard (*Phrynosoma blainvillii*) have potential to occur within the BSA. The Project Component provides potential nesting habitat for bird species, including raptors. No hydrologic features or potential jurisdictional features occur in the Project Component.

- **Cultural Resources.** SCE has submitted the following Cultural Resources Survey Report for the Vincent South Material Storage Yard (review status of the report is noted in parenthesis following the report name):
 - *Segment 6: Archaeological Survey and National Register of Historic Places and California Register of Historical Resources Evaluation of PL-SCE-Vincent-01H, PL-SCE-Vincent-05H, PL-SCE-Vincent-06H, and CA-LAN-3536H, Vincent Yard North and Vincent Yard South Contractor Show-Up and Material Yards.* (AE memorandum dated 11-15-10 concurs with report findings. ANF memorandum dated 11-15-10 concurs with report findings. ANF sent recommendation of concurrence to SHPO for approval.)

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

- All sensitive resource buffers shall be flagged prior to construction/site occupation. Resource flagging shall be field verified by the CPUC EM prior to site use.
- The Vincent North Material Yard shall be included in the project Habitat Restoration and Revegetation Plan required by MM B-1a, subject to review and approval by CPUC.
- Use of the subject site as a helicopter landing zone shall not be allowed until the contractor's Congested Area Flight Plan is approved by the Federal Aviation Administration and additional surveys and/or analysis are submitted and approved by CPUC, including but not limited to the following: 1) Updated flight plan and traffic control plans will be evaluated for impacts to nesting birds to ensure that mitigation measure requirements for required buffers are adhered to (Mitigation Measures B-5, B-14 and B-30), and 2) SCE shall route all construction traffic and helicopter flight away from residences, schools, and recreational facilities to the maximum extent feasible (Mitigation Measure N-1b).
- Prior to 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 BMP's. A log shall be maintained on site with the names of all crew personnel trained.
- Biological survey sweeps are required to occur immediately preceding and during project area set up and occupation as part of required biological monitoring activities. Sweeps for nesting birds shall include a 500 foot buffer. If active nests are found, a biological monitor shall establish a required 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 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. The biological monitor shall be responsible for documenting the results of the surveys and the ongoing monitoring. The buffer may be adjusted with the approval of CDFG and USFWS, and with prior knowledge of the CPUC. If special-status plant or animal species or bird nests are observed within the project area, CDFG and the CPUC EM shall be notified immediately (within 24 hours). After complete sweeps have been submitted and approved by the CPUC EM, site occupation can occur; however, if occupation does not occur within seven calendar days of survey, biological clearance sweeps shall be re-conducted prior to site occupation, including nesting bird surveys during the breeding season.

- Prior to site occupation and/or construction, SCE shall provide a copy of the SHPO approval of the cultural resources report to the CPUC. Conditions noted within the subject reports shall be implemented.
- At least 14 days prior to the start of any construction-related activities, SCE shall provide notification to potentially affected property owners, and copies of the notification and distribution list shall be provided to the CPUC at the time of noticing (Mitigation Measures L-1a and L-1b). In addition, SCE shall provide all affected property owners with quarterly updates on any changes to the information provided in the pre-construction notification (Mitigation Measure L-1c).
- Per the final PRMP, paleontological resource monitoring is recommended during any earth moving activities associated with the Vincent South Material Yard.
- If unanticipated biological, cultural or paleontological resources are detected, the CPUC EM shall be notified immediately.
- Prior to fuel storage on the subject sites, a Fuel Storage Plan shall be submitted to CPUC 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.
- Refueling and fueling locations shall be a minimum of 100-feet away from existing drainages. If construction debris or spills enter into environmentally sensitive areas, the jurisdictional agencies and the CPUC EM shall be notified immediately.
- 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