

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 6, 2011

Susan J. Nelson, AIA
Regulatory Affairs
Southern California Edison
2244 Walnut Grove Avenue, Quad 3D, GO1
Rosemead, CA 91770

RE: Tehachapi Renewable Transmission Project (TRTP), Segments 4-11: Notice to Proceed (NTP #28)

Dear Ms. Nelson,

On April 22, 2011, Southern Californian Edison (SCE) submitted a Notice to Proceed Request (NTPR) for use of Material Storage Yard 58 (also known as the Pasadena Material Yard) in support of Segment 11 Transmission Line (T/L) for the Tehachapi Renewable Transmission Project (TRTP), in the City of Pasadena, Los Angeles County, California. **This NTP #28 is approved by CPUC based on the following factors:**

- SCE submitted the following information:

SCE requests a Notice to Proceed (NTP) for use of Material Storage Yard 58 (also known as the Pasadena Material Yard) in support of Segment 11 T/L for the TRTP, in the City of Pasadena, Los Angeles County, California. The Material Storage Yard 58 consists of approximately five (5) acres located along Bradley Street, west of the intersection of New York Drive and Bradley Street. The yard is a relatively flat, disturbed area, and is generally void of vegetation. A new access gate is located along Bradley Street on the south side of the property. The property is owned by SCE.

PROJECT COMPONENTS

Material Yard 58 will serve as a storage yard for material associated with TRTP Segment 11. Operating hours for Material Yard 58 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

Facilities that may be present or active at Material Yard 58 throughout the duration of the project include: contractor equipment and material storage areas; security trailer; tool storage trailers; shipping containers; roll-off trash container; temporary sanitary facilities, which may include aboveground water and sanitary waste holding tanks; fueling areas; fire equipment and spill kit; vehicle parking area; roll-off steel disposal container; welder; and lighting and security.

Activities that may be present or active at Material Yard 58 throughout the duration of the project include: yard development, operation, and maintenance; security activities; contractor equipment and material receipt, storage, and shipping; vehicle parking; equipment repair; welding and torch work; installation of temporary power; tower lay-down and disassembly; equipment and vehicle fueling; and access gate and sidewalk modifications.

Site Work

Site Preparation – Material Yard 58 is predominately covered with asphalt and concrete. Site preparation activities at the yard will include clearing and removal of weeds and brush, and clearing vegetation from existing fencing.

Underground Major Activities – No underground major activities are planned at Material Yard 58.

Aboveground Major Activities – Electrical power and communication services will be provided to the yard for lighting and security. The installation of approximately 500 linear feet of new 6-foot high chain link fence and a new 36-foot access gate along Bradley Street and fence screen will be required at Material Yard 58. Existing fence will be repaired, and privacy fence screening will be installed as needed.

- **Biological Resources:** SCE submitted a biological report with the Notice to Proceed Request by ICF International dated April 2011, titled *SCE Tehachapi Renewable Transmission Project Component - Material Yard 58 Biological Review*. The report summarizes results of literature review and prior surveys conducted for the TRTP, as well as a literature review and field surveys conducted on Segments 6 and 11, which include the Material Yard 58 (Project Component). Previous focused surveys completed in the vicinity of the Project Component and the associated 500-foot buffer (biological survey area [BSA]) in support of Segment 11 include surveys for vegetation (ICF 2010nn, 2010au), rare plants (AMEC 2007a; ICF 2010au), and burrowing owl (*Athene cunicularia*) (AMEC 2009a; ICF 2010dk). The Project Component does not contain rare plants, and is not within suitable habitat for burrowing owl. Although a literature review identified the potential for special-status biological resources (Orcutt's linanthus (*Linanthus orcuttii*), Parish's gooseberry (*Ribes divaricatum* var. *parishii*), and southwestern willow flycatcher (*Empidonax traillii extimus*) to occur in the vicinity of the Project Component) appropriate habitat for these species does not exist within the BSA.

The field review determined that the Project Component is primarily developed with a small area of non-native woodland. The 500-foot buffer portion of the BSA is comprised of disturbed/developed, non-native woodland, disturbed coastal sage scrub, and ruderal grassland. No state-protected or regulated vegetation communities occur within the Project Component (ICF 2010nn, 2010au). One mature coast live oak (*Quercus agrifolia*) is present at the north end of the Project Component site, and several immature individuals are present within the BSA (ICF 2010au, 2010dj). Impacts to this species will be minimized to the greatest extent possible. If total avoidance is not possible, compensatory mitigation will be implemented.

One special-status species, Cooper's hawk, was detected overhead during a field survey of the BSA (ICF 2011j). Seven desert woodrat middens were observed within the BSA (ICF 2011j). Two potential colonial bat roost features (one tree, one pole) are present within the Project Component, and an additional potential colonial bat roost (one pole) is present within the BSA (ICF 2011bl). The Project Component provides potential nesting habitat for bird species that are protected under the Migratory Bird Treaty Act and the California Department of Fish and Game Code. Disturbed/developed areas also provide raptor foraging habitat. Preconstruction surveys will be conducted prior to any project-related activities to ensure impacts do not occur to nesting birds during the breeding season or on any potentially occurring special-status species.

No hydrological jurisdictional features are located within the Project Component (ICF 2010aj).

- **Cultural and Paleontological Resources:** SCE submitted cultural and paleontological information with their Notice to Proceed Request (NTPR). In the NTPR, SCE states that Material Yard 58 is located entirely within the previously surveyed right-of-way (ROW) for TRTP (Pacific Legacy 2007 and 2010). No cultural resources have been previously recorded within the proposed yard boundaries, or within the vicinity of the proposed yard boundaries. No additional cultural resources assessment is necessary for the development of

this area as a material yard. Per the final PRMP that was approved on August 22, 2010, paleontological monitoring is necessary only during ground disturbance in native soils in areas of medium to high sensitivity for paleontological resources. Soils at Material Yard 58 are comprised of Qg (gravel and sand of stream channels), which is classified as a low level of sensitivity for harboring paleontological resources. No monitoring is required during the course of development activities at Material Yard 58.

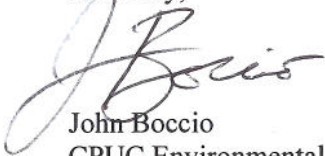
- **Land Use and Transportation:** Yard 58 is located with a light industrial area, with no nearby sensitive receptors. The roadway network servicing the site can accommodate project related construction vehicles and approved travel routes are identified in the approved Construction Transportation Management Plan.

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

- All applicable project mitigation measures, APMs, compliance plans, and permit conditions shall be implemented. Some measures have on-going/time-sensitive requirements and shall be implemented prior to and during construction where applicable.
- Per Mitigation Measure L-1a, SCE shall provide summary documentation to the CPUC of all complaints, comments, and concerns communicated to the liaison every two months for the duration of construction and for one year following the completion of construction.
- 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).
- All sensitive resource buffers shall be flagged prior to site occupation/construction. Resource flagging shall be field verified by the CPUC Environmental Monitor (EM) prior to project area use.
- 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. For *listed riparian species*, no work will be authorized within 500 feet of an active nest and all activities will stop immediately within 500 feet of the nest (Mitigation Measure B-15). 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 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.

- 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 or water features. If construction debris or spills enter into environmentally sensitive areas, the jurisdictional agencies and the CPUC EM shall be notified immediately.
- If unanticipated biological, cultural or paleontological resources are detected, the CPUC EM shall be notified immediately.
- Los Angeles County approval or applicable Municipal Code reference shall be provided to CPUC for all future Sunday work or for work outside of the hours 7:00 AM to 7:00 PM, Monday through Saturday, prior to the commencement of work.
- 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