

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 29, 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: Modification #3 to Notice to Proceed (NTP) #10

Dear Ms. Nelson,

On April 22, 2011, Southern Californian Edison (SCE) submitted a request for a Modification to Notice to Proceed (NTP) #10 for the installation of approximately 250 feet of underground fiber optic cable (FOC) along Rivergrade Road (from TSP 47878576E and extending north approximately 250 feet) on the Segment 7 and 8 66 kV Relocation of Tehachapi Renewable Transmission Project (TRTP) in the City of Irwindale, Los Angeles County, California. **This Modification #3 to NTP #10 is approved by CPUC for the proposed activities based on the following factors:**

- SCE submitted the following information:

SCE requests a Modification to Notice to Proceed (NTP #10) for the installation of approximately 250 feet of underground fiber optic cable (FOC) along Rivergrade Road (from TSP 47878576E and extending north approximately 250 feet) on the Segments 7 and 8 66 kV Relocation of TRTP in the City of Irwindale, Los Angeles County, California. The Notice to Proceed Request (NTPR) for Segment 7 and 8 66 kV Relocation (NTP #10 dated August 3, 2010) was prepared prior to completion of final design. During final design it was identified that, due to an existing gas line, approximately 250 feet of Telecom FOC, initially proposed to be collocated overhead as part of the Rio Hondo-Amador-Jose-Mesa 66 kV relocation, needs to be placed underground along Rivergrade Road. The new underground FOC will require an approximately three (3) feet wide trench and a temporary disturbance area of approximately ten (10) feet on either side of the trench edge. The temporary construction disturbance area will allow for material and equipment set-up during construction of the underground trench.

- **Biological Resources:** SCE submitted a report from ICF International dated April 19, 2011 titled *Biological Survey Report for the Underground Telecom Fiber Optic Cable Along Rivergrade Road for TRTP, Segment 7 66kV, Los Angeles County, California*. The report documents the biological conditions for the Underground Telecom Fiber Optic Cable Variance [NTP Modification Site] (Variance Project Component) and a 500-foot buffer (Biological Study Area [BSA]). The biological resources within the Variance Project Component site and BSA were evaluated during general preconstruction surveys associated with the Segments 7 and 8 66 kV Relocation Phases 1 and 2 (ICF 2010dg). Biological resources in the area also were evaluated during several focused surveys, including plant (AMEC 2009o, ICF 2010at), tree inventory (ICF 2010av), preconstruction burrowing owl (ICF 2010bj), and a preconstruction special-status bat habitat assessment (ICF 2010bg). A literature review was also performed as part of the Segments 7 and 8 66 kV biological review (ICF 2010kk). An additional clearance sweep was performed on March 15, 2011.

The Variance Project Component is composed of disturbed/developed land. Vegetation communities observed within the 500-foot buffer include: mule fat scrub, ruderal grassland, coastal sage scrub, open water, and disturbed/developed. No special-status plants have been identified in the BSA.

Although no special-status wildlife or plant species have been observed within the Variance Project Component, focused habitat assessments for burrowing owl (*Athene cunicularia*) (ICF 2010bj, 2011at) identified potential burrowing owl features in the rip-rap area along the San Gabriel River and within the BSA, but outside of the Variance Project Component. The mule fat scrub that occurs within the 500-foot buffer has been determined as not suitable for special-status riparian birds due to a lack of vertical structure and has not been included in focused survey efforts. Although suitable habitat for coastal California gnatcatchers (*Poliophtila californica*) (coastal sage scrub) is present at the southern end of the BSA, focused surveys for the species were negative (AMEC 2009m, ICF 2010ww). Active bird nests have been observed within the 500-foot buffer, and the nests include a ground disturbance buffer of appropriate size through consultation with CDFG.

Jurisdictional drainage features (7-13-S-1, 7-13-S-2) are present within the BSA to the west and north of the Variance Project Component (ICF 2010h) and will be avoided. These features were delineated within the BSA on aerial photography and data collected from the delineation (ICF 2010h). Prior to construction, a biological pre-construction survey will be conducted within the entire BSA. Any additional jurisdictional features not identified on the biological resource maps will be flagged and avoided as environmentally sensitive areas (ESAs).

No additional impacts to biological resources are anticipated.

Cultural and Paleontological Resources: SCE submitted a memorandum with the Variance Request from Matthew Wetherbee, MSc, RPA, Archaeologist, dated April 5, 2011, stating that no cultural or paleontological resources will be impacted by the telecommunications (telecom) underground work for TRTP Segment 7 66 kV in the City of Irwindale, Los Angeles County, California. The underground telecom alignment and temporary disturbance area were included in the previous cultural resources survey for the TRTP 66 kV right-of-way corridors and no cultural resources were identified (Pacific Legacy et al. 2010). The Paleontological Resources Management Plan (PRMP) for Segments 4 – 11 of the TRTP project area was prepared by Cogstone Resource Management Inc. (Gust and Scott 2009). No paleontological localities have been previously discovered in the project vicinity and the surface sediments are mapped as Qg (gravels and sands of major streams and alluvial fans) and have low sensitivity for yielding paleontological resources. The TRTP Segment 7 66 kV project area was also surveyed for paleontological resources in August 2010 and no paleontological resources were encountered (Aron 2010). No additional impacts to cultural or paleontological resources are anticipated.

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

- All conditions required by NTP #10 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #10, and this Modification #3 to NTP #10 shall be available on site for the duration of construction activities where applicable.

Sincerely,



John Boccio
CPUC Environmental Project Manager
cc: V. Strong, Aspen