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

June 1, 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 #5 to Notice to Proceed (NTP) #10

Dear Ms. Nelson,

On May 23, 2011, Southern Californian Edison (SCE) submitted a request for a Modification to Notice to Proceed (NTP) #10 for the realignment of approximately 500 feet of 66 kV underground transmission line on the Rio Hondo – Amador and Rio Hondo – Anita No. 2, between Pole Nos. 4753494E and 1705392E, in support of 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 #5 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 realignment of approximately 500 feet of 66 kV Underground Transmission Line on the Rio Hondo – Amador and Rio Hondo – Anita No. 2, between Pole Nos. 4753494E and 1705392E, in support of the Segment 7 and 8 66 kV Relocation of the 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. As part of final design, it was determined that for engineering functionality approximately 500 feet of 66 kV Underground on the Rio Hondo – Amador and Rio Hondo – Anita No. 2, must be realigned to extend between Underground Riser Pole Nos. 4753494E and 1705392E, and the location of Underground Riser Pole 1705392E has moved to the southwest corner of the Rio Hondo Substation. A Temporary Construction Disturbance Area, which is approximately 100 feet wide (50 feet on either side of the trench centerline), has been included in the realignment. The Temporary Construction Disturbance Area will allow for material and equipment set-up during construction of the underground trenches.

- **Biological Resources**: SCE submitted a biological report from ICF International dated May 23, 2011 titled *Biological Survey Report for a Proposed 66kV Underground Realignment between Poles 4753494E and 1705392E Variance for TRTP, Segment 7 66kV Relocation, Los Angeles County, California.* The report documents the results of biological surveys for the proposed underground realignment of the Segment 7 66 kV Relocation between poles 4753494E and 1705392E [NTP Modification Site] (Variance Project Component) and a 500-foot buffer (Biological Study Area [BSA]). Biological resources within the BSA were evaluated during surveys within and adjacent to the BSA, including focused species surveys for special-status plants and a tree inventory (AMEC 2009o; ICF 2010at, 2010av), Phase I and II surveys for burrowing owl (ICF 2010xx, ICF 2011at), and coastal California gnatcatcher focused surveys (AMEC 2008d, 2009m; ICF 2010ww). A literature review was also performed as part of the biological review (ICF 2010f, 2010kk).

  The Variance Project Component is composed of disturbed/developed land and coastal sage scrub (ICF 2010at). Vegetation communities observed within the BSA (ICF 2010at) include: disturbed/developed,

mule fat scrub, coastal sage scrub, Riversidean alluvial fan sage scrub, ruderal grassland, California annual grassland, and non-native woodland. No special-status plants or regulated trees were identified within the BSA (AMEC 2009o; ICF 2010at, 2010av).

No special-status wildlife species have been observed within the Variance Project Component, and no active nest or nest buffers overlap the Variance Project Component. A previously occupied killdeer (*Charadrius vociferous*) nest was located on the northeastern edge of the Variance Project Component. Vegetation suitable to support least Bell's vireo (*Vireo bellii pusillus*) is not present within the BSA (ICF 2010ss).

Phase I and II surveys for burrowing owl (*Athene cunicularia*) were conducted in 2010 along Segment 7 according to CBOC (1993) protocol (ICF 2010xx) and determined that no burrowing owl or burrowing owl features exist in the Variance Project Component. Suitable burrowing owl habitat is present within the 500-foot buffer along the San Gabriel River; however, this area was surveyed during a previous focused preconstruction burrowing owl survey for Segment 7 66 kV (ICF 2011at) with negative results.

Although coastal sage scrub within the BSA is suitable coastal California gnatcatcher (*Polioptila californica*) habitat, no coastal California gnatcatchers have been observed during focused surveys (AMEC 2008d, 2009m; ICF 2010ww). The BSA does not include coastal California gnatcatcher critical habitat (USFWS CFWO 2011) or coastal California gnatcatcher occupied habitat.

United States Army Corps of Engineers (USACE) regulated Waters of the U.S., California State Water Resources Control Board (SWRCB) regulated Waters of the State, and California Department of Fish and Game (CDFG) regulated streambed and riparian areas were identified in the Jurisdictional Delineation Report for TRTP Segments 7 and 8 (ICF 2010h). Part of the BSA was previously surveyed (ICF 2010h). The remaining portion of the Variance Project Component impact areas appears to be located in a heavily developed area within and adjacent to the Rio Hondo Substation. The San Gabriel River and feature 7-12-S-1 are located within the 500-foot buffer, and will not be impacted by the Variance Project Component. The San Gabriel River will be avoided and feature 7-12-S-1 will be staked and flagged for avoidance. Prior to construction, a biological pre-construction survey will be conducted within the entire BSA. Any additional jurisdictional features not identified on the biological resources 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 May 9, 2011, stating that no cultural or paleontological resources will be impacted by the underground realignment between Pole Nos. 4753494E and 1705392E for the TRTP Segment 7 66 kV underground work in the City of Irwindale, Los Angeles County, California. The realignment and temporary construction disturbance area was included in the previous cultural resources surveys for the TRTP and 66 kV right-of-way corridors and no cultural resources were identified (Pacific Legacy 2007, 2010; PCR 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 Qg (Quaternary gravels - gravels and sands of major streams and alluvial fans) and have low sensitivity for paleontological resources. The TRTP right-of-way for Segment 7 was 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 #5 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