

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



July 22, 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 #6 to Notice to Proceed (NTP) #10

Dear Ms. Nelson,

On July 20, 2011, Southern Californian Edison (SCE) submitted a request for a Modification to Notice to Proceed (NTP) #10 for improvements needed to connect existing distribution under build to underground risers, 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 #6 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 improvements needed to connect existing distribution under build to underground risers, in support of the Segment 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. As part of final design, it was determined that improvements are needed at seven locations to connect existing distribution under build to underground risers. The locations and construction activities are as follows:

Location 1

- Install and intercept 2-foot x 3-foot splice box between padmount P5482380 and pole number 4820677E.
- Install 4-inch duct into splice box.
- Extend new 4-inch duct to riser pole 4820677E.

Location 2

- Intercept existing 4-inch duct from padmount P5329447 to pole number 1544851E.
- Install split Y on existing 4-inch duct and sweep to new LWS Pole 4820663E.
- Remove existing 1/o cable and install new 1/o jacketed concentric neutral (JCN) cable from P9447 to 4820663E.

Location 3

- Install 13-inch x 24-inch x 24-inch concrete hand hole (HH) near pole 1544857E.
- Intercept existing 4-inch duct with HH install.
- Install 10-inch of 4-inch duct from HH to pole number 4820657E.
- Remove 44-foot 4-1/c 3-1/o and 1 # 2 cross-link polypropylene (CLP) (Cable).
- Install 54-inch 4-1/c 3-1/o and 1-2#JCN (Cable) from HH to pole number 4820657E.

Location 4

- Install 13-inch x 24-inch x 24-inch concrete HH.

- Intercept existing 4-inch duct with HH install.
- Install 10 feet of 4-inch duct from HH to pole number 4820672E.
- Remove 44-foot 4-1/c 3-1/o and 1 # 2 CLP (Cable)
- Install 54-inch 4-1/c 3-1/o and 1-2#JCN (Cable) from HH to pole number 4820672E.

Location 5

- Intercept existing 4-inch duct from padmount P5201810 to pole number 1544877E.
- Install split y on existing 4-inch duct and sweep to new LWS pole number 4745086E.
- Remove existing 1/o CLP and install new 1/o JCN from P5201810 to 4745086E.
- Install 181 feet of 3-1/c 1/o JCN P5201810 to 4745086E.

Location 6

- Install 20 feet of 3-inch duct from HH to 4745089E.
- Install 55 inches of 2-1/C #8 AL 600V (Cable) from HH to 4745089E.

Location 7

- Install 1-inch to 3-inch duct from HH to 4745087E.
- Remove 70-foot 3-1/c 2-1/o and 1-#2 600V (Cable)
- Install 60-foot 3-1/c 2-1/o & 1-2 600V (Cable)

Construction activities at these seven locations would occur within an approximately 50-foot x 50-foot proposed structure work area.

- **Biological Resources:** SCE submitted a biological report from ICF International dated July 15, 2011 titled *Biological Survey Report for the Dusty Underground Connections for TRTP, Segment 7 66kV Relocation, Los Angeles County, California*. The report documents the results of biological conditions for the proposed underground connections of the Segment 7 66 kV (Variance Project Component) and a 500-foot buffer (Biological Study Area [BSA]). Biological resources within the Variance Project Component and 500-foot buffer were evaluated during general preconstruction surveys, bat habitat assessment preconstruction surveys, and burrowing owl (*Athene cucicularia*) preconstruction surveys associated with the BSA (ICF 2011au, 2011av, 2011dz, 2011ea). Biological resources in the area also were evaluated during several focused surveys, including rare plant (AMEC 2009o, ICF 2010at), tree inventory (ICF 2010av), riparian bird (AMEC 2009n; ICF 2010ss), and burrowing owl (AMEC 2008b, 2009a, 2009j; ICF 2010xx). An additional clearance sweep was performed on the Variance Project Component on May 2 and 27, 2011. The 2011 protocol focused coastal California gnatcatcher (*Poliophtila californica*), focused riparian bird, and focused rare plant surveys are ongoing. A literature review was also performed as part of the Biological Review for Segment 7 and 8 66 kV (ICF 2010kk).

Summary of Locations 5, 7, and 6 (ICF Locations 1-3) Biological Resources within BSA

- The Variance Project Component was mapped as disturbed/developed.
- The 500-foot buffer was mapped as Riversidean alluvial fan sage scrub, ruderal grassland, and disturbed/developed.
- No special-status plant species were observed within the BSA.
- One peregrine falcon (*Falco peregrinus*) was observed on June 20, 2011, within the 500-foot buffer on Tower 4745091E near Location 6 (ICF Location 3).
- The jurisdictional feature located within the 500-foot buffer will not be impacted by the Variance Project Component.

Summary of Location 3 (ICF Location 4) Biological Resources within the BSA

- The Variance Project Component was mapped as disturbed/developed.
- The 500-foot buffer was mapped as mule fat scrub, ruderal wetland, and disturbed/developed.
- No special-status plant species were observed within the BSA.

- Potential burrowing owl features are located within the 500-foot buffer in the riprap along the San Gabriel River.
- The USFWS Biological Opinion identified least Bell's vireo (*Vireo bellii pusillus*) occupied habitat within the 500-foot buffer.
- Location 3 (ICF Location 4) is adjacent to the San Gabriel River.

Summary of Locations 2, 4, and 1 (ICF Locations 5 through 7) Biological Resources within the BSA

- The Variance Project Component was mapped as disturbed/developed vegetation.
- The 500-foot buffer was mapped as mule fat scrub, open water, and disturbed/developed.
- No special-status plant species were observed within the BSA.
- Potential burrowing owl features are located within the 500-foot buffer in the riprap along the San Gabriel River.
- Potential bat roosts occur within the 500-foot buffer.
- Locations 2, 4 and 1 (ICF Locations 5 though 7) are adjacent to the San Gabriel River.

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). The BSA has been partially surveyed. The Variance Project Component has been partially surveyed or surveyed during a desktop review. An additional jurisdictional delineation will be performed in the applicable unsurveyed portions of the BSA prior to construction. The preconstruction surveys conducted within the surveyed portion of the BSA did not identify additional potential jurisdictional features (ICF 2011au, 2011dz). If potential jurisdictional features are identified during sweeps or during construction monitoring, they will be flagged as ESAs and avoided. Jurisdictional features will be avoided where possible, and permit amendments will be required for the features that cannot be avoided; these features will be avoided until the amendment has been issued.

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 June 20, 2011, stating that no cultural or paleontological resources will be impacted by the Dusty Underground Connections for the Tehachapi Renewable Transmission Project (TRTP) Segment 7 66 kV within the City of Irwindale, Los Angeles County, California. All of the seven (7) locations were included in the previous cultural resources survey for the TRTP 66 kV right-of-way corridors and one cultural resource was identified (PCR 2010). This resource, the Rio Hondo-Bradbury 66 kV transmission line has been determined ineligible for listing on the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR) (Urbana Preservation and Planning 2010; Office of Historic Preservation 2010).

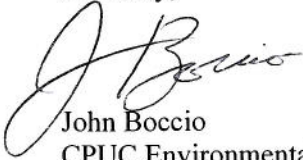
Previous paleontological assessments (Gust and Scott 2009; Aron and Kelly 2010) prepared for the TRTP project area indicate that no paleontological localities have been previously discovered in the project vicinity. Soils in the area, currently not covered by concrete/asphalt, consist of surface sediments that are mapped as Qg (Gravels and sands of major streams and alluvial fans). These units are sedimentary geologic units that are unlikely to contain vertebrate fossils, or scientifically significant invertebrate or plant fossils, and therefore these units have a low paleontological sensitivity (Gust and Scott 2009; Aron and Kelly 2010).

No additional impacts to cultural or paleontological resources are anticipated.

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

- An additional jurisdictional delineation for Waters of the U.S. and/or Waters of the State shall be performed in the applicable unsurveyed portions of the BSA prior to construction.
- SCE shall submit all required jurisdictional amendments and/or new permits prior to disturbing jurisdictional Waters of the U.S. and/or Waters of the State.
- 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 #6 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