

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 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 #7 to Notice to Proceed (NTP) #10

Dear Ms. Nelson,

On August 26, 2011, Southern Californian Edison (SCE) submitted a variance request for a Modification to Notice to Proceed (NTP) #10 to complete underground telecom and distribution line activities for the Segment 7 and 8 66kV Transmission Line (T/L) for the Tehachapi Renewable Transmission Project (TRTP) in the City of Chino, San Bernardino County, California. **This Modification #7 to NTP #10 is approved by the 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) to complete underground telecom and distribution line activities for the Segment 7 and 8 66kV Transmission Line (T/L) for the TRTP in the City of Chino, San Bernardino County, California. The Notice to Proceed Request (NTPR) for Segment 7 and 8 66kV Relocation (NTP #10, dated August 3, 2010) was prepared prior to completion of final design. During final design it was identified that due to diversity standards for fiber, which controls switching protection and separate substructures required for communication for heat and safety of workers, underground Telecom Fiber Optic Cable (FOC), which was initially proposed to be co-located underground as part of the Chino 66kV under relocation, needs to be placed underground within an isolated trench. The project work area is located along Edison Avenue, beginning west of Central Avenue and extending east to the Chino Substation from Structure M66-T1 east to Structure M66-T8. The new underground FOC will require an approximately 7,200-foot long trench that is 3 feet wide, and a temporary disturbance area of approximately 10 feet on either side of the trench edge. Additionally, a joint trench has been added to include underground distribution and telecom FOC. The new joint trench will be an approximately 5,300-foot long trench and require a temporary disturbance area of approximately 100 feet (i.e. 50 feet on either side of centerline). The temporary construction disturbance area will allow for material and equipment set-up during construction of the underground trench. The joint underground telecom and distribution trench will include the installation of eight (8) vaults (of which three are intercepts), five (5) manholes (of which three are intercepts), two (2) pull boxes, and one (1) slab box.

- **Biological Resources:** SCE submitted a report titled *Variance Biological Survey Report for Telecom Fiber Optic Cable and Underground Distribution Cable Installation for TRTP, Segment 8 66 kV, San Bernardino County, California* from ICF International dated August 19, 2011. The report documents the biological conditions for underground installation of telecom fiber optic cable (FOC) and 66 kV distribution cable from Structure M66-T1 east to Structure M66-T8 (Variance Project Component) and the 500-foot buffer (Biological Study Area [BSA]). The biological resources within the Variance Project Component site and 500-foot buffer were evaluated during general preconstruction surveys, bat habitat assessment preconstruction surveys, and burrowing owl preconstruction surveys associated with Segment 8 66kV

Relocations (ICF 2010fj, 2011w, 2011x). Biological resources in the area also were evaluated during several focused surveys for Segments 7 and 8, including rare plant (AMEC 2009o, ICF 2010at, 2011cq), tree inventory (ICF 2010av), and burrowing owl (AMEC 2008b, 2009a, 2009j; ICF 2010xx). Additionally, clearance sweeps were performed on the Variance Project Component on February 10 and 17, 2011, and March 9, 2011. All construction monitoring observations of biological resources are recorded in the FRED system. A literature review was performed as part of the Biological Review for Segments 7 and 8 66kV Relocation (ICF 2010kk).

The Variance Project Component is located along Edison Avenue, beginning west of Central Avenue and extending east to the Chino Substation. The Variance Project Component is completely within disturbed/developed land. The 500-foot buffer contains agriculture, mule fat scrub, ruderal wetland, sparsely vegetated streambed, nonnative woodland, and ruderal grassland, all located at the east end. Special-status plant Santa Barbara morning glory (*Calystegia sepium* ssp. *binghamiae*) was identified at the east end of the BSA (ICF 2011cq). This species is located adjacent to the temporary disturbance area for the Variance Project Component and a 66kV access road and will be flagged as an environmentally sensitive area (ESA) and will be avoided.

Surveys for burrowing owl (*Athene cunicularia*) were conducted in 2010 along Segment 8 East (ICF 2010xx) according to California Burrowing Owl Consortium (CBOC) protocol (CBOC 1993). Numerous potential burrowing owl features were observed along the path of the proposed joint FOC/66kV trench location beginning east of 12th Street along the south side of Edison Avenue to west of Oaks Avenue. Numerous additional potential burrowing owl features were observed throughout the east end of the 500-foot buffer, with the primary concentrations located in the agricultural field and the Chino substation. Four artificial burrowing owl burrows were constructed and became occupied in 2011 and will be avoided by the Variance Project Component. Occupied burrows, active nests, and individual owls were also observed within the Variance Project Component and at various locations within the 500-foot buffer through July 19, 2011.

Special-status bird species were previously identified within the BSA, and include one raptor nest near Tower M32-T4 (March 14, 2007; AMEC 2007c), and two pairs of loggerhead shrike (*Lanius ludovicianus*) incidentally observed on the distribution line east of Tower M66-T5. Active common bird nests and inactive raptor nests have been identified in the BSA in 2011 and documented in FRED.

Preconstruction habitat assessment surveys for special-status bat species were conducted in compliance with biological mitigation measure B-33a. Potential special-status solitary bat roosting sites were identified within the BSA near Tower M32-T4 (ICF 2010fj).

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 the TRTP Segments 7 and 8 (ICF 2010h). The Variance Project Component was fully surveyed and the majority of the 500-foot buffer was surveyed during the jurisdictional delineation (ICF 2010h). Jurisdictional features present within the BSA either have existing permit authorization for temporary impacts or will not be impacted by the Variance Project Component. Features 8-50-S-1 and 8-50-S-2 are located within the Variance Project Component and there will be temporary disturbance from trenching activities. Features 8-50-S-3, 8-50-S-4, 8-51-S-1 are within the 500-foot buffer and will not be impacted by construction covered under this Variance. If additional potentially jurisdictional features are identified during sweeps or construction monitoring, they will be flagged as environmentally sensitive areas (ESAs) and avoided.

No additional impacts to biological resources are anticipated.

- **Cultural and Paleontological Resources:** SCE submitted a memorandum titled *SCE TRTP Cultural and Paleontological Resource Guidelines for Segment 7/8 66kV Relocation – Variance Request – Telecom and Distribution Underground* dated August 9, 2011 from SCE Archaeologist, Matthew Wetherbee, MSc, RPA. The memorandum states that no cultural or paleontological resources will be impacted by the telecommunications (telecom) and distribution underground work for the TRTP Segment 7/8 66kV within a developed environmental in the City of Chino, San Bernardino County, California. The proposed locations were included in previous surveys for the TRTP right-of-way corridor and no cultural resources were identified (Pacific Legacy 2007; PCR 2010).

Previous paleontological assessments (Gust and Scott 2009; Aron 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 sediments that are mapped as Quaternary alluvium (Qa). These deposits are Holocene in age (less than 10,000 years old) and are too young geologically to have potential to yield significant fossil resources and are therefore assigned low paleontologic sensitivity (Aron 2010). Work will not take place outside of the previously surveyed TRTP areas.

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 #7 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