

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 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: Modification #8 to Notice to Proceed (NTP) #10

Dear Ms. Nelson,

On August 29, 2011, Southern Californian Edison (SCE) submitted a variance request for a Modification to Notice to Proceed (NTP) #10 to allow for changing insulators on the Mesa-Rush No. 2, Mesa-Anita-Eaton, Mesa-Narrows, Rio Hondo-Amador-Jose-Mesa, Mesa-Narrows, and Walnut-Hilgen-Industry-Mesa-Reno lines in Montebello Hills from glass to polymer for the Segment 7 and 8 66kV Transmission Line (T/L) of the Tehachapi Renewable Transmission Project (TRTP) in the Cities of Montebello and Monterey Park, Los Angeles and San Bernardino Counties, California. **This Modification #8 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 allow for changing insulators on the Mesa-Rush No. 2, Mesa-Anita-Eaton, Mesa-Narrows, Rio Hondo-Amador-Jose-Mesa, Mesa-Narrows, and Walnut-Hilgen-Industry-Mesa-Reno lines in Montebello Hills from glass to polymer for the Segment 7 and 8 66kV Transmission Line (T/L) of the TRTP in the Cities of Montebello and Monterey Park, Los Angeles and San Bernardino Counties, California. The Notice to Proceed Request (NTPR) for Segment 7 and 8 66kV Relocation (NTP #10, dated August 3, 2010) was prepared prior to final acquisition of all project approvals. Specifically, the Biological Opinion included restoration of several existing operations and maintenance access roads in Montebello Hills. To facilitate restoration of these access roads in Montebello Hills, insulators on the lines mentioned above need to be changed from glass to polymer to eliminate the need to access them for routine maintenance (i.e., cleaning). Insulators will be changed out at the following existing 66kV Pole Nos.: 2184508E, 2183514E, 2184520E, 2184509E, 2184515E, 2184521E, 2184510E, 2184516E, 2184522E, 2184511E, 2184517E, 2184523E, 2184512E, 2184518E, 2184524E, 2184525E, 2184513E, 2184519E. This activity will be completed from bucket trucks on existing roads and will not require additional ground disturbance.

- **Biological Resources:** SCE submitted a report titled *Biological Survey Report for the Montebello Hills Insulator Variance for TRTP, Segments 7 and 8 66kV Relocation, Los Angeles County, California* from ICF International dated August 26, 2011. The report documents the results of biological surveys for the Segment 7 66kV relocation proposed Montebello Hills Insulators (Variance Project Component) and the 500-foot buffer (Biological Study Area [BSA]). The biological resources within the Variance Project Component were evaluated during previous preconstruction surveys associated with 66kV and Segment 7 T/L (ICF 2010ay, 2010bi) and more recently on August 16, 2011 (ICF 2011fl). Biological resources within the BSA were evaluated during several focused surveys, including plant (ICF 2010at), tree (ICF 2010av), and coastal

California gnatcatcher (*Polioptila californica*) (ICF 2010ww), in addition to general preconstruction biological surveys. Focused survey results for 2011 are pending.

Vegetation communities observed in the Variance Project Component include disturbed/developed and ruderal grassland. Vegetation communities observed within the BSA (ICF 2010at) include: California annual grassland, coastal sage scrub, disturbed/developed, nonnative woodland, ruderal grassland, and southern willow scrub. Catalina mariposa lily (*Calochortus catalinae*) was observed within the BSA during focused surveys (ICF 2010at) south of TSPs 2184512E, 2184518E, and 2184524E; but was outside of the Variance Project Component. Coast live oak (*Quercus agrifolia*), a protected tree under local ordinances, also occurs at two locations within the BSA (ICF 2010av), but the species is not within the Variance Project Component.

Potential bat roost habitat was detected within the BSA during a focused bat roost assessment survey (ICF 2010bg). California gnatcatcher was observed within the BSA during 2010 focused surveys (ICF 2010ww), 2011 focused surveys (data and report in review), and preconstruction surveys (ICF 2010ay, ICF 2010bi, ICF 2011q, ICF 2011fl). One San Diego woodrat (*Neotoma lepida*) nest was observed east of Tower M41-T1 adjacent to the access road (ICF 2010bi). In November 2010, one Swainson's hawk (*Buteo swainsoni*) was observed flying over the area near the western BSA boundary (ICF 2010bi). Coastal California gnatcatchers occupy the area and were detected within the 500-foot buffer of the Variance Project Component. During the recent preconstruction survey (ICF 2011fl), the coastal California gnatcatchers that were observed were not exhibiting any potential nesting behaviors, feeding young, or defending an active breeding territory. Currently, no active nests are located in the Variance Project Component or the BSA.

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 for all of Segment 7 in the *Jurisdictional Delineation Report for the TRTP: Segments 7 and 8* (ICF 2010h). The Variance Project Component was added after the jurisdictional delineation and permitting process. The survey completed as part of this report confirmed there are several concrete lined channels within the BSA. These will be avoided by ESA staking and flagging. If these are required to be impacted, they will be confirmed as being jurisdictional, and if they are jurisdictional, permit amendments will be sought.

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 66kV Relocation – Variance Request – Insulator Replacement (City of Montebello)* dated August 26, 2011 from SCE Archaeologist, Matthew Wetherbee, MSc, RPA. The memorandum states that no cultural or paleontological resources will be impacted by the changing of insulators from glass to polymer on 66kV transmission lines for the TRTP. This activity will be completed from bucket trucks on existing roads and will not require additional ground disturbance. The right-of-way for these 66kV transmission lines were included in previous surveys for their respective 66kV transmission line survey corridors and six (6) cultural resources were identified (Pacific Legacy et al. 2010; PCR 2010a and 2010b; Schneider and Holson 2010). Five of these resources consist of the 66kV transmission lines themselves and all have 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 2010a, 2010b, 2010c, 2010d; Office of Historic Preservation 2010a, 2010b, 2010c, 2011). The last of the six sites consists of the Montebello oil field (CA-LAN-3813H) initially recorded in 2008 (Fulton and Fulton 2008). The use of the existing paved and unpaved access roads for the insulator change work for this variance will not impact features associated with the Montebello oil field since the work will be completed from bucket trucks on existing paved and unpaved roads that will not require additional ground disturbances or road improvements.

Previous paleontological assessments prepared for the TRTP project area indicate that no paleontological localities have been previously discovered in the project vicinity and the subsurface sediments are mapped as the Fernando Formation and have a high sensitivity for yielding paleontological resources (Gust and Scott 2009; Aron 2010). However, the proposed work will be completed using existing access roads and will not require additional ground disturbance. Work will not extend beyond the TRTP surveyed 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 #8 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