

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 21, 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 #9 to Notice to Proceed (NTP) #10

Dear Ms. Nelson,

On September 28, 2011, Southern Californian Edison (SCE) submitted a request for a Modification of NTP #10 for several structure work areas and pole additions at San Gabriel Junction and Whittier Narrows on the Segment 7 and 8 66 kV Relocation of the Tehachapi Renewable Transmission Project (TRTP), in Los Angeles County, California. Additional information was submitted on October 11 and 20, 2011. **This Modification #9 to NTP #10 is approved by CPUC based on the following factors:**

- SCE submitted the following information:

SCE submitted a request for a Modification to NTP #10 for several structure work areas and pole additions at San Gabriel Junction and Whittier Narrows on Segment 7 and 8 66 kV Relocation of the TRTP, in 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 the San Gabriel Junction and Whittier Narrows to facilitate construction and facility operation. These improvements include:

San Gabriel Junction (Rio Hondo – Amador – Jose – Mesa):

- Addition of proposed structure work area (120 feet by 30 feet) at Pole No. 4774412E and use of proposed existing access road (approximately 1,300 feet long) to Pole No. 4774412E. Use of this existing access road will not require road improvements or vegetation clearing.
- Addition of proposed Pole Nos. 4774414E, 4774415E, 4774416E, 4774417E and associated structure work areas (approximately 100 feet by 100 feet). Note that the structure work area associated with proposed Pole No. 4774414E has been limited on its southwestern extent to not encroach on San Gabriel Boulevard.
- Addition of proposed structure work area (50 feet by 50 feet) to existing distribution Pole No. 2317229E for installation of a down guy.
- Addition of proposed structure work area to Pole Nos. 2184525E, 2184513E, and 2184519E. In general the structure work area is enclosed within the existing, approved, access road loop and is approximately 0.175 acres.
- Addition of proposed pulling site (approximately 0.114 acres) along the west side of San Gabriel Boulevard.

- Removal of existing distribution pole (Pole No. 2194084E) along western edge of San Gabriel Boulevard. Work associated with this pole removal will occur from the road.

Whittier Narrows (Mesa – Narrows and Walnut – Hilgen – Industry – Mesa – Reno):

- Addition of proposed Pole No. 4773799E along southern edge of San Gabriel Boulevard, northwest of Lincoln Avenue.
- Removal of several existing distribution poles (Pole Nos. 2219866E, 2213456E, and 4713307E) along the southern edge of San Gabriel Boulevard, west of Rosemead Boulevard. Work associated with these pole removals will occur from the road.
- Addition of proposed pulling site (approximately 0.232 acres) along and adjacent to Siphon Road, west of Pole No. 4704318E.
- Pole No. 4704324E has been shifted approximately 40 feet west, inline, off the existing levee asphalt road. In addition, a proposed structure work area (approximately 70 feet by 100 feet) at Pole No. 4704324E has been added and a new transmission line access road is proposed to access Pole No. 4704324E. This access road will be primarily constructed by the Segment 8 T/L contractor as part of work included in the Segment 8 Phase 4 NTP; however, the extent needed to access Pole No. 4704324E will be constructed as part of 66 kV construction activities.
- Addition of proposed pulling site (approximately 0.230 acres), east of Pole No. 4704325E.
- **Biological Resources:** SCE submitted a biological summary letter by ICF International dated October 7, 2011, titled *Proposed Structure Work Areas, Pulling Sites, and Pole Additions at San Gabriel Junction and Whittier Narrows, Segment 7/8 66 kV, TRTP, Los Angeles County*. The letter documents the biological conditions at the proposed structure work areas, pulling sites, access road and pole additions and removals at San Gabriel Junction and Whittier Narrows (Variance Project Component) and the 500-foot buffer (Biological Study Area [BSA]). Biological resources within the BSA were evaluated during several focused surveys, including 2009, 2010, and 2011 rare plant surveys (AMEC 2009o; ICF 2010at, 2011cq); 2010 and 2011 tree inventory surveys (ICF 2010av, 2011cq); 2009, 2010, and 2011 coastal California gnatcatcher surveys (AMEC 2008d, 2009m; ICF 2010ww, 2011cq); 2009 and 2010 burrowing owl focused surveys (AMEC 2009j; ICF 2010xx); 2009, 2010, and 2011 riparian bird surveys (AMEC 2007c, 2009n; ICF 2010ss, 2011cq); two-striped garter snake and south coast garter snake (AMEC 2009r; ICF and BonTerra 2010e; ICF 2011cq); southwestern pond turtle (AMEC 2009q; ICF and BonTerra 2010d; ICF 2011cq). The biological resources within the BSA were also evaluated during general preconstruction surveys, burrowing owl preconstruction surveys, coastal California gnatcatcher preconstruction surveys, and bat habitat assessment preconstruction surveys for 66 kV, Segments 7 and 8 T/L construction within the BSA (ICF 2010bg, 2010fg, 2010fz, 2010gh, 2011at, 2011au, 2011bi, 2011bq, 2011dk, 2011ew, 2011ex, 2011fb, 2011fl, 2011ff, 2011fr, 2011fs, 2011ft, 2011fu, 2011fv, 2011fw, 2011fy, 2011fz). Additionally, clearance sweeps were performed on Site 1 on August 23, 2011, and on Site 2 on August 25, 2011. Construction monitoring has been ongoing regularly since the sites became active, and species events and nest events are recorded in FRED. Jurisdictional resources within the Variance Project Component were evaluated during the 2010 jurisdictional delineation for Segments 7 and 8 (ICF 2010h). A literature review was also performed as part of the Biological Review for Segments 7 and 8 66 kV (ICF 2010kk).

San Gabriel Junction (Rio Hondo – Amador – Jose – Mesa)

Site 1 - Work area and access road to Pole No. 4774412E:

Vegetation communities within the Project Component include ruderal grassland and disturbed developed. Vegetation communities within the 500-foot buffer include non-native woodland, ruderal grassland, ruderal wetland, southern sycamore alder riparian woodland, southern willow scrub, and disturbed/developed.

Special-status plant species, California walnut (*Juglans californica*), occurs within the Project Component and the 500-foot buffer. Special-status plant species, southern tarplant (*Centromadia [Hemizonia] parryi* ssp. *australis*), occurs within the 500-foot buffer. Coastal California gnatcatcher (*Polioptila californica*), Cooper's hawk (*Accipiter cooperii*), least Bell's vireo (*Vireo bellii pusillus*), Vaux's swift (*Chaetura vauxi*), Yellow-breasted chat (*Icteria virens*), and yellow warbler (*Dendroica petechia*), have been observed within the 500-foot buffer, as well as a potential burrowing owl (*Athene cunicularia*) feature. A red-tailed hawk (*Buteo jamaicensis*) active nest (FRED Nest 002425) and associated 300-foot buffer is located within the Site 1 500-foot buffer and does not overlap the Variance Project Component. Jurisdictional features 7-35-S-2 and 7-35-S-3 occur within the 500-foot buffer.

Site 2 – Addition of Pole Nos. 4774414E, 4774415E, 4774416E, 4774417E and associated work areas:

Vegetation communities within the Project component include disturbed/developed. Vegetation communities within the 500-foot buffer include coastal sage scrub, exotic-giant reed, non-native woodland, ruderal grassland, southern coast live oak riparian forest, southern sycamore alder riparian woodland, water, and disturbed/developed. Special-status plant species, California walnut, occurs within the 500-foot buffer. Regulated tree species, coast live oak (*Quercus agrifolia*), occurs within the Project Component and the 500-foot buffer. Wildlife species observed within the Project Component include coastal California gnatcatcher. Wildlife species observed within the 500-foot buffer include coastal California gnatcatcher, Cooper's hawk, sharp-shinned hawk (*Accipiter striatus*), yellow warbler, and southwestern pond turtle (*Emys marmorata pallida*). Potential colonial bat roost and potential solitary bat roost were observed within the 500-foot buffer. Jurisdictional features 7-35-S-1 and 7-35-S-2 occur within the 500-foot buffer.

Site 3 – Addition of work areas at Pole No. 2317229E:

Vegetation communities within the Project Component include non-native woodland and disturbed/developed. Vegetation communities within the 500-foot buffer include coastal sage scrub, non-native woodland, and disturbed/developed. Regulated tree species, coast live oak, occurs within the 500-foot buffer. Wildlife species observed within the 500-foot buffer include coastal California gnatcatcher, Cooper's hawk, and sharp-shinned hawk. Potential solitary bat roosts occur within the 500-foot buffer. Jurisdictional feature 7-35-S-1 occurs within the 500-foot buffer.

Site 4 – Addition of work area to Pole No. 2184525E, 2184513E, and 2184519E:

Vegetation communities within the Project Component include disturbed/developed. Vegetation communities within the 500-foot buffer include coastal sage scrub, non-native woodland, and disturbed/developed. Regulated tree species, coast live oak, occurs within the 500-foot buffer. Wildlife species observed within the 500-foot buffer include coastal California gnatcatcher, Cooper's hawk, and sharp-shinned hawk. Potential solitary bat roosts occur within the 500-foot buffer. Jurisdictional feature 7-35-S-1 occurs within the 500-foot buffer.

Site 5 – Addition of pulling site along west side of San Gabriel Boulevard:

Vegetation communities within the Project Component include coastal sage scrub and disturbed/developed. Vegetation communities within the 500-foot buffer include coastal sage scrub, non-native woodland, and disturbed/developed. Regulated tree species, coast live oak, occurs within the 500-foot buffer. Wildlife species observed within the 500-foot buffer include coastal California gnatcatcher and sharp-shinned hawk. Potential solitary bat roosts occur within the 500-foot buffer, and an inactive red-tailed hawk nest (FRED Nest 000182). Jurisdictional feature 7-35-S-1 occurs within the 500-foot buffer.

Site 6 – Removal of existing distribution Pole No. 2194084E along western edge of San Gabriel Boulevard:

Vegetation communities within the Project Component include disturbed/developed. Vegetation communities within the 500-foot buffer include coastal sage scrub, non-native woodland, and disturbed/developed. Regulated tree species, coast live oak, occurs within the 500-foot buffer. Wildlife observed within the 500-foot buffer include, coastal California gnatcatcher, Cooper's hawk, and sharp-

shinned hawk. Potential solitary bat roosts occur within the 500-foot buffer. Jurisdictional feature 7-35-S-1 occurs within the 500-foot buffer.

Whittier Narrows (Mesa – Narrows and Walnut – Hilgen – Industry – Mesa – Reno)

Site 7 – Addition of Pole No. 4773799E along southern edge of San Gabriel Boulevard, northwest of Lincoln Avenue:

Vegetation communities within the Project Component include disturbed/developed. Vegetation communities within the 500-foot buffer include coastal sage scrub, exotic-giant reed, mixed chaparral, mixed chaparral - disturbed, mule fat scrub, non-native woodland, ruderal grassland, and disturbed/developed. Special-status plant, California walnut, occurs within the 500-foot buffer. Wildlife species observed within the 500-foot buffer include coastal California gnatcatcher. Jurisdictional feature 8-6-R-1 occurs within the 500-foot buffer.

Site 8 – Removal of existing distribution Pole Nos. 2219866E, 2213456E, and 4713307E along southern edge of San Gabriel Boulevard, west of Rosemead Boulevard:

Vegetation communities within the Project Component include ruderal grassland and disturbed/developed. Vegetation communities observed within the 500-foot buffer include exotic-giant reed, mule fat scrub, ruderal grassland southern arroyo willow riparian forest, southern cottonwood willow riparian forest, southern willow scrub, southern willow scrub – disturbed, sparsely vegetated streambed, water, and disturbed/developed. Special-status plant species, California walnut, occurs within the 500-foot buffer. Wildlife species observed within the 500-foot buffer include coastal California gnatcatcher, least Bell's vireo, yellow-breasted chat, and yellow warbler. Jurisdictional feature 8-6-R-1 is within the Project Component, but will be avoided. This jurisdictional feature will be staked and flagged as an ESA until permit amendments are issued. Jurisdictional features 8-4-S-1, 8-4-S-3, 8-4-W-3 occur within the 500-foot buffer.

Site 9 – Addition of proposed pulling site along and adjacent to Siphon Road, west of Pole No. 4704318E:

Vegetation communities within the Project Component include ruderal grassland and disturbed/developed. Vegetation communities within the 500-foot buffer include agriculture, mule fat scrub, non-native woodland, southern cottonwood willow riparian forest, southern willow scrub, and disturbed/developed. Wildlife species observed within the 500-foot buffer include least Bell's vireo and yellow-breasted chat. Jurisdictional feature 8-4-S-6 occurs within the 500-foot buffer.

Site 10 – Pole No. 4704324E shift and addition of work area and access road:

Vegetation communities within the Project Component include mule fat scrub, mule fat scrub - disturbed, ruderal grassland, and disturbed/developed. Vegetation communities within the 500-foot buffer include California walnut woodland, exotic-giant reed, mule fat scrub, ruderal grassland, southern arroyo willow riparian forest, southern cottonwood willow riparian forest, southern sycamore alder riparian woodland, water, and disturbed/developed. Special-status plant species, California walnut, occurs within the 500-foot buffer. Regulated tree species, coast live oak, occurs within the 500-foot buffer. Wildlife observed within the 500-foot buffer includes Cooper's hawk, least Bell's vireo, yellow-breasted chat, and yellow warbler. Potential burrowing owl feature occurs within the 500-foot buffer. Potential solitary bat roost occurs within the Project Component and the 500-foot buffer. Jurisdictional feature 8-6-R-1 is within the Project Component and will be impacted, which will require permit amendments. Jurisdictional features 8-6-R-1, 8-7-S-1, and 8-7-W-1 occur within the 500-foot buffer.

Site 11 – Addition of pulling site east of Pole No. 4704325E:

Vegetation communities within the Project Component include mule fat scrub and disturbed/developed. Vegetation communities within the 500-foot buffer include exotic-giant reed, mule fat scrub, no-native woodland, ruderal grassland, southern arroyo willow riparian forest, southern cottonwood willow riparian

forest, southern willow scrub, southern willow scrub – disturbed, sparsely vegetated streambed, water, and disturbed/developed. Special-status plant species, California walnut, occurs within the Project Component and the 500-foot buffer. Wildlife species observed within the 500-foot buffer include least Bell's vireo, yellow warbler, and potential burrowing owl feature. Potential solitary bat habitat occurs within the 500-foot buffer. Jurisdictional feature 8-6-R-1 is within the Project Component and will be impacted, which will require permit amendments. Jurisdictional features 8-6-R-1 and 8-7-S-1 occur within the 500-foot buffer.

The Variance Project Component overlaps coastal California gnatcatcher critical habitat and least Bell's vireo occupied habitat at Site 10; overlaps coastal California gnatcatcher occupied habitat at Site 5; overlaps coastal California gnatcatcher critical habitat, coastal California gnatcatcher occupied habitat, and least Bell's vireo occupied habitat at Site 11; as well as observations of coastal California gnatcatcher outside of suitable habitat at Site 2. The 500-foot buffer overlaps coastal California gnatcatcher critical habitat, coastal California gnatcatcher occupied habitat, and least Bell's vireo occupied habitat. Riparian bird territories were mapped within the 500-foot buffer at Sites 1, 2, 5, 8, 9, 10, and 11.

No additional impacts to biological resources are anticipated with the implementation of this Modification #9 to NTP #10 and the conditions noted below.

- **Cultural and Paleontological Resources:** SCE submitted a memorandum dated October 5, 2011, regarding the TRTP Cultural and Paleontological Resources Guidelines for Segment 7/8 66kV, Variance Request – Structure Work Areas and Pole Additions at San Gabriel Junction and Whittier Narrows. The memorandum states that no cultural or paleontological resources will be impacted/effected by the structure work areas and pole additions at the San Gabriel Junction and Whittier Narrows for the Project. All of the proposed work areas were included in previous surveys for the TRTP project area and four (4) cultural resources were identified (Applied Earthworks 2009; Pacific Legacy 2007, 2010, 2011a; Pacific Legacy et al. 2010; Panich and Holson 2010; PCR 2010a, 2010b, 2010c; Schneider and Holson 2010).

The use of the existing access road to Pole No. 4774412E crosses three cultural resources: PL-SCE-SEG7-07, PL-SCE-SEG7-12, and PL-SCE-SEG7-13. Sites PL-SCE-SEG7-07 and PL-SCE-SEG7-12 have been determined ineligible for listing on the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR) (Pacific Legacy 2011b; Panich et al. 2011; Office of Historic Preservation 2011a, 2011b). Therefore, the use of the existing access road will not have an impact/effect on these two cultural resources. The proposed structure work area at Pole No. 4774412 is located in close proximity to Site PL-SCE-SEG7-13. Per the SCE TRTP Programmatic Agreement, Site PL-SCE-SEG7-13 has been assumed eligible for listing on the NRHP and CRHR (Reese et al. 2011). The use of the existing access road, with no improvements, and proposed structure work area at Pole No. 4774412E have been approved by the Army Corps of Engineer Archaeologist with the following management measures to protect site PL-SCE-SEG7-13 during TRTP construction (Ahmet 2011):

- Signs demarcating Environmentally Sensitive Area (ESAs) will be placed along the edge of the road prism that overlies the site;
- Cultural resources monitoring will be present during all construction activities; and
- Metal plates for the truck outriggers will be placed on the ground to protect the resource where the outriggers extend beyond the existing road prism.

The fourth resource consists of the Rio Hondo-Amador-Jose-Mesa 66kV transmission line. This resource has been determined ineligible for listing on the NRHP and the CRHR (Urbana Preservation and Planning 2010; Office of Historic Preservation 2010). Therefore, the insulator replacement on Pole No. 2184513E will have no adverse effects to the resource.

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 in the area

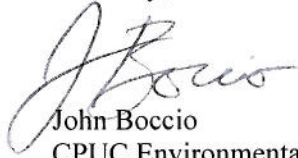
consist of Quaternary alluvium (Qg) and have a very low potential for yielding paleontological resources (Gust and Scott 2009; Aron 2010).

No additional impacts to cultural or paleontological resources are anticipated with the implementation of this Modification #9 to NTP #10 and the conditions noted below.

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

- Prior to commencement of pole erection at 4774414E, 4774415E, 4774416E, 4774417E, and 4773799E, and shift in Pole No. 4704324E, SCE shall provide documentation that illustrates that any required FAA mitigation as stipulated in the CPUC October 19, 2011 letter to SCE has been satisfied.
- Prior to commencement of construction activities, SCE shall submit to the CPUC documentation of notification to USFWS and CDFG regarding changes to acreage impacts for species' habitat covered under the Biological Opinion and the Incidental Take Permit, and submitted amendments.
- SCE shall follow the management measures listed above to protect site PL-SCE-SEG7-13 during TRTP construction
- All conditions required by Notice to Proceed (NTP) #10 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #10, and this Modification #9 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