STATE OF CALIFORNIA Edmund G. Brown Jr., Governor

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

November 4, 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 #11 to Notice to Proceed (NTP) #10

Dear Ms. Nelson,

On November 2, 2011, Southern Californian Edison (SCE) submitted a variance request for a Modification to Notice to Proceed (NTP) #10 to remove six existing lattice steel towers (LSTs) along the northern edge of Siphon Road for the Segment 7 and 8 66kV Transmission Line (T/L) for the Tehachapi Renewable Transmission Project (TRTP) in unincorporated Los Angeles County, California. **This Modification #11 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 remove six existing lattice steel towers (LSTs) along the northern edge of Siphon Road for Segment 7 and 8 66kV Transmission Line (T/L) for the TRTP in unincorporated Los Angeles County, California. The Notice to Proceed Request (NTPR) for Segment 7 and 8 66kV Relocation (NTP #10, dated August 3, 2010) did not include the removal of six existing LSTs along the northern edge of Siphon Road. The six existing structures proposed for removal are all located within existing, approved disturbance areas. Removal activities will be limited to these existing approved disturbance areas and will consist of structure removal and excavating and removing LST footings to a depth of two feet below grade. Any remaining footing foundation will remain in place and the excavation filled and compacted to match the surrounding grade.

- **Biological Resources**: SCE submitted biological resource information with the Variance Request. The Segment 8 66kV Siphon Road Structure Removals (Project Component) and 500-foot buffer are comprised of the following vegetation communities: California walnut woodland, disturbed/developed, mule fat scrub, nonnative woodland, ruderal grassland, southern arroyo willow riparian forest, southern cottonwood willow riparian forest, southern sycamore alder riparian woodland, and southern willow scrub. The Project Component and 500-foot buffer are located within coastal California gnatcatcher (*Polioptila californica*) designated critical habitat and least Bell's vireo (*Vireo bellii pusillus*) occupied habitat. Riparian vegetation associated with least Bell's vireo occupied habitat is also CDFG jurisdictional and the CDFG has issued a Streambed Alteration Agreement for the approved work area. No active, breeding bird nests occur within the Project Component of 500-foot buffer. Biological resources including high potential bat roost habitat occurs within the 500-foot buffer and will not be impacted by the Project Component work. Special-status biological resources are demarcated in the field by Environmentally Sensitive Area (ESA) staking where applicable. Construction has been on-going in this area since September 29, 2011 and the following surveys have been conducted in the area: general biological preconstruction (September 15, 2011) and bat habitat assessment (September 15, 2011). Burrowing owl (*Athene cunicularia*) surveys were not conducted as the area does not provide suitable habitat.

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 – Variance Request – Siphon Road Structure Removal* dated November 2, 2011 from SCE Archaeologist, Matthew Wetherbee, MSc, RPA. The memorandum states that no cultural or paleontological resources will be impacted/effected by the removal of the six existing idle structures located along Siphon Road within the Army Corps of Engineers (ACOE) Whittier Narrows for the TRTP Segment 7/8 66kV. The right-of-way for these structures along Siphon Road was included in previous surveys for the TRTP and one (1) cultural resource was identified within the survey corridor along Siphon Road (Applied Earthworks 2009; PCR 2010). This cultural resource consists of a grouping of six idle transmission towers known as the Siphon Road towers. These towers have been determined ineligible for listing on the National Register of Historical Places (NRHP) and the California Register of Historical Resources (CRHR) (Urbana Preservation and Planning 2010; Angeles National Forest 2010). Therefore, the removal of the Siphon Road structures will have no impacts/effects to the resource.

  In addition to the aforementioned transmission towers, four (4) other historical resources have been mapped based off of archival map sources in close proximity to the survey corridor along Siphon Road. Presumably these resources were destroyed during construction of the Whittier Narrows Flood Control Project completed in 1957 (PCR 2010). During the field survey, no surface remains of these resources or other cultural materials were identified. None of these mapped resources lie near or adjacent to the Siphon Road towers, therefore these resources will not be impacted by the removal of the Siphon Road towers. However, due to the high sensitivity for encountering subsurface cultural deposits along Siphon Road and in accordance with the TRTP Construction Phase Management Plan (CPMP), "spot-checking" by an archaeological monitor is required during the removal of the Siphon Road towers (Pacific Legacy 2011).

  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 (Qa) 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.

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

- As proposed, due to the high sensitivity for encountering subsurface cultural deposits along Siphon Road and in accordance with the TRTP Construction Phase Management Plan, "spot-checking" by an archaeological monitor is required during the removal of the Siphon Road towers.

- 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 #11 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