

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



March 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 (Segments 4-11), Modification #2 to Notice to Proceed (NTP #10)

Dear Ms. Nelson,

On March 15, 2011, Southern Californian Edison (SCE) submitted a request for a Variance (Modification) to Notice to Proceed Request (NTP #10) to allow for: (1) Removal and replacement of 21 existing wood poles with Light Weight Steel Poles on the Rio Hondo-Bradbury and Rio Hondo-Arcadia-Bradbury-Hopeful lines within the Rio Hondo Substation fenced area; and (2) Use of Live Oak Lane between Live Oak Avenue and Arrow Highway of the Segment 7 and 8 66 kV Relocation of Tehachapi Renewable Transmission Project (TRTP) located in the City of Irwindale, Los Angeles County, California. Cultural resources information was provided March 16th. Paleontological information was provided March 18th. Biological survey information was provided by SCE on March 21st. **This Modification #2 to NTP #10 is approved by CPUC for the proposed activities based on the following factors:**

- SCE submitted the following information:

SCE submitted a request for Variance (Modification) to NTP #10 to allow for: (1) Removal and replacement of 21 existing wood poles with Light Weight Steel Poles (LWSP) on the Rio Hondo-Bradbury and Rio Hondo-Arcadia-Bradbury-Hopeful lines within the Rio Hondo Substation fenced area; and (2) Use of Live Oak Lane between Live Oak Avenue and Arrow Highway of the Segment 7 and 8 66kV Relocation of TRTP located in the City of Irwindale, Los Angeles County.

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, 21 existing wood poles on the Rio Hondo-Bradbury and Rio Hondo-Arcadia-Bradbury-Hopeful lines, within the Rio Hondo Substation fenced area (located in the City of Irwindale), were identified to be removed and replaced with LWSPs, pole for pole replacement. As noted, these poles fall entirely within the substation boundary, on SCE owned property.

Additionally, subsequent to the issuance of NTP #10, additional access has been identified along Live Oak Lane, between Live Oak Avenue and Arrow Highway. This access road will allow for alternate access to and from the construction area, which is within an industrial use area.

- **Biological Resources** – SCE submitted a report titled *Biological Survey Report for the Proposed 66kV 21-Lightweight Steel Pole Replacements and Live Oak Lane Variance for TRTP, Segment 7 & 8 66kV Relocation, Los Angeles County, California* dated March 21, 2011 by ICF International. The Variance Project Component (NTP Modification Area) and a 500-foot buffer (Biological Study Area [BSA]) were included in this analysis. Biological resources within the BSA were evaluated during surveys within and adjacent to the BSA, including focused species surveys for special-status plants and a tree inventory (ICF 2010at, ICF 2010av) and preconstruction surveys completed as part of this report. A literature review was

performed as part of the biological review. The Variance Project Component was mapped as disturbed/developed. Six vegetation communities were mapped within the BSA and include mule fat scrub, ruderal grassland, coastal sage scrub, Riversidean alluvial fan sage scrub, open water, and disturbed/developed habitat.

No special status wildlife species have been observed within the Variance Project Component, and vegetation suitable to support least Bell's vireo (*Vireo bellii pusillus*) is not present within the BSA (ICF 2010ss). Suitable burrowing owl (*Athene cunicularia*) habitat is present within the 500-foot buffer along the San Gabriel River; however, this area was surveyed during a previous focused preconstruction burrowing owl survey for Segment 7 66kV (ICF 2011aj) with negative results. Two potential bat roosts were identified within the northeastern area of the BSA and one was observed outside of the BSA, but there are no suitable roosts within the Variance Project Component. The formal bat preconstruction report is forthcoming. One San Diego desert woodrat (*Neotoma lepida intermedia*) nest was detected within the BSA on August 4, 2010, during monitoring, but there are no nests within the Variance Project Component. An active red winged blackbird (*Agelaius phoeniceus*) nest was identified during monitoring activities on March 6, 2011, within the northeastern portion of the BSA.

No riparian vegetation suitable for least Bell's vireo or other listed species occurs within the San Gabriel River. No special-status plants were observed in the Variance Project Component during the previous focused survey (ICF 2010at). No regulated trees have been recorded for the Variance Project Component (ICF 2010av).

Part of the BSA was previously surveyed for jurisdictional features (ICF 2010h). The remaining portion of the Variance Project Component impact areas appears to be located in a heavily developed area within and adjacent to the Rio Hondo Substation. Feature 7-10-S-1 (Buena Vista Channel, a flood control channel) is located immediately north of the proposed extension to the access road. Feature 7-14-S-1, the San Gabriel River, is immediately east of the Rio Hondo Substation. These features were delineated within the BSA based on aerial photography and data collected from the delineation report. No additional impacts to biological resources are anticipated with the removal and replacement of the 21 light weight steel poles and the use of Live Oak Lane.

- **Cultural Resources** – SCE submitted a memorandum from Archaeologist Matthew Wetherbee, MSc, RPA, to SCE dated March 15, 2011. It states that no cultural resources will be affected by the Light Weight Steel Pole (LWSP) replacements within the Rio Hondo Substation and the use of the existing paved Live Oak Lane for the Tehachapi Renewable Transmission Project (TRTP) in the City of Irwindale, Los Angeles County. The Rio Hondo Substation was included in the previous survey for the TRTP right-of-way and no cultural resources were identified (Pacific Legacy 2007). The Rio Hondo Substation is located in a completely developed industrial environment and therefore remains low in sensitivity for encountering cultural resources. Live Oak Lane, an existing paved access road, lies outside of the TRTP right-of-way but within a completely built environment. These areas are likely to consist of previously disturbed subsurface stratigraphic horizons that are unlikely to yield subsurface cultural material. Based on a review of the archaeological database and aerial photographs of Live Oak Lane, the use of the paved access road will have no significant impact on cultural resources and has a low probability of impacting previously unrecorded cultural resources. Furthermore, no improvements will occur to the existing paved access road.

As part of the SCE historic infrastructure review, the Rio Hondo-Bradbury 66kV was identified as a historic transmission line (PCR 2010) and was evaluated for inclusion in the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR) per the Programmatic Agreement. The Rio Hondo-Bradbury 66kV transmission line was determined ineligible for listing on the NRHP and the CRHR. In addition, the Rio Hondo-Arcadia-Bradbury-Hopeful 66kV transmission line dates to 1965 is therefore not eligible for listing on the CRHR or NRHP. Work will not take place outside of the existing right-of-way or extend beyond the existing prism of the access road.

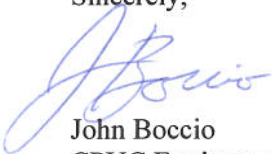
SCE submitted a memorandum from Archaeologist Matthew Wetherbee, MSc, RPA, to SCE dated March 18, 2011. It states that no paleontological resources will be impacted by the Light Weight Steel Pole (LWSP) replacements within the Rio Hondo Substation and the use of the existing paved Live Oak Lane for Southern California Edison (SCE) Tehachapi Renewable Transmission Project (TRTP) in the City of Irwindale, Los Angeles County, California. The Paleontological Resources Management Plan (PRMP) Segments 4 through 11 of the TRTP project area was prepared by Cogstone Resource Management Inc. (Gust and Scott 2009). No paleontological localities have been previously discovered in the project vicinity and the surface sediments are mapped as Qg (Gravels and sands of major streams and alluvial fans) and have low sensitivity for paleontological resources. The TRTP right-of-way for Segment 7 was surveyed for paleontological resources in August 2010 and no paleontological resources were encountered (Aron 2010). Soils at Rio Hondo substation consist of surficial deposits of Quaternary gravels (Qg)/Quaternary wash, and artificial fill. These surficial deposits are Holocene in age (~<11,000 years old) and are typically described as rounded to well-rounded gravels comprised of igneous and metamorphic rocks from the San Gabriel Mountains that have been washed downstream over time (Aron 2010:13). 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 (Aron 2010:13). The use of the paved Live Oak Lane will not impact any paleontological sensitive soils.

No additional impacts to cultural or paleontological resources are anticipated with the removal and replacement of existing wood poles with the light weight steel poles and the use of Live Oak Lane.

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

- SCE shall submit the Preconstruction Bat Survey Report for review and approval prior to the commencement of construction.
- 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 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