

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



March 14, 2011

Susan J. Nelson, AIA
Southern California Edison
Regulatory Affairs
2244 Walnut Grove Avenue, Quad 3D, GO1
Rosemead, California 91770

RE: Tehachapi Renewable Transmission Project (Segments 4-11), Modification to Notice to Proceed (NTP #15)

Dear Ms. Nelson,

On March 8, 2011, Southern California Edison (SCE) submitted a request to modify Notice to Proceed (NTP #15) for Segment 5 Transmission Line (T/L) to implement changes to the telecommunications (Telecom) portion of Segment 5 T/L of the Tehachapi Renewable Transmission Project in the City of Lancaster, Los Angeles County, California.

The SCE Tehachapi Renewable Transmission Project (TRTP) was evaluated in accordance with the California Environmental Quality Act and a Certification of Public Convenience and Necessity (CPCN) was granted by CPUC Decision 09-12-044, (Application #07-06-031), SCH #2007081156 on December 17, 2009. **Modification to NTP #15 is granted by CPUC for the proposed activities based on the following factors:**

- SCE submitted the following information regarding the Modification of the Segment 5 T/L Telecom construction:

SCE submitted a request to modify Notice to Proceed (NTP #15, dated September 10, 2010) for Segment 5 Transmission Line (T/L) to implement changes to the telecommunications (Telecom) portion of Segment 5 T/L of the Tehachapi Renewable Transmission Project (TRTP) in the City of Lancaster, Los Angeles County. Based on final engineering for the Telecom portion of Segment 5 T/L, it has been determined additional underground telecom duct banks from the transmission lines into the Antelope Substation are required to provide path diversity for communication systems. The additional telecom duct banks would enable a communications path to remain intact during most of the construction of TRTP's multiple transmission line configurations.

The duct banks would be situated west of the Antelope Substation and consist of two separate duct banks routes. While the telecom duct banks are associated with Segment 5 T/L, the duct banks would extend into Segment 4 T/L.

The new underground telecom duct banks will begin at Tower M0-T3-2 of the Antelope-Whirlwind 500 kV T/L and at Construct 55 of the Vincent-Whirlwind 500 kV T/L. Both routes will run, as directly as possible, to the Antelope Substation fence line, where they will transition to underground utility duct banks within the Antelope Substation.

The lengths of the duct bank routes would be approximately 643 and 1,040 linear feet (1,683 feet total). The new underground utility duct bank installation is typically comprised of an approximately 18-inch wide by 3-foot deep trench with two 5-inch PVC conduits installed. The trenches will then be filled with a mixture of concrete and concrete slurry (bottom portion) and native soil (top portion) to existing grade. The total

disturbance width the duct banks would be is approximately 25 feet. Thus, the total disturbance area associated with both routes would be approximately 0.97 acres. Of this total disturbance area, approximately 0.71 acres were previously approved for disturbance for the Segment 4 and 5 T/L NTPs. Therefore, new disturbance areas will comprise of approximately 0.26 acres.

- **Biological Resources:** SCE submitted a report titled *Biological Survey Report for the proposed Underground Telecom Addendum, Segment 5 Transmission line, Tehachapi Renewable Transmission Project, Los Angeles County, California* prepared by ICF International dated January 12, 2011. The biological survey area (BSA) for the Modified Project Component was defined as the Modified Project Component plus a 500-foot buffer. Biological resources within the BSA were evaluated during surveys within and adjacent to the Modified Project Component, including focused species and preconstruction biological surveys. A literature review was also performed as part of the biological reviews for Segment 4 and Segment 5 T/Ls (ICF 2010ad, ICF 2010yy). The Modified Project Component is relatively flat, with an elevation of approximately 2,500 feet. The Antelope Substation area and surrounding vicinity consists primarily of California annual grassland and disturbed/developed areas. The Modified Project Component occurs within California annual grassland and disturbed/developed areas. Previous focused burrowing owl (*Athene cunicularia*) surveys in 2010 for Segments 4 and 5 (ICF 2010ac) and Segment 9 (Antelope Substation) (ICF 2010am) were negative for burrowing owls or sign of the species within the BSA. However, potential burrowing owl burrows were identified within the BSA (ICF 2010cq). These burrows were inspected during the preconstruction surveys and it was determined that most were no longer able to support burrowing owl because they were partially or completely collapsed and filled with dirt, vegetation, or debris. No burrowing owls or sign of the species were detected during the 2010 ICF preconstruction surveys. New potential burrows were identified within the BSA during 2011 Segment 5 Preconstruction Surveys; however, none of these burrows showed evidence of burrowing owl use. Additional preconstruction surveys (general and burrowing owl) are being conducted that cover the portion of the BSA within Segment 4. Preconstruction surveys for bats (ICF 2010bq) were negative. Although no potential roost habitat was identified, specific mitigation measures (MM 33a-c) would be implemented if any suitable habitat is observed in the vicinity. No special-status plants were observed within the BSA during the 2010 focused surveys (ICF 2010ag) or during preconstruction surveys that included the BSA. Furthermore, no special-status plant species have been observed within the BSA during the 2009 focused surveys or 2010 tree inventory. No jurisdictional features are located within the BSA (ICF 2010l). No other biological constraints were observed. No additional impacts to biological resources are anticipated.

Cultural Resources. SCE submitted a Memorandum for the Segment 5 Telecom Modification stating that no cultural resources will be affected by the proposed undergrounding of an additional Segment 5 Telecom duct bank south of Antelope Substation. A record search and both cultural and paleontological surveys (Ahmet, et al. 2006; Gust and Scott 2009) of this portion of the proposed additional duct bank have been conducted previously. No cultural resources were identified in this area. Because cultural resources were not identified in this area, no additional cultural resource work or monitoring is recommended. However, since there is a possibility that paleontological resources exist, paleontological monitoring is recommended here whenever ground disturbing construction activities occur to a depth of more than two feet. No work will occur outside of the existing right-of-way. No additional impacts to cultural or paleontological resources are anticipated.

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

- Paleontological monitoring shall be conducted for ground disturbing activities that occur to a depth of more than two feet.
- All conditions required by NTP #15 shall apply to the subject area and activities.

- Copies of all relevant permits, compliance plans, NTP #15, and this Modification to NTP #15 shall be available on site for the duration of construction activities where applicable.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Boccio", written in a cursive style.

John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen