

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 16, 2012

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 #6 to Notice to Proceed (NTP) #15

Dear Ms. Nelson,

On March 13, 2012, Southern California Edison (SCE) submitted a request for a Supplemental Evaluation and Modification to Notice to Proceed (NTP) #15 for work associated with the Sagebrush single-circuit 220 kV Transmission Line (T/L) adjacent to the Segment 5 T/L of the Tehachapi Renewable Transmission Project (TRTP) in Los Angeles County, California. The work consists of new tower construction (Sagebrush Intersect Towers with H-frame structures), existing tower modifications, and installation of new conductor within the existing Sagebrush single-circuit 220 kV T/L adjacent to the Segment 5 T/L. The new H-frame structures and conductor are needed to address a conductor clearance issue created by installing the Segment 5 T/L. After installation, the intersect towers would slightly raise the height of the transmission line. **This Modification #6 to NTP #15 is approved by CPUC based on the following factors:**

- SCE submitted the following information:

SCE requests a Modification to Notice to Proceed (NTP) #15 for work associated with the Sagebrush single-circuit 220 kV T/L adjacent to the Segment 5 T/L of the TRTP in Los Angeles County, California. The work consists of new tower construction (Sagebrush Intersect Towers with H-frame structures), existing tower modifications, and installation of new conductor within the existing Sagebrush single-circuit 220 kV T/L adjacent to the Segment 5 T/L. The new H-frame structures and conductor are needed to address a conductor clearance issue created by installing the Segment 5 T/L. After installation, the intersect towers would slightly raise the height of the transmission line. Subsequent to the approval of the NTP (NTP #15 dated September 10, 2010) for Segment 5 T/L by the CPUC, SCE completed final engineering on portions of the approved Project. Based on final engineering, additional details associated with the construction of the Sagebrush single-circuit 220 kV transmission line (T/L) adjacent to the Segment 5 T/L have been further defined.

Description of Proposed Work

Based on final engineering completed to date by SCE for the TRTP, additional work associated with the Sagebrush single-circuit 220 kV T/L adjacent to the Segment 5 T/L have been identified. The work consist of new tower construction (Sagebrush Intersect Towers with H-frame structures), existing tower modifications, and installation of new conductor within the existing Sagebrush single-circuit 220 kV transmission T/L adjacent to the Segment 5 T/L. The new H-frame structures and conductor are needed to address a conductor clearance issue created by installing the Segment 5 T/L. After installation, the intersect towers would slightly raise the height of the transmission line.

The construction activities for the Sagebrush Intersect Towers are located approximately 2.25 miles west of Highway 14 in unincorporated Los Angeles County, California. The proposed new disturbance areas are intersected by existing CPUC-approved roads and/or occur adjacent to CPUC-approved disturbance areas. As such, no new roads would be needed for the proposed construction activities. At each proposed new work area, grubbing and light grading would be performed to create a level pad to support safe construction activities. The total additional disturbance area associated with the Sagebrush Intersect Tower construction activities is approximately 6 acres.

Construction

The Sagebrush Intersect Towers include construction of two H-frame steel structures (Constructs [CTs] 235A and 236A) intersect within the existing Sagebrush single-circuit 220 kV T/L adjacent to the Segment 5 T/L. Following structure installation, the existing conductor and ground wires would be replaced. Construction would last 12 weeks.

The structure and conductor construction would be located within the Florida Power and Light (FPL) ROW, adjacent to the SCE ROW. SCE would receive a Temporary Entrance Permit to allow work to be performed. Additional disturbance areas would be needed to provide work areas for structure construction and conductor installation activities. Specific construction activities are described below.

- Two H-frame, steel intersect structures (CTs 235A and 236A) would be constructed with a depth of 33 feet and a width of eight feet. The additional disturbance areas associated with these work areas are as follows:
 - CT 235A:
 - Northern disturbance area: 0.8 acre
 - Southern disturbance area: 1.1 acre
 - CT 236A: 2.5 acres
 - Three existing structures along the Sagebrush T/L (CTs 235, 236, and 237) would be modified to accommodate the new conductor to be installed, due to design requirements. Only ground wire hardware would be replaced. Approximate 200-foot by 200-foot work areas would be added at each tower location. The additional disturbance areas associated with these work areas are as follows (note that the proposed disturbance areas overlap with existing CPUC-approved disturbance areas and, as such, only portions of the proposed disturbance areas are considered additional disturbance areas):
 - CT 235: 0.6 acres
 - CT 236: 0.4 acres
 - CT 237: 0.7 acres
 - Following construction of the two new towers and modifications to the three existing towers, the existing conductor and ground wires would be removed and replaced. The disturbance areas at each tower (described above) would be sufficient for performing these activities.
- **Supplemental Evaluation.** A Supplemental Evaluation dated April 2012 was prepared for the CPUC to determine whether or not this work was previously covered by the analysis completed in the Final EIR or would result in any new or different impacts from what was previously analyzed in the Final EIR (see attached Supplemental Evaluation). Those environmental issue areas for which a potential change in the nature or magnitude of an impact could occur as a result of the proposed work include: Cultural Resources, Hydrology/Water Quality, Air Quality, Geology/Soils/Paleontology, Biological Resources, and Visual Resources. The determination made from this evaluation is that all impacts from the proposed work are either within the range of impacts already discussed in the Final EIR or are substantially similar to those

impacts. No new significant impacts would result from the proposed work and there would be no significant change in the magnitude of impacts previously disclosed in the Final EIR. As a result, no new mitigation measures are needed. A summary of the biological and cultural analyses are provided below.

- **Biological Resources.** SCE submitted a biological report from ICF dated February 21, 2012 titled *Proposed Segment 5 Sagebrush Addendum, Tehachapi Renewable Transmission Project, Los Angeles County*. The report documents the biological conditions at six sites (Project Component) and a 500-foot buffer around each site adjacent to the Segment 5 transmission line (T/L) for TRTP. The Project Component along with the 500-foot buffer is referred to as the Biological Study Area (BSA). The Project Component includes new tower construction, existing tower modifications, and installation of new conductor within the existing Sagebrush single-circuit 220 kV T/L adjacent to the Segment 5 T/L. Biological resources within the BSA were evaluated during several focused surveys, including 2009, 2010, and 2011 rare plant surveys (AMEC 2009c; ICF 2010ag, 2011gu); 2010 and 2011 tree inventory surveys (ICF 2010bf, 2011ga); and 2009 and 2010 burrowing owl (*Athene cunicularia*) surveys (AMEC 2009f; ICF 2010cq1). The biological resources within the BSA were also evaluated during Segment 5 Constructs 48-58 and Midway-Vincent general preconstruction surveys, burrowing owl preconstruction surveys, and preconstruction bat habitat assessment surveys associated with the Project Component (ICF 2010bq, 2010bs, 2011cu, 2011de, 2011df). A literature review was also performed as part of the Biological Review for Segment 5 (ICF 2010yy) and Midway-Vincent Transmission Line (ICF 2011cp). The Project Component does not overlap suitable habitat for special-status species as included in the CDFG Incidental Take Permit (ITP) or the USFWS Biological Opinion (BO). Additionally, clearance sweeps were performed on October 18, 2010 for Segment 5 and June 21, 2011 for Midway-Vincent. Construction monitoring has been ongoing regularly since the sites became active, and species events and nest events are recorded in the SCE Field Reporting Environmental Database (FRED).

Jurisdictional resources within the Project Component were evaluated during the 2010 jurisdictional delineation for Segments 4, 5, and 10 (ICF 2010l). Jurisdictional features identified within the Project Component will be staked as Environmentally Sensitive Areas (ESAs) and flagged for avoidance. Jurisdictional features identified within the 500-foot buffer will be avoided by the Project Component. Any additional potential jurisdictional features will be staked as ESAs and flagged for avoidance.

Site 1 - Modification of Construct 235 to accommodate new conductor to be installed, including an approximate 200-foot by 200-foot work area. Vegetation communities within the Project Component and 500-foot buffer (BSA) include California annual grassland, scrub oak chaparral, and disturbed developed. No special-status plant species have been observed within the BSA. Regulated tree species, Tucker's oak (*Quercus john-tuckeri*), occurs within the 500-foot buffer. Wildlife species observed within the 500-foot buffer include Vaux's swift (*Chaetura vauxi*).

Site 2 - H-frame steel interset Construct 235A Northern disturbance area. Vegetation communities within the Project Component include mixed chaparral and disturbed/developed. Vegetation communities within the 500-foot buffer include California annual grassland, scrub oak chaparral, mixed chaparral, and disturbed/developed. Special-status plant species, Peirson's morning glory (*Calystegia peirsonii*), and regulated tree species, Tucker's oak, occur within the 500-foot buffer.

Site 3 - H-frame steel interset Construct 235A Southern disturbance area. Vegetation communities within the Project Component include mixed chaparral. Vegetation communities within the 500-foot buffer include California annual grassland, scrub oak chaparral, mixed chaparral, and disturbed/developed. Special-status plant species, Peirson's morning glory, and regulated tree species, Tucker's oak, occur within the 500-foot buffer.

Site 4 - Modification of Construct 236 to accommodate new conductor to be installed, including an approximate 200-foot by 200-foot work area. Vegetation communities within the Project Component

include mixed chaparral and disturbed/developed. Vegetation communities within the 500-foot buffer include California annual grassland, mixed chaparral, mixed chaparral-burned, and disturbed/developed. Special-status plant species, Peirson's morning glory, occurs within the 500-foot buffer. Regulated tree species, Tucker's oak, occurs within the BSA. Wildlife species observed within the 500-foot buffer include Swainson's hawk (*Buteo swainsoni*) and yellow warbler (*Dendroica petechia*). Jurisdictional feature 5-29-S-1 occurs within the 500-foot buffer.

Site 5 - H-frame steel interset Construct 236A disturbance area. Vegetation communities within the Project Component include California annual grassland – burned, and mixed chaparral – burned. Vegetation communities within the 500-foot buffer include California annual grassland, California annual grassland – burned, mixed chaparral, mixed chaparral – burned, and Mojave mixed woodland scrub. Special-status plant species, Peirson's morning glory, occurs within the BSA. Regulated tree species, Tucker's oak, occurs within the 500-foot buffer. Potential burrowing owl features occur within the BSA. Jurisdictional feature 5-29-S-2 occurs within the BSA and will be avoided. Jurisdictional features SP-29-S-1 and SP-29-S-2 occur within the 500-foot buffer.

Site 6 - Modification of Construct 237 to accommodate new conductor to be installed, including an approximate 200-foot by 200-foot work area. Vegetation communities within the Project Component include California annual grassland – burned, mixed chaparral – burned, and disturbed/developed. Vegetation communities within the 500-foot buffer include California annual grassland, California annual grassland – burned, mixed chaparral, mixed chaparral – burned, Mojave mixed woodland scrub, Mojave mixed woodland scrub – burned, and disturbed developed. Regulated tree species, Tucker's oak, occurs within the 500-foot buffer. Wildlife species observed within the 500-foot buffer include sharp-shinned hawk (*Accipiter striatus*). A red-tailed hawk (*Buteo jamaicensis*) nest occurs within the 500-foot buffer. Jurisdictional feature 5-30-S-7 occurs within the BSA and will be avoided. Jurisdictional features SP-29-S-1, 5-30-S-5, 5-30-S-6, and 5-30-S-8 occur within the 500-foot buffer.

No additional impacts to biological resources are anticipated with the implementation of the conditions below.

- **Cultural Resources.** SCE submitted a cultural resources letter report by Pacific Legacy, Inc. dated March 2, 2012 to Natasha Tabares, Archaeologist, SCE, titled *Letter Report: Cultural Resources Survey for the Sagebrush Interset Tower Addendum – Towers 235, 236 and 237 H-Frame Structures, Segment 5, Tehachapi Renewable Transmission Project, Los Angeles County, California*. Pacific Legacy, Inc. conducted a cultural resources study for the Segment 5 Sagebrush Towers 235, 236 and 237 H-Frame Structures for the TRTP. Two portions of the proposed tower work areas had not been previously surveyed for cultural resources. Previous surveys for the Segments 2 and 5 corridors and roadstory, as well as the original Sagebrush variance, encompassed the remaining portion of the construction work areas (Ahmet et al. 2006; Pacific Legacy 2007, 2010b; Tejada 2011). A cultural resources records search was previously conducted and updated for TRTP, which encompasses the current study area (Pacific Legacy 2007, 2010c). Results of the records search indicated that 2 prehistoric sites and 1 historic archaeological site, and 1 built environment resource are recorded within one mile of the proposed area. None of these resources are located within the proposed Sagebrush Towers Area of Direct Effect (ADEs) or the Area of Potential Effect (APE) of the requested area. The previously unsurveyed portion of the construction disturbance area was surveyed for cultural resources by Pacific Legacy archaeologists, Jack Sprague and Melinda Walton, on March 1, 2012, by walking parallel transects spaced at 10 meter intervals. In addition to the general disturbance areas requested, the adjacent areas were also surveyed to cover gaps in the previously surveyed corridor. No cultural resources were identified during the survey of the proposed disturbance areas.

A paleontological review (Gust and Scott, 2009) indicates that the geology of the proposed area is characterized by igneous rocks. These types of rocks do not have the potential to yield paleontological

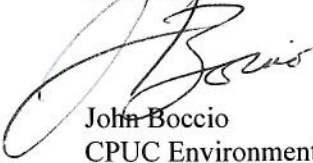
resources, therefore, construction activities associated with the Sagebrush intersert towers would not have a significant impact on paleontological resources and no paleontological monitoring is required.

No additional impacts to cultural or paleontological resources are anticipated with the implementation of the conditions below.

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

- All conditions required by Notice to Proceed (NTP #15) shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #15, and this Modification #6 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 "John Boccio", written over a printed name and title.

John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen