STATE OF CALIFORNIA Edmund G. Brown Jr., Governor

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

July 18, 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 #3 to Notice to Proceed (NTP) #17

Dear Ms. Nelson,

On July 15, 2011, Southern Californian Edison (SCE) submitted a Request for a Modification to Notice to Proceed (NTP) #17 seeking authorization from the California Public Utilities Commission (CPUC) for the proposed scope of work to accommodate the removal of existing overhead ground wire (OHGW) and Skywrap, and replacement with fiber optical ground wire (OPGW) on Segment 7 Transmission Line (T/L) of the Tehachapi Renewable Transmission Project (TRTP) in the City of Duarte, Los Angeles County, California.

The SCE Tehachapi Renewable Transmission Project (Project) 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. **This Modification #3 to NTP #17 is granted by CPUC for the proposed activities based on the following factors:**

The proposed work included in this Modification #3 to NTP #17 was described in the FEIR/EIS.

- SCE submitted the following information:

  SCE is requesting a Modification to Notice to Proceed (NTP #17 dated September 24, 2010) for the proposed scope of work to accommodate the removal of existing overhead ground wire (OHGW) and Skywrap and replacement with fiber optical ground wire (OPGW) on Segment 7 Transmission Line (T/L) of the TRTP in the City of Duarte, Los Angeles County. Subsequent to approval of the NTPR (NTP #17 dated September 24, 2010) by the CPUC, final design was completed and it was determined that the existing OHGW and Skywrap between Structures M54-T1 and M55-T1A must be removed and replaced with OPGW that attaches to the top of interset Structure M54-T3A. Upon completion of this activity, all of the OHGW will be removed, and only the OPGW will be in place, attached to the top of M54-T3A. Specifically, to provide the required access to the communication facilities, minimize communications system outages, provide for aircraft safety, and ensure the integrity of the transmission line structures, the following activities will be performed to accommodate this change in design:

  1. Remove approximately one (1) mile of existing overhead ground wire (OHGW) from M54-T1 to M55-T1 and remove 1.2 miles of Skywrap from M54-T1 to M55-T1A.

  2. Install one (1) mile of new fiber optical ground wire (OPGW) from M54-T1 to M55-T1.

3. Install approximately 0.2 miles of all-dielectric self-supporting (ADSS) fiber optic cable from M55-T1 to M55-T1A.

Additional disturbance areas of approximately 100 feet by 100 feet around M55-T1A and a 20-foot wide and 700-foot long strip along the distribution line will be required for installation of the ADSS cable. The underground ducts will be within these same disturbance areas or previously approved disturbance areas for tower construction at M28-P1, which is adjacent to M55-T1. A 4-foot by 4-foot by 6-foot interset vault will be installed over existing underground conduits approximately 10 feet east of M55-T1A. A new 90-foot long trench, 3.5 feet deep and 3 feet wide, will be excavated from the new vault east to existing pole #1005936E; 5-inch conduits will be installed, and a Uni-Strut riser will be constructed. An additional new 90-foot trench 3.5 feet deep and 3 feet wide, will be excavated and 5-inch conduits will be installed from the northeast leg of M55-T1 east to pole #1005932E. A galvanized iron pipe riser will be installed at M55-T1 with a new 3-foot by 3-foot by 10-inch splice box. A riser will be constructed on pole #1005932E.

The wire puller used to install the OPGW will be located on the road near M22-T1. An additional disturbance area of 180 feet by 200 feet will be needed north of Royal Oaks Drive within the transmission line right-of-way for tensioning equipment and wire. The rope used to remove the OHGW and Skywrap may drag on the ground in some locations along the right-of-way between M54-T1 and M55-T1A. Skywrap removal between M55-T1 and M55-T1A will be performed from either a helicopter or a crane that operates from approved roads or disturbance areas.

Helicopters will be used for approximately three (3) to five (5) days to pull in sockline, handle the Skywrap, and transport personnel, materials and equipment to and from the towers and ground. The days for helicopter work may not be consecutive. Various portions of the existing access road adjacent to Structure M54-T2 will be used as landing zones (LZ) for the helicopter. The LZs are proposed within the approved 18-foot road width and no refueling or non-emergency maintenance will take place at these locations.

Due to the critical communications that the Skywrap carries, the outage and splicing is expected to occur on a Sunday. If required by the applicable jurisdictions, approval will be obtained for Sunday work.

- **Biological Resources:** SCE submitted a biological report by ICF International dated June 23, 2011, titled *Biological Survey Report for Telecom Skywrap Variance for Tehachapi Renewable Transmission Project, Segment 7, Los Angeles County, California.* The report documents the results of biological conditions at the proposed Segment 7 Telecom Skywrap (Variance Project Component) and associated 500-foot buffer (Biological Study Area [BSA]). The biological resources within the Variance Project Component and BSA were evaluated during general preconstruction surveys associated with the structures within the BSA (ICF 2010dc, 2010df, 2011ah, 2011ay, 2011br). Biological resources in the area also were evaluated during several focused surveys, including plant (ICF 2010at), tree inventory (ICF 2010av), a preconstruction special-status bat habitat assessment (ICF 2010bg, 2010de), and a western spadefoot toad (*Spea hammondii*) and southwestern pond turtle (*Clemmys marmorata pallida*) focused habitat assessment was conducted on May 24, 2011 by ICF sub-consultant BonTerra (ICF 2011dg).

  Vegetation communities mapped within the Variance Project Component include: disturbed/developed, coastal sage scrub, coast live oak woodland, mixed chaparral, and southern willow scrub. Vegetation communities known to occur within the 500-foot buffer associated with the Variance Project Component include: disturbed/developed, coastal sage scrub, coast live oak woodland, mixed chaparral, southern willow scrub, and nonnative woodland. Blue elderberry (*Sambucus cerulea*), bigleaf maple (*Acer macrophyllum*), San Gabriel oak (*Quercus durata gabrielensis*), and coast live oak (*Quercus agrifolia*) occur within the Variance Project Component. Blue elderberry, bigleaf maple, California bay laurel (*Umbellularia californica*), coast live oak, interior live oak (*Quercus wislizeni*), San Gabriel oak and unknown willows occur within the 500-foot buffer (ICF 2010at, 2010av, 2011j).

  The coastal sage scrub present within the Variance Project Component has been determined not to support coastal California gnatcatcher *(Polioptila californica*), and focused surveys have not been conducted (AMEC 2009m; ICF 2010ww). In October 2010, January 2011, February 2011, and April 2011, potential

San Diego desert woodrat (*Neotoma lepida intermedia*) middens were identified within the BSA (ICF 2010df, 2011ah, 2011ay, 2011br, 2011j). Those located within the Variance Project Component are within the proposed landing zone. Potential solitary bat roosts, potential colonial bat roosts, and potential bat roosts were identified within the BSA. Within the Variance Project Component, this potential habitat is within the M54-T3A structure work area and at a proposed pole north of M28-P2 (ICF 2010bg, 2010de). Ringtail (*Bassariscus astutus*) habitat overlaps the BSA. No ringtails have been observed within the BSA during previous surveys (ICF 2010bg). On April 18, 2011, one adult coast range newt (*Taricha torosa*) was identified walking on the spur road adjacent to the Las Lomas Debris Basin within the 500-foot buffer. At the time of this report, active bird nests had been observed in the Variance Project Component and the 500-foot buffer (FRED).

United States Army Corps of Engineers (USACE) regulated Waters of the U.S., California State Water Resources Control Board (SWRCB) regulated Waters of the State, and California Department of Fish and Game (CDFG) regulated streambed and riparian areas were identified in the Jurisdictional Delineation Report for the TRTP Segments 7 and 8 (ICF 2010h). The BSA was partially surveyed during previous delineation surveys; however, the southern portion of the alignment between M54-T3A and M28-P2 was only surveyed at tower locations. This area was included in previous preconstruction and surveys and sweeps, and no additional jurisdictional features were identified. This area will be surveyed during preconstruction clearance surveys (P30) and clearance sweeps (S7) prior to construction. If any potentially jurisdictional resources are observed, they will be flagged as ESAs for avoidance (ICF 2010h).

There have been 36 jurisdictional stream features mapped in the BSA; 12 of these features are located in the Variance Project Component and include: 7-1-S-11, 7-1-S-12, 7-2-S-1, 7-2-A-2, 7-2-S-3, 7-2-S-6, 7-2-S-7, 7-2-S-9, 7-3-S-1, 7-3-S-7, 7-3-S-8, and 7-3A-S-5. Two jurisdictional features (7-3-S-7 and 7-3-S-8) are included in the pending 404 permit and will be avoided until the permits have been issued; all other jurisdictional features will be fully avoided.

No additional impacts to biological resources are anticipated with the implementation of this Variance/Modification.

Cultural Resources: SCE submitted a memorandum dated June 20, 2011 with the Variance Request from Matthew Wetherbee, MSc, RPA, Archaeologist, stating that no cultural or paleontological resources will be impacted by the Skywrap Replacement for the TRTP, Segment 7. The Skywrap Replacement is located partially within vacant land and within a developed urban environment in the City of Duarte, Los Angeles County. Approximately 90 percent of the work for the Skywrap Replacement from M54-T1 to M55-T1A for Segment 7 including all of the associated pull sites, additional disturbance areas, landing zone, and medium road improvements were included in the previous surveys for the TRTP and cultural resources were identified (Pacific Legacy 2007; 2010; PCR 2011). Approximately 550 feet of the OHGW Skywrap between M54-T1 and M54-T2 and a portion of the disturbance area at M54-T1 lay just outside of the TRTP surveyed corridor. However, this portion is situated on a densely vegetated steep slope and the possibility of encountering a cultural resource is very low. The portion of the work that include the installation of ADSS overhead on existing poles and underground conduits near M55-T1 to M55-T1A (approximately 1,056 feet) are located just outside of the TRTP right-of-way, but within a completely built environment, including modern residential areas. These areas are likely to consist of previously disturbed subsurface stratigraphic horizons that are unlikely to yield subsurface cultural and paleontological materials.

Previous paleontological assessments (Gust and Scott 2009; Aron 2010) prepared for the TRTP project area indicate that no paleontological resources have been previously discovered in the project vicinity. Soils in the vicinity consist of surficial deposits of Quaternary alluvium (Qa), Quaternary gravels (Qg), granodiorite, quartz diorite, and tertiary (basalt and andesite) dikes (Gust and Scott 2009; Aron 2010). These soils are too young geologically to have potential to yield significant fossil resources and are therefore assigned low paleontological sensitivity (Gust and Scott 2009; Aron 2010).

No additional impacts to cultural or paleontological resources are anticipated with the implementation of this Variance/Modification.

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

- All necessary jurisdictional permits for drainages and waterways shall be obtained from CDFG, RWQCB, and USACE, as applicable prior to commencement of activities that would impact identified jurisdictional features.

- All conditions required by NTP #17 shall apply to the subject area and activities.

- Copies of all relevant permits, compliance plans, NTP #17, and this Modification to NTP #17 shall be available on site for the duration of construction activities where applicable.

Sincerely,

John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen