STATE OF CALIFORNIA Edmund G. Brown Jr., Governor

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

November 17, 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 #2 to Notice to Proceed (NTP) #24

Dear Ms. Nelson,

On November 14, 2011, Southern Californian Edison (SCE) submitted a variance request for a Modification to Notice to Proceed (NTP) #24 for the lowering of the 66 kV line at the I-605 Shoofly, which would involve the installation of three new 55-foot wood poles and the modification of an existing 85-foot wood pole to a height of 53 feet, on Segment 8 West (Phase 4) of the Tehachapi Renewable Transmission Project (TRTP) in the City of Industry, County of Los Angeles, California. **This Modification #2 to NTP #24 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 #24) for the lowering of the 66 kV at the 605 Shoofly and the installation of three new 55-foot wood poles and the modification of an existing 85-foot wood pole to a height of 53 feet, on Segment 8 West (Phase 4) of the TRTP in the City of Industry, County of Los Angeles. Subsequent to approval of the NTPR (NTP #24 dated January 12, 2011) by the CPUC, final design was completed and it was identified that additional clearance is needed between an existing 66 kV overhead line and the Segment 8 Phase 4 T/L, in the area of the 605 Shoofly. To accommodate this, the profiles of two 66 kV overhead lines from existing Pole No. 2184534E to existing Riser Pole No. 4773797E need to be lowered. In addition, three new 55-foot wood poles will be interset and an existing 85-foot wood pole will be reframed to a height of 53 feet. New conductor will be installed from Pole Nos. 4788573E and 4788574E to existing Pole No. 2336361E, and will include installation of a guy at each end. Following completion of the interset and reframe, the existing overhead conductors will be transferred and connected to the new lower line section. This installation will occur within previously approved work areas on the east side of the 605 Freeway.

- **Biological Resources**: SCE submitted biological resource information with the Request. The Segment 8 West (Phase 4) 66 kV Lowering at 605 Shoofly (Project Component) would occur within approved TRTP work areas. Biological surveys of the Project Component and 500-foot buffer include general biological preconstruction survey (May 11, 2011) and bat habitat assessment (May 17, 2011). A burrowing owl preconstruction survey was not conducted as no suitable burrowing owl burrows were present.

  Vegetation communities within the Project Component include disturbed/developed and ruderal grassland. Vegetation communities within the 500-foot buffer include southern arroyo willow riparian forest, nonnative woodland, ruderal grassland, and disturbed/developed. These surrounding vegetation communities will not be impacted by the Project Component. California walnut (*Juglans californica*) occurs within the 500-foot buffer.

The Project Component is not located within critical habitat for coastal California gnatcatcher (*Polioptila californica*). A coastal California gnatcatcher was detected in June 2011; however, the individual was dispersing/foraging and not breeding. The jurisdictional area southeast of the Project Component provides suitable potential habitat for riparian birds and focused, protocol surveys in 2011 determined that riparian birds were not present. No active bird nests occur within the work area. Potential bat habitat occurs within the 500-foot buffer.

A jurisdictional resource does occur to the southeast of the Project Component (wetland 8-8-W-1); however, the feature will not be impacted.

Construction has been on-going in this area since June 19, 2011. Special-status biological resources are demarcated in the field by Environmentally Sensitive Area staking where applicable.

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 8 Phase IV – Variance Request – 66kV Lowering at 605 Shoofly* dated November 9, 2011 from Cogstone Resource Management, Inc. Archaeologist Tria Marie Belcourt, M.A., RPA. The memorandum states that no cultural or paleontological resources will be impacted by the proposed 66 kV lowering at 605 Shoofly on Segment 8 Phase 4 in support of the TRTP. The entire proposed area was included in the previous surveys for the TRTP and no cultural resources were identified (Pacific Legacy 2007, 2010, 2011; PCR 2011). The project area is located in highly disturbed area and therefore has a very low potential to encounter any previously unidentified cultural resources.

  Previous paleontological assessments conducted for the TRTP indicate that all of the proposed area is located within Quaternary alluvium (Qa) and artificial fill, which have a very low sensitivity 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:

- All conditions required by NTP #24 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #24, and this Modification #2 to NTP #24 shall be available on site for the duration of construction activities where applicable.

Sincerely,

John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen