



Puente Hills Landfill  
Native Habitat Preservation Authority

July 26, 2007

John Boccio  
CPUC, Energy Division  
505 Van Ness Avenue  
San Francisco, CA 94102

Re: Tehachapi Renewable Transmission Project

Dear Mr. Boccio:

The Puente Hills Landfill Native Habitat Preservation Authority (Habitat Authority) is a joint powers authority established pursuant to California Government Code Section 6500 *et seq.* with a Board of Directors consisting of the City of Whittier, County of Los Angeles, Sanitation Districts of Los Angeles County, and the Hacienda Heights Improvement Association. According to our mission, the Habitat Authority is dedicated to the acquisition, restoration, and management of open space in the Puente Hills for preservation of the land in perpetuity, with the primary purpose to protect the biological diversity. Additionally, the agency will endeavor to provide opportunities for outdoor education and low-impact recreation. The Habitat Authority's jurisdiction extends within eastern Los Angeles County approximately from the intersection of the 605 and 60 Freeways in the west to Harbor Boulevard in the east.

The proposed Tehachapi Renewable Transmission Project, Segment 8, is located within the Habitat Authority's jurisdictional boundary. The project will necessitate the acquisition of a transmission line right-of-way within a 3 mile stretch of Habitat Authority owned lands. The project proposes installation of a new line bisecting a popular intact habitat area on Habitat Authority property. Also, the project description involves installing a new 550 kV tower within the existing transmission right-of-way throughout the remainder of the Habitat Authority's jurisdiction. This project has the potential to negatively impact lands managed and/or owned by the Habitat Authority from at least the following aspects: biological, aesthetics, recreational, fire management, noise, and land use planning. The Habitat Authority recommends drafting a Notice of Preparation (NOP) for a Draft Environmental Impact Report.

Overall, the Habitat Authority manages over 3,860 acres of public open space, representing a public investment of over \$48.5 million dollars for acquisition. Land managed by this agency is for biological preservation purposes, as is at the western end



of a major wildlife corridor. Its sustainability is biologically dependent on the open space land to the east of our jurisdiction. When drafting the NOP please include analysis of economic impacts, and the importance of keeping the biological integrity of open space land within the project area intact so it does not diminish the biological value of land this agency manages.

### Biological

A major study (Resource Management Plan, Puente Hills Landfill Native Habitat Authority, LSA and Associates 2007) compiled much of the pertinent information on the sensitive wildlife and plants of the Puente Hills, which rely on the grassland, coastal sage scrub, riparian scrub, and oak woodland of the hills. This range is notable in the Los Angeles area as being among the last known habitats in the Los Angeles area for several taxa that are considered California Species of Special Concern and/or that are nearly extinct in the Los Angeles area, including reptiles such as the Red Diamondback Rattlesnake and the Western Blind Snake; amphibians such as the Western Spadefoot, birds such as the California gnatcatcher, Greater Roadrunner, Burrowing Owl, Loggerhead Shrike, Grasshopper Sparrow; and invertebrates such as the Fatal Metalmark butterfly. The Puente Hills appears to be extremely important for bats, and 11 species were documented on Habitat Authority properties during a recent study, including such sensitive species as Yuma myotis, western red bat, western yellow bat, hoary bat, pallid bat, pocketed free-tailed bat and western mastiff bat. Through recent biological monitoring, we are discovering additional protected species every year, including the federally Endangered Least Bell's Vireo (2005 and 2007).

Installation of new towers and the creation of new services roads will cause loss and fragmentation of habitat that has been acquired for biological preservation purposes. The acquisition of 100 feet of new transmission right-of-way for a 3 mile distance and installation of a new tower and transmission line across the eastern portion of Powder Canyon are significant negative impacts that require mitigation. Staging areas during construction have the potential to negatively impact avian species, as well as other wildlife, and wildlife movement corridors. Appropriate biological studies are needed to determine an accurate baseline of the area biota, in order to create alternatives to avoid, minimize or apply appropriate mitigation for biological impacts. Areas on or adjacent to Habitat Authority property that have been disturbed as a result of the project should be revegetated at a minimum ratio of 2:1, dependent on the impacts, with plants appropriate for the area, and in manner that will ensure long term success. For specific areas impacted with new towers, other possible mitigation measures for consideration are removal of eucalyptus trees and replacement with site appropriate vegetation, and raptor perching and nesting substitutes. The Habitat Authority is available for consultation during development and implementation of the mitigation measures.

### Aesthetics

The project will significantly impact the aesthetic quality of the Puente Hills from a recreationist perspective. The Aesthetic Report in Edison's Application did not address the impacts to the user on public trails within the Habitat Authority's jurisdiction. In

addition, the Aesthetic Report was based on methodology inappropriate for this area. The Federal Highway Administration methodology used in the analysis was selected reportably because it is “especially applicable for linear projects, particularly in developed settings.” Different criteria was used for lands within the Angeles National Forest. While the Puente Hills are surrounded by urbanization, they are relatively undeveloped and provide a respite for local and regional residents to escape the pressures of urban living.

The towers are visible throughout the hills and visible from many miles of public trails. The installation of new and bigger than existing towers will permanently change the character of the landscape and the experience of the hiker, biker, equestrian, or bird watcher in the hills. The backbone trail for this area, the Los Angeles County Schabarum Trail – also designated as the National Park Service’s recreational historic route of Juan Bautista De Anza – runs underneath or directly near the transmission line throughout the Habitat Authority’s jurisdiction. In addition, the project is visible from several Habitat Authority trails. Of particular concern, the installation of a new line within the eastern portion of Powder Canyon will bisect a currently undisturbed vista area, negatively and irrevocably impacting the area aesthetics. This new bisecting line is directly visible to all visitors within the first minute of entering the Preserve and before reaching the designated public parking area. The first experience for visitors will be permanently and negatively changed with this new tower.

#### Fire Management

Under no circumstance will smoking be allowed on Habitat Authority properties. This requirement needs to be changed within the standards addressing designated smoking areas. For all work occurring on or over Habitat Authority property, coordination with our rangers on fire preventative measures is necessary.

#### Land Use Planning

The proposed project has the potential to be inconsistent with the following goals adopted as a part of the Habitat Authority’s Resource Management Plan:

Goal BIO-3 Maintain all populations of native plants and wildlife with special emphasis on management of locally uncommon, sensitive, federally-threatened or endangered species and other sensitive resources.

Objective BIO-3.6 Protect and maintain all native vegetation communities paying special attention to sensitive vegetation types such as walnut woodland, oak woodland, coastal sage scrub, riparian communities, and native grassland.

Objective BIO-3.7 Encourage new development adjacent to the Preserve to provide an appropriate buffer zone on the development site to minimize edge effects. Promote additional methods to minimize potential edge effects with new and existing urbanization.

Goal VISUAL-1: Protect and enhance views and distinctive landscape features that contribute to the setting, character and visitor experience of the Preserve.

Objective VISUAL-1.2 Protect views from within the Preserve to outlying properties. Evaluate proposed projects surrounding the Preserve with a priority to retain the visual quality of the Preserve's undeveloped landscape.

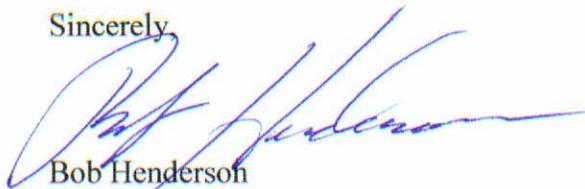
Objective VISUAL-1.3 Protect visitor experience of the Preserve from noise impacts.

These goals and objectives should be taken into consideration when evaluating impacts of this project.

In addition, we encourage that all possible alternatives be explored that avoid any impacts to the Habitat Authority properties, including a no project alternative.

Thank you for your consideration, and please include me on the mailing list associated with the proceedings for this project. Please do not hesitate to contact me or Andrea Gullo, Executive Director, for discussion at (562) 945-9003 or [agullo@habitatauthority.org](mailto:agullo@habitatauthority.org).

Sincerely,

A handwritten signature in blue ink, appearing to read "Bob Henderson", written over a horizontal line.

Bob Henderson  
Chairman