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September 27, 2007

John Boccio/George Farra  
California Public Utilities Commission/Angeles National Forest  
c/o Aspen Environmental Group  
30423 Canwood Street, Suite 215  
Agoura Hills, California 91301

## **Notice of Preparation for a Joint Environmental Impact Report/ Environmental Impact Statement for Tehachapi Renewable Transmission Project Proposed by Southern California Edison Company (Application No. A.07-06-031)**

Dear Mr. Boccia and Mr. Farra:

The Wildlife Corridor Conservation Authority (WCCA) offers the following comments on the Notice of Preparation for a Joint Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for Tehachapi Renewable Transmission Project Proposed by Southern California Edison Company (SCE) (Application No. A.07-06-031). WCCA was created for the proper planning, conservation, environmental protection and maintenance of the habitat and wildlife corridor between the Whittier-Puente-Chino Hills and the Cleveland National Forest in the Santa Ana Mountains. The majority of these comments refer to Segment 8 (from the existing Mesa Substation Area near East Pomona Boulevard in Monterey Park to the Chino Substation), while the comments at the end of this letter refer to Segment 7 (from the Angeles National Forest near the city of Duarte to the existing Mesa Substation Area).

For this project, WCCA is most concerned with the proposed new right-of-way (ROW) alignments on existing parkland and other public open space and recreation areas. This will lead to permanent degradation of biological, aesthetic, and recreational resources on these public lands, inconsistent with the intent of protecting these lands for passive recreational use and preservation of sensitive biological resources. The limited open space in the Puente-Chino Hills has been rapidly dwindling, and further loss and degradation of this open space collectively compromises the long-term sustainability and maintenance of the Puente-Chino Hills wildlife corridor.

The project (Segment 8) appears to propose expanded and new ROW alignments on lands owned by the Puente Hills Landfill Native Habitat Preservation Authority. The EIR/EIS should consider alternative alignments to those proposed through protected open space land. The

only way these permanent impacts from the transmission line project should be allowed on currently protected open space lands would be if substantial land is purchased by the project proponent and transferred to a park and conservation agency for permanent protection. For new ROW on protected open space and recreational lands, land must be acquired at a ratio of three acres for every acre of new ROW proposed within protected open space and recreational lands. This land to be purchased must be contiguous to the wildlife corridor, on the west side of State Route 57. The EIR/EIS must define this mitigation measure, and not defer those specifics until later.

It is not clear if the project proponent has considered in the alternatives analysis the costs of securing the ROWs in the proposed project, along with the costs of building the project and mitigating the adverse environmental impacts to biological, aesthetic, and recreational resources. In the alternatives analysis, it is also not clear if the costs associated with the loss of energy that results from sending electricity over long distances (e.g., from Tehachapi to San Bernardino County) was considered. WCCA strongly encourages the reevaluation of the costs associated with the proposed project and the consideration or reconsideration of using that money to pursue other renewable energy sources such as solar power. The amount of money needed to implement the proposed project could be allocated to building a large number of solar panels on public land and private rooftops in the immediate area that needs to be serviced. Solar power has the advantage of having immediate effects. We provide additional project-specific comments below.

## **Project Overview**

Segment 8A originates at the Mesa Substation and continues east through Puente Hills and Chino Hills to its terminus at the Chino Substation (Proponent's Environmental Assessment [PEA], p. 4.5-138). Segment 8 includes the following project components: construction of approximately 33 miles of new single- and double-circuit 500 kV transmission line to include the new Mira Loma - Vincent 500 kV transmission line and construction of approximately 7 miles of new double-circuit 220 kV transmission line from the Chino Substation to the Mira Loma Substation (PEA, p. ES-17). Most construction would occur in existing 150- to 250-foot-wide ROW (30 miles). There would be additional construction in a new 100-foot-wide ROW (3 miles), additional construction in a new 240-foot-wide ROW (<1 mile); and additional construction in new 150-foot-wide ROW (<1 mile). This includes Rose Hills Cemetery ROW relocation (existing: 200-foot-wide; future: 240-foot-wide); Hacienda Heights ROW expansion (existing: 150-foot-wide; future: 250-foot-wide); and Fullerton Road new ROW (existing: none; future: 250-foot-wide).

There are estimated to be 242.32 acres of vegetation communities that will be disturbed by construction operations along Segment 8A (PEA, p. 4.5-142). This includes the following impacts to vegetation communities from direct tower placement and other disturbances: 154.47 acres of agriculture, developed, disturbed, or ruderal habitats; 8.10

acres of coast live oak woodland; 28.62 acres of coastal sage scrub; 16.75 acres of California walnut woodland; 1.47 acres of native grassland; and 20.68 acres of non-native grassland (PEA, Table 4.5-18, pp. 4.5-142 to 143). All habitat and vegetation community disturbance would occur during construction; therefore no additional impacts are anticipated to occur during operation (PEA, p. 4.5-142). Although the project passes through existing and proposed Significant Ecological Areas (SEAs), including the Puente Hills SEA, the PEA (p. 4.5-151) states that the proposed Project is not subject to the processes and regulatory provisions of the SEAs. The PEA states that the resulting level of significance of impacts to biological resources would be less than significant after implementation of Applicant Proposed Measures (APMs) and mitigation measures (PEA, pp. ES-24 to ES-25).

APM BIO-7 states that where significant and unavoidable impacts on any special-status resources cannot be avoided, SCE would work with the appropriate regulatory agency to determine suitable compensatory mitigation (PEA, p. 4.5-85). BIO MIT-11 (p. 4.5-87) states that mitigation measures would be developed in conjunction with the United States Fish and Wildlife Service and may include: ...restoration/creation/enhancement of on-site coastal sage scrub habitat, and/or the purchase of land or mitigation bank credits at the appropriate ratio to offset impacts to coastal California gnatcatcher or their habitat.

According to the PEA (p. ES-5), no project alternatives have been identified for Segments 4 through 8 and Segment 11. The proposed TRTP is considered by SCE to be the only feasible and cost effective method of meeting the Project purpose, need, and objectives (PEA, p. ES-14).

### **Need to Address Impacts to Currently Protected Parkland, Protected Open Space Areas, and Recreational Areas**

- (1) The EIR/EIS must explicitly address which parkland, protected open space areas, and recreational areas would be impacted by the proposed project. This must include, but not be limited to, lands owned by the Puente Hills Landfill Native Habitat Preservation Authority (Habitat Authority), as well as Whittier Narrows Recreation Area. It appears that ROW is proposed to be acquired within Habitat Authority lands. The EIR/EIS should provide detailed, zoomed-in maps showing the area of disturbance in these publicly-owned open space and recreation areas, along with acres of plant communities to be impacted for these various public park and conservation agencies.
- (2) Given the expenditure of funds used to purchase and protect these park and open space areas, the limited and dwindling open space in the Puente-Chino Hills wildlife corridor, the value they provide to the park users and local communities, and the anticipated adverse environmental impacts from the project, WCCA is adamant that

alternatives be explored to avoid new right-of-way acquisition on these existing park and open space lands. This should include consideration of other renewable energy sources such as solar energy. If avoidance of new rights-of-way is not possible then at the very least a ratio of 3 acres to be purchased/ preserved for every one acre of new ROW in protected public parkland must be required. The applicant should purchase this land for transfer to a park and conservation agency for permanent preservation. For impacts to those Habitat Authority lands, this land to be purchased must be contiguous to the wildlife corridor, on the west side of State Route 57. This mitigation must be developed in consultation with the respective park agency, and that mitigation must be explicitly defined in the EIR/EIS.

- (3) WCCA supports the comments provided by the Puente Hills Landfill Native Habitat Preservation Authority (Habitat Authority) in their July 26, 2007 letter to the California Public Utilities Commission (CPUC). Also, in the Land Use section and the Recreation section of the EIR/EIS, there must be a discussion of the compatibility, or incompatibility, of the proposed project with the Habitat Authority Resource Management Plan (2007) and the Habitat Authority's Trails Plan.
- (4) The EIR/EIS must analyze the impacts to biological resources, recreational resources, and aesthetic resources related to protected park and open space lands. This should include a visual analysis of impacts to trails and other park facilities, including before and after view simulation from trails on Habitat Authority-owned lands. We disagree with the PEA (p. 4.15-1) that states that the project "is not expected to have any significant impacts on recreational facilities or activities." Impacts that could degrade the park user experience include visual impacts (associated with larger towers and more towers, as well as larger areas of disturbance and vegetation removal), noise impacts, and general disturbance associated with maintenance. Construction activities potentially could result in significant impacts to the park user experience given the duration (3 years), and the variety of activities (see PEA, p. 4.2-36). Also, the PEA (p. 4.15-28) states that maintenance traffic and activity would be similar to existing levels and would not affect any recreational uses in the region. If a new route is being proposed through Powder Canyon (west of Fullerton Road), how could the maintenance and activity be similar to existing levels if there is no transmission line currently?
- (5) Because the construction of access roads is anticipated to lead to adverse impacts to biological resources, alternatives should be explored, particularly where new access roads are proposed within existing parkland, but also in other native vegetated areas. These alternatives could include co-locating roads and installing towers using helicopters instead of building new roads (see Applicant Proposed Measure AES-10 Helicopter Construction).

### **Need for Clarification of Project Description**

- (6) The exact locations of the boundaries of the existing ROWs and the impact area were difficult to identify from the figures available on the web. For example, in the maps in Volume II of the biological resources technical reports showing vegetation communities, it is not clear if the locations of the existing ROWs and the proposed impact area are shown.
- (7) Many of the maps on the website were somewhat blurry, small scale, and difficult to read. WCCA requests hard-copies or figures on a CD of the following layers overlain on a figure, once the EIR/EIS is available for public review: existing ROWs, proposed ROWs, project impact areas, vegetation communities, and parkland boundaries (in the project area and nearby) within the Puente-Chino Hills. (We can accept these maps in ArcView form.)
- (8) The California Environmental Quality Act/National Environmental Policy Act document must provide zoomed-in maps clarifying specifically where the new ROWs would be located in the Puente-Chino Hills (Hacienda Heights ROW expansion, Fullerton Road new ROW, and any others). Regarding the new ROW along Fullerton Road, Figure 4.2-3b appears to show the location of “reroute 220 kV” near Fullerton Road, and it appears that this may be the new ROW within Powder Canyon. We recommend that the EIR/EIS include zoomed-in figures of the locations of new ROWs in the Puente-Chino Hills overlain on mapped vegetation communities, the existing ROW, and proposed project impact areas. It is currently unclear if the new ROWs would be on both sides of the existing ROW (although p. 4.15-28 of the PEA states that from S8A MP 12.1 to 13 the new ROW would be on the south side).
- (9) The EIR/EIS should clarify for those new ROWs in the Puente-Chino Hills, whether the ROWs would be obtained from private property or public property owners, and if public owner, what type of public entity. WCCA is most interested in cases where any public parkland would be used as a new ROW.
- (10) The location of any new access or spur roads within the Puente-Chino Hills should be shown overlain on vegetation communities and existing and proposed ROWs.

### **Need to Maximum Avoidance of Impacts Sensitive Plant Communities**

- (11) Although the project location is largely defined by the existing ROW through the Puente-Chino Hills, it is unclear if there are further opportunities for avoiding impacts to sensitive plant communities. The EIR/EIS should include an analysis of the possibility of rerouting short stretches to achieve maximum avoidance to sensitive

plant communities. For example, if the project impact area passes through large patches of sensitive plant communities (e.g., coastal sage scrub, oak woodlands, walnut woodlands), can small areas of rerouting be accomplished within the existing ROW? For proposed new ROWs, is there any flexibility to extend the ROW on one side of the existing ROW, while decreasing the proposed expanded ROW on the other side, to minimize impacts? In particular, for proposed new ROWs, the EIR/EIS should address whether these new ROWs pass through large, intact areas of sensitive native vegetation, and whether reroutes of small sections could be accomplished to avoid any significant impacts to sensitive plant communities. Altering the distance between towers may also achieve these goals.

### **Compensatory Mitigation**

- (12) It is not appropriate to delay the specifics regarding compensatory mitigation for impacts to sensitive plant communities and habitats until approvals are obtained from another agency. As the mitigation measures are written, there are no assurances as to the degree of compensatory mitigation that will be implemented, and that these measures will in fact be implemented. Given the extent of project impacts in this biologically-rich area called the Puente-Chino Hills wildlife corridor, the EIR/EIS must provide specificity regarding these measures, including, but not limited to, mitigation ratios, assurances for permanent protection of restoration/acquisition areas, schedule for implementation, etc. A secure funding source for those measures must also be included.

### **Cumulative Impacts to Biological Resources**

- (13) The PEA (p. 5-20) states that all cumulative impacts to biological resources (south of the Angeles National Forest) could be mitigated below a level of significant by incorporating the APMs and mitigation measures. WCCA recommends that a more detailed cumulative impacts analysis be done for impacts to biological resources in the Puente-Chino Hills. For example, how many acres of coastal sage scrub are expected to be impacted by the proposed project in conjunction with these other projects. This plant community has already declined by 80-90 percent in southern California. How many of these projects involve impacts to coastal California gnatcatcher and critical habitat for this species? The EIR/EIS should also address more specifically the cumulative impacts to walnut woodlands in the Puente-Chino Hills.

### **Specific Biology Impacts**

- (14)(a) The PEA (p. 4.5-47) states there is a high potential for coastal California gnatcatcher to occur in some areas of the Puente Hills and Chino Hills. This should be modified to clarify that gnatcatchers are known to occur in the Puente-Chino Hills. In fact, the PEA (p. 5-23) states that coastal California gnatcatcher was observed in the Puente-Chino Hills during investigations for this project.
- (14)(b) The applicant proposed measures include removing raptor nests outside nesting season, and designing structures to be raptor-safe in accordance with suggested practices (PEA, p. 4.5-86). The EIR/EIS should address the cumulative impacts to raptor nests (e.g., by quantifying the number of raptor nests to be removed), and should address the extent of raptor collisions during flight that are expected to result from the project.

### **Recommendation for Public Recreational Access along Transmission Corridors**

- (15) In recognition of the significant visual and physical impacts caused by replacement of 220 kV towers with 500 kV towers, and in recognition of the tremendous value to Los Angeles County residents of being able to take advantage of open space in these SCE ROWs, it is recommended that permanent public access be allowed through development of trails and green belts within all ROWs in which this project will take place. Notably, we are interested in additional trail access along the southern boundary of the Puente Hills Landfill property, providing a recreational connection towards San Jose Creek.

### **Comments on Segment 7**

WCCA is concerned with some project elements in the south-westerly portion of the Segment 7, in the vicinity of the 605 Freeway. This area is near the western portion of the Whittier-Puente-Chino Hills, and provides, or has the potential to provide, ecological and recreational (e.g., trail) connections with the rest of the Puente-Chino Hills wildlife corridor. This area is in the same watershed, the San Gabriel River watershed, as much of the Puente-Chino Hills wildlife corridor, and is thus also connected hydrologically.

- (16) Specifically, Section 7, as well as portions of Section 8, cross through the jurisdiction of the San Gabriel & Lower Los Angeles Rivers and Mountains Conservancy (RMC). Of note, Segment 7 is proposed to be aligned adjacent to, and south of, the San Gabriel River through, or adjacent to, the former Woodland Duck Farm site in La Puente, now publicly owned (from San Jose Creek to Valley Boulevard). A river parkway, including habitat restoration and passive recreation such as trails, is being planned in this area. The EIR/EIS must address the compatibility, or incompatibility,

of the project with these plans. EIR/EIS must address alternatives and or ways to minimize the project footprint in existing rights -of-way in this area. The potential environmental impacts, both direct and indirect, to the publicly-owned land, including impacts to biological, aesthetic, and recreational resources must be fully disclosed in the EIR/EIS. Appropriate mitigation should be developed in coordination with the RMC and the Watershed Conservation Authority and those measures should be specifically included in the EIR/EIS.

- (17) In the Land Use section and the Recreation section, there must be a discussion of the compatibility, or incompatibility, of the proposed project with the guiding plan of the RMC entitled Common Ground, from the Mountains to the Sea (2001).

Thank you for your consideration. We would appreciate if you would confirm that our organization is on the mailing list for this project. We are requesting to receive the EIR/EIS and other public documents for review. Please direct any correspondence and questions to Judi Tamasi at the above address and by phone at (310) 589-3200, ext. 121.

Sincerely,

Bob Henderson  
Chairperson