

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



September 12, 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 #1 to Notice to Proceed (NTP) #11

Dear Ms. Nelson,

On September 7, 2011, Southern Californian Edison (SCE) submitted a variance request for a Modification to Notice to Proceed (NTP) #11 to modify the new permanent access road, and associated crane pad, grading and contractor work limits to M57-T1 and M24-T1A on Segment 8 (Phase 1) of the Tehachapi Renewable Transmission Project (TRTP), in unincorporated Los Angeles County, California. **This Modification #1 to NTP #11 is approved by CPUC for the proposed activities based on the following factors:**

- SCE submitted the following information:

SCE requests a Modification to Notice to Proceed (NTP) #11 to allow for modifying the new permanent access road and associated crane pad, grading and contractor work limits, to M57-T1 and M24-T1A on Segment 8 (Phase 1) of the TRTP, in unincorporated Los Angeles County, California. Subsequent to approval of the NTPR (NTP #11 dated August 12, 2010) by the CPUC, final design was completed and the access road to Structures M57-T1 and M24-T1A was modified. Additionally, crane pad disturbance, grading limits and contractor work limits have been proposed for crane pad and access road construction. The new permanent access road is approximately 590 feet long, has a grading limit that ranges between approximately 35 feet and 120 feet wide, and has a total disturbance area of approximately 3 acres.

- **Biological Resources:** SCE submitted a Biological Survey Report by ICF International dated September 6, 2011 titled *Biological Survey Report for the Modification of an Access Road and Additional Grading near M57-T1 and M24-T1A, TRTP, Segment 8 Chino Hills (Phase I), Los Angeles County, California*. The survey report documents the biological conditions for the modification of an access road and additional grading near M57-T1 and M24-T1A variance (Variance Project Component) and the 500-foot buffer (Biological Study Area [BSA]). Biological resources in the area were evaluated during several focused surveys, including rare plant (AMEC 2009o; ICF 2010at, 2011cq), tree inventory (ICF 2010av, 2011cq), coastal California gnatcatcher (*Poliophtila californica*) (AMEC 2009m; ICF 2010ww, 2011cq), and burrowing owl (*Athene cunicularia*) (AMEC 2008b, 2009a, 2009j; ICF 2010xx, 2011cq). Biological resources were also evaluated during general preconstruction (ICF 2010ez, 2011ad) and bat habitat assessment preconstruction (ICF 2011y) surveys within Tonner Canyon, which included Structures M57-T1 and M24-T1A. Additionally, a clearance sweep was performed on the Variance Project Component on March 1, 2011. All construction monitoring observations of biological resources are recorded in the FRED system.

Vegetation communities mapped within the Variance Project Component and 500-foot buffer are mixed chaparral, coast live oak woodland, California walnut woodland, and disturbed/developed. Special-status



tree, California walnut (*Juglans californica*), and Los Angeles County regulated tree, coast live oak (*Quercus agrifolia*), have been identified within the Variance project Component and 500-foot buffer (ICF 2010av, 2010at, 2010ez, 2011cq). Special-status plant, Catalina mariposa lily (*Calochortus catalinae*), was identified within the 500-foot buffer (ICF 2010at).

Suitable habitat for coastal California gnatcatchers (coastal sage scrub) is not present within the BSA. The BSA does not overlap coastal California gnatcatcher critical habitat as determined by the USFWS or coastal California gnatcatcher occupied habitat according to the parameters for the Biological Opinion (coastal sage scrub within 300 feet of a coastal California gnatcatcher observation, or within a coastal sage scrub polygon that is within 300 feet of an observation).

Phase I and II surveys for burrowing owl were conducted in 2010 along Segment 8 Chino Hills (Phase 1) according to CBOC (1993) protocol. No potential burrowing owl features, burrowing owl, or sign were observed within the BSA during 2010 focused surveys (ICF 2010xx).

Potential colonial bat roost habitat was identified within the Variance Project Component, and potential colonial and solitary bat roost habitat was identified within the 500-foot buffer (ICF 2011y).

Potential San Diego woodrat (*Neotoma lepida intermedia*) middens were observed within the 500-foot buffer during preconstruction surveys (ICF 2011ad). The middens will be avoided.

No raptor nests have been observed within the BSA, and no active nests occur within the BSA.

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 Variance Project Component was fully surveyed, and the 500-foot buffer was partially surveyed during the jurisdictional delineation for Segments 7 and 8. Feature 8-33-S-200 is present within the Variance Project Component and 500-foot buffer. Impacts to this feature are currently being processed under Amendment 1 to the Segment 7 & 8 permits which are pending. Feature 8-33-S-200 will be routed around the new towers under the new access road via culverts. The preconstruction survey conducted within the entire BSA did not identify additional potential jurisdictional features (ICF 2011ad). If potential jurisdictional features are identified during sweeps or during construction monitoring, they will be flagged as environmentally sensitive areas (ESAs) and avoided.

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

- **Cultural and Paleontological Resources:** SCE submitted a memorandum with the Variance Request titled *TRTP Cultural and Paleontological Resources Guidelines for Segment 8 T/L Phase 1, Variance Request – Road Modification and Grading Addition at M57-T1 and M24-T1A* dated September 2, 2011, which states that no cultural or paleontological resources will be impacted by the road modification and grading addition at Structures M57-T1 and M24-T1A on the TRTP Segment 8 Phase 1. Approximately 95 percent of the road modification and grading limits were included in the previous surveys for the TRTP project and no cultural resources were identified (Pacific Legacy 2007, 2010). The remaining five percent of the grading limits lie outside of the TRTP previously surveyed area. However, this portion is situated on a densely vegetated slope and the possibility of encountering a cultural resource is very low.

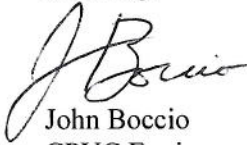
Previous paleontological assessments (Gust and Scott 2009; Aron 2010) conducted for the TRTP indicate that paleontological localities have been previously discovered in the project vicinity and that the proposed road modification and grading addition at M57-T1 and M24-T1A are located within the Miocene Puente Formation, which has a high sensitivity for yielding paleontological resources (Gust and Scott 2009; Aron 2010). In accordance with the Paleontological Resource Management Plan (Gust and Scott 2009),

paleontological resources monitoring is required during any ground disturbing activities for the road modification and grading addition at Structures M57-T1 and M24-T1A on Segment 8 Phase 1.

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

- In accordance with the Paleontological Resource Management Plan (Gust and Scott 2009), paleontological resources monitoring shall be conducted during any ground disturbing activities for the road modification and grading addition at Structures M57-T1 and M24-T1A on Segment 8 Phase 1.
- Work related to jurisdictional delineation Feature 8-33-S-200 shall not proceed until the applicable permit amendments are provided to the CPUC EM.
- All conditions required by Notice to Proceed (NTP) #11 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #11, and this Modification #1 to NTP #11 shall be available on site for the duration of construction activities where applicable.

Sincerely,



John Boccio  
CPUC Environmental Project Manager

cc: V. Strong, Aspen