

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



January 16, 2012

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 #3 to Notice to Proceed (NTP) #11

Dear Ms. Nelson,

On December 19, 2011, Southern Californian Edison (SCE) submitted a variance request for a Modification to Notice to Proceed (NTP) #11 for use of the access road and structure additions or modifications, and associated structure work areas on Segment 8 Transmission Line (T/L) Chino Hills (Phase 1) of the Tehachapi Renewable Transmission Project (TRTP), in unincorporated Los Angeles County, and in the City of Chino, San Bernardino County, California. SCE submitted additional information to the CPUC on January 16, 2012. **This Modification #3 to NTP #11 is approved by CPUC for the proposed activities based on the following factors:**

- SCE submitted the following information:

SCE submitted a variance request for a Modification to NTP #11 for use of the access road and structure additions or modifications, and associated structure work areas on Segment 8 T/L Chino Hills (Phase 1) of the TRTP, in unincorporated Los Angeles County, and in the City of Chino, San Bernardino County, California. Subsequent to approval of the NTP (NTP #11 dated August 12, 2010) by the CPUC, final design was completed and several access road and structure additions or modifications were identified for the project. Additionally, grading limits and contractor work limits have been proposed in certain areas for crane pad and access road construction. Specifically, the following access road and structure additions or modifications have been identified, including grading limits and contractor work limits, where applicable.

1. Modification to location of structure work area (approximately 0.92 acres) at Structure M55-T2. Unincorporated Los Angeles County.
2. Addition of proposed OPGW splice site (approximately 0.92 acres) at Structure M55-T2. Unincorporated Los Angeles County.
3. Modification to guard structure location at Tonner Canyon Road and addition of proposed existing access road to access WSS 8-1.2 off of Tonner Canyon Road. Unincorporated Los Angeles County.
4. Addition of proposed temporary crane pad grading limits and contractor work limits adjacent to and north of Structures M57-T3 and M23-T3. The total disturbance area of the proposed temporary crane pad grading limits and contractor work limits is approximately 0.402 acres. Unincorporated Los Angeles County.
5. Modification to location of Structure M57-T4 and associated structure work area (approximately 0.69 acres). Unincorporated Los Angeles County.

6. Modification to location of structure work area (approximately 0.69 acres) at M58-T2. Unincorporated Los Angeles County.
 7. Addition of proposed temporary crane pad, proposed temporary crane pad grading limit, and contractor work area, west of Structure M64-T3. The total disturbance area of the proposed temporary crane pad, proposed temporary crane pad grading limit, and contractor work limit, is approximately 0.18 acres. City of Chino. County of San Bernardino.
 8. Addition of proposed OPGW splice site (approximately 0.92 acres) at Structure M65-T2. City of Chino. County of San Bernardino.
 9. Modification to new permanent access road to Structure M65-T4 and addition of proposed temporary grading limit adjacent to and north of Structure M65-T4. The new permanent access road is approximately 190 feet long, has a permanent limit that ranges between 13 feet and 23 feet wide, and including the temporary grading limit, has a total disturbance area of approximately 0.29 acres. City of Chino. County of San Bernardino.
 10. Modification to new permanent access road to Structure M65-T5 and addition of proposed temporary grading limit adjacent to and north of Structure M65-T5. The new permanent access road is approximately 195 feet long, has a permanent limit that ranges between 14 feet and 29 feet wide, and including the temporary grading limit, has a total disturbance area of approximately 0.28 acres. City of Chino. County of San Bernardino.
- **Biological Resources:** SCE submitted a biological survey report by ICF International dated November 18, 2011, titled *Proposed Changes in Engineering, Segment 8 Phase I, TRTP, Los Angeles County*. The letter documents the biological conditions at the proposed sites throughout Segment 8 Phase I (Variance Project Component) and the 500-foot buffer (Biological Study Area [BSA]). Biological resources within the Variance Project Component and 500-foot buffer were evaluated during several focused surveys, including 2009, 2010, and 2011 rare plant surveys (AMEC 2009o, ICF 2010at, 2011cq); 2010 and 2011 tree inventory surveys (ICF 2010av, 2011cq); 2007, 2009, 2010, and 2011 riparian bird focused surveys (AMEC 2007c, 2009n; ICF 2010ss, 2011cq); 2008, 2009, 2010, and 2011 coastal California gnatcatcher (*Polioptila californica*) focused surveys (AMEC 2008d, 2009m; ICF 2010ww, 2011gq); and 2009 and 2010 burrowing owl (*Athene cunicularia*) focused surveys (AMEC 2009j; ICF 2010xx). Biological resources within the BSA were also evaluated during general preconstruction surveys and bat habitat assessment preconstruction surveys (ICF 2010ak, 2010cb, 2010ce, 2010ez, 2010fr, 2010fq, 2011y, 2011ad, 2011bu, 2011cd, 2011ce, 2011fi, 2011fo, 2011gx, 2011gy, 2011gz). A literature review was also performed as part of the Biological Review for Segment 8 Phase I (Chino Hills) (ICF 2010ar). Combined general biological preconstruction survey and clearance sweeps were performed on September 7, 2011 (ICF 2011gx). Additionally, preconstruction survey sweeps were performed on March 1 and 28, June 23, and August 2, 2011. Construction monitoring has been ongoing regularly since the sites became active, and species events and nest events are recorded in the Field Reporting Environmental Database (FRED).

Biological resources information by site is listed below:

Sites 1 & 2 (M55-T2) - Vegetation communities within the Project Component include coast live oak woodland, coastal sage scrub, and disturbed/developed. Vegetation communities within the 500-foot buffer include California annual grassland, coast live oak woodland, California walnut woodland, coastal sage scrub, nonnative woodland, ruderal grassland, and disturbed/developed. Special-status plant species within the Project Component include California walnut (*Juglans californica*), and intermediate mariposa lily (*Calochortus weedii* var. *intermedia*). Special-status plant species within the 500-foot buffer include California walnut. Regulated tree species within the Project Component include coast live oak (*Quercus agrifolia*). Regulated tree species within the 500-foot buffer include coast live oak and California scrub oak (*Quercus berberidifolia*). Wildlife species observed within the Project Component and 500-foot buffer include San Diego desert woodrat (*Neotoma lepida intermedia*) potential midden (ICF 2010ce, Clearance

sweep 9/17/10). An inactive red-tailed hawk (*Buteo jamaicensis*) nest and potential colonial bat roost habitat and medium potential bat roost habitat are present within the Project Component. Colonial bat roost habitat, low potential to medium potential bat roost habitat occurs within the 500-foot buffer.

Site 3 (WSS 8-1.2) – Vegetation communities within the Project Component include coastal sage scrub, California walnut woodland, nonnative woodland, and disturbed/developed. Vegetation communities within the 500-foot buffer include California annual grassland, southern coast live oak riparian forest, coast live oak woodland, coastal sage scrub, California walnut woodland, mixed chaparral, nonnative woodland, ruderal grassland, southern arroyo willow riparian forest, and disturbed/developed. Special-status plant species within the Project Component include California walnut. Special-status plant species within the 500-foot buffer include California walnut and intermediate mariposa lily. Regulated tree species, coast live oak, occurs within the 500-foot buffer. Wildlife species observed within the 500-foot buffer include yellow-breasted chat (*Icteria virens*) (ICF 2010ss, 2011cq), yellow warbler (*Dendroica petechia*) (ICF 2010ss, 2011cq), San Diego desert woodrat potential midden (9/17/10), and burrowing owl (AMEC 2009j). The Project Component and 500-foot buffer is within occupied California gnatcatcher habitat (0.05 acre of temporary impact). This impact is included in the pending Biological Opinion amendment request. An inactive red-tailed hawk nest, potential solitary bat roost habitat and medium potential bat roost habitat occurs within the 500-foot buffer. Jurisdictional features 8-33-S-2, 8-33-S-3, and 8-34-S-1 occur within the 500-foot buffer and will be avoided.

Site 4 (M57-T3) – Vegetation communities within the Project Component include coast live oak woodland, coastal sage scrub, California walnut woodland, and disturbed/developed. Vegetation communities within the 500-foot buffer include California annual grassland, coast live oak woodland, coastal sage scrub, California walnut woodland, nonnative woodland, and disturbed/developed. Special-status plant species within the Project Component include California walnut. Regulated tree species within the Project Component and 500-foot buffer include coast live oak. Special-status plant species within the 500-foot buffer include California walnut and Catalina mariposa lily (*Calochortus catalinae*). Wildlife species observed within the 500-foot buffer include white-tailed kite (*Elanus leucurus*), northern harrier (*Circus cyaneus*), and San Diego desert woodrat potential midden (ICF 2010ce). Potential colonial bat roost habitat exists within the 500-foot buffer. Jurisdictional features 8-35-S-2 and 8-35-S-5 are within the 500-foot buffer and will be avoided.

Site 5 (M57-T4) – Vegetation communities within the Project Component include coast live oak woodland, coastal sage scrub, and disturbed/developed. Vegetation communities within the 500-foot buffer include California annual grassland, coast live oak woodland, coastal sage scrub, California walnut woodland, and disturbed/developed. Special-status plant species within the Project Component and 500-foot buffer include California walnut. Regulated tree species, coast live oak, occurs within the Project Component and 500-foot buffer. Wildlife species observed within the Project Component include San Diego desert woodrat potential midden (ICF 2020ce) and potential burrowing owl features (AMEC 2009j). Wildlife species observed within the 500-foot buffer include white-tailed kite and northern harrier. Potential colonial bat roost habitat occurs within the Project Component and 500-foot buffer. Jurisdictional feature 8-35-S-1 occurs within the 500-foot buffer and will be avoided.

Site 6 (M58-T2) – Vegetation communities within the Project Component include California annual grassland and disturbed/developed. Vegetation communities within the 500-foot buffer include California annual grassland, coast live oak woodland, coastal sage scrub, California walnut woodland, mixed chaparral, and disturbed/developed. Special-status plant species, California walnut, occurs within the Project Component. Special-status plant species, California walnut and Catalina mariposa lily, occur within the 500-foot buffer. Regulated tree species, coast live oak, occurs within the 500-foot buffer. Wildlife species observed within the 500-foot buffer include northern harrier. Potential colonial bat roost habitat occurs within the 500-foot buffer.

Site 7 (M64-T3) – Vegetation communities within the Project Component include disturbed/developed. Vegetation communities within the 500-foot buffer include California annual grassland, nonnative woodland, water, ruderal grassland, and disturbed/developed. No special-status plant species, regulated tree species, or wildlife, were observed within the BSA. Jurisdictional features 8-44-S-2 and 8-45-S-1 occur within the 500-foot buffer and will be avoided.

Site 8 (M65-T2) – Vegetation communities within the Project Component and 500-foot buffer include ruderal grassland and disturbed/developed. No special-status plant species, regulated tree species, or wildlife, were observed within the BSA.

Site 9 (M65-T4) – Vegetation communities within the Project Component include ruderal grassland. Vegetation communities within the 500-foot buffer include California annual grassland, ruderal grassland, and disturbed/developed. No special-status plant species or regulated trees occur within the BSA. Potential burrowing owl feature was observed within the 500-foot buffer (AMEC 2009j).

Site 10 (M65-T5) – Vegetation communities within the Project Component include ruderal grassland and disturbed/developed. Vegetation communities within the 500-foot buffer include California annual grassland, ruderal grassland, and disturbed/developed. No special-status plant species or regulated trees occur within the BSA. Burrowing owls have been observed within the 500-foot buffer (AMEC 2009j).

No additional impacts to biological resources are anticipated.

- **Cultural and Paleontological Resources:** SCE submitted a memorandum dated November 16, 2011 regarding the TRTP Cultural and Paleontological Resources Guidelines for Segment 8 T/L Phase 1 Variance Request – Road and Structure Additions and Modifications. The memorandum states that no cultural resources will be impacted by the proposed road and structure additions and modifications on the TRTP Segment 8 Phase 1. All but one portion of the proposed areas were included in the previous surveys for the TRTP for Segment 8 T/L and no cultural resources were identified (Pacific Legacy 2007, 2010). Portions of Site 3 (WSS 8-1.2) lay outside of the previous surveys for TRTP, within an undisturbed area, and required an additional cultural resources survey (*Cultural Resources Survey in Support of Variance Request for Use of Existing Access Road to Wire Set Up Site 8-1.2, Segment 8 Phase I, TRTP, Los Angeles County, CA*).

Previous paleontological assessments (Gust and Scott 2009; Aron 2010) prepared for the TRTP project indicate that paleontological resources have been previously discovered in the vicinity of the areas requested under this variance. Subsurface sediments consist of artificial fill and the Puente Formations; of which only the Puente Formation 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 located within the Puente Formations for the proposed road and structure additions on Segment 8 Phase I.

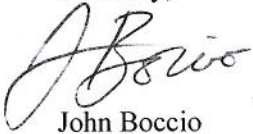
No additional impacts to cultural or paleontological resources are anticipated.

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 is required during any ground disturbing activities located within the Puente Formations for the proposed road and structure additions on Segment 8 Phase I.
- 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 #3 to NTP #11 shall be available on site for the duration of construction activities where applicable.

Sincerely,

A handwritten signature in cursive script, appearing to read "J. Boccio".

John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen