

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 24, 2011

Susan J. Nelson, AIA
Southern California Edison
Regulatory Affairs
2244 Walnut Grove Avenue, Quad 3D, GO1
Rosemead, California 91770

RE: Tehachapi Renewable Transmission Project (Segments 4-11), Modification #3 to Notice to Proceed (NTP #15)

Dear Ms. Nelson,

On June 16, 2011, Southern California Edison (SCE) submitted a variance request (Modification #3 to NTP #15) to implement slope stabilization measures along the access road to Tower 20 resulting in the need for additional disturbance areas on Segment 5 Transmission Line (T/L) of the Tehachapi Renewable Transmission Project (TRTP) in Los Angeles County, California.

The SCE Tehachapi Renewable Transmission Project (TRTP) was evaluated in accordance with the California Environmental Quality Act and a Certification of Public Convenience and Necessity (CPCN) was granted by CPUC Decision 09-12-044, (Application #07-06-031), SCH #2007081156 on December 17, 2009. **Modification #3 to NTP #15 is granted by CPUC for the proposed activities based on the following factors:**

- SCE submitted the following information regarding the Modification of the Segment 5 T/L construction:

SCE submitted a variance request (Modification to NTP #15) to implement slope stabilization measures for the access road to Tower 20, which would require expanded disturbance area on Segment 5 T/L of TRTP in Los Angeles County, California. Subsequent to the approval of the NTPR (NTP #15 dated September 10, 2010) by the CPUC, project site conditions have been further evaluated and slope stabilization measures are needed for the Tower 20 location.

Information for the affected tower location includes the following:

Tower	Approximate Size (Acres)
20	0.05

At each site, soil would be imported, and grading and compaction along the eastern and western sides of the road. (Note that this road was previously approved by the CPUC). The ground disturbance associated with these slope stabilization activities would comprise an estimated total of 0.05 acres.

- Biological Resources:** SCE submitted a letter regarding the *Proposed Segment 5 Construct 20 Additional Disturbance Area*, for Segment 5 Transmission Line, Tehachapi Renewable Transmission Project, Los Angeles County, California, prepared by ICF International dated June 15, 2011. The letter documents the biological conditions at the proposed Segment 5 Tower 20 Additional Disturbance Area

(Project Component). The Project Component is 0.05 acres plus a 500-foot buffer (Biological Study Area [BSA]).

Vegetation communities within the Project Component and BSA were mapped as disturbed/developed, Mojave mixed woody scrub, and Mojavean juniper-woodland scrub (ICF 2010l). The special-status plant, Peirson's morning glory (*Calystegia peirsonii*), were detected within the BSA during the 2009 and 2010 focused surveys (AMEC 2009c; ICF 2010ag, 2010bf) and short-joint beavertail (*Opuntia basilaris* var. *brachyclada*; CNPS List 1B.2), was observed during the 2009 focused surveys (AMEC 2009c). However, during the 2010 focused surveys, it was determined that much of the short-joint beavertail cactus observed in 2009 was likely the more common beavertail cactus (ICF 2010yy; 2010ag). Only four individuals of short-joint beavertail cactus were found during 2010 focused surveys, none of which are located within the BSA. No special-status wildlife species were observed within the BSA during previous surveys.

Construction activities associated with Segment 5 are ongoing in the vicinity of the Project Component. A rufous-crowned sparrow (*Aimophila ruficeps*) was observed within the BSA on March 22, 2011 (FRED species event 000937). San Diego desert woodrat middens within the BSA were identified to be outside of the Construct 20 disturbance area. No nesting birds have been identified within the BSA. Sweeps of the BSA have been conducted regularly since February 1, 2011.

The Project Component has been identified as foraging habitat for Swainson's hawk. A total of 0.003 acres of Swainson's hawk foraging area is expected to be temporarily impacted.

The Project Component was partially surveyed during the original jurisdictional delineation for Segments 4, 5 and 10, and was fully surveyed during preconstruction surveys and clearance sweeps, and no jurisdictional features were identified. No jurisdictional features were identified within the BSA (ICF 2010l). If any features are subsequently identified, they will be staked and flagged as Environmental Sensitive Areas (ESAs) for avoidance.

No other biological constraints were observed. No additional impacts to biological resources are anticipated.

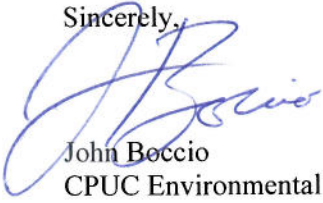
Cultural Resources. SCE submitted a Memorandum for the Segment 5 Grading Limit Expansion for Slope Stabilization at Tower 20 dated June 2, 2011, stating that no cultural resources will be impacted by the requested Variance in support of the TRTP. Cultural resource record search and surveys, and a paleontological literature review have been previously conducted for this area and no resources were identified (Ahmet et al. 2006; Pacific Legacy 2007, 2008, 2010; Gust and Scott 2009). A paleontological review has indicated that the proposed slope stabilization parcel is within an area containing soils that have the potential to yield paleontological resources (Gust and Scott 2009). Since there is a possibility that paleontological resources exist, paleontological monitoring is recommended when ground disturbing excavation exceeds a depth of two feet.

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

- SCE shall submit the Variance Request to CDFG for notification purposes due to the increase in impact acreages of Swainson's hawk foraging areas.
- Paleontological monitoring shall be conducted for all ground disturbing activities that occur to a depth of more than two feet.
- All conditions required by NTP #15 shall apply to the subject area and activities.

- Copies of all relevant permits, compliance plans, NTP #15, and this Modification #3 to NTP #15 shall be available on site for the duration of construction activities where applicable.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Beccio", is written over the typed name.

John Beccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen