

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



October 25, 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 #4 to Notice to Proceed (NTP) #15

Dear Ms. Nelson,

On October 18, 2011, Southern Californian Edison (SCE) submitted a request for a Modification to Notice to Proceed (NTP) #15 to relocate the Tower 68 structure, work area, and access road, on the Segment 5 Transmission Line (T/L) of the Tehachapi Renewable Transmission Project (TRTP) in Los Angeles County, California. **This Modification #4 to NTP #15 is approved by CPUC for the proposed activities based on the following factors:**

- SCE submitted the following information:

SCE submitted a request for a Modification to NTP #15 to relocate Tower 68 structure, work area, and access road, on the Segment 5 T/L of the TRTP in Los Angeles County, California. Subsequent to the approval of the NTP (NTP #15 dated September 10, 2010) by the CPUC, project site conditions have been further evaluated and the locations of the Segment 5 Tower 68 structure, work area, and access road need to be repositioned for constructability purposes.

Due to a steep slope present in the CPUC-approved Tower 68 area, the structure and structure work area need to be moved approximately 90 feet north. The tower access road would also be moved northward and slightly realigned. Additional disturbance areas are needed on the north and south sides of this access road to allow for grading activities. This total additional disturbance area associated with these changes is approximately 0.41 acres.

Due to this change, Construct 67 will no longer be necessary and will not be constructed.

- **Biological Resources:** SCE submitted a biological report with the Modification Request from ICF International, dated October 18, 2011, regarding the *Proposed Repositioning of Construct 68 Work Area and Access Road, Segment 5, TRTP, Los Angeles County*. The report documents the biological conditions at the proposed repositioning of Construct 68 work area and access road (Variance Project Component) and the 500-foot buffer (Biological Study Area [BSA]). Biological resources within the BSA were evaluated during several focused surveys, including 2009, 2010, and 2011 rare plant surveys (AMEC 2009c; ICF 2010ag, 2011cq); 2010 and 2011 tree inventory surveys (ICF 2010bf, 2011ga); and 2009 and 2010 burrowing owl (*Athene cunicularia*) surveys (AMEC 2009f; ICF 2010cq1). The biological resources within BSA were also evaluated during general preconstruction surveys, burrowing owl preconstruction surveys, and preconstruction bat habitat assessment surveys associated with Construct 68 (ICF 2010bd, 2010bq, 2010br). A literature review was also performed as part of the Biological Review for Segment 5 (ICF 2010yy). Additionally, a clearance sweep was performed for the Variance Project Component on

November 2, 2010. Construction monitoring has been ongoing regularly since the site became active, and species events and nest events are recorded in the SCE Field Reporting Environmental Database (FRED).

Vegetation communities mapped within the Variance Project Component include Mojave mixed woody scrub and disturbed/developed. Vegetation communities within the 500-foot buffer include Mojave mixed woody scrub, Mojavean juniper woodland scrub, Mojavean juniper woodland scrub – disturbed, and disturbed/developed. No special-status plants or regulated trees were identified within the Variance Project Component. Beavertail cactus (*Opuntia basilaris*) and short-joint beavertail cactus (*Opuntia basilaris* var. *brachyclada*) were observed within the 500-foot buffer.

No special-status wildlife species were detected within the Variance Project Component or the 500-foot buffer. Preconstruction bat assessment surveys performed on September 27 and October 6, 2010, by ICF detected no potential bat roosts within the Variance Project Component.

Jurisdictional resources within the Variance Project Component were evaluated during the 2010 jurisdictional delineation for Segments 4, 5, and 10 (ICF 2010I). No mapped jurisdictional features are located within the Variance Project Component or the 500-foot buffer. Any additional potential jurisdictional features will be staked as Environmental Sensitive Areas (ESAs) and flagged for avoidance.

There are no impacts to species included in the CDFG Incidental Take Permit (ITP) or their habitat associated with this Modification.

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

**Cultural and Paleontological Resources:** SCE submitted a memorandum dated October 4, 2011, titled *TRTP Variance Request – Seg 5, CT-68X Tower Move – Cultural Clearance for CT-68X Tower Disturbance and Access Road Areas on Segment 5* with the Modification Request. The memorandum states that no cultural resources will be impacted by the proposed new Tower Construction and Access Road Areas for CT-68X on Segment 5 as part of this Variance Request in support of the Tehachapi Renewable Transmission Project (TRTP). A cultural record search and surveys (Ahmet et al. 2006; Pacific Legacy 2007, 2010a, 2010b) and a paleontological literature review (Gust and Scott 2009) have been previously conducted for these areas on Segment 5. The research identified no cultural or paleontological resources. The paleontological review indicated that the proposed tower construction and access road areas contain soils that have no potential to yield paleontological resources (Gust and Scott 2009).

No additional impacts to cultural or paleontological resources are anticipated with the implementation of this Modification.

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

- Prior to the commencement of assembly of Tower 68, SCE shall provide documentation that illustrates that any required FAA mitigation as stipulated in the CPUC October 19, 2011 letter to SCE has been satisfied.
- All conditions required by Notice to Proceed (NTP) #15 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #15, and this Modification #4 to NTP #15 shall be available on site for the duration of construction activities where applicable.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Boccio". The signature is fluid and cursive, with the first letter of the first name being a large, stylized capital 'J'.

John Boccio  
CPUC Environmental Project Manager

cc: V. Strong, Aspen