

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 13, 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 #3 to Notice to Proceed (NTP) #24

Dear Ms. Nelson,

On November 30, 2011, Southern Californian Edison (SCE) submitted a variance request for a Modification to Notice to Proceed (NTP) #24 to conduct a minor shift of Structure M52-T2 and associated new permanent access road, crane pad and grading limit modifications on the Segment 8 Transmission Line (T/L) West (Phase 4) of the Tehachapi Renewable Transmission Project (TRTP), in unincorporated Los Angeles County, California. **This Modification #3 to NTP #24 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 #24) for a shift at Structure M52-T2 and associated new permanent access road, crane pad and grading limit modifications on the Segment 8 Transmission Line (T/L) West (Phase 4) of the TRTP, in unincorporated Los Angeles County, California. Subsequent to approval of the NTPR (NTP #24 dated January 12, 2011) by the CPUC, final design was completed and it was identified that an existing concrete V-ditch was in conflict with structure M52-T2. For this reason structure M52-T2 was slightly shifted inline and to the west to avoid the concrete V-ditch. To accommodate this tower shift, modification was made to the new permanent access road and addition of proposed temporary crane pad, proposed temporary grading limit, proposed permanent grading limit, and contractor work limit to access and construct Structure M52-T2. The new permanent access road is approximately 245 feet long, ranges between approximately 14 feet and 23 feet wide, and including the crane pad, has a total disturbance area of approximately 0.74 acres.

Biological Resources: SCE submitted a biological report by ICF International dated November 22, 2011, titled *Proposed Grading and Access Areas near M52-T2, Segment 8 West, Tehachapi Renewable Transmission Project, Los Angeles County*. The report documents the biological conditions at the proposed grading and access areas near M52-T2 (Variance Project Component) and a 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; and 2009 and 2010 burrowing owl (*Athene cunicularia*) surveys (AMEC 2009j; ICF 2010xx). Biological resources within the BSA were also evaluated during general preconstruction surveys and bat habitat assessment preconstruction surveys associated with M52-T2 (ICF 2011du, 2011dy, 2011fi, 2011gp). A literature review was also performed as part of the Biological Review for Segment 8, Phase 4 (West) (ICF 2010dw). Additionally, clearance sweeps were performed on March 17, 2011. Regular construction monitoring has occurred since the site became active, and species events and nest events are recorded in FRED.

Vegetation communities within the Variance Project Component and the 500-foot buffer include California annual grassland, nonnative woodland, and disturbed/developed. The removal or trimming of trees may be necessary. If this is the case, the contractor will submit a Tree Plan to SCE for review and approval. Potential solitary bat roost habitat is within the Variance Project Component and low to medium potential for bat roost habitat within the 500-foot buffer. The BSA does not overlap special-status species USFWS critical habitats or special-status species occupied habitats.

Jurisdictional resources within the Variance Project Component were evaluated during the 2010 jurisdictional delineation for Segment 7 and 8 (ICF 2010h). Jurisdictional drainage feature 8-26-S-1 and 8-26-S-2 are within the 500-foot buffer and will be avoided. Any additional potential jurisdictional features identified will be staked and flagged as ESAs for avoidance.

No additional impacts to biological resources are anticipated.

Cultural and Paleontological Resources: SCE submitted a memorandum dated October 26, 2011 titled *SCE TRTP Cultural and Paleontological Resource Guidelines for Segment 8 Phase IV T/L Variance Request – M52-T2 Grading and Access*. The memorandum states that no significant cultural resources or historic properties will be impacted by the proposed construction work areas for M52-T2 on the TRTP, Segment 8 Phase IV. No previously recorded cultural resources are in the vicinity of the proposed construction work areas.

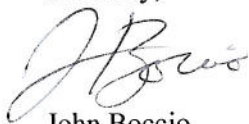
Paleontological site P-19-120032 is located near M52-T2, but could not be relocated during the supplemental survey of Segment 8 West. The Construction Phase Management Plan (CPMP) has been updated and no management or monitoring is required of P-19-120032. However, previous paleontological assessment (Gust and Scott 2009; Aron 2010) states that full-time paleontological monitoring is necessary during grading activities at this location. Soils are comprised of Puente Formation, which is classified as a high level of sensitivity for harboring paleontological resources.

No additional impacts to cultural or paleontological resources are anticipated.

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

- Full time paleontological monitoring shall be conducted during grading and earthwork activities.
- All conditions required by NTP #24 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #24, and this Modification #3 to NTP #24 shall be available on site for the duration of construction activities where applicable.

Sincerely,



John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen