STATE OF CALIFORNIA Edmund G. Brown Jr., Governor

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

April 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 #4 to Notice to Proceed (NTP) #24

Dear Ms. Nelson,

On March 20, 2012, Southern Californian Edison (SCE) submitted a variance request for a Modification to Notice to Proceed (NTP) #24 for a number of access road and structure additions or modifications, and associated structure work areas, on the Segment 8 Transmission Line (T/L) West (Phase 4) of the Tehachapi Renewable Transmission Project (TRTP), in City of Industry, City of La Habra Heights, Los Angeles County, and unincorporated Los Angeles County, California. **This Modification #4 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 number of access road and structure additions or modifications, and associated structure work areas, 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 several access road and structure additions or modifications, and associated structure work areas, were identified for the project. Additionally, crane pad disturbance, grading limits and contractor work limits have been proposed in certain areas for crane pad and access road construction. Specifically, the following access road, crane pad and structure additions or modifications have been identified, including crane pad disturbance, grading limits, structure work areas, and contractor work limits, where applicable:

  1. Addition of proposed OPGW splice site at Structure M40-T3. This proposed OPGW splice site has a proposed disturbance of approximately 0.804 acre; of this approximately 0.002 acre is new disturbance not previously approved in NTP/Variance. Note: approximately 0.054 acre of proposed disturbance was previously approved in 66kV NTP/Variance. Unincorporated Los Angeles County.

  2. Modification to new permanent access road and addition of proposed temporary crane pads and contractor work limit to access and construct Structures M40-T5 and M11-T1A. The new permanent access road is approximately 650 feet long, ranges between 14 and 21 feet wide, and including the crane pads, has a total disturbance area of approximately 0.824 acre (of this, approximately 0.271 acre is new disturbance not previously approved in NTP/Variance). Unincorporated Los Angeles County.

  3. Modification to WSS 8-4.4 to include an approximately 0.134 acre area along the WSS's western extent (of this, approximately 0.126 acre is new disturbance not previously approved in NTP/Variance). Note: There is approximately 0.007 acre of overlapping proposed features in Items 2 and 3. Unincorporated Los Angeles County.

4. Addition of proposed structure work area (approximately 0.085 acre of entirely new disturbance not previously approved in NTP/Variance) at M41-J1. Unincorporated Los Angeles County.

5. Modification to guard structure location at Durfee Avenue. Disturbance area restricted to edge of road. Unincorporated Los Angeles County.

6. Addition of proposed structure work area for 66kV removal (approximately 0.021 acre of entirely new disturbance not previously approved in NTP/Variance) adjacent to M41-T5. Unincorporated Los Angeles County.

7. Slight shift to proposed structure work area and proposed OPGW splice site associated with Structure M43-T1. The proposed structure work area is approximately 0.746 acre (of this, approximately 0.005 acre is new disturbance not previously approved in NTP/Variance). The proposed OPGW splice site is approximately 0.551 acre (there is no new disturbance not previously approved in NTP/Variance associated with the proposed OPGW splice site). City of Industry. County of Los Angeles.

8. Modification to new permanent access road and addition of proposed temporary crane pad, proposed permanent grading limit, and contractor work limit, to access and construct Structures M43-T3 and M8-T1A. The new permanent access road is approximately 865 feet long, has a permanent grading limit that ranges between 40 feet and 190 feet wide, and including the crane pad, has a total disturbance area of approximately 4.168 acres (of this, approximately 2.646 acres is new disturbance not previously approved in NTP/Variance). Unincorporated Los Angeles County.

9. Addition of proposed temporary crane pad and proposed temporary crane pad disturbance and contractor work limit to approved new permanent access road to Structures M44-T1 and M10-T2. The total disturbance area of the proposed temporary crane pad disturbance and contractor work limit is approximately 0.245 acre (of this, approximately 0.015 acre is new disturbance not previously approved in NTP/Variance). Unincorporated Los Angeles County.

10. Shift of proposed ESP location #3, near Structure M7-T3. Unincorporated Los Angeles County.

11. Addition of proposed temporary crane pad, proposed temporary grading limit, and contractor work limit to Structures M44-T2 and M7-T3. The total disturbance area of the proposed temporary crane pad, proposed temporary grading limit, and contractor work limit is approximately 0.329 acre (there is no new disturbance not previously approved in NTP/Variance associated with the proposed temporary crane pad, proposed temporary grading limit, and contractor work limit). Unincorporated Los Angeles County.

12. Addition of new permanent access road, proposed permanent grading limit, and contractor work limit to access and construct Structures M44-T3 and M7-T2B. The new permanent access road is approximately 340 feet long, has a permanent grading limit that ranges between 37 feet and 75 feet wide, and has a total disturbance area of approximately 0.621 acre (of this, approximately 0.194 acre is new disturbance not previously approved in the NTP/Variance). Unincorporated Los Angeles County.

13. Addition of proposed temporary crane pads, proposed temporary crane pad disturbance, proposed permanent grading limit, and contractor work limit to previously approved new permanent access road to access and construct Structures M44-T4 and M7-T2A. The proposed permanent grading limit along the previously approved road ranges between 18 feet and 30 feet wide, and including the crane pads, has a total disturbance area of approximately 0.744 acre (of this, approximately 0.325 acre is new disturbance not previously approved in NTP/Variance). Unincorporated Los Angeles County.

14. Modification to new permanent access road, and addition of proposed temporary crane pads, proposed temporary crane pad disturbance, proposed permanent grading limit, and contractor work limit, to access and construct Structures M44-T5 and M7-T2. The new permanent access road is approximately 380 feet long, has a permanent grading limit that ranges between 18 feet and 30 feet wide, and including the crane pads, has a total disturbance area of approximately 0.896 acre (of this, approximately 0.284 acre is new disturbance not previously approved in NTP/Variance). Unincorporated Los Angeles County.

15. Modification to new permanent access road, and addition of proposed temporary crane pads, proposed temporary crane pad disturbance, proposed permanent grading limit, and contractor work limit, to access and construct Structures M45-T1 and M7-T1A. The new permanent access road is approximately 180 feet long, has a permanent grading limit that ranges between 18 feet and 38 feet wide, and including the crane pads, has a total disturbance area of approximately 0.616 acre (of this, approximately 0.070 acre is new disturbance not previously approved in NTP/Variance). Unincorporated Los Angeles County.

16. Addition of proposed temporary crane pads, proposed temporary crane pad disturbance, proposed permanent grading limit, and contractor work limit to previously approved new permanent access road to Structures M45-T2 and M7-T1. The proposed permanent grading limit ranges between 18 feet and 34 feet wide, and including the crane pads, has a total disturbance area of approximately 0.638 acre (of this, approximately 0.178 acre is new disturbance not previously approved in NTP/Variance). Unincorporated Los Angeles County.

17. Addition of proposed new permanent access road, proposed temporary crane pads, proposed temporary crane pad disturbance, proposed permanent grading limit, and contractor work limit to access and construct Structures M45-T3 and M6-T3. The new permanent access road is approximately 165 feet long, has a permanent grading limit that ranges between 16 feet and 60 feet wide, and including the crane pads, has a total disturbance area of approximately 0.614 acre (of this, approximately 0.241 acre is new disturbance not previously approved in NTP/Variance). Unincorporated Los Angeles County.

18. Addition of proposed temporary crane pads, proposed temporary crane pad disturbance, and contractor work limit to construct Structures M45-T4 and M6-T2. The total disturbance area of the proposed temporary crane pad, proposed temporary crane pad disturbance, and contractor work limit is approximately 0.363 acre (of this, approximately 0.005 acre is new disturbance not previously approved in NTP/Variance). Unincorporated Los Angeles County.

19. Modification to WSS 8-4.19b to include approximately 0.210 acre area along the eastern extent (of this, approximately 0.199 acre is new disturbance not previously approved in NTP/Variance). Unincorporated Los Angeles County.

20. Shift to Structure M45-T5 and associated proposed structure work area, and addition of proposed temporary crane pad and proposed temporary crane pad disturbance, and contractor work limit to Structures M45-T5. The total disturbance to the proposed structure work area for Structure M45-T5 is approximately 0.721 acre (of this, approximately 0.263 acre is new disturbance not previously approved in NTP/Variance). The total disturbance area of the proposed temporary crane pad, proposed temporary crane pad disturbance, and contractor work limit is approximately 0.190 acre, and is entirely within the proposed structure work area for Structure M45-T5. Unincorporated Los Angeles County.

21. Shift to guard structure location at Turnbull Canyon Road. Disturbance area restricted to edge of road. Unincorporated Los Angeles County.

22. Addition of proposed temporary crane pads, proposed temporary crane pad disturbance, proposed permanent grading limit, and contractor work limit to previously approved new permanent access road to Structures M46-T3 and M5-T1A. The proposed permanent grading limit ranges between 25 feet and 55 feet wide, and including the crane pads, has a total disturbance area of approximately 1.245 acres (of this, approximately 0.208 acre is new disturbance not previously approved in NTP/Variance). Unincorporated Los Angeles County.

23. Addition of proposed new permanent access road, proposed temporary grading limit, and contractor work limit to access Structure M48-T4. The new permanent access road is approximately 110 feet long, has a temporary grading limit that ranges between 30 feet and 50 feet wide, and has a total disturbance area of approximately 0.264 acre (this is entirely new disturbance not previously approved in NTP/Variance). City of La Habra Heights. County of Los Angeles.

24. Addition of proposed new permanent access road, proposed temporary grading limit, proposed temporary crane pad, proposed temporary crane pad disturbance, and contractor work limit to Structure M49-T4. The new permanent access road is approximately 275 feet long, has a temporary grading limit that ranges between 13 feet and 60 feet wide, and including the crane pad, has a total disturbance area of approximately 0.272 acre (of this, approximately 0.051 acre is new disturbance not previously approved in NTP/Variance. City of La Habra Heights. County of Los Angeles.

25. Addition of proposed temporary crane pad, proposed temporary crane pad disturbance, and contractor work limit to Structure M50-T1. The total disturbance area of the proposed temporary crane pad, proposed temporary crane pad disturbance, and contractor work limit is approximately 0.207 acre (of this, approximately 0.006 acre is new disturbance not previously approved in NTP/Variance). City of La Habra Heights. County of Los Angeles.

26. Addition of proposed temporary crane pad, proposed temporary crane pad disturbance, proposed permanent grading limit, and contractor work limit to previously approved new permanent access road to Structure M50-T2. The total disturbance area of the proposed temporary crane pad, proposed temporary crane pad disturbance, and contractor work limit is approximately 0.627 acre (of this, approximately 0.173 acre is new disturbance not previously approved in NTP/Variance). City of La Habra Heights. County of Los Angeles.

27. Addition of proposed temporary crane pad, proposed temporary crane pad disturbance, and contractor work limit to Structure M50-T3. The total disturbance area of the proposed temporary crane pad, proposed temporary crane pad disturbance, and contractor work limit is approximately 0.220 acre (this is entirely new disturbance not previously approved in NTP/Variance). City of La Habra Heights. County of Los Angeles.

28. Addition of proposed new temporary access road, proposed temporary grading limit, proposed temporary crane pads, proposed permanent grading limit, and contractor work limit to Structure M50-T4. The new temporary access road is approximately 270 feet long, has a temporary grading limit that ranges between 15 feet and 30 feet wide, and including the crane pad, has a total disturbance area of approximately 0.635 acre (of this, approximately 0.027 acre is new disturbance not previously approved in NTP/Variance). City of La Habra Heights. County of Los Angeles.

29. Addition of proposed temporary crane pad, proposed temporary crane pad disturbance, proposed permanent grading limit, and contractor work limit to previously approved new permanent access road to Structure M51-T1. The proposed permanent grading limit ranges between 25 feet and 35 feet wide, and including the crane pad, has a total disturbance area of approximately 0.697 acre (of this, approximately 0.232 acre is new disturbance not previously approved in NTP/Variance). City of La Habra Heights. County of Los Angeles.

30. Modification to new permanent access road and addition of proposed temporary crane pad, proposed temporary crane pad disturbance, proposed permanent grading limit, and contractor work limit to Structure M51-T2. The new permanent access road is approximately 500 feet long, has a permanent grading limit that ranges between 20 feet and 45 feet wide, and including the crane pad, has a total disturbance area of approximately 1.110 acres (of this, approximately 0.509 acre is new disturbance not previously approved in NTP/Variance). City of La Habra Heights. County of Los Angeles.

31. Addition of proposed temporary crane pad, proposed temporary crane pad disturbance, and contractor work limit to Structure M51-T3. The total disturbance area of the proposed temporary crane pad, proposed temporary crane pad disturbance, and contractor work limit is approximately 0.290 acre (of this, approximately 0.048 acre is new disturbance not previously approved in NTP/Variance). City of La Habra Heights. County of Los Angeles.

32. Addition of proposed OPGW splice site (approximately 0.750 acre) adjacent to Structure M52-T1. This proposed OPGW splice site is entirely within the existing work area for Structure M52-T1. Unincorporated Los Angeles County.

33. Addition of proposed OPGW splice site (approximately 0.918 acre) at Structure M53-T3 (of this, approximately 0.174 acre is new disturbance not previously approved in NTP/Variance). Unincorporated Los Angeles County.

- **Biological Resources**: SCE submitted a biological report by ICF International dated March 14, 2012, titled *Proposed Changes in Engineering, Segment 8 Phase 4, Tehachapi Renewable Transmission Project, Los Angeles County.* The report documents the biological conditions at 33 sites throughout Segment 8 Phase 4 (Variance Project Component) and a 500-foot buffer. The Variance Project Component and the 500-foot buffer are referred to as the Biological Study Area (BSA). Biological resources within the BSA were evaluated during several focused surveys, including 2009, 2010, and 2011 rare plant surveys (AMEC 2009o, ICF 2010at, 2011hc); 2010 and 2011 tree inventory surveys (ICF 2010av, 2011hd); 2007, 2009, 2010, 2011 riparian bird focused surveys (AMEC 2007c, 2009n; ICF 2010ss, 2011fx); 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*) surveys (AMEC 2009j; ICF 2010xx). Biological resources within the BSA were also evaluated during general preconstruction surveys and bat habitat assessment preconstruction surveys within the BSA (ICF 2010bg, 2010cb, 2010fz, 2010gh, 2011bs, 2011bw, 2011by, 2011di, 2011dj, 2011dk, 2011du, 2011dv, 2011dy, 2011fi, 2011fl, 2011ft, 2011fu, 2011gg, 2011gh, 2011gi, 2011gj, 2011gk, 2011gl, 2011gm, 2011go, 2011gp, 2011he, 2012f). A literature review was also performed as part of the Biological Review for Segment 8, Phase 4 (West) (ICF 2010dw). Combined general biological preconstruction survey and clearance sweeps were performed on September 6, 26, 28, and 30, 2011, and December 6 and 19, 2011 (ICF 2011fu, 2011gh, 2011gi, 2011he, 2012f).March 17, 2011. Additionally, preconstruction survey sweeps were performed on May 24 and 26, June 1 and 22, August 2, 4, 10 and 25, September 28, 2011, and January 10, 2012. Construction monitoring has been ongoing regularly since the sites became active, and species events and nest events are recorded in FRED.

  The site numbers below correspond with the numbers listed above.

  Site 1. Vegetation communities within the Variance Project Component include disturbed/developed. Vegetation communities within the 500-foot buffer include coastal sage scrub, exotic giant reed, ruderal grassland, southern coast live oak riparian forest, southern sycamore alder riparian woodland, water, and disturbed/developed. Special-status plant species, California walnut (*Juglans californica*), occur within the Variance Project Component and the 500-foot buffer. Regulated tree species, coast live oak (*Quercus agrifolia*), occur within the 500-foot buffer. Coastal California gnatcatchers have been observed within the BSA. Other wildlife observed within the 500-foot buffer include yellow warbler (*Dendroica petechia*), least Bell's vireo (*Vireo bellii pusillus*), Cooper's hawk (*Accipiter cooperii*), and southwestern pond turtle (*Clemmys marmorate pallida*). Potential solitary bat roost occurs within the Variance Project Component. A bushtit (*Psaltriparus minimus*) active nest occurs within the Variance Project Component (FRED Nest ID 002647). The 500-foot buffer overlaps least Bell's vireo occupied habitat and coastal California gnatcatcher designated critical and occupied habitat. Potential solitary bat roost and colonial bat roost habitat occurs within the 500-foot buffer. A red-tailed hawk (*Buteo jamaicensis*) active nest buffer and helicopter buffer occur within the 500-foot buffer. Bushtit active nests ant associated buffers occur within the 500-foot buffer. Eurasian collared-dove (*Streptopelia decaocto*) active nest occurs within the 500-foot buffer. Jurisdictional features 7-35-S-1 (permitted) and 7-35-S-2 occur within the 500-foot buffer.

  Site 2. Vegetation communities within the Variance Project Component include ruderal grassland, ruderal wetland, southern sycamore alder riparian woodland, southern willow scrub, and disturbed/developed. Vegetation communities within the 500-foot buffer include mule fat scrub, non-native woodland, ruderal grassland, ruderal wetland, southern coast live oak riparian forest, southern sycamore alder riparian woodland, southern willow scrub, water, and disturbed/developed. Special-status plant species, California walnut, and regulated tree species, coast live oak, occurs within the 500-foot buffer. Wildlife observed within the 500-foot buffer include coastal California gnatcatcher, yellow warbler, least Bell's vireo, yellow-breasted chat (*Icteria virens*), and northern harrier (*Circus cyaneus*). Riparian bird territory occurs within

the BSA. Potential burrowing owl features occur within the 500-foot buffer. Potential solitary bat roost habitat occurs within the 500-foot buffer. Least Bell's vireo occupied habitat occurs within the 500-foot buffer. Jurisdictional feature 7-35-S-3 occurs within the Variance Project Component, as well as the 500-foot buffer, and a permit amendment is pending. Jurisdictional features 7-35-S-2, 7-35-W-1 (permitted), and 8-6-R-1 (amendment pending) occur within the 500-foot buffer.

Site 3. Vegetation communities within the Variance Project Component include ruderal grassland. Vegetation communities within the 500-foot buffer include non-native woodland, ruderal grassland, ruderal wetland, southern coast live oak riparian forest, southern sycamore alder riparian woodland, southern willow scrub, water, and disturbed/developed. Special-status plant species, California walnut, and regulated tree species, coast live oak, occur within the 500-foot buffer. Wildlife species observed within the 500-foot buffer include coastal California gnatcatcher, yellow warbler, least Bell's vireo, yellow-breasted chat, and northern harrier. Potential burrowing owl features occur within the 500-foot buffer. Riparian bird territory and least Bell's vireo occupied habitat occur within the 500-foot buffer. Jurisdictional features 7-35-S-2, 7-35-S-3 (amendment pending), and 8-6-R-1 (amendment pending) occur within the 500-foot buffer.

Site 4. Vegetation communities within the Variance Project Component include disturbed/developed. Vegetation communities within the 500-foot buffer include mule fat scrub, ruderal grassland, ruderal wetland, southern sycamore alder riparian woodland, southern willow scrub, and disturbed/developed. Wildlife observed within the 500-foot buffer include coastal California gnatcatcher, yellow warbler, least Bell's vireo, and yellow-breasted chat. Riparian bird territory occurs within the Variance Project Component and the 500-foot buffer. Potential burrowing owl features occur within the 500-foot buffer. Least Bell's vireo occupied habitat occurs within the 500-foot buffer.

Site 5. Vegetation communities within the Variance Project Component include disturbed/developed. Vegetation communities within the 500-foot buffer include agriculture, mixed chaparral, mule fat scrub, non-native woodland, ruderal grassland, ruderal wetland, southern arroyo willow riparian forest, southern cottonwood willow riparian forest, water, and disturbed/developed. Wildlife observed within the 500-foot buffer include sharp-shinned hawk (*Accipiter striatus*), yellow warbler, least Bell's vireo, yellow-breasted chat, and willow flycatcher (*Empidonax traillii*). Potential burrowing owl features occur within the 500-foot buffer. Riparian bird territory and least Bell's vireo occupied habitat occurs within the 500-foot buffer. Coastal California gnatcatcher designated critical habitat occurs within the 500-foot buffer. Jurisdictional feature 8-6-R-1 (amendment pending) and 8-6-S-1 occur within the 500-foot buffer.

Site 6. Vegetation communities within the Variance Project Component include southern cottonwood willow riparian forest and southern sycamore alder riparian woodland. Vegetation communities within the 500-foot buffer include freshwater marsh, mixed chaparral, mule fat scrub, non-native woodland, ruderal wetland, southern arroyo willow riparian forest, southern cottonwood willow riparian forest, southern sycamore alder riparian woodland, southern willow scrub, water, and disturbed/developed. Special-status plant species within the 500-foot buffer include California walnut. Wildlife species observed within the 500-foot buffer include yellow warbler, yellow-breasted chat, least Bell's vireo, and willow flycatcher. Riparian bird territory and least Bell's vireo occupied habitat occurs within the Variance Project Component and the 500-foot buffer (BSA). Coastal California gnatcatcher designated critical habitat also occurs within the BSA. A red-tailed hawk active nest buffer occurs within the Variance Project Component. Potential burrowing owl features occur within the 500-foot buffer. A raptor nest and an active red-tailed hawk nest and associated buffers occur within the 500-foot buffer. Medium potential bat habitat occurs within the 500-foot buffer.

Site 7. Vegetation communities within the Variance Project Component include disturbed/developed. Vegetation communities within the 500-foot buffer include southern arroyo willow riparian forest and disturbed/developed. Special-status plant species, California walnut, occurs within the BSA. Wildlife species observed within the 500-foot buffer include yellow warbler and coastal California gnatcatcher. San

Diego desert woodrat (*Neotoma lepida intermedia*) midden occurs within the 500-foot buffer. Solitary bat roost habitat also occurs within the 500-foot buffer. Jurisdictional feature 8-8-W-1 occurs within the 500-foot buffer.

Site 8. Vegetation communities within the Variance Project Component include coastal sage scrub, ruderal grassland, and disturbed/developed. Vegetation communities within the 500-foot buffer include coast live oak woodland, coastal sage scrub, non-native woodland, ruderal grassland, and disturbed/developed. Regulated tree species, coast live oak, occurs within the 500-foot buffer. Wildlife observed within the 500-foot buffer include coastal California gnatcatcher. Solitary bat roost habitat occurs within the BSA and colonial bat roost habitat occurs within the Variance Project Component. Coastal California gnatcatcher designated critical habitat and occupied habitat occurs within the BSA. San Diego desert woodrat potential midden occurs within the BSA. Potential burrowing owls features occur within the 500-foot buffer. Jurisdictional feature 8-10-S-1 occurs within the BSA.

Site 9. Vegetation communities within the Variance Project Component include coastal sage scrub, ruderal grassland, and disturbed/developed. Vegetation communities within the 500-foot buffer include coastal sage scrub, non-native woodland, ruderal grassland, and disturbed/developed. Wildlife observed within the 500-foot buffer includes coastal California gnatcatcher. Coastal California gnatcatcher designated critical habitat and occupied habitat occurs within the BSA. A coastal California gnatcatcher nest occurs within the 500-foot buffer. San Diego desert woodrat potential midden occurs within the 500-foot buffer. Potential burrowing owl features occur within the 500-foot buffer. Solitary bat roost habitat occurs within the 500-foot buffer.

Site 10. Vegetation communities within the Variance Project Component include disturbed/developed. Vegetation communities within the 500-foot buffer include coastal sage scrub, non-native woodland, ruderal grassland, and disturbed/developed. Coastal California gnatcatchers have been observed within the 500-foot buffer. The BSA is coastal California gnatcatcher designated critical habitat and the 500-foot buffer is coastal California gnatcatcher occupied habitat. A red-tailed hawk active nest and associated buffers occur within the 500-foot buffer. Potential burrowing owl features occur within the 500-foot buffer. Jurisdictional feature 8-11-S-5 occurs within the 500-foot buffer.

Site 11. Vegetation communities within the Variance Project Component include ruderal grassland and disturbed/developed. Vegetation communities within the 500-foot buffer include coastal sage scrub, non-native woodland, ruderal grassland, and disturbed/developed. Coastal California gnatcatchers have been observed within the 500-foot buffer. Coastal California gnatcatcher designated critical habitat occurs within the BSA. Coastal California gnatcatcher occupied habitat occurs within the 500-foot buffer. A red-tailed hawk active nest and associated buffers occurs within the Variance Project Component. Potential burrowing owl features occur within the BSA. Jurisdictional feature 8-11-S-5 occurs within the 500-foot buffer.

Site 12. Vegetation communities within the Variance Project Component include ruderal grassland and disturbed/developed. Vegetation communities within the 500-foot buffer include coast live oak woodland, coastal sage scrub, ruderal grassland, and disturbed/developed. Coastal California gnatcatchers have been observed within the BSA. Coastal California gnatcatcher designated critical habitat occurs within the BSA and occupied habitat occurs within the 500-foot buffer. San Diego desert woodrat potential midden occurs within the 500-foot buffer. Jurisdictional feature 8-11-S-5 occurs within the 500-foot buffer.

Site 13. Vegetation communities within the Variance Project Component include non-native woodland and ruderal grassland. Vegetation communities within the 500-foot buffer include coastal sage scrub, mule fat scrub, non-native woodland, ruderal grassland, and disturbed/developed. Willow flycatchers have been observed within the 500-foot buffer. Coastal California gnatcatcher designated critical habitat occurs within the BSA and occupied habitat occurs within the 500-foot buffer. Least Bell's vireo occupied habitat occurs

within the 500-foot buffer. Jurisdictional feature 8-11-S-1 and 8-11-S-3 (permitted) occur within the 500-foot buffer.

Site 14. Vegetation communities within the Variance Project Component include non-native woodland, ruderal grassland, and disturbed/developed. Vegetation communities within the 500-foot buffer include coast live oak woodland, coastal sage scrub, non-native woodland, ruderal grassland, and disturbed/developed. Yellow-breasted chats have been observed within the 500-foot buffer. Coastal California gnatcatcher designated critical habitat occurs within the BSA. Potential burrowing owl features occur within the 500-foot buffer. Riparian bird territory occurs within the 500-foot buffer.

Site 15. Vegetation communities within the Variance Project Component include ruderal grassland and disturbed/developed. Vegetation communities within the 500-foot buffer include coast live oak woodland, coastal sage scrub, non-native woodland, ruderal grassland, southern coast live oak riparian forest, and disturbed/developed. Regulated tree species, coast live oak, occurs within the 500-foot buffer. Northern harrier have been observed within the BSA. Other wildlife observed within the 500-foot buffer include Vaux's swift (*Chaetura vauxi*), least Bell's vireo, yellow-breasted chat, and white-tailed kite (*Elanus caeruleus*). Coastal California gnatcatcher designated critical habitat occurs within the BSA. Potential burrowing owl features occur within the BSA. San Diego desert woodrat potential midden occurs within the Variance Project Component. Jurisdictional feature 8-11-S-1 occurs within the 500-foot buffer.

Site 16. Vegetation communities within the Variance Project Component include coastal sage scrub, ruderal grassland, and disturbed/developed. Vegetation communities within the 500-foot buffer include California annual grassland, coast live oak woodland, coastal sage scrub, ruderal grassland, and disturbed/developed. Special-status plant species, Plummer's mariposa lily (*Calachortus plummera*), and regulated tree species, coast live oak, occur within the 500-foot buffer. Wildlife species observed within the 500-foot buffer include coastal California gnatcatcher, yellow-breasted chat, white-tailed kite, and northern harrier. Coastal California gnatcatcher designated critical habitat occurs within the BSA. Potential burrowing owls occur within the 500-foot buffer. Riparian bird territory occurs within the 500-foot buffer.

Site 17. Vegetation communities within the Variance Project Component include coast live oak woodland and ruderal grassland. Vegetation communities within the 500-foot buffer include coast live oak woodland, coastal sage scrub, ruderal grassland, and disturbed/developed. Special-status plant species, Intermediate mariposa lily (*Calachortus weedii* var. *intermedia*), occurs within the BSA, and California walnut occur within the 500-foot buffer. Regulated tree species, coast live oak, occur within the BSA. Wildlife observed within the 500-foot buffer include Cooper's hawk and white-tailed kite. Coastal California gnatcatcher designated critical habitat occurs within the 500-foot buffer. Potential burrowing owl features occur within the 500-foot buffer. San Diego desert woodrat potential midden(s) occur within the BSA.

Site 18. Vegetation communities within the Variance Project Component include coastal sage scrub, mixed chaparral, ruderal grassland, and disturbed/developed. Vegetation communities within the 500-foot buffer include coast live oak woodland, coastal sage scrub, mixed chaparral, ruderal grassland, and disturbed/developed. Regulated tree species, coast live oak, occurs within the 500-foot buffer. Coastal California gnatcatcher designated critical habitat and occupied habitat occur within the BSA. San Diego desert woodrat potential midden(s) occur within the BSA. Potential solitary bat roost habitat occurs within the 500-foot buffer.

Site 19. Vegetation communities within the Variance Project Component include coast live oak woodland, ruderal grassland, and disturbed/developed. Vegetation communities within the 500-foot buffer include coast live oak woodland, coastal sage scrub, ruderal grassland, and disturbed/developed. Special-status plant species, California walnut, occurs within the BSA. Regulated tree species, coast live oak, occurs within the 500-foot buffer. Wildlife observed within the 500-foot buffer include Copper's hawk and coastal California gnatcatcher. Coastal California gnatcatcher designated critical habitat occurs within the BSA. San Diego

desert woodrat potential midden(s) occur within the BSA. Potential burrowing owl features occur within the 500-foot buffer.

Site 20. Vegetation communities within the Variance Project Component include California annual grassland, coast live oak woodland, and disturbed/developed. Vegetation communities within the 500-foot buffer include California annual grassland, coast live oak woodland, coastal sage scrub, mixed chaparral, ruderal grassland, southern coast live oak riparian forest, southern sycamore alder riparian woodland, and disturbed/developed. Special-status plant species, Intermediate mariposa lily, occurs within the BSA, and Plummer's mariposa lily occurs within the 500-foot buffer. Regulated tree species, coast live oak and canyon live oak (*Quercus chrysolepis*) occur within the 500-foot buffer. Coastal California gnatcatchers have been observed within the 500-foot buffer. Coastal California gnatcatcher designated critical habitat occurs within the BSA and occupied habitat occurs within the 500-foot buffer. San Diego desert woodrat potential midden(s) occur within the BSA. Low bat habitat potential occurs within the 500-foot buffer. A red-tailed hawk active nest and associated buffers occurs within the 500-foot buffer. Jurisdictional features 8-14-S-1 and 8-14-S-2 (permitted) occur within the 500-foot buffer.

Site 21. Vegetation communities within the Variance Project Component include coastal sage scrub and disturbed/developed. Vegetation communities within the 500-foot buffer include coast live oak woodland, coastal sage scrub, ruderal grassland, and disturbed/developed. Regulated tree species, coast live oak, occurs within the 500-foot buffer. Northern harriers have been observed within the 500-foot buffer. Coastal California gnatcatcher designated critical and occupied habitat occurs within the BSA. San Diego desert woodrat potential midden occur within the 500-foot buffer. Jurisdictional feature 8-15-S-4 occurs within the BSA. Jurisdictional features 8-15-S-3, 8-15-S-5, and 8-15-S-6 occur within the 500-foot buffer.

Site 22. Vegetation communities within the Variance Project Component include ruderal grassland and disturbed/developed. Vegetation communities within the 500-foot buffer include coastal sage scrub, ruderal grassland, and disturbed/developed. Wildlife observed within the 500-foot buffer include loggerhead shrike (*Lanius ludovicianus*), northern harrier, and peregrine falcon (*Falco peregrinus*). Coastal California gnatcatcher designated critical habitat occurs within the BSA. Coastal California gnatcatcher occupied habitat occurs within the 500-foot buffer. Potential burrowing owl features occur within the 500-foot buffer.

Site 23. Vegetation communities within the Variance Project Component include coast live oak woodland and disturbed/developed. Vegetation communities within the 500-foot buffer include California annual grassland – wildflower field, coast live oak woodland, coastal sage scrub, mixed chaparral, non-native woodland, and disturbed/developed. Regulated tree species, coast live oak, occurs within the BSA. Regulated tree species, toyon (*Heteromeles arbutifolia*), blue elderberry (*Sambucus mexicanus*), and western sycamore (*Platanus racemosa*) occur within the 500-foot buffer. Coastal California gnatcatcher designated critical habitat occurs within the BSA. San Diego desert woodrat potential midden occurs within the BSA. Jurisdictional feature 8-19-S-1 occurs within the 500-foot buffer.

Site 24. Vegetation communities within the Variance Project Component include coast live oak woodland, coastal sage scrub, and disturbed/developed. Vegetation communities within the 500-foot buffer include coast live oak woodland, coastal sage scrub, non-native woodland, ruderal grassland, and disturbed/developed. Coastal California gnatcatcher designated critical habitat and occupied habitat occurs within the BSA. Potential burrowing owl features occur within the BSA. Solitary and low potential bat roost habitat occurs within the 500-foot buffer. Jurisdictional feature 8-21-S-4 occurs within the 500-foot buffer.

Site 25. Vegetation communities within the Variance Project Component include California walnut woodland, coastal sage scrub, and disturbed/developed. Vegetation communities within the 500-foot buffer include California annual grassland, California walnut woodland, coast live oak woodland, coast live oak woodland – burned, coastal sage scrub, mixed chaparral, non-native woodland, ruderal grassland, and disturbed/developed. Special-status plant species, California walnut, occur within the BSA. Regulated tree

species, blue elderberry, coast live oak, and toyon, occur within the 500-foot buffer. San Diego desert woodrat potential midden(s) occur within the BSA. Low potential bat habitat occurs within the BSA and solitary potential bat roost habitat occurs within the 500-foot buffer. Bushtit active nest and associated buffers occur within the 500-foot buffer. Jurisdictional features 8-21-S-2 and 8-21-S-3 occur within the 500-foot buffer.

Site 26. Vegetation communities within the Variance Project Component include California annual grassland, coastal sage scrub, mixed chaparral, non-native woodland, and disturbed/developed. Vegetation communities within the 500-foot buffer include California annual grassland, coast live oak woodland, coastal sage scrub, mixed chaparral, non-native woodland, ruderal grassland, and disturbed/developed. Regulated tree species, coast live oak, occurs within the BSA, and blue elderberry and toyon occurs within the 500-foot buffer. Coastal California gnatcatcher designated critical habitat occurs within the BSA. Low potential (solitary) bat habitat occurs within the BSA. San Diego desert woodrat potential midden occurs within the 500-foot buffer. Jurisdictional feature 8-22-S-5 and 8-22-S-6 occur within the 500-foot buffer.

Site 27. Vegetation communities within the Variance Project Component include California annual grassland, mixed chaparral, and disturbed/developed. Vegetation communities within the 500-foot buffer include California annual grassland, coast live oak woodland, coastal sage scrub, mixed chaparral, ruderal grassland, and disturbed/developed. Regulated tree species, holly-leaved cherry (*Prunus ilicifolia*), coast live oak, and blue elderberry occur within the 500-foot buffer. Coastal California gnatcatcher designated critical habitat occurs within the BSA. Low potential (solitary) bat habitat occurs within the BSA. San Diego desert woodrat potential midden(s) occur within the 500-foot buffer. Jurisdictional feature 8-22-S-2 and 8-22-S-3 occur within the 500-foot buffer.

Site 28. Vegetation communities within the Variance 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, ruderal grassland, and disturbed/developed. Special-status plant species, California walnut, occurs within the BSA. Regulated tree species coast live oak, blue elderberry, and toyon occur within the BSA. Coastal California gnatcatcher designated critical habitat occurs within the BSA. San Diego desert woodrat potential midden(s) occur within the BSA. Low potential and medium potential (solitary) bat habitat occur within the 500-foot buffer. Jurisdictional feature 8-23-S-23 occurs within the 500-foot buffer.

Site 29. Vegetation communities within the Variance Project Component include coastal sage scrub, non-native woodland, ruderal grassland, and disturbed/developed. Vegetation communities within the 500-foot buffer include California annual grassland, California walnut woodland, coast live oak woodland, coastal sage scrub, non-native woodland, ruderal grassland, southern coast live oak riparian forest, southern willow scrub, and disturbed/developed. Special-status plant species, California walnut, occurs within the 500-foot buffer. Regulated tree species, coast live oak, blue elderberry, and toyon occur within the 500-foot buffer. Coastal California gnatcatcher designated critical habitat occurs within the BSA. Coastal California gnatcatcher occupied habitat occurs within the 500-foot buffer. San Diego desert woodrat potential midden occurs within the 500-foot buffer. Potential burrowing owl features occur within the 500-foot buffer. Low potential (solitary) bat habitat occurs within the 500-foot buffer.

Site 30. Vegetation communities within the Variance Project Component include non-native woodland, ruderal grassland, and disturbed/developed. Vegetation communities within the 500-foot buffer include California walnut woodland, coast live oak woodland, coastal sage scrub, mixed chaparral, non-native woodland, ruderal grassland, and disturbed/developed. Special-status plant species, California walnut, occurs within the 500-foot buffer. Regulated tree species, coast live oak, blue elderberry, and toyon occur within the 500-foot buffer. Coastal California gnatcatcher designated critical habitat occurs within the BSA. A raptor nest occurs within the Variance Project component (2006). San Diego desert woodrat potential

midden occurs within the 500-foot buffer. Potential burrowing owl features occur within the 500-foot buffer. Low potential (solitary) bat roost habitat occurs within the 500-foot buffer.

Site 31. Vegetation communities within the Variance Project Component include coast live oak woodland, non-native woodland, and disturbed/developed. Vegetation communities within the 500-foot buffer include California walnut woodland, coast live oak woodland, coastal sage scrub, mixed chaparral, non-native woodland, ruderal grassland, and disturbed/developed. Special-status plant species, California walnut, occurs within the BSA. Regulated tree species, blue elderberry and toyon, occur within the 500-foot buffer. Coastal California gnatcatcher designated critical habitat occurs within the BSA. Low potential (solitary) bat roost habitat occurs within the BSA. Potential burrowing owl features occur within the 500-foot buffer. San Diego desert woodrat potential midden(s) occur within the 500-foot buffer. A raptor nest (2006) occurs within the 500-foot buffer.

Site 32. Vegetation communities within the Variance Project Component include non-native woodland, ruderal grassland, and disturbed/developed. Vegetation communities within the 500-foot buffer include coast live oak woodland, non-native woodland, ruderal grassland, and disturbed/developed. Special-status plant species, California walnut, occurs within the BSA. Regulated tree species, canyon live oak, occurs within the 500-foot buffer. Low potential (solitary) bat roost habitat occurs within the Variance Project Component. Solitary and colonial potential bat roost habitat occurs within the 500-foot buffer. Medium potential bat roost habitat occurs within the 500-foot buffer. Coastal California gnatcatcher designated critical habitat occurs within the 500-foot buffer. A common raven active nest and associated buffers occur within the 500-foot buffer. An American kestrel (*Falco sparverius*) inactive nest occurs within the 500-foot buffer.

Site 33. Vegetation communities within the Variance Project Component include California walnut woodland and disturbed/developed. Vegetation communities within the 500-foot buffer include bunchgrass grassland, California walnut woodland, ruderal grassland, and disturbed/developed. Special-status plant species, California walnut, occurs within the BSA. Regulated tree species, coast live oak, occurs within the BSA. Northern harriers have been observed within the BSA. White-tailed kite have been observed within the 500-foot buffer. Bushtit active nests and associated buffers occur within the BSA. Coastal California gnatcatcher active nests and associated buffers occur within the BSA. An inactive red-tailed hawk nest occurs within the Variance Project Component. Potential burrowing owl features occur within the 500-foot buffer. Low potential bat habitat occurs within the 500-foot buffer. A common raven active nest and associated buffers occurs within the 500-foot buffer.

Habitat Impacts

Coastal sage scrub defined as coastal California gnatcatcher occupied habitat occurs within the Variance Project Component (Sites 8, 9, and 21). Additional project impacts to coastal California gnatcatcher occupied habitat as a result of the Variance Project Component total 1.773 acres of temporary impacts. The impacts associated with this variance are in compliance with the applicable take permits.

Coastal California gnatcatcher designated critical habitat occurs within the Variance Project Component (Sites 6, 8, 9, 12, 13, 14, 15, 16, 18, 19, 20, 21, 22, 23, 24, 25, 26, 28, 29, 30, and 31). Additional project impacts to coastal California gnatcatcher designated critical habitat as a result of the Variance Project Component total 0.305 acres of permanent impacts and 5.319 acres of temporary impacts. The portion of the temporary contractor work limits at Site 12 located in ruderal vegetation on the east side of the access road and outside the existing 200 x 200 work limits is not included in the Biological Opinion and will be maintained as an ESA. The impacts associated with this variance are in compliance with the applicable take permits.

Least Bell's vireo occupied habitat occurs within the Variance Project Component (Sites 2, 5, and 6). Additional project impacts to least Bell's vireo occupied habitat total 0.008 acre of permanent impacts and

0.023 acre of temporary impacts. The impacts associated with this variance are in compliance with the applicable take permits.

Jurisdictional resources within the Variance Project Component were evaluated during the 2010 jurisdictional delineation for Segment 7 and 8 (ICF 2010h). Jurisdictional features 7-35-S-1, 7-35-W-1, 8-11-S-3, 8-14-S-2 have been previously permitted for impacts from installation of an underground vault, maintenance grading, a wire setup site, and road widening, respectively. New impacts to features 7-35-S-3 and 8-6-R-1 related to the Variance Project Component have been submitted to the regulatory agencies for permit amendments (submitted October 7, 2011) and will be avoided until permits are obtained. Impacts related to these jurisdictional features which have not changed are considered to be permitted under previous permits and would not require amendment. All other jurisdictional features mapped within the BSA will be avoided by the Variance Project Component. Any additional potential jurisdictional features will be flagged as Environmentally Sensitive Area (ESAs) for avoidance.

No additional impacts to biological resources are anticipated.

- **Cultural and Paleontological Resources**: SCE submitted a memorandum dated March 13, 2012 titled *SCE Tehachapi Renewable Transmission Project - Cultural and Paleontological Resources Guidelines for Segment 8 Phase IV - Variance Request – Road and Tower Additions and Modifications*. The memorandum states that cultural or paleontological resources will be impacted by the proposed road and tower additions and modifications on Segment 8 Phase IV of the TRTP. Thirty-one (31) of the above listed thirty-three (33) proposed areas were included in previous surveys for the TRTP Segment 8 T/L and no cultural resources were identified (Pacific Legacy 2007, 2010, 2011; PCR 2011). Approximately 0.036 acres of proposed activity for Site 19, and approximately 0.010 of proposed activity for Site 23 are outside of the previous surveys for TRTP. These two areas are located in disturbed areas and/or on the side of steep slopes. Therefore, the potential to encounter cultural resources is low and additional surveys are not recommended. Portions of the proposed activity at Site 9 and proposed activity at Site 13 lay outside of the previous surveys for TRTP and required additional surveys. SCE submitted a survey report letter for this area by PCR Services Corporation dated September 29, 2011, titled *Cultural Resources Survey in Support of Variance Request for Road and Tower Additions and Modifications, Segment 8 Phase IV, TRTP, Los Angeles County, California.* No cultural resources were identified as a result of these surveys.

  Previous paleontological assessments (Gust and Scott 2009; Aron 2010) prepared for the TRTP, indicate that paleontological resources have been previously discovered in the vicinity of the areas requested under this variance. Subsurface sediments consist of Quaternary alluvium and the Fernando and Puente Formations. The Fernando and Puente Formations have a high potential for yielding paleontological resources. Per the Paleontological Resources Management Plan (Gust and Scott 2009) all work proposed in areas 1, and 8 through 33 of this variance require a paleontological monitor to be present if the proposed work involves ground disturbing activities.

  No additional impacts to cultural or paleontological resources are anticipated.

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

- Due to the high potential for yielding paleontological resources in the Fernando and Puente Formations, and per the Paleontological Resources Management Plan (PRMP), all work proposed in areas 1, and 8 through 33, require a paleontological monitor to be present during ground disturbing 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 #4 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