

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



April 24, 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 #5 to NTP #24

Dear Ms. Nelson,

On April 11, 2012, Southern Californian Edison (SCE) submitted a variance request for a Modification to Notice to Proceed (NTP) #24 for a new permanent access road and the addition of two temporary crane pads, and associated grading and contractor work limits to M2-T4a and M49-T1 on Segment 8 Transmission Line (T/L) West (Phase 4) of the Tehachapi Renewable Transmission Project (TRTP), in unincorporated Los Angeles County, California. **This Modification #5 to NTP #24 is approved by CPUC based on the following factors:**

- SCE submitted the following information:

SCE requests a Modification to Notice to Proceed (NTP #24) for the new permanent access road and the addition of two temporary crane pads, and associated grading and contractor work limits to M2-T4a and M49-T1 on Segment 8 T/L West (Phase 4) of the TRTP, in Unincorporated Los Angeles County. The new permanent access road is approximately 1,030 feet long, has a permanent grading limit that ranges between 20 feet and 125 feet wide, has a contractor work limit that ranges between 40 feet and 160 feet wide, and has a total disturbance area (based on the outer most disturbance, which is the contractor work limit) of approximately 2.37 acres (of this, approximately 1.20 acres is new disturbance not previously approved in NTP #24).

- **Biological Resources:** SCE submitted a biological summary letter by ICF International dated April 5, 2012, titled *Proposed Road Modification and Grading Addition at M2-T4a and M49-T1, Segment 8 Phase 4, TRTP, Los Angeles County*. The letter documents the biological conditions at the proposed road modification and grading addition to M2-T4a and M49-T1 (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, 2011hc); 2010 and 2011 tree inventory surveys (ICF 2010av, 2011hd), 2008, 2009, 2010, and 2011 coastal California gnatcatcher (*Polioptila californica*) focused surveys (AMEC 2008d, 2009m; ICF 2010ww, 2011gq). Biological resources within the BSA were also evaluated during general preconstruction surveys and bat habitat assessment preconstruction surveys associated with M2-T4a and M49-T1 (ICF 2011bs, 2011bt, 2011bw, 2011by, 2011ho). A literature review was also performed as part of the Biological Review for Segment 8 Phase 4 (West) (ICF 2010dw). Additionally, a clearance sweep was performed on July 16, 2011. Construction monitoring has been ongoing regularly since the site became active, and species events and nest events are recorded in FRED.

Vegetation communities mapped within the Variance Project Component include mixed chaparral, nonnative woodland, ruderal grassland, southern willow scrub and disturbed/developed. Vegetation



communities within the 500-foot buffer include coast live oak woodland, coastal sage scrub, mixed chaparral, nonnative woodland, ruderal grassland, southern willow scrub and disturbed/developed. Regulated tree species, blue elderberry (*Sambucus mexicana*), coast live oak (*Quercus agrifolia*), and toyon (*Heteromeles arbutifolia*) occur within the Variance Project Component. Regulated tree species, Arroyo willow (*Salix lasiolepis*), blue elderberry (*Sambucus mexicana*), coast live oak (*Quercus agrifolia*), holly-leaved cherry (*Prunus ilicifolia*), toyon (*Heteromeles arbutifolia*) and western sycamore (*Platanus racemosa*) occur within the 500-foot buffer.

The Variance Project Component and the 500-foot buffer overlap coastal California gnatcatcher critical habitat, resulting in approximately 0.089 acres of permanent impacts and 1.114 acres of temporary impacts.

Bat assessment surveys performed by ICF on April 4, 2011, detected potential solitary and colonial bat roosts within the BSA (ICF 2011by).

San Diego desert woodrat middens were identified within the BSA (ICF 2011bw; FRED 002979-002989; FRED 002952, 002957-002962).

Jurisdictional resources within the Variance Project Component were evaluated during the 2010 and 2011 jurisdictional delineations for Segments 7 and 8 (ICF 2010h; ICF 2011hp). Jurisdictional features 8-20-R-4, 8-20-S-4, 8-20-W-1 (avoided) and 8-20-R-400 occur within the Variance Project Component. Impacts to these features (excluding 8-20-W-1) are included in the Work Package 3 Amendment 2, submitted to the regulatory agencies November 18, 2011. Jurisdictional features 8-20-R-4, 8-20-S-4, 8-20-W-1, 8-20-S-400 and 8-20A-S-2 occur within the 500-foot buffer and will not be impacted by the Variance Project Component. Any unmapped features will be flagged and avoided.

No additional impacts to biological resources are anticipated.

- **Cultural and Paleontological Resources:** SCE submitted a memorandum dated September 8, 2011 from Matthew Wetherbee, MSc, RPA, SCE Archaeologist, regarding the TRTP Cultural and Paleontological Resources Guidelines for Segment 8 T/L Phase 4 Variance Request – Road Modification and Grading Addition at M2-T4a and M49-T1. The memorandum states that no cultural or paleontological resources will be impacted by the proposed road modification and grading at structures M2-T4a and M49-T1 on the TRTP, Segment 8 Phase 4. The new permanent access road and approximately 80 percent of the grading limits were included in the previous surveys for the TRTP for Segment 8 T/L and no cultural resources were identified (Pacific Legacy 007, 010a, 2010b; PCR 2011). Approximately 20 percent of the grading limits lay outside of the previous surveys for TRTP within an undisturbed area and required an additional cultural resources survey. SCE submitted a report for the previously unsurveyed area by PCR dated September 8, 2011 titled *Cultural Resources Survey in Support of Variance Request for Road Modification and Grading Additions at M2-T4a and M49-T1, Segment 8 Phase IV, Tehachapi Renewable Transmission Project, Los Angeles County, California*. The additional field survey yielded no cultural or paleontological resources, or historic properties.

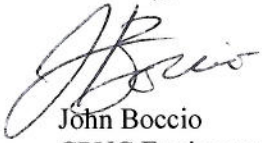
Previous paleontological assessments conducted for the TRTP indicate that paleontological resources have been previously discovered in the project vicinity. Subsurface sediments are mapped as the Puente Formation and have a high sensitivity for yielding paleontological resources (Gust and Scott 2009; Aron 2010). In accordance with the Paleontological Resources Management Plan (Gust and Scott 2009), paleontological resources monitoring is required during any ground disturbing activities for the proposed road modification and grading addition areas at M2-T4a and M49-T1 on Segment 8 Phase 4. Work will not extend beyond the proposed work area at M2-T4a and M49-T1.

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 sensitivity for yielding paleontological resources, and in accordance with the Paleontological Resources Management Plan (Gust and Scott 2009), paleontological resources monitoring shall be conducted during any ground disturbing activities for the proposed access road and disturbance areas for Structure M2-T4a and M49-T1 on Segment 8 Phase 4 (West).
- SCE shall conduct preconstruction biological surveys prior to construction.
- All conditions required by Notice to Proceed (NTP) #24 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #24, and this Modification #5 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