

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 4, 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 #6 to NTP #24

Dear Ms. Nelson,

On May 22, 2012, Southern Californian Edison (SCE) submitted a variance request for a Modification to Notice to Proceed (NTP) #24 for several field changes to provide vehicle and equipment access to all structures between Towers M49-T2 and M51-T5 on Segment 8 Transmission Line (T/L) West (Phase 4) of the Tehachapi Renewable Transmission Project (TRTP), in the City of La Habra Heights, Los Angeles County, California. Additional information was submitted on June 4, 2012. **This Modification #6 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 Request (NTP #24 dated January 12, 2011) that was approved by the CPUC for several field changes to provide vehicle and equipment access to all structures between M49-T2 and M51-T5 on Segment 8 T/L West (Phase 4) of the TRTP, in the City of La Habra Heights, Los Angeles County. Current conditions at eight (8) specified turns within the Puente Hills Reserve work area are inadequate to accommodate access for large construction vehicles and equipment (e.g. cranes, lowboy trailers).

At each of the eight (8) curves, additional space is required to widen the curves as needed to allow construction vehicles and equipment to navigate the roads (curve widening). The additional space will also allow for vehicle parking/staging and other project use to support construction. These identified curves (8 curves) are depicted as Medium Improvement on the construction maps; however, the disturbance level needed to widen these curves beyond the existing road surface is considered Heavy Improvement. Work that is permitted under "Medium" Improvement would not allow large construction vehicles and equipment to successfully negotiate these eight (8) turns. Therefore, a Variance is required to complete the curve widening work at Curves 1, 2, 3, 4, 11, 12, 14, and 15. No permanent improvements to the curves would be made and no permanent facilities or structures would be installed within the curve boundaries. Note that several other curves are located within areas already depicted for Heavy Improvements, and these areas will remain as such. With the exception of the eight (8) curves included herein for Heavy Improvement, and the several other curves that will remain as Heavy Improvements, all remaining roads between M49-T2 and M51-T5 will be reclassified as Medium Improvement, and construction maps will be updated accordingly.

The following is a list of the disturbance activities needed to utilize each identified curve. Disturbance acreages requested to widen each access curve and their impact on Environmentally Sensitive Areas (ESA) and/or California coastal gnatcatcher Critical and/or Occupied Habitat are identified in the Biological Resources section below. For purposes of calculating potential impacts to designated critical habitat by vegetation community, impacts are identified as permanent. However, following construction these areas would be stabilized and restored per SWPPP requirements.

Curve 1

Curve 1 is located on Skyline Drive, approximately 690 feet south of Structure M49-T2. Work and disturbance activities that need to be conducted include:

- a) Drive and crush approximately 45 ft x 10 ft (L x W) of the inside of Curve 1.

Curve 2

Curve 2 is located on Skyline Drive, approximately 740 feet southwest of Structure M49-T2. Work and disturbance activities that need to be conducted include:

- a) Clear existing vegetation and blade approximately 100 ft x 15 ft (L x W) along the inside edge of Curve 2, within the staging area.
- b) Clear existing vegetation and blade approximately 100 ft x 5 ft (L x W) along the inside edge of Curve 2, beyond the staging area.

Curve 3

Curve 3 is located on Skyline Drive, approximately 420 feet southwest of Structure M49-T2. Work and disturbance activities that need to be conducted include:

- a) Clear and blade approximately 70 ft x 20 ft (L x W) of the inside or southern edge of turn.

Curve 4

Curve 4 is located on Skyline Drive, approximately 230 feet southwest of Structure M49-T3. Work and disturbance activities that need to be conducted include:

- a) Clear and blade approximately 100 ft x 10 ft (L x W) on the south side of the access road.

Curve 11

Curve 11 is located on Skyline Drive, approximately 820 feet southeast of Structure M50-T1. Work and disturbance activities that need to be conducted include:

- a) Clear and blade approximately 85 ft x 8 ft (L x W) of the outside or southern edge of the curve.
- b) Clear and blade approximately 75 ft x 10 ft (L x W) of the inside or northern edge of the curve.

Curve 12

Curve 12 is located on Skyline Drive, approximately 830 feet southwest of Structure M50-T2. Work and disturbance activities that need to be conducted include:

- a) Blade approximately 160 ft x 15 ft (L x W) of the northern edge of the curve, within the staging area.

Curve 14

Curve 14 is located on Skyline Drive, approximately 1,150 feet south of Structure M50-T3. Work and disturbance activities that need to be conducted include:

- a) Cut and blade approximately 330 ft x 15 ft (L x W) of the northern edge of the curve, within the staging area.

Curve 15

Curve 15 is located on the approved four-wheel drive (4WD) road between Skyline Drive and La Habra Road, approximately 900 feet southeast of Structure M50-T4. Work and disturbance activities that need to be conducted include:

- a) Clear and blade approximately 60 ft x 10 ft (L x W) of the outside or western side of the curve.
- b) Clear and blade approximately 65 ft x 10 ft (L x W) of the inside or eastern edge of the curve.

- **Biological Resources:** SCE submitted a biological survey letter by ICF International dated May 18, 2012, titled *Proposed Curve Widening between M49-T2 and M51-T5, Segment 8 West (Phase IV), TRTP, Los Angeles County*. The letter documents the biological conditions at eight proposed curve widening locations between Structures M49-T2 and M51-T5 (Variance Project Component) and a 500-foot buffer. The Variance Project Component plus a 500-foot buffer is referred to as the Biological Study Area (BSA). Biological resources within the Variance Project Component and 500-foot buffer were evaluated during several focused surveys, including 2007, 2009, 2010, and 2011 rare plant surveys (AMEC 2007a, 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); and 2010 burrowing owl focused surveys (ICF 2010xx). Biological resources within the BSA were also evaluated during general preconstruction surveys and bat habitat assessment preconstruction surveys (ICF 2011bt, 2011gm, 2011gn, 2012f). A literature review was also performed as part of the Biological Review for Segment 8 Phase 4 (West) (ICF 2010dw). Additionally, preconstruction survey sweeps were performed on December 21-23, 2011 and January 12, 2012. Construction monitoring has been ongoing regularly since the sites became active, and species events and nest events are recorded in FRED.

Curve 1. Vegetation communities mapped within the Variance Project Component include coastal sage scrub. Vegetation communities within the 500-foot buffer include California annual grassland, coastal sage scrub, mixed chaparral, nonnative woodland, and disturbed/developed. Special-status plant species, intermediate mariposa lily (*Calochortus weedii* var. *intermedius*), and regulated tree species, blue elderberry (*Sambucus mexicanus*), occurs within the 500-foot buffer. Wildlife species observed within the 500-foot buffer include coastal cactus wren (*Campylorhynchus bruneicapillus*) and San Diego desert woodrat (*Neotoma lepida intermedia*) potential middens. The Variance Project Component and the 500-foot buffer are in coastal California gnatcatcher designated critical habitat.

Curve 2. Vegetation communities mapped within the Variance Project Component include California annual grassland and nonnative woodland. Vegetation communities mapped within the 500-foot buffer include California annual grassland, coast live oak woodland, coastal sage scrub, mixed chaparral, nonnative woodland, and disturbed/developed. Special-status plant species, intermediate mariposa lily, and regulated tree species, blue elderberry, occur within the 500-foot buffer. Wildlife species observed within the 500-foot buffer include coastal cactus wren and San Diego desert woodrat potential middens. The Variance Project Component and the 500-foot buffer are in coastal California gnatcatcher designated critical habitat.

Curve 3. Vegetation communities mapped within the Variance Project Component include nonnative woodland and disturbed/developed. Vegetation communities within the 500-foot buffer include California annual grassland, coast live oak woodland, coastal sage scrub, mixed chaparral, nonnative woodland, and disturbed/developed. Special-status plant species, intermediate mariposa lily, and regulated tree species, blue elderberry and coast live oak (*Quercus agrifolia*), occur within the 500-foot buffer. Wildlife species observed within the 500-foot buffer include coastal cactus wren and San Diego desert woodrat potential middens. Potential solitary bat roosts occur within the BSA. The Variance Project Component and the 500-foot buffer are in coastal California gnatcatcher designated critical habitat. Jurisdictional features 8-20-S-1 and 8-20-S-2 occur within the 500-foot buffer.

Curve 4. Vegetation communities mapped within the Variance Project Component include nonnative woodland and disturbed/developed. Vegetation communities within the 500-foot buffer include coast live oak woodland, coastal sage scrub, mixed chaparral, nonnative woodland, and disturbed/developed. Special-status plant species, intermediate mariposa lily, and regulated tree species, blue elderberry and coast live oak, occur within the 500-foot buffer. Wildlife species observed within the 500-foot buffer include coastal cactus wren and San Diego desert woodrat potential middens. Potential solitary bat roosts occur within the

BSA. The Variance Project Component and the 500-foot buffer are in coastal California gnatcatcher designated critical habitat. Jurisdictional features 8-20-S-1 and 8-20-S-2 occur within the 500-foot buffer.

Curve 11. Vegetation communities mapped within the Variance Project Component include California annual grassland, nonnative woodland, and disturbed/developed. Vegetation communities within the 500-foot buffer include bunchgrass grassland, California annual grassland, coast live oak woodland, coastal sage scrub, mixed chaparral, nonnative woodland, ruderal grassland, and disturbed/developed. Special-status plant species, Catalina mariposa lily (*Calachortus catalinae*), and regulated tree species, blue elderberry and coast live oak, occur within the 500-foot buffer. Potential solitary bat roosts and medium potential bat roost habitat occurs within the 500-foot buffer. The Variance Project Component and the 500-foot buffer are in coastal California gnatcatcher designated critical habitat. Jurisdictional feature 8-22-S-1 occurs within the 500-foot buffer.

Curve 12. Vegetation communities mapped within the Variance Project Component include California annual grassland and disturbed/developed. Vegetation communities within the 500-foot buffer include bunchgrass grassland, California annual grassland, coast live oak woodland, coastal sage scrub, mixed chaparral, ruderal grassland, and disturbed/developed. Regulated tree species, blue elderberry, coast live oak, and toyon (*Heteromeles arbutifolia*) occur within the 500-foot buffer. San Diego desert woodrat potential middens occur within the 500-foot buffer. Potential solitary bat roosts and medium potential bat roost habitat occurs within the 500-foot buffer. The Variance Project Component and the 500-foot buffer are in coastal California gnatcatcher designated critical habitat. Jurisdictional features 8-22-S-1, 8-22-S-7, and 8-22-S-8, occur within the 500-foot buffer.

Curve 14. Vegetation communities mapped within the Variance Project Component include California annual grassland and disturbed/developed. Vegetation communities within the 500-foot buffer include California annual grassland, coast live oak woodland, coastal sage scrub, mixed chaparral, nonnative woodland, and disturbed/developed. Regulated tree species, coast live oak, occurs within the 500-foot buffer. Potential solitary bat roosts occur within the 500-foot buffer. The Variance Project Component and the 500-foot buffer are in coastal California gnatcatcher designated critical habitat. Jurisdictional features 8-22-S-1 and 8-22A-S-1 occur within the 500-foot buffer.

Curve 15. Vegetation communities mapped within the Variance Project Component include California annual grassland 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 willow scrub, and disturbed/developed. Special-status plant species, California walnut (*Juglans californica*), occurs within the 500-foot buffer. Regulated tree species, blue elderberry, coast live oak, toyon, and red willow (*Salix laevigata*), occur within the 500-foot buffer. Wildlife observed within the 500-foot buffer include yellow-breasted chat (*Icteria virens*), active house wren (*Troglodytes aedon*) nests, San Diego desert woodrat potential middens, and potential solitary bat roosts. The Variance Project Component and the 500-foot buffer are in coastal California gnatcatcher designated critical habitat. Jurisdictional features 8-23-S-23, 8-23-R-400 and 8-23-R-401 occur within the 500-foot buffer.

The Variance Project Component overlaps coastal California gnatcatcher designated critical habitat at all of the curves, resulting in approximately 0.134 acres of permanent impacts. The additional impacts to coastal California gnatcatcher designated critical habitat are consistent with acreage allotted for road improvements in the USFWS Biological Opinion (BO). No amendment to the BO is required.

Jurisdictional resources within the Variance Project Component were evaluated during the 2010 jurisdictional delineations for Segments 7 and 8 (ICF 2010h). Jurisdictional features mapped within the BSA will be avoided by the Variance Project Component. Any additional potential jurisdictional features will be staked and flagged as Environmentally Sensitive Areas (ESAs) for avoidance.

No additional impacts to biological resources are anticipated.

- **Cultural and Paleontological Resources:** SCE submitted a memorandum dated May 11, 2012 from Koral Ahmet, MA, RPA, SCE Senior Archaeologist, regarding the TRTP Variance Request Cultural Clearance for 8 Curve Widening Locations between M49-T2 and M50-T4 on Segment 8 T/L Phase 4, City of La Habra Heights, Los Angeles County. The memorandum states that no cultural resources will be impacted by the curve widening at M49-T2 to M50-T4 on Segment 8 Phase 4 as part of this Variance Request in support of the TRTP. The road curves (1-4, 11-12, and 14-15) fall within the cultural records search and surveyed area for TRTP (Pacific Legacy 2007). The cultural records search and survey did not yield any resources, but two historic transmission lines, the Mesa-Walnut and Chino-Mesa 220 kV transmission lines, run through this general area. Both were evaluated and determined ineligible for the NRHP and CRHR in 2010.

A paleontological literature review (Gust and Scott 2009) shows this area to lie within the Puente Formation, which has a high paleontological sensitivity. Since the work areas lie in sensitive paleontological formations, a paleontological monitor will be required during ground disturbing activities associated with this variance per requirements of the Paleontological Resources Management Plan (PRMP).

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 (PRMP), paleontological resources monitoring shall be conducted during ground disturbing activities for the proposed curve widening work between Structures M49-T2 and M51-T5.
- 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 #6 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