

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
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February 8, 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 to Notice to Proceed (NTP) #32

Dear Ms. Nelson,

On January 18, 2012, Southern Californian Edison (SCE) submitted a variance request for a Modification to Notice to Proceed (NTP) #32 to modify several disturbance areas on the Segment 6A Transmission Line (T/L) of the Tehachapi Renewable Transmission Project (TRTP), in unincorporated Los Angeles County, California. Additional information was submitted February 3, 2012. **This Modification to NTP #32 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 #32) to modify several disturbance areas on the Segment 6A Transmission Line (T/L) of the TRTP, in unincorporated Los Angeles County, California. These disturbance areas are described below.

Site 1

Subsequent to submittal of the NTPR to the CPUC, SCE determined that the work areas outside the grading limits near existing Structure M18-T2A were missing from the GIS data. Work areas are needed around the grading limit in this area in order to properly show the disturbance area and provide the contractor with the adequate space to work and install BMPs. The additional disturbance area is a Temporary PAR Work Area that has an area of 0.05 acres. Structure M18-T2A is located southwest of Vincent Substation, and will be access from access roads identified in the initial NTPR.

Site 2

An area just west of Structure M77-T3 (Structure 5) needs to be revised to show revised grading, designed road boundary and work areas. This modification was necessary due to the original grading limits conflicting with an existing structure and foundation. The original permanent grading limits were 1.98 acres and are being reduced to 1.79 acres. The original permanent designed road boundary was 0.37 acres and is being reduced to 0.36 acres. The original temporary PAR work limits were 0.23 acres and are being increased to 0.38 acres. The permanent designed road boundary is moving slightly west at the north end of the road and slightly east towards the south end of the road.

Site 3

An area north of Structure 11 is being revised to avoid impacts to a jurisdictional feature. Grading cut and fill areas were reduced within the pull site, generally cutting off some of the areas to the east and south. There was a small additional temporary PAR work limit and a revised temporary grading limit that resulted in a slightly different temporary PAR work limit outside the already approved temporary Wire Setup Site. The total acreage for these additional temporary areas is 0.01 acres.

- **Biological Resources:** SCE submitted a biological report by ICF International dated January 11, 2012, titled *Proposed Additional Disturbance Areas, Segment 6A, Tehachapi Renewable Transmission Project, Los Angeles County*. The report documents the biological conditions at the proposed additional disturbance areas (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 2009w, ICF 2010au, 2011cq); 2010 and 2011 tree inventory surveys (ICF 2010dk, 2011cq); 2007, 2008, 2009, and 2010 arroyo toad focused surveys (AMEC 2007e, 2008c, 2009y; ICF and BonTerra 2010k) and 2007, 2008, and 2009 burrowing owl (*Athene cunicularia*) surveys (AMEC 2008b, 2009a, 2009z). Biological resources within the BSA were also evaluated during general preconstruction surveys, burrowing owl preconstruction surveys, and preconstruction bat habitat assessment surveys (ICF 2010bq, 2011bl; ICF and BonTerra 2011d, 2011h, 2011i). A literature review was also performed as part of the Biological Review for Segment 6A (ICF 2011gc). Construction monitoring has been ongoing regularly since the sites became active, and species events and nest events are recorded in the SCE Field Reporting Environmental Database (FRED).

Site 1

Vegetation communities within the Variance Project Component include Mojavean juniper woodland scrub and disturbed/developed. Vegetation communities within the 500-foot buffer include big sagebrush scrub, Mojave desert wash scrub, Mojavean juniper woodland scrub, and disturbed/developed. Special-status plant species, short-joint beavertail (*Opuntia basilaris* var. *brachyclada*) and Lemmon's syntrichopappus (*Syntrichopappus lemmonii*), occur within the 500-foot buffer. Regulated tree species, Tucker's oak (*Quercus john-tuckeri*), occur within the 500-foot buffer. Wildlife species observed within the 500-foot buffer include Loggerhead shrike (*Lanius ludovicianus*) and San Diego desert woodrat (*Neotoma lepida intermedia*). An active red-tailed hawk (*Buteo jamaicensis*) nest occurs within the 500-foot buffer (FRED Nest ID 000023). Jurisdictional features 11-2-S-4, 11-2-S-6, 11-2-S-7, and 11-2-S-8 occur within the 500-foot buffer, but will be avoided.

Site 2

Vegetation communities within the Variance Project Component and the 500-foot buffer include Mojavean juniper woodland scrub, Tucker oak scrub, and disturbed/developed. Special-status plant species, short-joint beavertail, occurs within the 500-foot buffer. Regulated tree species, Tucker's oak and lodge pole pine (*Pinus contorta*), occur within the 500-foot buffer. Wildlife species observed within the Variance Project Component include prairie falcon (*Falco mexicanus*) and San Diego desert woodrat. Wildlife species observed within the 500-foot buffer include sharp-shinned hawk (*Accipiter striatus*), San Diego desert woodrat, and potential burrowing owl features. Jurisdictional features 11-4-S-1, 11-4-S-2, 11-4-S-6, 11-4-S-7, 11-4-S-10, and 11-4-S-11 occur within the 500-foot buffer, but will be avoided.

Site 3

Vegetation communities within the Variance Project Component include mixed chaparral and disturbed/developed. Vegetation communities within the 500-foot buffer include desert almond-saltbrush scrub, mixed chaparral, Mojave mixed woody scrub, Riversidean alluvial fan sage scrub, and disturbed/developed. Regulated tree species, blue elderberry (*Sambucus cerulea*), Fremont cottonwood (*Populus fremontii*), holly-leaved cherry (*Prunus ilicifolia*), knobcone pine (*Pinus attenuata*), and Tucker's oak, occur within the 500-foot buffer. Wildlife species observed within the 500-foot buffer include loggerhead shrike, burrowing owl, potential burrowing owl feature, and San Diego desert woodrat. Jurisdictional features 6-8-S-2, 6-10-S-7, 6-11-S-1, 6-11-S-2, 6-11-S-3, 6-11-S-4, 6-11-S-5, 6-11-S-6, 6-11-S-7, 6-11-S-8, and 6-11-S-9 occur within the 500-foot buffer, but will be avoided.

Jurisdictional resources within the Variance Project Component were evaluated during the 2010 jurisdictional delineation for Segments 6 and 11 (ICF 2010aj). No mapped jurisdictional features are located within the Variance Project Component. Jurisdictional features within the 500-foot buffer will be avoided

by the Variance Project Component. Any additional potential jurisdictional features will be staked as Environmental Sensitive Areas (ESAs) and flagged for avoidance.

The Variance Project Component does not overlap suitable habitat for special-status species as included in the CDFG Incidental Take Permit (ITP) or the USFWS Biological Opinion (BO).

No additional impacts to biological resources are anticipated.

- **Cultural and Paleontological Resources:** SCE submitted cultural and paleontological resources information with the variance request and stated that no cultural or paleontological resources will be impacted by the proposed work area changes associated with the variance request for the TRTP. All of the proposed areas were included in previous cultural resources surveys for the TRTP. Results of background records searches and pedestrian surveys for TRTP show that no previously recorded cultural resources lay within the boundaries or approximate vicinity of any of the proposed modified project components (Greenberg et al. 2011, Pacific Legacy 2007, 2011). Previous paleontological assessments (Gust and Scott 2009) prepared for the TRTP project areas indicate that no paleontological resources have been previously discovered in the project vicinity. Soils in the vicinity of Site 1 and Site 3 consist of Quaternary Older Alluvium (Qoa), which is classified as a moderate level of sensitivity for harboring paleontological resources (Gust and Scott 2009). Spot-check monitoring of ground disturbance activities extending two feet below the surface is required at these locations.

No additional impacts to cultural or paleontological resources are anticipated.

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

- Spot-check paleontological monitoring shall be conducted during ground disturbance activities that exceed a depth of two feet at Sites 1 and 3.
- All conditions required by NTP #32 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #32, and this Modification to NTP #32 shall be available on site for the duration of construction activities where applicable.

Sincerely,



John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen