

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 16, 2014

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 Variance #100

Dear Ms. Nelson,

On September 5, 2014, Southern Californian Edison (SCE) submitted a Request for a Modification to Variance #100 seeking authorization from the California Public Utilities Commission (CPUC) to utilize two existing staging areas (staging area northwest of Structure M46-T1 and staging area southwest of Structure M46-T3) approved under Variance #100 as helicopter landing operational areas to support construction on Segment 8 Transmission Line (T/L) West (Phase 4) of the Tehachapi Renewable Transmission Project (TRTP), in La Habra Heights and unincorporated Los Angeles County, California. Variance #100 was approved by the CPUC to add 24 areas between Structures M45-T5 and M51-T5 for staging large vehicles and equipment, turn-around of concrete trucks, storing and staging materials, and parking on November 11, 2011.

The SCE Tehachapi Renewable Transmission Project (Project) was evaluated in accordance with the California Environmental Quality Act and a Certification of Public Convenience and Necessity (CPCN) was granted by CPUC Decision 09-12-044, (Application #07-06-031), SCH #2007081156 on December 17, 2009. **This Modification to Variance #100 is granted by CPUC for the proposed activities based on the following factors:**

- SCE submitted the following information:

SCE is requesting to utilize two existing staging areas (staging area northwest of Structure M46-T1 and staging area southwest of Structure M46-T3) approved under Variance #100 as helicopter landing operational areas to support construction on Segment 8 Transmission Line (T/L) West (Phase 4) of the TRTP, in La Habra Heights and unincorporated Los Angeles County, California as described below:

- Staging area northwest of Structure M46-T1: Use of the staging area for helicopter landing, refueling, and material/equipment helicopter picking operations.
- Staging area southwest of Structure M46-T3: Use of the staging area for material/equipment helicopter picking operations. No helicopter landing will occur at this location.

No additional disturbance area will be needed for the proposed helicopter operations.

Based upon existing site conditions, site disturbance will be limited to drive and crush; no vegetation removal or grading is anticipated.

- Biological Resources:** SCE submitted a biological survey report from ICF International dated August 24, 2011 titled *Biological Survey Report for Additional Staging Areas for Tehachapi Renewable Transmission Project, Segment 8 West (Phase IV), Los Angeles County, California*. The report documents the biological conditions for 24 additional areas necessary for staging large vehicles and equipment, turn-around of concrete trucks, storing and staging materials, and parking for monitors/inspectors for work between Structures M45-T5 and M51-T5 (Variance Project Component) and the 500-foot buffer (Biological Study Area [BSA]). The biological resources within the Variance Project Component and 500-foot buffer were evaluated during general preconstruction surveys and bat habitat assessment preconstruction surveys associated with Towers M46-T1, M46-T3, M49-T2, M49-T3, M49-T4, M50-T1, M50-T2, M50-T3, M51-T1, M51-T2, and MA1-T3 (ICF 2011du, 2011dv, 2011dw, 2011dx, 2011dy). Biological resources in the area also were evaluated during several focused surveys, including 2009, 2010, and 2011 rare plant (AMEC 2009o, ICF 2010at, 2011cq); 2010 and 2011 tree inventory (ICF 2010av, 2011cq); 2009, 2010, and 2011 coastal California gnatcatcher (*Polioptila californica*) (AMEC 2009m; ICF 2010ww, 2011cq); 2009, 2010, and 2011 riparian bird (AMEC 2009n; ICF 2010ss, 2011cq); 2007, 2009, and 2010 burrowing owl (*Athene cunicularia*) (AMEC 2008b, 2009a, 2009j; ICF 2010xx); and preconstruction special-status bat habitat assessment (ICF 2011dw, 2011dy). A literature review was also performed as part of the Biological Review for Segment 8 West (Phase IV) (ICF 2010dw). Additionally, clearance sweeps that overlapped that Variance Project Component were performed on April 23, 2011; May 13, 2011; May 18, 2011; June 6, 2011; August 4, 2011; and August 10, 2011. All construction monitoring observations of biological resources are recorded in the FRED system.
- Site A1:** Approximately 0.42 acres, adjacent to Skyline Fire Road, west of Tower M46-T1 in unincorporated Los Angeles County. Vegetation communities within the Variance Project Component include coast live oak woodland, coastal sage scrub, 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. Special-status plant species Plummer's mariposa lily (*Calochortus plummerae*) was identified within the 500-foot buffer. Coastal California gnatcatcher suitable habitat, critical habitat, and occupied habitat are located within the BSA; coastal California gnatcatcher was observed within the 500-foot buffer. San Diego desert woodrat middens were identified within the 500-foot buffer. Jurisdictional features located within the 500-foot buffer (8-15-S-3, 8-15-S-4) will not be impacted by Site A1.
- Site A2:** Approximately 0.48 acres, along Skyline Fire Road, southwest of Towers M46-T3 and M5-T1A in unincorporated Los Angeles County. Vegetation communities within the Variance Project Component include ruderal grassland and disturbed/developed. Vegetation communities with the 500-foot buffer include coastal sage scrub, ruderal grassland, and disturbed/developed. Coastal California gnatcatcher suitable habitat and critical habitat are located within the BSA; however, no coastal California gnatcatchers have been observed within the BSA during the 2011 surveys. Coastal California gnatcatcher occupied habitat is located within the 500-foot buffer. A potential burrowing owl feature was identified within the 500-foot buffer.

No additional impacts to biological resources are anticipated since no additional disturbance area will be needed for the proposed helicopter operations.

- Cultural and Paleontological Resources:** SCE submitted a memorandum dated August 26, 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 – Multiple Staging, Parking, and Turn-Around Areas between Towers M45-T5 and M51-T5. The memorandum states that no cultural or paleontological resources will be impacted by the proposed twenty-four (24) staging, parking, and turn-around areas between Towers M45-T5 and M51-T5 on Segment 8 T/L Phase IV of the TRTP. Twenty-two (22) of the proposed staging, parking, and turn-around areas were included in the previous surveys for the TRTP for Segment 8 T/L and no cultural resources were identified (Pacific Legacy 2007, 2010; PCR 2011),

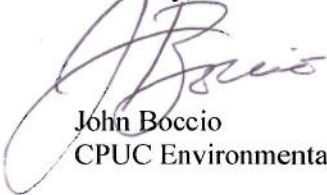
including Site A2. Approximately 20 percent of Site A1 lays outside of the previous surveys for TRTP within an undisturbed area and required an additional cultural resources survey (PCR August 25, 2011). The additional survey report by PCR dated August 25, 2011 titled *Cultural Resources Survey in Support of Variance Request for Two Staging, Parking, and Turn-Around Areas West of Structure M46-T1 and South of Structure M50-T3, Segment 8 Phase IV, TRTP, Los Angeles County, California*, states that the field survey yielded no cultural or paleontological resources, or historic properties.

Previous paleontological assessments (Gust and Scott 2009; Aron 2010) prepared for the TRTP project area 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). However, as noted above, no additional disturbance area will be needed for the proposed helicopter operations at Sites A1 and A2, so no impacts to cultural or paleontological resources are anticipated.

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

- 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, Variance #100, and this Modification to Variance #100 shall be available on site for the duration of construction activities where applicable.
- SCE shall submit a Congested Area Flight Plan (if applicable) to the CPUC prior to helicopter operations at these two staging areas.

Sincerely,



John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen