

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



January 9, 2015

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 #3 to Variance #100

Dear Ms. Nelson,

On December 9, 2014, Southern Californian Edison (SCE) submitted a Request for Modification #3 to Variance #100 seeking authorization from the California Public Utilities Commission (CPUC) to utilize an existing staging area near Structure M49-T4 approved under Variance #100 for helicopter use to support construction on Segment 8 Transmission Line (T/L) West (Phase 4) of the Tehachapi Renewable Transmission Project (TRTP), in 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. Additional biological information was submitted by SCE on January 5 and 8, 2015.

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 #3 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 an existing staging area near Structure M49-T4 approved under Variance #100 for helicopter use to support construction on Segment 8 Transmission Line (T/L) West (Phase 4) of the TRTP, in unincorporated Los Angeles County, California. Subsequent to the approval of Variance #100 (November 2, 2011) by the CPUC, project site conditions have been further evaluated and a CPUC-approved staging area is needed for use as a helicopter landing area to support construction. The staging area southeast of Structure M49-T4 will be utilized for helicopter landing, refueling, and material/equipment helicopter picking operations.

No additional disturbance area will be needed for the proposed helicopter operations. The surface of the staging area is currently rocky; no additional improvements (i.e., grading) are anticipated.

- **Biological Resources:** SCE previously 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 under

Variance #100 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 M49-T4 (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, 2011, and 2012 coastal California gnatcatcher (*Poliophtila californica*) (AMEC 2009m; ICF 2010ww, 2011cq, ICF 2012); 2009, 2010, and 2011 riparian bird (AMEC 2009n; ICF 2010ww, 2011cq); 2007, 2009, 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.

Specifically for this modification proposed near the Structure M49-T4 parking/staging area, the vegetation communities present include disturbed/developed and coastal sage scrub. Vegetation communities within the 500-foot buffer include coastal sage scrub, mixed chaparral, California annual grassland, coast live oak woodland, coast live oak woodland - burned, non-native woodland, ruderal, and disturbed/developed. No special status plants were identified within the proposed area, but intermediate mariposa lily (*Calochortus weedii* var. *intermedius*), Plummer's mariposa lily/intermediate mariposa lily (*Calochortus plummerae*), and Plummer's mariposa lily, and regulated tree species blue elderberry (*Sambucus mexicana*), coast live oak (*Quercus agrifolia*), and toyon (*Heteromeles arbutifolia*) were identified within the 500-foot buffer.

No special-status wildlife species were identified within the proposed area, but San Diego desert woodrat (*Neotoma lepida intermedia*) and bat habitat were identified within the 500-foot buffer. Coastal California gnatcatcher critical habitat, occupied habitat, and 300-foot buffer of occupied habitat are located within the BSA; however, no coastal California gnatcatchers were observed within the BSA during the 2012 surveys.

Jurisdictional features located within the 500-foot buffer (8-21-S-2, 8-21-S-3, and 8-21-S-4) will not be impacted by the modification.

The surface of the staging area is currently rocky; no additional improvements (i.e., grading) are anticipated. No additional impacts to biological resources are anticipated with the implementation of this Variance and the conditions noted below.

- **Cultural and Paleontological Resources:** The area identified for this modification request was included in previous cultural and paleontological resources surveys in support of SCE's TRTP. No resources were identified at this location. Also, as stated above, no additional disturbance area will be needed for the proposed helicopter operations. The surface of the staging area is currently rocky; no additional improvements (i.e., grading) are anticipated.

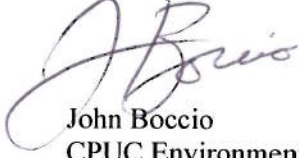
No additional impacts to cultural or paleontological resources are anticipated with the implementation of this Variance and the conditions noted below.

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 #3 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 this staging area.

Sincerely,

A handwritten signature in cursive script, appearing to read "J. Boccio".

John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen