

PUBLIC UTILITIES COMMISSION

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November 24, 2015

Ryan Stevenson
Principal Advisor
Regulatory Policy & Affairs
Southern California Edison
8631 Rush Street, General Office 4 - G100 (Ground Floor)
Rosemead, CA 91770

RE: Tehachapi Renewable Transmission Project (TRTP), Segments 4-11: Minor Temporary Work Change Request #2

Dear Mr. Stevenson,

On November 23, 2015, Southern Californian Edison (SCE) submitted a Minor Temporary Work Change request for the use of additional disturbance areas, including two wire setup sites (WSS), a distribution pole work area, and an access road. The requested work areas are located on the Segment 8 Transmission Line (T/L), Phase 1, of the Tehachapi Renewable Transmission Project (TRTP) in unincorporated Los Angeles County, California. **This Minor Temporary Work Change Request is approved by CPUC based on the following factors:**

- SCE submitted the following information:

SCE submitted a request for a Minor Temporary Work Chance for the use of additional disturbance areas, including two wire setup sites (WSS), a distribution pole work area, and an access road on Segment 8 T/L Phase 1 of the TRTP, in unincorporated Los Angeles County, California. Subsequent to the approval of the NTPR (NTP #11 dated August 12, 2010) by the CPUC, SCE has identified the need for two additional WSS, a distribution pole work area, and the use of an existing access road as described below:

- A new WSS (approximately 1.73 acres) situated between Structures M57-T1 and M57-T2. The proposed WSS will provide additional area to support transmission line stringing activities and removal of an existing 12 kV distribution line that traverses the right of way (ROW). Guard structures will be installed near the jurisdictional drainage situated in the western portion of the proposed WSS to enable avoidance of the drainage.
- The second proposed WSS (approximately 0.06 acre) is needed for foot traffic between the disturbance areas and, as needed, for the distribution line to drop on the ground surface when it is removed. The area consists of a narrow strip of land extending from the proposed distribution work area to the proposed WSS between Structures M57-T1 and M57-T2.
- A distribution work area (approximately 0.20 acre) is needed to support the temporary removal of an existing 12 kV distribution line; the distribution line will be replaced following the wire stringing activity. The work area is situated approximately 130 feet south of the ROW.
- The use of an existing unpaved road (approximately 1,040 linear-foot) is needed to access the proposed distribution work areas described above. This access road is situated south of the ROW.

Based upon existing site conditions, no vegetation removal or grading is planned.

- **Biological Resources:** SCE submitted a biological summary with the Minor Temporary Work Change request for the Segment 8 T/L Phase 1 use of two WSS, a distribution work area, and access road (Project Component), and the associated 500-foot buffer. The Project Component plus the 500-foot buffer is referred to as the Biological Study Area (BSA). The proposed additional work areas are within the SCE TRTP protocol and focused survey corridor. Vegetation communities within the Project Component include Coast Live Oak Woodland, California Walnut Woodland, and Disturbed/Developed. Vegetation communities within the 500-foot buffer include Coast Live Oak Woodland, California Walnut Woodland, Disturbed/Developed, Coastal Sage Scrub, Mixed Chaparral, and Ruderal Grassland. Special-status plants and regulated trees located within the BSA include Coast Live Oak, Blue Elderberry, California Scrub Oak, California Walnut, and Catalina Mariposa Lily. The BSA supports suitable bat, San Diego desert woodrat, and coast range newt (occupied) habitat. Jurisdictional resource 8-33-S-200 falls within the BSA, and will be protected with guard structures to prevent any unauthorized impacts.

Based on an analysis of the proposed construction activities, several resources are anticipated to be impacted within the Project Component due to vegetation removal and trimming, pedestrian access, and wire dropping activities.

Temporary impacts will be mitigated on-site per the Habitat Mitigation and Monitoring Plan (HMMP) and APM BIO-1a, as well as SWPPP requirements, weed control (Mitigation Measure [MM] B-3a), dust control (MM AQ-1a), and visual resources (MM V-1 and APM AES-8 and APM AES-13).

No additional measures are being proposed for implementation outside of the mitigation measure, permit, and regulatory requirements.

- **Cultural and Paleontological Resources:** SCE submitted a memorandum dated November 20, 2015 with the Minor Temporary Work Change Request titled the *Southern California Edison Tehachapi Renewable Transmission Project Cultural and Paleontological Resource Guidelines for Segment 8 T/L Phase I, Temporary Work Change Request –Wire Setup Sites, Distribution Pole Work Area, and Access Road near Structure M57-T2*. The memorandum states that no cultural or paleontological resources will be impacted by the proposed request in support of the TRTP Segment 8 Phase 1. The distribution work area, second proposed WSS, and the existing unpaved access road lay within the TRTP records search area, but outside of the TRTP survey areas. Therefore, a cultural resources survey was required and was conducted on November 19, 2015. A survey memorandum dated November 19 titled *SCE Tehachapi Renewable Transmission Project Temporary Extra Work Space Request Wire Stringing Site, Distribution Pole Work Area, and Access Road Near M57-T2 November 19, 2015* was provided along with the request, and no cultural, paleontological, or other historic properties were identified.

Previous paleontological assessments conducted for the TRTP indicate that the proposed areas are located within the Puente Formation, which has a high sensitivity for yielding paleontological resources (Gust and Scott 2009; Aron 2010). However, there is no ground disturbing activities associated the proposed work. No further paleontological work is required.

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:

- Prior to the start of construction, the staking of the requested area shall be reviewed and approved by the CPUC Environmental Monitor.
- Per MM B-1a, impacts to all oaks and native trees (with >3 inch diameter at breast height [DBH]) will be documented by identifying the species, number, location, and DBH. On non-Federal lands all protection

and replacement measures shall be consistent with applicable local jurisdiction requirements, such as the Los Angeles County Oak Tree Ordinance.

- All conditions required by Notice to Proceed (NTP) #11 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #11, and this Minor Temporary Work Change shall be available on site for the duration of construction activities where applicable.

Sincerely,

A handwritten signature in black ink, appearing to read "John Boccio". The signature is stylized with a large, looping initial "J".

John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen