

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



April 6, 2011

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: Variance Request (VR) #47

Dear Ms. Nelson,

On April 5, 2011, Southern Californian Edison (SCE) submitted a variance request to allow use of Wire Setup Sites (WSS) adjacent to Tower M2-T2 on the Segment 8 Transmission Line (T/L) East (Phase 2) of the Tehachapi Renewable Transmission Project in the City of Ontario, San Bernardino County, California. **This Variance Request is approved by CPUC based on the following factors:**

- SCE submitted the following information:

SCE requests a Variance to allow use of Wire Setup Sites (WSS) adjacent to Tower M2-T2 on Segment 8 Transmission Line (T/L) East (Phase 2) of the Tehachapi Renewable Transmission Project (TRTP) in the City of Ontario, San Bernardino County. Wilson Construction (SCE's contractor) has requested to expand an existing WSS and to add a new WSS from that approved in the NTP (NTP #13 dated August 24, 2010) and subsequent Variance Request (VR #10 dated October 13, 2010) by the CPUC. Specifically, Wilson has requested a variance to increase the size of the WSS on the west side of Tower M2-T2 by approximately 40,550 square feet and to add a WSS (approximately 66,500 square feet) on the east side of M2-T2, in the City of Ontario, County of San Bernardino. No grading will occur at either of these sites, as use of these sites will only require "drive and crush" method for set up of the wire puller.

These WSS are needed to reduce the length of the wire pull. This will reduce the amount of road and "hot line" crossings and increase on-site worker safety. Additionally, these WSS are needed to maintain a 3:1 ratio (the ratio of wirepuller distance from structure to vertical height of the structure) for wire pulling operations. M2-T2 is 146 feet tall, which, accounting for the length of the truck and wire puller will be attached to, requires the WSS to extend approximately 465 feet from the edge of the work area boundary on both its east and west sides. The enclosed figure shows the location of the proposed WSS located adjacent to Tower M2-T2.

- **Biological Resources:** SCE submitted a report from ICF International dated April 5, 2011 titled *Biological Survey Report for the Wire Setup Site at M2-T2 Variance for TRTP, Segment 8 East Phase 2, Los Angeles County [San Bernardino County], California*. The report documents the biological conditions at the proposed Variance location (Variance Project Component), which includes Wire Setup Sites at Tower M2-T2. The report addresses the biological resources that exist within the proposed Variance Project Component and a 500-foot buffer (Biological Study Area [BSA]). Biological resources within the Variance Project Component site and BSA were evaluated during general preconstruction surveys associated with the Segment 8 East (Phase 2) T/L (ECF 2010ax, 2010u). Biological resources in the area also were evaluated during several focused surveys, including plant (ICF 2010at), tree inventory (ICF 2010av), focused burrowing owl (*Athene cunicularia*) (ICF 2010xx, 2010dt, 2010dv), and a preconstruction special-status bat habitat assessment (ICF 2010fj). Additional clearance sweeps and construction monitoring

has been performed on the Variance Project Component between January and March 2011. A literature review was also performed as part of the Biological Review for Segment 8 East (Phase 2) (ICF 2010aw).

Four vegetation communities were mapped within the Variance Project Component and associated 500-foot buffer, including agriculture, California annual grassland, developed/disturbed and non-native woodland (ICF 2010ee). No special-status wildlife or plant species are located within the Variance Project Component, though a Cooper's hawk (*Accipiter cooperi*) and peregrine falcon (*Falco peregrinus*) were observed flying over the Variance Project Component. The 500-foot BSA for the Variance Project Component supports California walnut (*Juglans californica*) (ICF 2010at, 2010av), and active nests for American crow (*Corvus brachyrhynchos*), Brewer's blackbird (*Euphagus cyanocephalus*) and house finch (*Carpodacus mexicanus*), and rock pigeon (*Columba livia*). SCE will consult with CDFG regarding nesting bird buffer reductions prior to working in an area with active nests. Numerous potential burrowing owl features (no birds observed) were also detected within the BSA, but not within the proposed Wire Setup Sites (ECF 2011j). Focused habitat assessments for special-status bats provided no evidence that solitary or colonial roosting bat sites existing with the proposed Wire Setup Sites. There are no jurisdictional water features identified within the BSA. No additional impacts to biological resources are anticipated.

- **Cultural and Paleontological Resources:** SCE submitted a memorandum with the Variance Request from Matthew Wetherbee, MSc, RPA, Archaeologist, dated March 24, 2011, stating that no cultural or paleontological resources will be impacted by the proposed Wire Setup Sites at Tower M2-T2 on Segment 8 (Phase 2) of TRTP in the City of Ontario, San Bernardino County, California. The proposed Wire Setup Sites were included in the previous survey for the TRTP right-of-way corridor and no cultural resources were identified (Pacific Legacy 2007). No paleontological localities have been previously discovered in the project vicinity and the surface sediments (Quaternary alluvium) in the area have very low sensitivity for paleontological resources. The TRTP right-of-way for Segment 8 (Phase 2) was surveyed for paleontological resources in August 2010 and no paleontological resources were encountered (Aron 2010). No additional impacts to cultural or paleontological resources are anticipated.

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

- All conditions required by NTP #13 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #13, and this Variance shall be available on site for the duration of construction activities where applicable.

Sincerely,



John Boccio  
CPUC Environmental Project Manager

cc: V. Strong, Aspen