

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 7, 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) #48

Dear Ms. Nelson,

On April 5, 2011, Southern Californian Edison (SCE) submitted a variance request to allow use of an existing gravel turnout area located at the intersection of Tonner Canyon Road and Sanome Mountain Way (also known as Haskell Road) and additional turning radii areas located on Sanome Mountain Way in Tonner Canyon on the Segment 8 Transmission Line (T/L) Chino Hills (Phase 1) of the Tehachapi Renewable Transmission Project in unincorporated Los Angeles 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 an existing gravel turnout area located at the intersection of Tonner Canyon Road and Sanome Mountain Way (also known as Haskell Road) and additional turning radii areas located on Sanome Mountain Way in Tonner Canyon of the Segment 8 T/L Chino Hills (Phase 1) of the Tehachapi Renewable Transmission Project (TRTP) in unincorporated Los Angeles County, California. Subsequent to approval of the NTPR (NTP #11 dated August 12, 2010) by the CPUC, project site conditions have been further evaluated and the Contractor has requested the use of these areas. Since Sanome Mountain Way is a single lane road, and is too narrow for passing, the requested turnout area is necessary for safety purposes; to ensure that vehicles traveling up the road are not obstructed by vehicles traveling down the road (and vice versa). The proposed increased turning radii areas are also necessary to accommodate vehicles with large turning radius (dump trucks, concrete trucks, etc.). The additional turning area consists either of vegetated grass areas or dirt. No improvements would be necessary to utilize these areas other than "drive and crush", as necessary.

- **Biological Resources:** SCE submitted a report from ICF International titled *Biological Survey Report for the Proposed Sanome Mountain Way Turning Radius Variance for TRTP, Segment 8 Phase 1, Los Angeles County, California*, dated March 30, 2011. The report documents the results of biological surveys at the proposed Variance locations (Variance Project Component) and a 500-foot buffer (Biological Survey Area [BSA]). Biological resources within the Variance Project Component site and BSA were evaluated during surveys associated with the Segment 8 Chino Hills (Phase 1) T/L, including focused species surveys for California gnatcatcher (*Poliophtila californica*), burrowing owl (*Athene cunicularia*), special-status plants and a tree inventory (ICF 2010ww, 2010xx, 2010at, 2010av) and previously completed preconstruction surveys. A literature review was also performed as part of the Biological Review.

Nine vegetation communities were mapped within the Variance Project Component and associated 500-foot buffer including: disturbed/developed, California annual grassland, coast live oak woodland, coastal sage scrub, bunchgrass grassland, southern arroyo willow riparian forest, mixed chaparral, California walnut

woodland, and ruderal grassland (ICF 2010at). Vegetation suitable to support least Bell's vireo (*Vireo bellii pusillus*) is not present within the BSA (ICF 2010ss). A biological preconstruction survey completed on January 4, 2011, identified golden eagle (*Aquila chrysaetos*) and white-tailed kite (*Elanus leucurus*) within the BSA (ICF 2011ad). No other special-status wildlife species were identified in the BSA. Vegetation suitable to support coastal California gnatcatcher is present within the BSA; however, focused surveys for coastal California gnatcatcher conducted within the BSA were negative (AMEC 2009m; ICF 2010ww). Focused burrowing owl surveys were negative for burrowing owl features and burrowing owl (AMEC 2009j; ICF 2010xx). However, suitable burrowing owl habitat was observed within the BSA near the intersection of Sanome Mountain Way, State Road, and Tonner Canyon Road in December during burrowing owl preconstruction surveys (ICF 2010ey). No burrowing owl or sign (e.g., feathers, excrement, tracks, prey remains, and pellets) were observed (ICF 2010ey). A query of nests as of March 28, 2011 shows that helicopter buffers for nests located outside of the BSA cross the Project Component, including two oak titmouse (*Baeolophus inornatus*) nests and one house wren (*Troglodytes aedon*) nest. Catalina mariposa lily (*Calochortus catalinae*) was observed within the BSA, but outside of the Variance Project Component during the previous focused survey (AMEC 2009o; ICF 2010at). Regulated trees, California walnut (*Juglans californica*) and coast live oak (*Quercus agrifolia*) have been recorded within the BSA (ICF 2010av). No jurisdictional water features were identified within the portion of the Variance Project Component or BSA that was previously surveyed. The remaining portion of the Variance Project Component, including roughly three areas along Sanome Mountain Way were not included in the jurisdictional survey area. Prior to construction, a biological preconstruction survey will be conducted within the entire BSA. Any additional jurisdictional features not identified on the biological resources maps will be flagged and avoided as environmentally sensitive areas (ESAs). No improvements would be necessary at the intersection of Tonner Canyon Road and Sanome Mountain Way (the area is already graveled), and at the additional turning radii areas located on Sanome Mountain Way in Tonner Canyon, only "drive and crush" will be utilized, as necessary. No additional impacts to biological resources are anticipated.

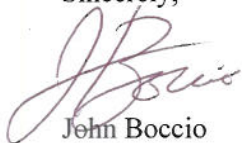
- **Cultural and Paleontological Resources:** SCE submitted a memorandum with the Variance Request from Matthew Wetherbee, MSc, RPA, Archaeologist, dated March 10, 2011, stating that no cultural or paleontological resources will be impacted by the use of the existing Sanome Mountain Way turnout and turning areas on the Tehachapi Renewable Transmission Project (TRTP) Segment 8 (Phase 1). All of the turning areas along Sanome Mountain Way (Haskell Road) were included in the previous survey for the TRTP access roads and no cultural or paleontological resources were identified (Pacific Legacy 2010; Aron 2010). Approximately 80 percent of the turnout area at the intersection of Tonner Canyon Road and Sanome Mountain Way was included in the previous survey for the TRTP and no cultural or paleontological resources were identified (Pacific Legacy 2010; Aron 2010). Approximately 20 percent of this turnout area lies outside of the TRTP access road survey corridor, but within a completely graded and disturbed area, including gravel, off the south side of the existing access road. This area is likely to consist of previously disturbed subsurface stratigraphic horizons that area unlikely to yield subsurface cultural or paleontological materials. Furthermore, no ground disturbance is proposed for all of these turnout and turning areas. Based on a review of the archaeological database and aerial photographs, the use of the turnout area at the intersection of Tonner Canyon Road and Sanome Mountain Way will have no significant impact on cultural or paleontological resources and has a low probability of impacting previously unrecorded cultural resources. Work will not extend beyond the proposed turnout and turning areas. No additional impacts to cultural or paleontological resources are anticipated.

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

- Access shall not extend beyond the previously disturbed and graveled area at the turnout at the intersection of Tonner Canyon Road and Sanome Mountain Way (Haskell Road). All vehicles and equipment shall stay off of the vegetation adjacent to this location.

- All conditions required by NTP #11 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #11, and this Variance shall be available on site for the duration of construction activities where applicable.

Sincerely,

A handwritten signature in dark ink, appearing to read "John Boccio", written in a cursive style.

John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen