

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 12, 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) #50

Dear Ms. Nelson,

On March 29, 2011, Southern Californian Edison (SCE) submitted a variance request to allow construction of two new water bars and the repair of an existing water bar located in Tonner Canyon, Segment 8 Chino Hills (Phase I) Transmission Line 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 construction of two new water bars and the repair of an existing water bar located in Tonner Canyon, Segment 8 Chino Hills (Phase I) Transmission Line (T/L) of the Tehachapi Renewable Transmission Project (TRTP) in unincorporated Los Angeles County, California. One new water bar is required in the existing roadway (classified as a State Road) leading up to structure M58-T1 to divert and reduce the amount of storm water currently flowing towards the intersection of Sanome Mountain Way and State Road, which results in a significant amount of sedimentation with each storm event producing runoff. The construction of this water bar would require blading a berm in the existing road to divert runoff. Work would also require blading a leveled area just to the south of the on-road berm to convey and discharge runoff downstream and minimize erosion of downstream areas. The flat area will consist of an area of approximately 25 feet x 65 feet rectangular area.

Another new water bar is required in the northern portion of the roadway leading to structure M57-T4 (near bottom of roadway). The improvement is necessary to divert and reduce the amount of storm water currently flowing onto the site from the access road, which is responsible for onsite erosion. The construction of this water bar would require blading a berm in the existing road to divert runoff. Work would also require blading a leveled area just to the north of the on-road berm to convey and discharge runoff downstream and minimize erosion of downstream areas. The flat area will consist of an area of approximately 25 feet x 40 feet rectangular area.

Additionally, the existing water bar located at the southern portion of the road (near top of the roadway) to M57-T4 needs to be required. Water is not diverted to this water bar in its existing condition and instead, continues to flow downstream into structure M57-T4 due to sediment obstruction.

- **Biological Resources:** SCE submitted a biological review from ICF International for the *Proposed Segment 8 Phase I Water Bars M58-T1 and M57-T4 Variance*, dated March 25, 2011. The review documents the biological conditions at the proposed [Variance] Project Component sites, as well as a summary of previous biological survey results. The general preconstruction survey was submitted to the CPUC and CDFG the week of January 3, 2011. The Project Component Site M57-T4 (Site 1) is mapped disturbed/develop, coastal sage scrub, and California annual grassland (ICF 2010nn). In addition to the

vegetation communities within Site 1, the 500-foot buffer for Site 1 contains coast live oak (*Quercus agrifolia*) woodland and California walnut (*Juglans californica*) woodland. The Project Component Site M58-T1 (Site 2) is mapped disturbed/developed, coastal sage scrub, California annual grassland (ICF 2010nn). In addition to the vegetation communities within Site 2, the 500-foot buffer for Site 2 contains coast live oak woodland, California walnut woodland, bunchgrass woodland, and ruderal grassland. The Project Component does not contain any special-status resources.

The 500-foot buffer for Site 1 includes observations of California walnut and coast live oak, potential colonial bat roost (ICF 2011y), San Diego desert woodrat (*Neotoma lepida intermedia*) nest (ICF 2011ad), and potential burrowing owl (*Athene cunicularia*) feature (no birds observed; AMEC 2009j). The 500-foot buffer for Site 2 includes observations of California walnut and coast live oak, and potential burrowing owl feature (no birds observed; ICF 2010xx). Coastal California gnatcatcher (*Poliophtila californica*) focused surveys (AMEC 2009m, ICF 2010ww) of the Project Component were negative for coastal California gnatcatcher. Potential bat roosts were identified during the preconstruction survey within the 500-foot buffer of Site 1, but outside of the Project Component (ICF 2011ad).

A general preconstruction sweep of the Variance Project Component was performed by ICF biologists on December 28, 2010 (ICF 2011ad). The last daily sweep was performed by an ICF biologist on February 10, 2011. Daily morning clearance sweeps for work associated with M58-T1 and M57-T4 were negative for additional biological resources. Preconstruction surveys will be conducted prior to the start of construction. Because these surveys expire after 30 days, updated surveys will be conducted as the previous surveys expire. Additionally when construction activity is occurring on the site, morning sweeps will be conducted daily. 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 resources will be effected by the proposed construction of two water bars and the repairing of an existing water bar within Segment 8 Phase I of the Tehachapi Renewable Transmission Project (TRTP) in Tonner Canyon, within Los Angeles County, California. All three water bar locations were included in the previous surveys for the TRTP right-of-way corridor and access roads and no cultural resources were identified (Pacific Legacy 2007, 2010). However, all three water bar locations are situated within sediments that are sensitive for paleontological resources (Gust and Scott 2009; Aron 2010). In accordance with the Paleontological Resource Management Plan (Gust and Scott 2009), paleontological resources monitoring is required during any ground disturbing activities for the construction and repairing of the water bars. Work will not extend beyond the right-of-way. No additional impacts to cultural or paleontological resources are anticipated.

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

- Because the water bar locations are situated within sediments that are sensitive for paleontological resources, and in accordance with the Paleontological Resource Management Plan (PRMP), paleontological resource monitoring shall be conducted during any ground disturbing activities for the construction and repairing of the water bars.
- 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,



John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen