

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



April 13, 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) #51

Dear Ms. Nelson,

On April 11, 2011, Southern Californian Edison (SCE) submitted a variance request to allow use of six additional Wire Setup Sites (WSS) on Segment 8 East (Phases 2 and 3) Transmission Line (T/L) of the Tehachapi Renewable Transmission Project in the Cities of Chino and 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 six additional Wire Setup Sites (WSS) on Segment 8 East (Phases 2 and 3) Transmission Line (T/L) of the Tehachapi Renewable Transmission Project (TRTP) in the Cities Chino and Ontario, San Bernardino County. Wilson Construction (SCE's contractor) has requested to add several new Wire Setup Sites, which are in addition to those approved in the NTP (NTP #13 dated August 24, 2010) by the CPUC. Specifically, Wilson has requested to add the following Wire Setup Sites (WSS):

1. WSS 8-2.1a: Addition of WSS within Chino Substation with an area totaling 0.40 acres in the City of Chino.
2. WSS 8-2.1b: Addition of WSS within Chino Substation with an area totaling 1.14 acres in the City of Chino.
3. WSS 8-2.14a: Addition of WSS located just east of structure M5-T4 with an area totaling 1.84 acres in the City of Ontario.
4. WSS 8-3.18a: Addition of WSS between structures M73-T3 and M73-T4 with an area totaling 2.32 acres in the City of Ontario.
5. WSS 8-3.19a: Addition of WSS within Mira Loma Substation, between structure M73-T5 and the Mira Loma Sub DE, with an area totaling 1.28 acres in the City of Ontario.
6. WSS 8-2.20a: Addition of WSS within Mira Loma Substation, located to the northwest, west, and south of structure M7-T1, with an area totaling 3.32 acres in the City of Ontario.

These Wire Setup Sites are needed to maintain a 3:1 ratio (the ratio of wire puller distance from structure to vertical height of the structure) for wire pulling operations, and to safely and efficiently work on the structures associated with the Wire Setup Site and to stage equipment.

- **Biological Resources:** SCE submitted a report from ICF International dated April 6, 2011 titled *Biological Survey Report for the Wilson Proposed Wire Setup Sites (WSS 8-2.1a, 8-2.1b, 8-2.14a, 8-3.18a, 8-3.19a, 8-2.20a) Variance for TRTP, Segment 8 East Transmission Line (Phase 2 & 3), San Bernardino County, California*. The report documents the results of biological surveys and conditions within the proposed Wire Setup Sites (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 surveys within and

adjacent to the BSA, including focused species surveys (ICF 2010m, 2010xx, 2010av) and preconstruction biological surveys. These surveys include Preconstruction Special-Status Bat Habitat Assessment (Phase 2) (ICF 2010ak), Preconstruction Burrowing Owl (ICF 2010dt, 2010fi, ICF 2010dv, 2011bf, 2011be), and General Biological Preconstruction (ICF 2010ax, 2010dy, 2010fe, 2010du, 2011z, 2011bd, 2011bg, 2011bc). A literature review was also performed as part of the biological review for Segment 8 East (Phase 2 and 3) (ICF 2010aw). A summary of the biological resources by WSS are listed below:

#### **WSS 8-2.1a and WSS 8-2.1b**

Within the Variance Project Component areas, disturbed/developed habitat was mapped; and ruderal grassland, disturbed/developed, and non-native woodland were mapped within the BSA. Potential burrowing owl features are present within WSS 8-2.1b and the BSA (ICF 2010xx). One previously occupied burrowing owl burrow (ICF 2010dv) is present within the BSA south of Edison Avenue. Active nests with buffers are present in the BSAs. No special-status species are present in WSS 8-2.1a. Drainage features 8-50-S-2, 8-50-S-3, and 8-50-S-4, located within the BSA, will not be impacted by the WSS.

#### **WSS 8-2.14a**

Within the Variance Project Component, disturbed/developed habitat was mapped; and open water, agriculture, California annual grassland, disturbed/developed, and ruderal grassland were mapped within the BSA. Potential burrowing owl features (ICF 2010fi), burrowing owl active nests, and burrowing owl observations are within the BSA. The active nest occurs 300 feet south of 8-2.14a, but does not pose a constraint to work activities because it is greater than 250 feet away. One peregrine falcon was identified within the BSA at M5-T4 (ICF 2011j). No special-status species are present within WSS 8-2.14a.

#### **WSS 8-3.18a and WSS 8-3.19a**

Within the WSS 8-3.18a Variance Project Component, ruderal grassland habitat was mapped. Within the WSS 8-3.19a Variance Project Component, disturbed/developed habitat was mapped. Agriculture, disturbed/developed, ruderal grassland, and California annual grassland were mapped within the BSA. One potential burrowing owl feature was observed within WSS 8-3.18a (ICF 2010dv), and potential burrowing owl features are present within the BSA (ICF 2010dv). One nest with buffer is present within the BSA, but the buffer does not cross either WSS. No special-status species are present in WSS 8-2.14a. Drainage feature 8-69-S-1, located within the BSA, will not be impacted by the WSS.

#### **WSS 8-2.20a**

Within the Variance Project Component, disturbed/developed habitat was mapped; and non-native woodland, agriculture, disturbed developed, and ruderal grassland were mapped within the BSA. Potential burrowing owl features are present within the BSA (ICF 2010du). Active nests are present within the Variance Project Component and the BSA. One loggerhead shrike (ICF 2011bd) and one peregrine falcon (ICF 2010dt) were observed within the BSA. One loggerhead shrike nest buffer extends to within the BSA. Drainage features 8-61-S-1 and 8-61-S-2 will not be impacted by the WSS.

No special-status plants were observed in the Variance Project Component areas during the previous focused survey (AMEC 2009o, ICF 2010at) and preconstruction surveys (ICF 2010ax). No regulated trees have been recorded for the Variance Project Component areas (ICF 2010av).

Any areas determined to be potentially jurisdictional waters during the preconstruction surveys that were not identified in the original delineation will be staked during preconstruction surveys and avoided during construction. If it is determined that a wetland and/or drainage cannot be avoided, a jurisdictional delineation will be conducted and permits requested for any new affected jurisdictional features. All wetland and drainages will be avoided until permit agreements are received.

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 30, 2011, stating that no cultural or paleontological resources will be impacted/effected by the proposed additional Wire Setup Sites for the TRTP Segment 8 (Phases 2 and 3) T/L in the Cities of Chino and Ontario, San Bernardino County, California. Five of 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; Panich et al. 2010). Approximately 60 percent of Wire Setup Site 8-2.14a was included in the previous survey for the TRTP and no cultural resources were identified (Panich et al. 2010). The remaining 40 percent of the Wire Setup Site lies outside of the TRTP survey corridor, but within a completely graded and disturbed area including an active dairy farm. These areas are likely to consist of previously disturbed subsurface stratigraphic horizons that are unlikely to yield subsurface cultural or paleontological materials. Furthermore, no ground disturbance is proposed for the Wire Setup Site.

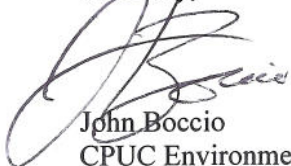
Wire Setup Sites 8-2.1a and 8-2.1b are situated within the SCE Chino Substation. As part of the SCE historic infrastructure review, the Chino Substation was identified as a historic substation complex (Urbana Preservation and Planning 2010) and was evaluated for inclusion in the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR) per the Programmatic Agreement. The Chino Substation complex as a whole was determined ineligible for listing on the NRHP and the CRHR (Urbana 2010). However, one component of the complex, the Chino Substation building, is considered to meet the definition of a historical resource/historic property (Urbana 2010:17). The two Wire Setup Sites would occur within the view of the historic Chino Substation building; but not within the footprint or immediately adjacent to the exterior walls of the historic building (the two WSS are approximately 850 and 1,124 feet away from the historic building, respectively). TRTP activities, including the proposed WSS, in the Chino Substation Complex would not cause any material impairments or integrity reduction to the historic Chino Substation building, and therefore, the Wire Setup Sites would not result in an adverse effect to the historic property or to cause a substantial adverse change in the significance of a historical resource (Urbana 2010:17).

No paleontological localities have been previously discovered in the project vicinity and the surface sediments (Quaternary alluvium) in the area have low sensitivity for yielding paleontological resources. The TRTP right-of-way for Segment 8 (Phases 2 and 3) 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