

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 4, 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) #58

Dear Ms. Nelson,

On May 2, 2011, Southern Californian Edison (SCE) submitted a variance request to allow use of the proposed paved access roads to Tower M48-T4 on the Segment 8 Transmission Line (T/L) West (Phase 4) of the Tehachapi Renewable Transmission Project (TRTP), in the City of Hacienda Heights, Los Angeles County, California. **This Variance Request is approved by CPUC based on the following factors:**

- SCE submitted the following information:

SCE submitted a request for a Variance to allow use of the proposed paved access roads to Structure M48-T4 on the Segment 8 Transmission Line (T/L) West (Phase 4) of the TRTP, in the City of Hacienda Heights, Los Angeles County, California. Subsequent to approval of the NTPR (NTP #24 dated January 12, 2011) by the CPUC, proposed access to Structure M48-T4 has been identified. Specifically, the proposed access to Structure M48-T4 would be along West Skyline Drive from Hacienda Road, and along the unnamed paved road that extends north to Structure M48-T4 from West Skyline Drive.

- Initially, load testing will be conducted along the subject access road. Load testing results will determine if additional improvements to the roadway are necessary to accommodate the equipment and material loads. A modification to this variance will be required to address any necessary roadway improvements.
- **Biological Resources:** SCE submitted a biological report by ICF International dated April 27, 2011, titled *Biological Survey Report for the M48-T4 Access Road for TRTP, Segment 8 West (Phase IV), Los Angeles County, California*. The report documents the biological conditions for an access road from Skyline Drive to Tower M48-T4 (Variance Project Component) and a 500-foot buffer (Biological Study Area [BSA]). Biological resources within the Variance Project Component and the BSA were evaluated during general preconstruction surveys associated with Tower M48-T4 (ICF 2011bs). Biological resources in the area also were evaluated during several focused surveys, including plant (AMEC 2009o, ICF 2010at), tree inventory (ICF 2010av), focused coastal California gnatcatcher (*Poliophtila californica*) (AMEC 2009m, ICF 2010ww), and a preconstruction special-status bat habitat assessment (ICF 2011bt). An additional clearance sweep was performed on the Variance Project Component on April 25, 2011. A literature review was also performed as part of the Biological Review for Segment 8 West (Phase 4) (ICF 2010dw).

The Variance Project Component is composed of disturbed/developed vegetation. The vegetation communities observed within the BSA include: coastal sage scrub, non-native woodland, California walnut woodland, coast live oak woodland, mixed chaparral, California annual grassland, wildflower field – California annual grassland, and disturbed/developed. No special-status plants have been identified in the BSA. Regulated trees, including blue elderberry (*Sambucus mexicana*), toyon (*Heteromeles arbutifolia*),

and coast live oak (*Quercus agrifolia*), were identified within the BSA, outside of the Variance Project Component (ICF 2010av). One coast live oak within the M48-T4 tower footprint is located approximately 8 feet outside of the Variance Project Component, putting it within the encroachment area (within 15 feet of the Variance Project Component; ICF 2010av). This tree and other regulated trees may need to be trimmed or removed. All necessary trimming and removal of regulated trees during construction will be fully documented and consistent with local tree ordinances.

No special-status species wildlife was identified within the BSA. The coastal sage scrub that occurs within the 500-foot buffer was included in coastal California gnatcatcher surveys (AMEC 2009m, ICF 2010ww). Coastal California gnatcatcher were determined to be absent within the BSA (AMEC 2009m, ICF 2010ww). Focused coastal California gnatcatcher surveys will occur in the BSA in 2011. No active nests have been identified within the BSA (FRED).

United States Army Corps of Engineers (USACE) regulated Waters of the U.S., California State Water Resources Control Board (SWRCB) regulated Waters of the State, and California Department of Fish and Game (CDFG) regulated streambed and riparian areas were identified in the Jurisdictional Delineation Report for the TRTP: Segments 7 and 8 (ICF 2010h). Jurisdictional drainage features (8-19-S-1, 8-20-S-3) are present within the BSA to the east of the Variance Project Component (ICF 2010h) and will be avoided. The preconstruction survey conducted within the entire BSA did not identify additional potential jurisdictional features (ICF 2011bs). If potential jurisdictional features are identified during sweeps or during construction monitoring, they will be flagged as environmentally sensitive areas (ESAs) and avoided. No additional impacts to biological resources are anticipated with the implementation of this Variance.

Cultural and Paleontological Resources: SCE submitted a memorandum dated April 28, 2011 from Natasha Tabares MA, RPA, SCE Archaeologist, regarding the Cultural Resources Guidelines for Segment 8 Phase IV (West) Variance Request for Access to M48-T4. The memorandum states that no cultural or paleontological resources will be affected by the use of the access road to M48-T4 on the TRTP Segment 8 located in Hacienda Heights, Los Angeles County. Approximately two thirds of the access road was previously surveyed for the TRTP and no cultural resources were identified (Pacific Legacy 2011). The portion of the road that was not previously surveyed is also paved and will not require any modifications for load testing. Previous paleontological assessments conducted for the TRTP indicate that the access road is located within the Miocene Puente Formation, which has a high sensitivity for yielding paleontological resources (Gust and Scott 2009; Aron 2010). However, no disturbance of the road will be required during load testing of the access road to Tower M48-T4 and therefore the use of the access road will have no effects on cultural or paleontological resources. No additional impacts to cultural or paleontological resources are anticipated with the implementation of this Variance.

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

- Because the subject access road is located within soils which have a high sensitivity for yielding paleontological resources, if load testing requires soil disturbance, a paleontological monitor shall be present.
- As a result of load testing, if road improvements are necessary, a modification to this variance describing the required roadway improvements shall be submitted to the CPUC, including a supplemental cultural report for the portion of road that was not previously surveyed.
- All conditions required by Notice to Proceed (NTP) #24 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #24, and this Variance shall be available on site for the duration of construction activities where applicable.

Sincerely,

A handwritten signature in cursive script, appearing to read "J Boccio".

John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen