

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 2, 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 (Segments 4-11), Modification to Variance #60

Dear Ms. Nelson,

On April 25, 2011, Southern Californian Edison (SCE) submitted a Request for a Modification to Variance #60 seeking authorization from the California Public Utilities Commission (CPUC) to move Wire Setup Site (WSS) 7.1a so that it is located west of Structure M54-T1A and north of Structure M27-T2 on Segment 7 Transmission Line (T/L) of the Tehachapi Renewable Transmission Project (TRTP) in the City of Duarte, Los Angeles County, California. Additional information was submitted by SCE on May 9th and 25th. Variance #60 was approved by the CPUC for the expansion of four other WSS on May 13, 2011.

The SCE Tehachapi Renewable Transmission Project (Project) was evaluated in accordance with the California Environmental Quality Act and a Certification of Public Convenience and Necessity (CPCN) was granted by CPUC Decision 09-12-044, (Application #07-06-031), SCH #2007081156 on December 17, 2009. **This Modification to Variance #60 is granted by CPUC for the proposed activities based on the following factors:**

- SCE submitted the following information:

SCE is requesting to move WSS 7.1a so that it is located west of Structure M54-T1A and north of Structure M27-T2 on Segment 7 Transmission Line (T/L) of the TRTP in the City of Duarte, Los Angeles County. Expansions of four other WSS were requested under the same Variance Request and were approved under Variance #60, as WSS 7.1a had information pending.

Grading and excavation will occur adjacent to the west side of Structure M54-T1A. The grading and excavation limits are approximately 0.41 acres, with an additional outer work limit of 0.12 acres, for a total of 0.53 acres. Excavation of the upslope of the hillside and fill of the down slope of the hillside is needed to create a level work pad for equipment setup during structure removal activities and wire pulling. The total metrics are 9,095 cubic yards (CY) cut and 66 CY fill. The overall disturbed surface area is 17,629 sq. ft. The specific excavation and grading information is as follows:

<u>Pad</u>	<u>Cut</u>	<u>Fill</u>	<u>Slope</u>	<u>Cut</u>	<u>Fill</u>
Length	116 ft	78 ft	Length	120 ft	N/A
Width	38 ft	19 ft	Width	60 ft	N/A
Depth	15 ft	0.5 ft	Depth	15 ft	N/A

Since the proposed slope is cut at a 1:1 based on the geology, replacing the soil to a pre-cut elevation would not be feasible and the fill would be left in place as well since it would be impractical to haul it off site and re-contour the pad area.

The WSS area outside of the footprint of the grading limits and outer work limits will be drive and crush only. The WSS is 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 WSS and to stage equipment.

SCE and their contractor will prevent erosion and stabilize any slopes as laid out in the mitigation measures pertaining to slope stabilization as well as sediment and erosion control.

- **Biological Resources:** SCE submitted a biological report by ICF International dated April 22, 2011, titled *Biological Survey Report for the Proposed Wilson Wire Setup Site (WSS 7.1a, 7.7a, 7.34a, 7.59a, 7.61a) Expansions Variance for Tehachapi Renewable Transmission Project, Segment 7, Los Angeles County, California*. The report documents the biological conditions for the proposed Variance Wire Setup Site (WSS) (Variance Project Component) and the 500-foot buffer (Biological Study Area [BSA]). The biological resources within the Variance Project Component and BSA for WSS 7.1a were evaluated during general preconstruction survey reports completed for TRTP structures M54-T1A and M27-T2, which are within or adjacent to the Variance Project Component sites (ICF 2010df, 2011ay, 2011bq, 2011bo). Biological resources in the area were also evaluated during several focused surveys, including plant (ICF 2010at), tree inventory (ICF 2010av), focused burrowing owl (AMEC 2009j; ICF 2010xx, 2010bj, 2011bp), and a preconstruction special-status bat habitat assessment (ICF 2010bg). Additional clearance sweeps were performed within the Variance Project Component on March 15 and April 13, 2011. A literature review was also performed as part of the Biological Review for Segment 7 (ICF 2010ay).

Vegetation communities observed within the Variance Project Component include mixed chaparral and coastal sage scrub. Vegetation communities observed within the BSA include mixed chaparral, coastal sage scrub, southern willow scrub, and disturbed/developed (road). San Gabriel oaks (*Quercus gabrielensis*) are present within WSS 7.1a (ICF 2010av). No other special-status plants are present within the Variance Project Component or BSA.

Potential ringtail (*Bassariscus astutus*) habitat and San Diego desert woodrat (*Neotoma lepida intermedia*) nests were observed at WSS 7.1a. Focused habitat assessments for burrowing owl (*Athene cucularia*) (AMEC 2009j, ICF 2010xx) did not identify potential burrowing owl features within the BSA. The BSA supports habitat for nesting birds.

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). The Variance Project Component impact areas were surveyed and the BSA was partially surveyed during previous delineation surveys (ICF 2010h). Jurisdictional drainage features are present within the Variance Project Component (7-2-S-1, 7-2-S-2) and BSA (7-2-S-3, 7-2-S-4, 7-2-S-5, 7-2-S-6, 7-2-S-7, 7-1-S-12, 7-1-S-13, 7-1-S-14, 7-1-S-15, 7-1-S-16, 7-1-S-17, 7-1-S-18, 7-1-S-19, 7-1-S-20). Impacts to these jurisdictional features will be avoided. If these features cannot be avoided, permit amendments will be necessary, and the features will be flagged as ESAs and avoided until permit amendments are issued.

No additional impacts to biological resources are anticipated.

Cultural Resources: SCE submitted a memorandum dated April 7, 2011 with the Variance Request from Matthew Wetherbee, MSc, RPA, Archaeologist, stating that no cultural or paleontological resources will be impacted by the proposed Wire Setup Site Expansions for TRTP Segment 7. All of the proposed

WSS expansion areas were included in the previous survey for the TRTP right-of-way corridor and no cultural resources were identified (Pacific Legacy 2007). The Paleontological Resources Management Plan (PRMP) for Segments 4 -11 of TRTP project area was prepared by Cogstone Resource Management Inc. (Gust and Scott 2009). No paleontological localities have been previously discovered in the project vicinity and the surface sediments (Quartz diorite, tertiary dikes, and Quaternary alluvium and gravels) have low sensitivity for yielding paleontological resources. The TRTP right-of-way for Segment 7 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 with the implementation of this Variance.

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

- Per MM H-1a, APM GEO-3, and APM HYD-1, SCE shall implement the Erosion Control Plan and SWPPP, and demonstrate compliance with water quality permits.
- Per MM V-4b and APM AES-8, SCE shall apply the Excavation Plan to work at WSS 7.1a and revegetate the construction site.
- All conditions required by NTP #17 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #17, and this Modification to NTP #17 shall be available on site for the duration of construction activities where applicable.

Sincerely,



John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen