

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 11, 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) #60

Dear Ms. Nelson,

On April 25, 2011, Southern Californian Edison (SCE) submitted a variance request to move one Wire Setup Site and to expand several other Wire Setup Sites on Segment 7 of the Tehachapi Renewable Transmission Project (TRTP) in Los Angeles County, California. One of the Wire Setup Sites (WSS 7.1a) will be processed under a separate Variance since information is pending for this site. **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 move one Wire Setup Site (WSS) and to expand several other WSS on Segment 7 of the TRTP in Los Angeles County, California. Wilson Construction (SCE's contractor) has requested the Variance for changes in WSS from those in the NTP (NTP #17 dated September 24, 2010) and subsequent variance requests. The WSS 7.1a near Structure M54-T1A in the City of Duarte will be processed under a separate Variance. Specifically, Wilson has requested to move or expand the following Wire Setup Sites:

1. **WSS 7.7a:** Expand area of the existing WSS located northeast of Structure 29-T2 and southwest of M29-T1 by a total of 0.82 acres, in the City of Irwindale, Los Angeles County.
2. **WSS 7.34a:** Expand area of the existing WSS located between Structures M34-T5 and M34-T6 by 2.02 acres, in the City of Baldwin Park, Los Angeles County.
3. **WSS 7.59a:** Expand area of the existing WSS located southeast of Structure M39-T4 in the Whittier Narrows Recreation Area by 0.68 acres, in unincorporated Los Angeles County.
4. **WSS 7.61a:** Expand area of the existing WSS located west of Structure M39-T4 in the Whittier Narrows Recreation Area by 0.88 acres, in unincorporated Los Angeles County.

These WSS 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 WSS and to stage equipment.

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 Sites (WSS) (Variance Project Component) and the 500-foot buffer (Biological Study Area [BSA]). The

Variance Project Component includes expansion of four approved wire setup sites within the TRTP Segment 7 alignment. The biological resources within the Variance Project Component sites and BSAs were evaluated during general preconstruction survey reports completed for TRTP structures M29-T2, M39-T4, M34-T5, and M34-T6, 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).

- Variance Project Component and BSA – WSS 7.7a

The vegetation communities mapped within the Variance Project Component include disturbed/developed and coastal sage scrub. The vegetation communities mapped within the BSA include: disturbed/developed, coastal sage scrub, mule fat scrub, and open water. No special-status plants were observed within the Variance Project Component or BSA. A Swainson's hawk was observed overhead within the Variance Project Component. While suitable coastal gnatcatcher habitat is present within the Variance Project Component, coastal California gnatcatcher surveys were negative (AMEC 2009m, ICF 2010ww). This area will be included in 2011 focused surveys for California gnatcatcher. A non-numbered jurisdictional feature is within the BSA of WSS 7.7a.

- Variance Project Component and BSA – WSS 7.34a

The vegetation communities mapped within the Variance Project Component include disturbed/developed. The vegetation communities mapped within the BSA include disturbed/developed, mule fat scrub, sparsely vegetated streambed, and ruderal wetland. No special-status plants were observed within the Variance Project Component or BSA. Suitable habitat and habitat features occur within the BSA for WSS 7.34 (ICF 2011bo). Jurisdictional features within the BSA include 7-24-S-1 and 7-25-S-1.

- Variance Project Component and BSA – WSS 7.59a

The vegetation communities mapped within the Variance Project Component include non-native woodland and disturbed/developed. The vegetation communities mapped within the BSA include: non-native woodland, disturbed/developed, southern willow scrub, southern sycamore alder riparian woodland, freshwater marsh, and open water. No special-status plants were observed within the Variance Project Component or BSA. Potential bat roost habitat was observed within the Variance Project Component. A jurisdictional feature (7-34-S-1) is within the BSA of WSS 7.59a.

- Variance Project Component and BSA – WSS 7.61a

The vegetation communities mapped within the Variance Project Component include non-native woodland and disturbed/developed. The vegetation communities mapped within the BSA include: non-native woodland, disturbed/developed, southern will scrub, southern sycamore alder riparian woodland, freshwater marsh, and open water. No special-status plants were observed within the Variance Project Component or BSA. Potential bat roost habitat was observed within the Variance Project Component. A jurisdictional feature (7-34-S-1) is within the BSA of WSS 7.61a.

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 and BSA (see individual WSS above).

No additional impacts to biological resources are anticipated with the implementation of this Variance.

Cultural and Paleontological Resources: SCE submitted a memo 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 (ROW) 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:

- All conditions required by Notice to Proceed (NTP) #17 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #17, 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