

PUBLIC UTILITIES COMMISSION

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June 1, 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) #64

Dear Ms. Nelson,

On May 23, 2011, Southern Californian Edison (SCE) submitted a variance request for the use of additional areas for "wire tagging" for Structures M3-T3A, M5-T1A, and M8-T1A, and use of an access route to the proposed wire tag site associated with Structure M3-T3A, 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. Additional information was submitted on May 27th. **This Variance Request is approved by CPUC based on the following factors:**

- SCE submitted the following information:

SCE submitted a request for a Variance for the use of additional areas for "wire tagging" for Structures M3-T3A, M5-T1A, and M8-T1A, and use of an access route to the proposed wire tag site associated with Structure M3-T3A, 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, additional areas for "wire tagging" have been identified. Wire tagging is an activity where crews park a truck or drive a stake into the ground and pull conductor perpendicular to the alignment to provide room to work safely. The disturbance activity needed to utilize the sites is drive and crush and where site allows, driving a stake in the ground.

The M3-T3A north wire tag site is proposed for 0.02 acres; the M3-T3A south wire tag site is proposed with an area of 0.07 acres. The M5-T1A north and south wire tag sites each are proposed with areas of 0.03 acres (0.06 total). The wire tag site south of Structure M8-T1A is proposed with an area of 0.03 acres. The total area proposed for wire tagging is approximately 0.18 acres.

Wilson is requesting an approximate 875 foot long access route leading to wire tag site M3-T3A south. No improvements are necessary to the proposed access route along Skyline Drive for the proposed wire tag site associated with Structure M3-T3A south, since it is a paved road. This separate route is needed as an alternate because there is a concrete V-ditch blocking access off the approved existing access road. This approved road could be used for access, but would require setting steel plates to protect the existing infrastructure. In addition to the concrete V-ditch, there is metal fencing that would need to be removed to provide the necessary width for vehicles to pass through and moderate vegetation removal would be necessary as well.

- **Biological Resources:** SCE submitted a biological report by ICF International dated May 12, 2011, titled *Biological Survey Report for Access and Additional Wire Tagging at M3-T3A, M5-T1A, and M8-T1A, Variance for TRTP, Segment 8 West (Phase IV), Los Angeles County, California*. The report documents the biological conditions within the wire tag sites for M3-T3A, M5-T1A, and M8-T1A, and the 875-foot access

road (Variance Project Component) and a 500-foot buffer (Biological Study Area [BSA]). Biological resources within the BSA were evaluated through the review of previous focused survey results from within or adjacent to the BSA (ICF 2010at, 2010xx, 2010av), including a special-status bat assessment (ICF 2011by, 2011bt), bat preconstruction survey (ICF 2011bt), focused burrowing owl survey (ICF 2011bx), focused California gnatcatcher surveys (AMEC 2009m, ICF 2010ww), and during preconstruction biological surveys (ICF 2011bw, 2011bx, 2011by). A literature review was also performed as part of the biological review (ICF 2010dw).

This Variance includes three sites that support a total of five wire tag sites. Variance Site 1 supports Wire Tag Site 1 and is located north of Rose Hills Memorial Park, southwest of Tower M8-T1A. Variance Site 2 supports Wire Tag Sites 2 and 3 at Tower M5-T1A. Variance Site 3 supports Wire Tag Sites 4 and 5 and is located east of the intersection of Colima Road and Skyline Drive.

The Variance Project Component is composed of ruderal vegetation, coastal sage scrub, and non-native woodland. The vegetation communities observed within the BSA include: coast live oak woodland, coastal sage scrub, California black walnut woodland, disturbed/developed habitat, mixed chaparral, non-native woodland, and ruderal grassland. No special-status plants or regulated trees have been recorded for the Variance Project Component (ICF 2010at). Coast live oaks (*Quercus agrifolia*), a regulated tree species, were observed in the BSA for Variance Site 1 during the previous focused surveys (ICF 2010av). Two California black walnut (*Juglans californica*), a special-status plant species, were observed within the BSA of the Variance Site 3 (ICF 2010at).

Although no special-status wildlife species have been observed within the Variance Project Component, Site 1 overlaps coastal California gnatcatcher (*Polioptila californica*) critical habitat and supports suitable habitat (coastal sage scrub) (AMEC 2009m, ICF 2010ww). Site 1 is considered currently occupied by coastal California gnatcatcher according to the parameters for the Biological Opinion. Sites 2 and 3 also overlap designated coastal California gnatcatcher critical habitat, but do not contain suitable habitat and are not considered occupied by coastal California gnatcatcher. Focused 2011 surveys are on going in the area north and south of Sites 2 and 3, and if the species is found, appropriate buffers will be implemented. Sites 4 and 5 do not overlap coastal California gnatcatcher critical habitat and no suitable habitat is present; however, focused 2011 surveys are on going in the area south of Sites 4 and 5, and if the species is found, appropriate buffers will be implemented.

Potential bat roost habitat was observed within the Site 1 BSA. Potential San Diego desert woodrat middens were observed within the Site 1 and 3 BSAs. A potential burrowing owl feature was observed within the Site 2 BSA. Two common raven nests (FRED nest ID #s 001067 and 000761) were identified within the BSA of Site 3.

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). No jurisdictional features were mapped within the Variance Sites; however, four jurisdictional features (8-18-S-50, 8-18-S-1, 8-18-S-2, and 8-18-S-3) exist within the BSA of Site 3. These features will be staked and flagged for avoidance.

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


Cultural and Paleontological Resources: SCE submitted a memorandum dated April 27, 2011 from Natasha Tabares MA, RPA, SCE Archaeologist, regarding the TRTP Cultural Resources Guidelines for Segment 8 Variance Request for Wire Tag Sites and Access. The memorandum states that no cultural or paleontological resources will be affected by the use of an access road and five areas for wire tagging for Structures M3-T3A, M5-T1A, and M8-T1A on the TRTP Segment 8 located in Hacienda Heights, Los

Angeles County. The proposed five wire tagging areas and fifty percent of the paved access road, Skyline Drive, were previously surveyed for the TRTP and no cultural resources were identified (Pacific Legacy 2007). The portion of the road that was not previously surveyed is also paved and will not require any modifications. Previous paleontological assessments conducted for the TRTP indicate that the wire tag sites are located in an area along the Pliocene Fernando Formation and the Miocene Puente Formation. These formations have a high sensitivity to yield paleontological resources (Aron 2010). However, the disturbance activities associated with wire tagging (drive and crush and driving a stake in the ground) are considered minimal. 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) #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,



John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen