

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



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) #65

Dear Ms. Nelson,

On May 25, 2011, Southern Californian Edison (SCE) submitted a variance request for the use of an area adjacent to Structure M48-T3 for parking, staging, and turnaround of equipment and materials, 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 for the use of an area adjacent to Structure M48-T3 for parking, staging, and turnaround of equipment and materials, on the Segment 8 Transmission Line (T/L) West (Phase 4) of the TRTP, in the City of Hacienda Heights, Los Angeles County, California. Wilson Construction is requesting a Variance to the NTPR (NTP #24 dated January 12, 2011) by the CPUC, to use an area for parking and staging vehicles and equipment, and for concrete truck turn-around, for work at and around Structure M48-T3. This area has an irregular shape and is approximately 0.10 acres.

This Variance is being requested because there is limited space due to steep topography located to the east and west of Structure M48-T3. The proposed location is a grassy area off an access road, just southwest of Structure M48-T3. The proposed location could be used as is and does not require grading and/or maintenance to clear. The only disturbance activity to the proposed area would be drive and crush.

- **Biological Resources:** SCE submitted a biological report by ICF International dated May 25, 2011, titled *Biological Survey Report for the M48-T3 Staging Area Variance for TRTP, Segment 8 West (Phase IV), Los Angeles County, California*. The report documents the biological conditions for a staging area south of Structure M48-T3 (Variance Project Component) and a 500-foot buffer (Biological Study Area [BSA]) located in Hacienda Heights. Biological resources within the Variance Project Component and 500-foot buffer were evaluated during general preconstruction surveys associated with M48-T3 (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 riparian birds (ICF 2010ss), focused coastal California gnatcatcher (*Polioptila 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 28, 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, ruderal grassland, and coastal sage scrub vegetation. The vegetation communities observed within the BSA include: coastal sage scrub, non-

native woodland, southern willow scrub, coast live oak woodland, ruderal grassland, and disturbed/developed. Non-native woodland, coast live oak woodland, and southern willow scrub will not be affected by the Variance Project Component. No special-status plants have been identified in the BSA (AMEC 2009o; ICF 2010at). 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).

No special-status wildlife species were identified within the BSA. Although coastal sage scrub within the Variance Project Component is suitable coastal California gnatcatcher habitat, no coastal California gnatcatchers have been observed during focused surveys (AMEC 2008d, 2009m; ICF 2010ww). The Variance Project Component does overlap coastal California gnatcatcher USFWS designated critical habitat (USFWS CFWO 2011), but does not overlap coastal California gnatcatcher occupied habitat. Focused coastal California gnatcatcher surveys will occur in the BSA in 2011.

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 (8-19a-S-1, 8-19a-S-3) are present within the BSA to the west of the Variance Project Component (ICF 2010h) and will be staked and flagged for avoidance. The preconstruction survey conducted within the entire BSA did not identify additional potential jurisdictional features (ICF 2011bs).

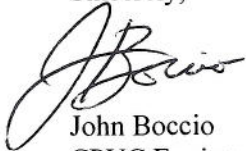
No additional impacts to biological resources are anticipated with the implementation of this Variance.

Cultural and Paleontological Resources: SCE submitted a memorandum dated May 10, 2011 from Matthew Wetherbee, MSc, RPA, SCE Archaeologist, regarding the TRTP Cultural and Paleontological Resource Guidelines for Segment 8 West (Phase 4) Variance Request for a Parking and Staging Area at M48-T3. The memorandum states that no cultural or paleontological resources will be impacted by the use of the proposed parking and staging area at Structure M48-T3 on the TRTP Segment 8 West (Phase 4) located within the City of Hacienda Heights, Los Angeles County. The proposed parking and staging area were included in previous surveys for the TRTP for Segment 8 and no cultural resources were identified (Pacific Legacy 2007, 2010). Previous paleontological assessments conducted for the TRTP indicate that the proposed parking and staging area is located within the Miocene Puente Formation, which has a high sensitivity for yielding paleontological resources (Gust and Scott 2009; Aron 2010). However, no ground disturbance is proposed for the use of the parking and staging area. Work will not extend beyond the proposed parking and staging area. 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