

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 6, 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) #67

Dear Ms. Nelson,

On May 27, 2011, Southern Californian Edison (SCE) submitted a variance request for use of an area adjacent to Structure M23-T2A for parking and staging of equipment and materials on the Segment 8 Transmission Line (T/L) Chino Hills (Phase 1) of the Tehachapi Renewable Transmission Project (TRTP), in Tonner Canyon, in unincorporated 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 use of an area adjacent to Structure M23-T2A for parking and staging of equipment and materials on the Segment 8 T/L Chino Hills (Phase 1) of the TRTP (NTP #11 dated August 12, 2010), in Tonner Canyon, in unincorporated Los Angeles County, California.

The area has an irregular shape totaling approximately 0.19 acres. The Variance is being requested because there is limited available space at and near Structures M57-T4, M57-T3, and M23-T2A due to steep sloped terrain and vegetation surrounding these structures. The proposed parking and staging area is an existing tower location that is not associated with TRTP. There is an existing approved access road to this proposed parking and staging area. The proposed location would be used as is and would not require grading or maintenance to clear. Disturbance activity would be limited to drive and crush.

- **Biological Resources:** SCE submitted a biological report by ICF International dated May 25, 2011, titled *Biological Survey Report for the Staging and Parking Area Near Structure M23-T2A Variance for TRTP, Segment 8 Chino Hills (Phase 1), Los Angeles and San Bernardino County, California*. The report documents the biological conditions at the proposed Staging and Parking Area near Structure M23-T2A (Variance Project Component) and a 500-foot buffer (Biological Study Area [BSA]). Biological resources within the BSA were evaluated during general preconstruction surveys associated with Segment 8 Chino Hills (Phase 1) (ICF 2010ce). Biological resources in the area also were evaluated during several focused surveys, including plant (AMEC 2009o, ICF 2010at), tree inventory (ICF 2010av), coastal California gnatcatcher (AMEC 2008d, 2009m; ICF 2010ww), and a preconstruction special-status bat habitat assessment (ICF 2010ak, 2010cb, 2011y). A literature review was also performed as part of the Biological Review for Segment 8 Chino Hills (Phase 1) (ICF 2010ar).

Vegetation communities mapped within the Variance Project Component include California annual grassland and disturbed/developed. The vegetation communities observed within the BSA include: California annual grassland, coastal sage scrub, coast live oak woodland, mixed chaparral, and disturbed/developed. No special-status plants or regulated trees were identified within the Variance Project

Component (AMEC 2009o; ICF 2010at, 2010av). California walnut (*Juglans californica*) and Catalina mariposa lily (*Calochortus catalinae*) were identified within the BSA (ICF 2010at).

No special-status wildlife species have been observed within the Variance Project Component. Northern harrier (*Circus cyaneus*) were observed in flight on February 10, 24, and April 8, 2011, during construction monitoring (FRED Species Events #000667, 000778, and 001057). A portion of the coastal sage scrub that occurs within the BSA was included in coastal California gnatcatcher surveys (*Poliopitila californica*) (AMEC 2008d, 2009m; ICF 2010ww). Coastal California gnatcatchers were determined to be absent within the BSA (ICF 2010ww). The BSA is also not within USFWS designated coastal California gnatcatcher critical habitat (USFWS CFWO 2011) or coastal California gnatcatcher occupied habitat. Focused coastal California gnatcatcher surveys in 2011 will include all coastal sage scrub within the BSA. Potential colonial bat roost habitat was not identified within the BSA (ICF 2010ak, 2010cb, 2011y). Although no active nests have been identified within the BSA, the active nest helicopter buffer overlaps 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). The Variance Project Component impact area was surveyed and the BSA was partially surveyed during previous delineation surveys (ICF 2010h). No jurisdictional features were identified within the BSA. Prior to construction, a biological preconstruction survey will be conducted within the entire BSA. Any additional potential jurisdictional features not identified on the biological resources map will be flagged and avoided as environmentally sensitive areas (ESAs).

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

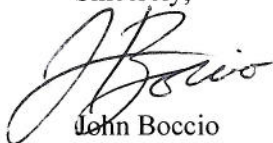
- **Cultural and Paleontological Resources:** SCE submitted a memorandum dated May 10, 2011 from Matthew Wetherbee, MSc, RPA, SCE Archaeologist, regarding the Cultural and Paleontological Resources Guidelines for Segment 8 (Phase 1) Variance Request for Parking and Staging Area at M23-T2A. The memorandum states that no cultural or paleontological resources will be impacted by the use of the proposed parking and staging area at Structure M23-T2A on Segment 8 (Phase 1). The proposed parking and staging area was included in the previous surveys for Segment 8 and no cultural resources were identified (Applied Earthworks 2009; Pacific Legacy 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, and therefore the use of the parking and staging area will have no impacts to cultural or paleontological resources. 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) #11 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #11, and this Variance shall be available on site for the duration of construction activities where applicable.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Boccio". The signature is fluid and cursive, with the first letter "J" being particularly large and stylized.

John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen