

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 2, 2014

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: Modification #2 to Variance #100

Dear Ms. Nelson,

On November 25, 2014, Southern Californian Edison (SCE) submitted a Request for a Modification to Variance #100 seeking authorization from the California Public Utilities Commission (CPUC) for additional disturbance activities within a CPUC-approved staging area near Structure M50-T3 on Segment 8 Transmission Line (T/L) West (Phase 4) of the Tehachapi Renewable Transmission Project (TRTP), in unincorporated Los Angeles County, California. Variance #100 was approved by the CPUC to add 24 areas between Structures M45-T5 and M51-T5 for staging large vehicles and equipment, turn-around of concrete trucks, storing and staging materials, and parking on November 4, 2011. The subject area was previously approved under Variance #100 as a staging area, but no ground disturbance was proposed (drive and crush only). After further evaluation, the contractor has identified that some grading is necessary to get vehicles and equipment into the area.

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 #2 to Variance #100 is granted by CPUC for the proposed activities based on the following factors:**

- SCE submitted the following information:

SCE is requesting authorization for additional disturbance activities within a CPUC-approved staging area near Structure M50-T3 approved under Variance #100 to support construction on Segment 8 Transmission Line (T/L) West (Phase 4) of the TRTP, in unincorporated Los Angeles County, California. Subsequent to the approval of Variance Request #100 by the CPUC, project site conditions have been further evaluated and additional disturbance activities within a CPUC-approved staging area are needed for constructability purposes. The additional disturbance activities will occur within a staging area that was previously approved by CPUC via variance request. The grading is needed to temporarily widen an existing, minimum improvement access road to allow construction equipment access to WSS 8-4.24. The temporary grading area will be returned to its pre-graded condition following wire stringing activities. In addition, the area will be used to accommodate potential line drag during wire stringing activities.

No additional disturbance area is needed for the proposed disturbance activities.

Based upon existing site conditions, vegetation removal and grading will occur.

- **Biological Resources:** SCE submitted biological information with the Variance Request. The proposed disturbance activities are within approved disturbance areas. Vegetation communities within the Variance Project Component include California annual grassland, mixed chaparral, and disturbed/developed. Vegetation communities within the 500-foot buffer include California annual grassland, coast live oak woodland, coastal sage scrub, mixed chaparral, nonnative woodland, ruderal grassland, and disturbed/developed. Regulated tree species blue elderberry, coast live oak, holly-leaved cherry, and toyon were identified within the 500-foot buffer.

Coastal California gnatcatcher suitable habitat and critical habitat and jurisdictional features (8-22-S-2, 8-22-S-3) are located within the 500-foot buffer, but these areas will not be impacted. These areas are subject to regular construction monitoring and nesting bird surveys.

No additional impacts to biological resources are anticipated with the implementation of this Variance and the conditions noted below.

- **Cultural and Paleontological Resources:** SCE submitted a memorandum dated November 20, 2014 regarding the TRTP Cultural and Paleontological Resource Guidelines for Segment 8 T/L Phase 4 Modification to Variance 100 – Access Road Improvement and Wire Stringing Activities within a Staging Area near Structure M50-T3. The memorandum states that no cultural resources will be impacted; however, there is a potential for impacting paleontological resources by the proposed Variance Request on Segment 8 T/L Phase IV of the TRTP. The proposed area provided in this Variance Request was included in the previous surveys for the TRTP and no cultural resources were identified (Pacific Legacy 2007, 2010).

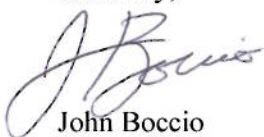
Previous paleontological assessments conducted for the TRTP indicate that the proposed area is located within the Miocene Puente Formation, which has a high sensitivity for yielding paleontological resources (Gust and Scott 2009; Aron 2010). In accordance with the Paleontological Resource Management Plan (Gust and Scott 2009), paleontological resources monitoring is required during any ground disturbing activities.

No additional impacts to cultural or paleontological resources are anticipated with the implementation of this Variance and the conditions noted below.

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, Variance #100, and this Modification #2 to Variance #100 shall be available on site for the duration of construction activities where applicable.
- Per the Paleontological Resource Management Plan (Gust and Scott 2009), paleontological resources monitoring is required during any ground disturbing activities.
- The additional disturbance area shall be restored to preconstruction conditions.

Sincerely,



John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen