STATE OF CALIFORNIA Edmund G. Brown Jr., Governor

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

February 9, 2012

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) #115

Dear Ms. Nelson,

On February 7, 2012, Southern Californian Edison (SCE) submitted a variance request for the expansion of several Wire Setup Sites and Guard Pole Sites on Segment 7 Transmission Line (T/L) of the Tehachapi Renewable Transmission Project (TRTP), in the Cities of Duarte and Irwindale, 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 expansion of several Wire Setup Sites and Guard Pole Sites on Segment 7 T/L of the TRTP, in the Cities of Duarte and Irwindale, Los Angeles County, California. The purpose of the variance request is to include temporary Wire Setup Sites (WSS) and Guard Pole Sites required to setup wire stringing equipment needed to complete wire stringing at Structures M28-T3, M28-T4, M31-T2, and M33-T4. The proposed temporary WSS expansion and Guard Pole Sites include the following:

  Site 1
  WSS expansion adjacent to Structure M28-T3, extending WSS 7.4 northward (approximately 0.431 acre). City of Duarte, County of Los Angeles.

  Site 2
  Addition of two Guard Pole Sites northeast of Structure M28-T4 to prevent contact with distribution lines during stringing activities (approximately 0.23 acre per Guard Pole Site). City of Duarte. County of Los Angeles.

  Site 3
  WSS expansion adjacent to Structure M31-T2, extending WSS 7.14 northeast (approximately 0.861 acre). City of Irwindale. County of Los Angeles.

  Site 4
  WSS expansion adjacent to Structure M33-T4, extending WSS 7.28 to Structure M33-T4 (approximately 1.108 acres) and to the north of Structure M33-T4 (approximately 2.533 acres). City of Irwindale. County of Los Angeles.

  The total area requested for the proposed sites is approximately 5.393 acres. Minor ground disturbance (i.e., leveling a pad to support wire pulling equipment and setting temporary guard poles to support the wire guard structure) and minor vegetation removal of shrubs and grasses is needed to utilize the proposed areas.

- **Biological Resources**: SCE submitted a biological survey report by ICF International dated February 6, 2012, titled *Proposed Segment 7 Wire Setup Site Expansions and Additional Guard Pole Sites, TRTP*. The letter documents the biological conditions at the proposed Segment 7 Wire Setup Site (WSS) expansions and additional Guard Pole Sites (Variance Project Component) and the 500-foot buffer (Biological Study Area [BSA]). Biological resources within the Variance Project Component and 500-foot buffer (BSA) were evaluated during several focused surveys, including 2009, 2010, and 2011 rare plant surveys (AMEC 2009o, ICF 2010at, 2011cq); 2010 and 2011 tree inventory surveys (ICF 2010av, 2011hd); 2007, 2009, 2010, and 2011 coastal California gnatcatcher (*Polioptila californica*) focused surveys (AMEC 2008d, 2009m; ICF 2010ww, 2011gq); 2010, 2011 riparian birds surveys (ICF 2010ss, 2011fx); and 2010 burrowing owl (*Athene cunicularia*) focused surveys (ICF 2010xx). Biological resources within the BSA were also evaluated during general biological preconstruction surveys, burrowing owl preconstruction surveys, and bat habitat assessment preconstruction surveys (ICF 2010bg, 2010bh, 2011ay, 2011bm, 2011bo, 2011bq, 2011dm, 2011dn, 2011dq, 2011fv, 2011hl). A literature review was also performed as part of the Biological Review for Segment 7 (ICF 2010ay). Clearance sweeps were performed for Sites 1 and 2 on February 5, 2011, April 11, 2011, and June 7, 2011; for Site 3 on February 7, 2011, February 18, 2011, April 4, 2011, April 13, 2011, and May 16, 2011; and for Site 4 on February 11, 2011, April 18, 2011, and May 31, 2011. Construction monitoring has been ongoing regularly since the sites became active, and species events and nest events are recorded in the Field Reporting Environmental Database (FRED).

  Site 1 – WSS adjacent to Structure M28-T3
  Vegetation communities within the Variance Project Component include disturbed/developed. Vegetation communities within the 500-foot buffer include coastal sage scrub and disturbed/developed. No special-status plant species or regulated trees were observed within the BSA. No special-status wildlife species were observed within the BSA. Potential solitary bat roost habitat occurs within the Variance Project Component. Potential solitary bat roost habitat and potential colonial bat roost habitat occurs within the 500-foot buffer. The 500-foot buffer is within coastal California gnatcatcher occupied habitat.

  Site 2 – Two Guard Pole Sites northeast of Structure M28-T4
  Vegetation communities within the Variance Project Component include California annual grassland and disturbed/developed. Vegetation communities within the 500-foot buffer include California annual grassland, coastal sage scrub, mule fat scrub, nonnative woodland, open water, Riversidean alluvial fan sage scrub, and disturbed/developed. No special-status plant species were observed within the BSA. One regulated tree, coast live oak (*Quercus agrifolia*), occurs within the 500-foot buffer. Wildlife species observed within the 500-foot buffer include least Bell's vireo (*Vireo bellii pusillus*), yellow-headed blackbird (*Xanthocephalus xanthocephalus*), yellow warbler (*Dendroica petechia*). Potential solitary bat habitat occurs within the 500-foot buffer. The 500-foot buffer is within coastal California gnatcatcher occupied habitat and least Bell's vireo occupied habitat, and is a riparian bird territory.

  Site 3 – WSS adjacent to Structure M31-T2
  Vegetation communities within the Variance Project Component include California annual grassland, ruderal grassland, and disturbed/developed. Vegetation communities within the 500-foot buffer include coastal sage scrub, mule fat scrub, Riversidean alluvial fan sage scrub, ruderal grassland, and disturbed/developed. No special-status plant species or regulated trees were observed within the BSA. Wildlife species observed within the 500-foot buffer include San Diego desert woodrat (*Neotoma lepida intermedia*), and Swainson's hawk (*Buteo swainsoni*). Jurisdictional feature 7-10-S-2 occurs within the 500-foot buffer and will be avoided.

  Site 4 – WSS adjacent to and north of Structure M33-T4
  Vegetation communities within the Variance Project Component include agriculture. Vegetation communities within the 500-foot buffer include agriculture, mule fat scrub, Riversidean alluvial fan sage scrub, ruderal grassland, southern willow scrub, sparsely vegetated streambed, and disturbed/developed. No special-status plant species or regulated trees were observed within the BSA. No special-status wildlife

species were observed within the BSA. Potential burrowing owl feature was observed within the 500-foot buffer. Jurisdictional feature 7-22-S-1 occurs within the 500-foot buffer and will be avoided.

Jurisdictional resources within the Variance Project Component were evaluated during the 2010 jurisdictional delineation for Segments 7 and 8 (ICF 2010h). Jurisdictional features mapped within the BSA will be avoided by the Variance Project Component. Subsequently identified potential jurisdictional features will be staked and flagged as Environmentally Sensitive Area (ESAs) for avoidance.

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 January 25, 2012 regarding the SCE TRTP Variance Request - Cultural Clearance for WSS Expansions Adjacent to M28-T3, M28-T4, M31-T2, M33-T4 – Segment 7, City of Duarte, Los Angeles County. The memorandum states that no cultural resources will be impacted by the WSS expansion areas adjacent to M28-T3, M28-T4, M31-T2, and M33-T4 in support of TRTP Segment 7 T/L. A cultural record search and survey (Pacific Legacy 2007), and a paleontological literature review (Gust and Scott 2009) have been previously conducted for this area of Segment 7. This research indicates that the proposed disturbance area is located within an area previously surveyed for the TRTP and shows that no significant cultural resources exist at this location. The Antelope-Mesa 220kV T/L runs through these areas and was evaluated and determined ineligible for the NRHP and CRHR in 2010. Also, an historic debris scatter (07-H-002) lies in the WSS for M33-T4 that was also evaluated and determined ineligible for the NRHP and CRHR in 2010. Per the 3rd revised CPMP, no further management is required for these resources. This research also shows that no significant paleontological resources are likely to exist at this location.

  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) #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