

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



March 7, 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) #118

Dear Ms. Nelson,

On March 5, 2012, Southern Californian Edison (SCE) submitted a variance request for use of an additional access road near M42-T6 and Wire Set-up Site 7.75 on Segment 7 Transmission Line (T/L) of the Tehachapi Renewable Transmission Project (TRTP), in the City of Monterey Park, Los Angeles County, California. Additional information was submitted on March 7, 2012. **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 additional access road near Structure M42-T6 and Wire Set-up Site (WSS) 7.75 on Segment 7 T/L of the TRTP, in the City of Monterey Park, Los Angeles County, California. Wilson Construction has requested a field change to add approximately 644 linear feet (LF) of access road to provide a means for wire stringing equipment to demobilize the work site without disturbing an identified rare biological resource positioned to the northeast of the equipment. The proposed field change includes the use of an existing access road and entrance through a gate in the Mesa Contractor Yard perimeter fence.

Wire stringing equipment (forklift, tensioner, and wire boat trailers) staged at M42-T6 and WSS 7.75 would need to travel through the existing Biological Resource Buffer (2694), which has been identified as a rare species, to demobilize using approved access roads. The rare Biological Resource (2694) is located near M42-T5 with its buffer encompassing the only usable approved access road for the identified work area. Therefore, this proposed field change is requesting access to travel from the approved WSS 7.75, south, along existing disturbed roads and into the Mesa Contractor Yard through a chain-link fence gate. A pole hauling truck will take approximately six (6) to eight (8) trips to remove the wire spools, currently located on the wire boats. The tensioner will be hauled away on a lowboy trailer. The proposed access road is within 500-feet of the Biological Resource (2557). However, the contractor will not enter the established 150-foot ground buffer for this resource.

No ground disturbance or vegetation removal will be needed to utilize the existing gravel roads being requested. Wilson considers disturbance on the existing roads to be temporary.

On March 3, 2012, the ambient noise was measured from the approved access road, between M42-T6 and its southwestern work boundary, and was found to be 57.3 dB(A). The proposed activity will be taking place at a minimum of 650-feet from the rare Biological Resource (2694) buffer and 950-feet from the Resource itself. The pole hauling truck used to remove the wire spools produces a similar level of sound as a boom truck. At a distance of 200-feet, a boom truck produces approximately 49.5 dB(A) when traveling at 15 miles per hour. The vehicle used to pull the lowboy trailer produces a similar level of sound as a cement truck. At a distance of 200-feet, a cement truck produces approximately 54.8 dB(A) when traveling at 15 miles per

hour. Therefore, all activities taking place on the proposed access roads will be well below the acceptable noise limits (60 dB(A) measured at the edge of the territory) associated with the rare Biological Resource (2694).

- **Biological Resources:** SCE submitted biological information on March 7, 2012, for the variance request. The Project Component area is located on an existing dirt access road. Vegetation communities and biological resources located within 500 feet of the Project Component include developed, ruderal grassland, coastal sage scrub, sparsely vegetated streambed, disturbed mulefat scrub, mulefat scrub, and nonnative woodland (ICF 2012). These surrounding vegetation communities will not be impacted by the Project Component. The Project Component is not located within occupied habitat or critical habitat for coastal California gnatcatcher (*Poliptila californica*) or least Bell's vireo (*Vireo bellii pusillus*). However, the Project Component is located immediately adjacent to occupied California gnatcatcher habitat. Two active California gnatcatcher territories (identified as Territory A and Territory B) are located approximately 1460 feet and 950 feet northeast of the Project Component (measured from the center of nest event), respectively. Use of the Project Component is subject to the terms and conditions of the USFWS Biological Opinion and CDFG Incidental Take Permit. Applicable disturbance free buffers have been implemented in the field and do not overlap the Project Component. A jurisdictional resource is located within the Project Component; however, it is bridged by an existing culvert. No modifications to the culvert are required as part of the Project Component. No permit amendment is required. This area was surveyed for nesting birds on March 3, 2012. As of March 5, 2012, two active bird nests are located within 500 feet of the Project Component. Nest Event 2673 (mourning dove; *Zenaida macroura*) is located approximately 470 feet from the Project Component and a 25 foot disturbance free ground buffer has been established; and Nest Event 2557 (red-tailed hawk; *Buteo jamaicensis*) is located approximately 260 feet from the Project Component and a 150 foot disturbance free ground buffer has been established. The disturbance free buffers for these nests do not overlap the variance request area. Special-status biological resources are demarcated in the field by Environmentally Sensitive Area staking where applicable. Construction has been on-going in this area since December 2010 (i.e., wire removal and wreckout). The following surveys have been conducted in the area: bat habitat assessment (November 4, 2010), and biological preconstruction and sweep (October 28, 2010, December 2, 2010, January 9, 2011, August 23, 2011, September 16, 2011).

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 March 5, 2012 regarding the SCE TRTP Variance Request - Cultural Clearance for 644 Feet of Additional Access from Wire Set-up Site (WSS) 7.75 at M42-T6 to Mesa Contractor Yard Perimeter Fence, on Segment 7, City of Monterey Park, Los Angeles County. The memorandum states that no cultural or paleontological resources will be impacted by the 644 feet of additional access from WSS 7.75 at M42-T6 to the Mesa Contractor Yard perimeter fence as part of this variance request in support of the TRTP. Eighty percent of the additional access lies within the surveyed corridor for TRTP (Pacific Legacy 2007). In addition, the paleontological literature review (Gust and Scott 2009) shows the area west of M42-T6 to lie in Quaternary Alluvium, an area considered to have a low paleontological sensitivity. The previous cultural survey identified two pieces of historic infrastructure, a transmission line (Mesa-Walnut 220kV) and a substation (Mesa Substation) located near to but not overlapping the requested area. The line and substation were evaluated and determined ineligible for the NRHP and CRHR in 2010. Furthermore, there will be no ground disturbance or vegetation removal needed to utilize the existing gravel roads being requested. As a result, there will be no impacts to significant cultural resources and no exposure of sensitive paleontological resources 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,

A handwritten signature in black ink, appearing to read "J. Boccio", written in a cursive style.

John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen