

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 4, 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) #125

Dear Ms. Nelson,

On March 27, 2012, Southern Californian Edison (SCE) submitted a variance request for the use of additional work areas to provide additional temporary power to the Vincent North and South Material Yards, as part of the Tehachapi Renewable Transmission Project (TRTP), in unincorporated City of Vincent, 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 additional work areas to provide additional temporary power to the Vincent North and South Material Yards, as part of the TRTP, in unincorporated City of Vincent, Los Angeles County, California. The Vincent North Material Yard was approved by the CPUC under Notice to Proceed (NTP) #21 dated December 9, 2010. The Vincent South Material Yard was approved by the CPUC under NTP #22 dated December 9, 2010. Since the issuance of the NTPs, SCE has determined that there is inadequate power supply from the temporary secondary power supply from the Bootlegger 12kV circuit existing pole 4587497E, located on Angeles Forest Highway into the Vincent Material Yards. The Bootlegger 12kV circuit tap line extension will provide temporary power to the Vincent North and South Material Yards. This work will bring primary 12kV power closer to two transformers within the material yard. Installation of temporary power will require the placement of one temporary wood power pole and guywire anchor outside the boundary of the Vincent North and South Material Yards and pole 4587497E, from which to string temporary power to the Vincent North and South Material Yards.

Proposed 12kV tap line extension to the Vincent Yard trailers will include the following:

- Set eight poles, five 45-foot wood poles and three 50-foot wood poles. One pole and one anchor rod on Boggs property with new disturbance area.
 - Install ten anchor rods for down guys.
 - Install two transformers on poles within material yard.
 - Install associated hardware on poles.
 - Two additional disturbance areas on the property to the east.
- **Biological Resources:** SCE submitted a biological report titled *Proposed Installation of Additional Temporary Power from Angeles Forest Highway to Vincent South and North Material Yards, Segment 6, Tehachapi Renewable Transmission Project, Los Angeles County* dated March 15, 2012. The report documents the biological conditions at the proposed Vincent North and South Material Yards (Variance Project Component) plus a 500-foot buffer. The Variance Project Component and the 500-foot buffer are

referred to as the Biological Study Area (BSA). Biological resources within the BSA were evaluated during several focused surveys, including 2009, 2010, and 2011 rare plant surveys (AMEC 2009c; ICF 2010ag, 2011gu); 2010 and 2011 tree inventory surveys (ICF 2010bf, 2011ga); and 2009 and 2010 burrowing owl (*Athene cunicularia*) surveys (AMEC 2009f; ICF 2010cq1). The biological resources within the BSA were also evaluated during Rodeo Contractor Yard, Segment 5, Vincent North Material Yard, Vincent South Material Yard general preconstruction surveys, burrowing owl preconstruction surveys, and preconstruction bat habitat assessment surveys (ICF 2010bd, 2010br, 2010rr, 2010ae, 2010af, 2010bq, 2010gi, 2011m, 2011n, 2011bj, 2011bk, 2011fk, 2011fl, 2011hm, 2011hn). Literature reviews were also performed as part of the Biological Review for Rodeo Contractor Yard (ICF 2010oo), Segment 5 (ICF 2010yy), Vincent North Material Yard (ICF 2010cl), and Vincent South Material Yard (ICF 2010cl). Additionally, clearance sweeps were performed at Vincent material Yard North and Vincent Material Yard South on December 1, 15, 17, and 23, 2010; January 11, 12, 14, 15, 17, 25, and 29, 2011; and April 4, 13, and 14, 2011. Construction began within a week of the most recent preconstruction surveys. Woodrat midden relocations were also conducted within the BSA (ICF 2011bh, 2011bi). Construction monitoring has been ongoing regularly since the sites became active, and species events and nest events are recorded in the SCE Field Reporting Environmental Database (FRED).

Vegetation communities within the Variance Project Component include Mojavean juniper woodland scrub, Mojave mixed woody scrub, and disturbed/developed. Vegetation communities within the 500-foot buffer include Mojavean juniper woodland scrub, Mojavean juniper woodland scrub – disturbed, Mojave mixed woody scrub, rabbitbrush scrub, ruderal grassland, and disturbed/developed. Special-status plant species, Short-joint beavertail cactus (*Opuntia basilaris*, var. *brachyclada*), was observed in the Variance Project Component and 500-foot buffer (January 20, 2012) and was relocated off-site in February 2012. No regulated tree species occur within the BSA.

Special-status wildlife species observed within the 500-foot buffer include: loggerhead shrike (*Lanius ludovicianus*), yellow-headed blackbird (*Xanthocephalus xanthocephalus*), Golden eagle (*Aquila chrysaetos*), silvery legless lizard (*Aniella pulchra pulchra*), coast horned lizard (*Phrynosoma blainvillii*), and American badger (*Taxidea taxus*). Potential burrowing owl feature(s) were observed within the Variance Project Component and the 500-foot buffer (ICF 2010fs). San Diego desert woodrat (*Neotoma lepida intermedia*) midden was observed within the 500-foot buffer. A common raven (*Corvus corax*) active nest was also observed within the 500-foot buffer (FRED Nest ID 002708). The Variance Project Component does not overlap suitable habitat for special-status species as included in the CDFG Incidental Take Permit (ITP) or the USFWS Biological Opinion (BO).

Jurisdictional resources within the Variance Project Component were evaluated during the 2010 jurisdictional delineation for Segment 6 (ICF 2010l). No mapped jurisdictional features are located within the BSA (ICF 2010l). Any additional potential jurisdictional features will be staked as Environmentally Sensitive Areas (ESAs) and flagged 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 memo titled *SCE Tehachapi Renewable Transmission Project Cultural and Paleontological Guidelines for Segment 6 – Vincent Yard, Variance Request – Vincent Yard Power Upgrade* dated March 5, 2012. The memo states that no historic properties, historical resources or significant paleontological resources will be impacted by the proposed power upgrade at the Vincent Yards, in support of Segment 6 of the Tehachapi Renewable Transmission Project (TRTP). All areas were included in previous cultural resources surveys and assessments for the TRTP (Bischoff 2011; Pacific Legacy 2007, 2010; Schneider et al. 2010). Four cultural resources were previously recorded within the areas proposed for the power upgrade (this historic-era Bootlegger 12kV distribution line, PL-SCE-Seg6-07 (isolated historic refuse deposit), PL-SCE-Vincent-05H (historic-era trash scatter),

and CA-LAN-3536H (historic-era trash scatter). The Bootlegger 12kV distribution line was evaluated and determined ineligible for listing on the National Register of Historic Places (NRHP) (Williams 2009). This resource was badly damaged during the Station Fire and rebuilt in 2010. PL-SCE-Seg6-07 was evaluated per Appendix K of the Construction Phase Management Plan and determined ineligible for listing on NRHP/CRHR, requiring no further management (Bischoff 2011). PL-SCE-Vincent-05H and CA-LAN-3536H were evaluated and recommended ineligible for inclusion on NRHP/CRHR (Schneider, et al. 2010). PL-SCE-Vincent-05H and CA-LAN-3536H were determined ineligible for inclusion on the CRHR. Per consultation with the State of California Office of Historic Preservation, PL-SCE-Vincent-05H was determined (by consensus) to not be eligible for NRHP. Development of the Vincent Yards as determined to not have an adverse effect to CA-LAN-3536H (letter correspondence dated December 13, 2010 from Susan Straton (for Milford Wayne Donaldson, SHPO) to Martin Dumpis, Acting Forest Supervisor, Angeles National Forest). Cultural resources monitoring was provided by SCE during development of Vincent Yard North and South and the installation of poles providing temporary power to the yards. All three of the historic trash scatters were removed during these construction activities. No subsurface component of any of the historic-era resources was encountered during yard development or installation of temporary power.

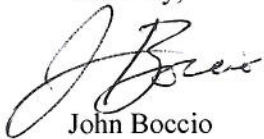
Previous paleontological assessments (Gust and Scott 2009) for TRTP indicate that no paleontological resources have been previously documented in the vicinity of the areas requested by this variance. Surface sediments consist of Quaternary Alluvium (Qa), which is considered low sensitivity for harboring significant paleontological resources (Gust and Scott 2009).

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) #21 and NTP #22 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #21, NTP #22, 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