

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 20, 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) #127

Dear Ms. Nelson,

On April 3, 2012, Southern Californian Edison (SCE) submitted a variance request to use access roads through Rose Hills Memorial Park and Puente Hills Landfill for construction of on the Segment 8 Transmission Line (T/L) West (Phase 4) of the Tehachapi Renewable Transmission Project (TRTP) in unincorporated Los Angeles County, California. **This Variance Request is approved by CPUC based on the following factors:**

- SCE submitted the following information:

SCE submits a request for a Variance for use of existing access roads through Rose Hills Memorial Park and Puente Hills Landfill.

Rose Hills Memorial Park Additional Access Roads: The use of these roads will provide adequate vehicle and equipment access to structures within and adjacent to Rose Hills. The request is to temporarily use approximately 45,340 linear feet (8.59) of existing access roads within Rose Hills Memorial Park (Park) located in Unincorporated Los Angeles County, to ensure the following, in coordination with Park staff:

- Avoid impacts to funeral processions and funeral services by providing construction crews with maximum flexibility to re-route construction traffic.
- Disperse the volume of construction vehicles among several routes to minimize the visibility of construction traffic within the park.
- Reduce wear-and-tear on the Park's arterial and tributary roads by dispersing construction vehicles among many routes, in coordination with Park Staff.

The proposed additional access roads are existing paved roads. No ground disturbance, road improvements, or vegetation removal is required to utilize the additional access roads. The proposed additional access roads are located in Rose Hills Memorial Park, in unincorporated Los Angeles County.

Puente Hills Landfill Additional Access Roads: Approximately 9,240 linear feet (1.75 miles) of existing access roads within Puente Hills Landfill are requested to safely access the transmission line ROW. Los Angeles County Sanitation District specifically identified and approved these access roads for use by TRTP construction vehicles when traversing Puente Hills Landfill. The proposed access roads are existing permanent access roads. The proposed access roads are located in Puente Hills Landfill, in Unincorporated Los Angeles County.

- **Biological Resources:** SCE submitted a biological report with the Variance Request from ICF International dated April 3, 2012 titled *Biological Survey Report for Use of Existing Access Roads in Rose Hills Memorial Park and Puente Hills Landfill, Tehachapi Renewable Transmission Project, Segment 8 West (Phase IV)*. The report documents the biological conditions for the use of existing access roads in Rose Hills Memorial Park, the Puente Hills Landfill (Project Component) and the 500-foot buffer (Biological Study Area [BSA]). Biological resources within the 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); and coastal California gnatcatcher (*Poliptila californica*) surveys (AMEC 2008d, 2009m; ICF 2010ww, 2011hc); riparian bird (AMEC 22009n; ICF 2010ss, 2011fx), and 2010 burrowing owl (*Athene cunicularia*) focused surveys (ICF 2010xx). The biological resources within the BSA were also evaluated during general biological preconstruction surveys and bat habitat assessment preconstruction surveys within the BSA (ICF 2011bw, 2011by, 2011dj, 2011dk, 2011gh, 2011gi, 011he). A literature review was also performed as part of the Biological Review for Segment 8 Phase 4 (West) (ICF 2010dw). Additionally, a general biological preconstruction clearance sweep was performed on February 17, 2012. All construction monitoring observations of biological resources are recorded in the SCE Field Reporting Environmental Database (FRED). For purposes of discussion in the biological report, the Variance Project Component is split into the following three (3) sites: Site 1 (in Rose Hills), Site 2a (in Puente Hills) and Site 2b (in Puente Hills).

Site 1: The Variance Project Component is mapped as disturbed/developed. The vegetation communities observed within the 500-foot buffer include agriculture, coastal sage scrub, disturbed/developed, nonnative woodland and ruderal grassland. Coastal California gnatcatcher suitable habitat (coastal sage scrub) is located within the 500-foot buffer; coastal California gnatcatcher individuals (AMEC 2008d, 2009m; ICF 2010ww, 2011gh, 2011gq; FRED species ID 003549, 003558, 003611) and a 2012 active coastal California gnatcatcher nest (FRED Nest ID 002662) have been observed within the Site 1 500-foot buffer. Coastal California gnatcatcher designated critical habitat and coastal California gnatcatcher occupied habitat overall the Site 1 500-foot buffer. Least Bell's vireo occupied habitat overlaps the Site 1 500-foot buffer, and least Bell's vireo, yellow-breasted chat, and yellow warbler individuals were observed within the Site 1 500-foot buffer during 2010 and 2011 surveys (ICF 2010ss, 2010ww, 011gq). Potential burrowing owl features were identified within the Site 1 500-foot buffer (ICF 010xx). Medium potential colonial and low potential solitary bat roosts as well as potential San Diego desert woodrat potential occur within the Site 1 500-foot buffer (ICF 2011by; 2011 bw, 2011dj, 2011dh). An active red-tailed hawk nest (FRED Nest ID 002478) was identified within the 500-foot buffer. Jurisdictional feature 8-11-S-5 is located within the 500-foot buffer.

Site 2a: The Variance Project Component is mapped as disturbed/developed. The vegetation communities observed within the 500-foot buffer include annual grassland, coast live oak woodland, coastal sage scrub, disturbed/developed and nonnative woodland. Coastal California gnatcatcher designated critical habitat and coastal California gnatcatcher occupied habitat overlap the Site 2a 500-foot buffer, and coastal California gnatcatcher designated critical habitat also overlaps the Project Component. Coast live oaks were identified within the 500-foot buffer (ICF 2010av, 2011hd). Coastal California gnatcatcher individuals (ICF 2011gq; FRED species ID 003550, 003551) have been observed within the Site 2a 500-foot buffer. Low potential solitary bat roosts are located within the 500-foot buffer (ICF 2011by). There is a jurisdictional feature (8-10-S-1) within the 500-foot buffer that will not be impacted by the project.

Site 2b: The Variance Project Component is mapped as disturbed/developed. The vegetation communities observed within the 500-foot buffer include coastal sage scrub, disturbed/developed, mule fat scrub, nonnative woodland and ruderal grassland. Coastal California gnatcatcher designated critical habitat and coastal California gnatcatcher occupied habitat overlap the Site 2b 500-foot buffer; no coastal California gnatcatcher individuals or nests have been observed within the BSA. A willow flycatcher was observed within the 500-foot buffer (ICF 2010ss). Jurisdictional features are located within the 500-foot buffer (8-11-S-1, 8-11-S-2, 8-11-S-3, 8-11-S-4).

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, 20112 regarding the *TRTP Cultural Clearance for Use of Existing Access Roads on Segment 8 T/L Phase IV, Rose Hills Memorial Park and Puente Hills Landfill*. The memorandum states that no cultural or paleontological resources will be impacted by the use of additional access roads.

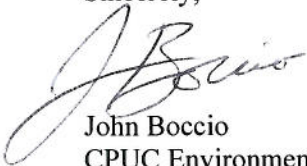
The additional roads fall within the cultural records search, but outside the surveyed area for TRTP (Pacific Legacy 2007). The cultural records search did not yield any resources, but two historic transmission lines, the Walnut-Mesa 220 kV and the Walnut-Hilgen-Industry-Mesa-Reno 66 kV lines, run through this general area. Both were evaluated and determined ineligible for the NRHP and CRHR in 2010. Since, no ground disturbance is proposed, no significant impacts to cultural resources are anticipated.

The paleontological literature review (Gust and Scott 2009) shows this area to lie within the Fernando Formation which has a high paleontological sensitivity; however, since there will be no ground disturbance in support of this Variance request, there are no anticipated impacts paleontological resources.

The conditions noted below shall be met by SCE and its contractors:

- As access to the proposed access roads was not granted by the landowner to conduct preconstruction biological surveys, prior to use of the subject access roads, SCE shall provide CDFG concurrence to not conduct 7-day least Bell's vireo surveys.
- 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, 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