STATE OF CALIFORNIA Edmund G. Brown Jr., Governor

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

May 10, 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) #128

Dear Ms. Nelson,

On May 3, 2012, Southern Californian Edison (SCE) submitted a variance request to add 7,182 linear feet of additional existing access roads and a 0.36 acre wire setup site (WSS) between Structures M30-T1 and M29-T3 on Segment 7 Transmission Line (T/L) of the Tehachapi Renewable Transmission Project (TRTP) within the Cities of Duarte and Irwindale, County of Los Angeles. **This Variance Request is approved by CPUC based on the following factors:**

- SCE submitted the following information:

  SCE submitted a request to add approximately 7,182 linear feet of existing access roads and approximately 0.36 acre Wire Setup Site (WSS) to facilitate wire pulling activities associated with Structures M30-T1 to M29-T3. The proposed access roads include use of existing roads located west of the 605 freeway and north of WSS 7.11. The proposed WSS is a sparsely-vegetated area between Structures M30-T1 and M29-T5.

  The wire stringing activities require staging wire pulling equipment on the existing proposed road extending northeast of WSS 7.11. However, using currently approved access roads to access the proposed existing road extending northeast of WSS 7.11 is not feasible because of an impassible concrete ditch located at the northeast edge of WSS 7.11. Additionally, the approved access road that approaches WSS 7.11 from the southwest has curves that do not allow wire stringing vehicles and equipment to successfully negotiate the curves without damaging the roadway curbs. As such, the proposed access roads will provide access to WSS 7.11, the north side of the concrete ditch, and the proposed WSS between M29-T and M30-T1. Wire stringing activities in the vicinity of the north side of the ditch will only occur on the existing roads. The proposed access roads will provide space to stage the puller, turn around area for associated vehicles, and temporary parking. No ground disturbance or vegetation removal will be needed to utilize the requested roads.

  The proposed WSS is requested for wire snubbing activities. Wilson Construction intends to temporarily snub the tail end of the conductors to bulldozers staged within the proposed WSS. Drive and crush disturbance will be needed to utilize the area. This area is sparsely vegetated with non-native vegetation and is previously disturbed. The bulldozers will be staged within the southern portion of the proposed WSS where an existing pullout feature is cut from the slope to the north. Conductor will also be snubbed to bulldozers staged on the road to the north of the variance area. The northern portion of the proposed WSS will be used to temporarily lay down excess conductor when snubbing to the bulldozers on the road.

  Access to the requested roads will be through a gate located to the southeast of the intersection at Duarte Road and Highland Avenue, in the City of Duarte, County of Los Angeles. Access to the proposed WSS will

be approved access roads located between M30-T1 and M39-T5 in the City of Irwindale, County of Los Angeles.

- **Biological Resources**: SCE submitted biological information with the variance request stating that the wire setup site and access roads (Project Component) are located within previously surveyed portions of the Segment 7 Transmission Line for TRTP. The WSS is referred to as Site One and the access road to Site One is referred to as Site Two.

  Site One is characterized as California annual grassland. Vegetation communities and biological resources located within 500 feet of Site One include developed land, flood control basin/open water, coastal sage scrub and Riversidean alluvial fan sage scrub (ICF 2012). The surrounding vegetation communities will not be impacted by the Project Component. Site One is not located within occupied habitat or critical habitat for coastal California gnatcatcher or least Bell's vireo. A jurisdictional resource is located adjacent to Site One but will not be impacted by the Project Component. As of April 24, 2012, one active bird nest is located within 500 feet of Site One (FRED Nest ID#: 2655). The disturbance free buffer does not overlap the Project Component. Special-status resources observed within 500 feet of the Project Component include loggerhead shrike. A preconstruction survey was conducted for the Project Component April 11, 2011.

  Site Two is comprised of unvegetated existing access roads. Vegetation communities located within 500 feet of Site Two include developed land, ruderal grassland, flood control basin/open water, coastal sage scrub, and Riversidean alluvial fan sage scrub (ICF 2012). The surrounding vegetation communities will not be impacted by the Project Component. Site Two is not located within occupied habitat or critical habitat for coastal California gnatcatcher or least Bell's vireo. A jurisdictional resource is located adjacent to Site Two but will not be impacted by the Project Component. As of April 24, 2012, three active bird nests are located within 500 feet of Site Two (FRED Nest IDs#: 2655, 3013, 2658). The disturbance free buffers do not overlap the Project Component. Special status resources within 500 feet of the Project Component include loggerhead shrike and San Diego desert woodrat. A preconstruction survey was conducted for the project component April 11, 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 April 25, 2012 regarding the SCE TRTP Variance Request - Cultural and Paleontological Resources Guidelines for Segment 7 Variance Request– WSS 30-T2 to M29-T3. The memorandum states that no cultural or paleontological resources will be impacted by the additional access road and a wire setup site on Segment 7 as part of this variance request in support of the TRTP. Although the area falls outside the TRTP cultural surveys area, it does fall within the records search area for TRTP which yielded no previously recorded cultural resources (Pacific Legacy 2007, 2010). Previous paleontological assessments for TRTP define the sediment type in this area as "gravels and sands of major streams and alluvial fans" (Gust and Scott 2009; Aron 2010). These types of soils are considered very low sensitivity for harboring significant paleontological resources. No further cultural or paleontological resources assessments or monitoring are required for this variance request.

  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