STATE OF CALIFORNIA Edmund G. Brown Jr., Governor

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

July 11, 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) #132

Dear Ms. Nelson,

On June 20, 2012, Southern Californian Edison (SCE) submitted a variance request to provide adequate vehicle and equipment access to Structures M45-T4 and M6-T2 and to wire setup site (WSS) 8-4.17 within Rose Hills Memorial Park on 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 submitted a request for a Variance to provide adequate vehicle and equipment access to Structures M45-T4 and M6-T2 and to WSS 8-4.17 within Rose Hills Memorial Park on Segment 8 T/L West (Phase 4) in unincorporated Los Angeles County, California. Current conditions at two specified turns (i.e. Curves 1 and 2) within the Rose Hills access roads are inadequate to accommodate large construction vehicles and equipment (e.g. cranes, tractor-trailers, lowboy trailers). In addition to the two curves, a modification/shift of WSS 8-4.17 (needed to reduce impacts to California gnatcatcher Designated Critical Habitat, and provide "Give Back" habitat needed to off-set additional disturbance areas required to widen the identified curves), and an alternate access road to the modified wire site are being requested.

  Specifically, the curve widenings are being requested to provide additional space along existing access roads to allow construction vehicles and equipment to access structure sites. Improvements generally include drive and crush, clearing and blading, cut and blading. No permanent improvements to the curves would be made and no permanent facilities or structures would be installed within the curve boundaries. Note that for purposes of calculating potential impacts to designated critical habitat by vegetation community, impacts are identified as permanent. However, following construction these areas would be stabilized per SWPPP requirements.

  At each of the two curves, additional space is required to widen the curves to allow construction vehicles and equipment to safely and adequately navigate the roads. The additional space will also allow for vehicle parking/staging and other project use to support construction. These two curves are depicted as Medium Improvement on the construction maps; however, the disturbance level needed to widen these curves beyond the existing road surface is considered Heavy Improvement. Therefore, a variance is required to complete the curve widening work at Curves 1 and 2. Note that several other curves along Rose Hills No. 1 Fire Road and the northern access road to M46-T1 from Turnbull Canyon Road will be reclassified as Medium Improvement, and construction maps will be updated accordingly.

  In addition to the curve widenings, 662 linear feet of additional access route is requested for WSS 8-4.17. This additional access road is requested because there is a chain link fence and permanent methane gas pipe separating the approved access route (as depicted on the construction maps) from the structure site

preventing use of the road. The additional access route is an existing dirt/unpaved road and no additional improvements, vegetation removal, or ground disturbance is required beyond the limits of the existing road surface to utilize the alternate road. This existing access road would incur Medium Improvements, including clearing existing vegetation and blading, within the limits of the existing road surface.

The following is a list of the disturbance activities needed to utilize each identified curve. Disturbance acreages requested to widen each access curve and their impact on ESA and/or California gnatcatcher Critical Habitat are identified in the Biological Letter Report.

1. Curve 1 is located on Skyline Drive, approximately 150 feet southwest of M45-T4/M6-T2, and has been approved for Medium Improvement. Work that is permitted under Medium Improvement would not be sufficient to allow large construction vehicles and equipment to successfully negotiate the turn. Therefore, three changes at Curve 1 are requested to accommodate oversized vehicles.

   Work and disturbance activities to be conducted include:

   a. Clear existing vegetation and blade approximately 45 ft. x 10 ft. (L x W) of shoulder located just north of Curve 1. The existing area consists primarily of ruderal vegetation.

   b. Remove portion of existing fence and drive and crush an area of approximately 8 ft. x 11 ft. (L x W), located on the north side of the intersection of Skyline Drive and access road to M45-T4. The existing area consists primarily of ruderal vegetation with scattered coastal sage scrub.

   c. Clear existing vegetation and blade approximately 230 ft. x 11 ft. (L x W) of shoulder area located on the south side of Skyline Drive. The existing area consists primarily of ruderal vegetation.

2. Curve 2 is located on Skyline Drive, approximately 665 feet northwest of M45-T4/M6-T2 and has been approved for Medium Improvement. Total width of the existing roadway at the apex of the turn is approximately 11 feet due to the protrusion of an existing fence post on the east side of the road. A field change is requested to widen the western portion of the road.

   Work and disturbance activities to be conducted include:

   a. Blade approximately 110 ft. x 8 ft. (L x W) along the western road edge to remove fallen slough material accumulated from the original berm to establish an 18-foot travel way width in the turn.

- **Biological Resources**: SCE submitted a biological report with the Variance Request from ICF International dated June 15, 2012 titled *Proposed Changes in Engineering, Segment 8 West (Phase IV) Rose Hills Curve Widening (Structures M45-T4 and M6-T2), Tehachapi Renewable Transmission Project, Los Angeles County*. The report documents the biological conditions at four sites in Segment 8 West (Phase IV) including two curve widenings, a modification/shift of WSS 8-4.17, and an alternate access road to the modified wire setup site (Variance Project Component) and the 500-foot buffer. The Variance Project Component plus a 500-foot buffer is 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 2009o; ICF 2010at, 2011hc); 2010 and 2011 tree inventory surveys (ICF 2010av, 2011hd); 2008, 2009, 2010, and 2011 coastal California gnatcatcher (*Polioptila californica*) focused surveys (AMEC 2008d, 2009m; ICF 2010ww, 2011gq); and 2009 and 2010 burrowing owl (*Athene cunicularia*) focused surveys (AMEC 2009j; 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, 2011gi, 2011gk, 2011gj, 2011he). A literature review was also performed as part of the Biological Review for Segment 8 Phase 4 (West) (ICF 2010dw). Additionally, combined general biological preconstruction survey and clearance sweeps were performed on September 7, 2011 and May 21

and 22, 2012. Preconstruction survey sweeps were also performed on March 1 and 28, June 23, and August 2, 2011, and May 30 and 31, 2012. 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).

Curve 1: Vegetation communities within the Variance Project Component include coast live oak woodland, ruderal wetland, and disturbed/developed. Vegetation communities within the 500-foot buffer include coast live oak woodland, coastal sage scrub, mixed chaparral, ruderal grassland, and disturbed/developed. Regulated tree species, coast live oak (*Quercus agrifolia*), occurs within the 500-foot buffer. The Variance Project Component and 500-foot buffer are within Coastal California gnatcatcher designated critical habitat. Potential solitary bat roosts occur within the 500-foot buffer. San Diego desert woodrat (*Neotoma lepida intermedia*) potential midden occurs within the 500-foot buffer.

Curve 2: Vegetation communities within the Variance Project Component include disturbed/developed. Vegetation communities within the 500-foot buffer include coast live oak woodland, coastal sage scrub, ruderal grassland, and disturbed/developed. Special-status plant species, California walnut (*Juglans californica*), and regulated tree species, coast live oak, occur within the 500-foot buffer. The Variance Project Component and 500-foot buffer are within Coastal California gnatcatcher designated critical habitat. The 500-foot buffer is within coastal California gnatcatcher occupied habitat. Potential solitary bat roosts occur within the 500-foot buffer. San Diego desert woodrat potential midden occurs within the 500-foot buffer.

WSS 8-4.17 Modification/Shift: Vegetation communities within the Variance Project Component include ruderal grassland. Vegetation communities within the 500-foot buffer include coast live oak woodland, coastal sage scrub, mule fat scrub, nonnative woodland, ruderal grassland, and disturbed/developed. Wildlife species observed within the Variance Project Component include prairie falcon (*Falco mexicanus*). Wildlife species observed within the 500-foot buffer include willow flycatcher (*Empidonax traillii*). The Variance Project Component and the 500-foot buffer are within coastal California gnatcatcher designated critical habitat. The 500-foot buffer is within coastal California gnatcatcher occupied habitat and Least Bell's vireo (*Vireo bellii pusillus*) occupied habitat. San Diego desert woodrat potential midden occurs within the 500-foot buffer. Jurisdictional features 8-11-S-1, 8-11-S-2, 8-11-S-3, and 8-11-S-4 occur within the 500-foot buffer.

WSS 8-4.17 Additional Access Road: Vegetation communities within the Project Component include Ruderal grassland. Vegetation communities within the 500-foot buffer include coast live oak woodland, coastal sage scrub, mule fat scrub, nonnative woodland, ruderal grassland, and disturbed/developed. Wildlife species observed within the 500-foot buffer include prairie falcon and willow flycatcher. The Variance Project Component and the 500-foot buffer occur within coastal California gnatcatcher designated critical habitat. The 500-foot buffer occurs within coastal California gnatcatcher occupied habitat and Least Bell's vireo occupied habitat. Jurisdictional features within the 500-foot buffer include 8-11-S-1, 8-11-S-2, 8-11-S-3, and 8-11-S-4.

The additional impacts on coastal California gnatcatcher designated critical habitat are consistent with acreage allotted for road improvements in the Biological Opinion and for the WSS, the proposed use of the existing road will eliminate the acreage impact that would result from the originally approved access route. No amendment to the Biological Opinion is required.

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. Any additional potential jurisdictional features will be staked and flagged as Environmentally Sensitive Areas (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 June 8, 20112 regarding the *TRTP Variance Request - Cultural Clearance for Rose Hills Curve Widening (Curves 1 & 2) at M45-T4 and Access and Modification to WSS 8-4.17 on Segment 8 T/L Phase IV, Los Angeles County*. The memorandum states that no cultural resources will be impacted by the Rose Hills Curve Widening (Curves 1 and 2) at M45-T4, and the additional access and modification to WSS 8-4.17 on Segment 8 Phase 4, just south of Rose Hills Memorial Park and Puente Hills Landfill, Los Angeles County as part of this variance request is support of the TRTP. Curves 1 and 2 and the modified WSS fall within the cultural records search and surveyed area for TRTP (Pacific Legacy 2007). In addition, a paleontological literature review (Gust and Scott 2009) shows this area to lie within the Fernando and Puente Formations which have a high paleontological sensitivity. The cultural records search and survey did not yield any resources, but two historic transmission lines, the Mesa-Walnut and Chino-Mesa 220kV transmission lines, run through this general area. Both were evaluated and determined ineligible for the NRHP and CRHR in 2010.

  Since the work areas lie in sensitive paleontological formations, a paleontological monitor will be required during ground disturbing activities associated with this variance per the requirements of the Paleontological Resources Management Plan (PRMP).

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

- Due to the high sensitivity for paleontological resources and per the requirements of the Paleontological Resources Management Plan (PRMP), a paleontological monitor shall be present during ground disturbing activities.

- 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