

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 29, 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) #134

Dear Ms. Nelson,

On August 24, 2012, Southern Californian Edison (SCE) submitted a variance request for access to Structures M45-T1, M7-T1A, M44-T5, M7-T2, M44-T4, M7-T2a, and Wire Setup Site (WSS) 8-4.17 through the Puente Hills Landfill, 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 for the landfill access to Structures M45-T1, M7-T1A, M44-T5, M7-T2, M44-T4, M7-T2a, and WSS 8-4.17 on Segment 8 T/L West (Phase 4) in unincorporated Los Angeles County, California. This variance request is to resolve practical access constraints associated with the use of the approved access road through the Los Angeles County Sanitation District, Puente Hills Landfill (landfill). This requested field change consists of approximately 198 linear feet of access road and 0.17 acre of previously disturbed area to widen the curve to provide adequate access to specified structures and WSS from the landfill property.

Access to Structures M45-T1, M7-T1A, M44-T5, M7-T2, M44-T4, M7-T2A, and WSS 8-4.17 is constrained due to access restrictions through the Rose Hills Memorial Park property. Additionally, an existing above-ground methane pipe, running parallel between the approved permanent and temporary access roads, precludes access to these work areas at the existing approved access points through WSS 8-4.17 and structure work area M7-T2. The location of the above-ground methane gas pipe is preventing access to cross between the approved temporary and permanent access roads. Therefore, the requested route will provide alternate construction access that will avoid crossing the methane pipe.

The additional 198 feet of previously disturbed access road and curve widening area (0.17 acre) are required to adequately accommodate large oversized construction vehicles and equipment (e.g. cranes, tractor-trailers, lowboy trailers). Activities in this area will include drive and crush of ruderal vegetation, removal of a portion of chain-link fence (approximately 50 feet), installation of a gate, and tree trimming actions (trim one pine and one eucalyptus tree). Following construction these areas would be stabilized per SWPPP requirements.

- **Biological Resources:** SCE submitted biological information with the Variance Request for the Segment 8 Phase 4 T/L – Landfill Access to Structures M45-T1, M7-T1A, M44-T5, M7-T2, M44-T4, M7-T2A, and WSS 8-4.17 (Project Component). The Project Component is located within previously surveyed portion of the Segment 8 T/L work areas and construction has been on-going in this area since January 2012 (i.e.,

work pad construction). The following surveys have been conducted in the area: biological preconstruction and sweep (September 28, 30, 2011 and December 6, 2011).

The Project Component is comprised of existing access roads and a row of non-native trees. Vegetation communities located within 500 feet of the Project Component include developed land, ruderal, coastal sage scrub, coast live oak woodland, coast live oak riparian forest (ICF 2012). These surrounding vegetation communities will not be impacted by the Project Component.

The Project Component is located partially within critical habitat for coastal California gnatcatcher. The additional impacts to coastal California gnatcatcher designated critical habitat are consistent with acreage allotted for road improvements in the Biological Opinion. No amendment to the Biological Opinion is required. The Project Component is not located within coastal California gnatcatcher or least Bell's vireo occupied habitat.

As of August 20, 2012, no active bird nests are located within 500 feet of the Project Component. Special-status species observed within 500 feet of the Project Component include San Diego desert woodrat, potential burrowing owl burrows, northern harrier, and coastal California gnatcatcher.

Jurisdictional resources are not located within or adjacent to the Project Component.

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 with the variance request titled the *TRTP Variance Request - Cultural Clearance for Landfill Access to Structures M45-T1, M7-T1A, M44-T5, M7-T2, M44-T4, M7-T2A, and WSS 8-4.17 on Segment 8 Phase IV, Los Angeles County*. The memorandum states that no cultural resources will be impacted by the Landfill Access to Structures M45-T1, M7-T1A, M44-T5, M7-T2, M44-T4, M7-T2A, and WSS 8-4.17 on Segment 8 Phase 4, as part of this variance request in support of the TRTP. The additional access fall within the cultural records search and surveyed area for TRTP (Pacific Legacy 2007). 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.

In addition, a paleontological literature review (Gust and Scott 2009, Aron and Kelly 2010) shows this area to lie within the Fernando Formations which has a high paleontological sensitivity. 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) and APM Paleo-3 and APM Paleo-5.

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) and APM Paleo-3 and APM Paleo-5, 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,

A handwritten signature in black ink, appearing to read "Lon Payne". The signature is fluid and cursive, with the first name "Lon" being more prominent than the last name "Payne".

Lon Payne
CPUC Environmental Project Manager

cc: V. Strong, Aspen