

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



November 5, 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) #137

Dear Ms. Nelson,

On November 2, 2012, Southern Californian Edison (SCE) submitted a variance request to add approximately 0.113 acre of work area to the eastern edge of the M38-T4 structure work area to facilitate assembly and erection activities at Structure M38-T4 on Segment 7 Transmission Line (T/L) of the Tehachapi Renewable Transmission Project (TRTP) within the City of El Monte, County of Los Angeles. **This Variance Request is approved by CPUC based on the following factors:**

- SCE submitted the following information:

Wilson Construction is requesting to add approximately 0.113 acre of work area to the eastern edge of the M38-T4 structure work area to facilitate assembly and erection activities at Structure M38-T4 on Segment 7 T/L of the TRTP within the City of El Monte, County of Los Angeles. Currently, the site is constrained due to a reduced work area boundary and overhead utilities within the approved structure work area.

The proposed work area addition extends the approved M38-T4 structure work area eastward. The additional space will be used to stage a crane during assembly and erection activities. Due to the shape of the approved M38-T4 structure work area, and the proximity of the adjacent overhead utility line to the south, there is not ample space to safely stage the crane and assemble the structure within the existing approved work area. Therefore, Wilson Construction is requesting the proposed work area addition, measuring approximately 40 ft. x 120 ft., to the immediate east of the existing work area. Access to this site will be from the approved M38-T4 structure work area. Drive and crush and minor vegetation removal would occur to use the proposed work area addition.

- **Biological Resources:** SCE submitted biological information with the variance request stating that the Segment 7 T/L – M38-T4 additional work area (Project Component) is located within previously surveyed portions of the Segment 7 T/L work areas for TRTP. The following surveys have been conducted in the area: bat habitat assessment (November 4, 2010), and biological preconstruction and sweep (January 28, 2011, September 14, 2011, and September 10, 2012).

The Project Component is located in a ruderal grassland area on federal land at the Whittier Narrows Natural Area. Vegetation communities located within 500 feet of the Project Component include additional ruderal grassland, non-native woodland, southern willow scrub, coastal sage scrub, exotic giant reed and sparsely vegetated channel (ICF 2012). Special-status plant species within 500-feet of the Project Component include California walnut (*Juglans californica*) and Coulter's matilija poppy (*Romneya coulteri*). The Project Component is not located within occupied habitat or critical habitat for coastal California gnatcatcher (*Poliophtila californica*) or least Bell's vireo (*Vireo bellii pusillus*); however,

occupied habitat for both coastal California gnatcatcher and least Bell's vireo occur within 500 feet of the Project Component. As of November 2, 2012, no active bird nests are located within 500 feet of the Project. Special-status wildlife species observed within 500 feet of the project include yellow warbler (*Dendroica petechia*), yellow-breasted chat (*Icteria virens*), Cooper's hawk (*Accipiter cooperii*), great blue heron (*Ardea herodias*), Vaux's swift (*Chaetura vauxi*), coastal California gnatcatcher, and least Bell's vireo. Special-status biological resources are demarcated in the field by Environmentally Sensitive Area staking where applicable. The Project Component is located adjacent to a jurisdictional resource associated with feature 8-6-R-1 and 7-32-S-2. Permit amendments (under Sections 401 and 404 of the Clean Water Act or Section 1600 of the California Department of Fish and Game Code) are not required to support this location/activity. No impacts to the jurisdictional features are anticipated. Construction has been on-going in this area since September 2011 (i.e., wire removal).

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 November 1, 2012 regarding the SCE TRTP Cultural and Paleontological Resources Guidelines for Segment 7 Variance Request – Additional Work Area at M38-T4. The memorandum states that no significant cultural or paleontological resources will be impacted by the additional work space at M38-T4 associated with SCE's TRTP Segment 7 in the City of El Monte, Los Angeles County. Previous surveys and records searches for the TRTP project area included the proposed work area expansion (Pacific Legacy 2007; Pacific Legacy et al. 2010). One cultural resource, the historic-era Rio Hondo-Amador-Jose-Mesa 66kV transmission line, lies in the vicinity of this area. This resource was formally evaluated and determined ineligible for listing on the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR) (Urbana 2010). The transmission line will not be impacted as a result of using the proposed additional workspace at M38-T4.

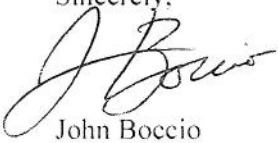
Previous paleontological assessments prepared for the TRTP project area indicate that no paleontological localities have been previously discovered in the project vicinity. The subsurface sediments in the area are classified as gravels and sands of major streams and alluvial fans (Qg) and considered low potential for yielding paleontological resources (Gust and Scott 2009; Aron 2010).

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,

A handwritten signature in black ink, appearing to read "J Boccio". The signature is fluid and cursive, with the first letter "J" being particularly large and stylized.

John Boccio  
CPUC Environmental Project Manager

cc: V. Strong, Aspen