

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



November 19, 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) #138

Dear Ms. Nelson,

On October 29, 2012, Southern Californian Edison (SCE) submitted a variance request to extend the boundaries of the Vincent South Material Yard in support of the Tehachapi Renewable Transmission Project (TRTP) in unincorporated Los Angeles County. Additional biological information was submitted November 16, 2012. **This Variance Request is approved by CPUC based on the following factors:**

- SCE submitted the following information:

SCE is requesting to extend the boundaries of the Vincent South Material Yard in support of the TRTP in unincorporated Los Angeles County. SCE needs the additional space for material storage and other yard activities. The use of this area will be temporary. Yard development will include ground disturbing activities including installation of perimeter fencing, vegetation removal, and grading. The extension is irregular in shape and consists of approximately 13 acres.

SCE will take the following steps to minimize juniper removal for the Vincent South Material Yard extension:

- Material and equipment storage will be placed in open space to the extent feasible to minimize juniper removal.
- Vehicle access and parking areas will be aligned in the yard to minimize juniper removal.
- Junipers will be trimmed, instead of removed, to the extent feasible.

Additionally, the western boundary of the yard extension will be placed approximately 50 feet from the neighboring property, providing a buffer and reducing juniper removal on the west side.

- **Biological Resources:** SCE submitted a biological survey report by ICF International dated October 25, 2012 and titled *Proposed Vincent South Material Yard Expansion, Segment 6, Tehachapi Renewable Transmission Project, Los Angeles County*. The report documents the biological conditions at the proposed Segment 6 Vincent South Material Yard Expansion (Variance Project Component). 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 2009c; ICF 2010ag, 2011gu); 2010 and 2011 tree inventory surveys (ICF 2010bf, 2011ga); and 2009 and 2010 burrowing owl surveys (AMEC 2009f; ICF 2010cq1). The biological resources within the BSA were also evaluated during Segment 5 and Vincent South Material Yard general preconstruction surveys, burrowing owl preconstruction surveys, and preconstruction bat habitat assessment surveys (ICF 2010bd, 2010br, 2010bq, 2010fk, 2011n, 2011m, 2011bj, 2011bk, 2011hm, 2011hn). Additionally, combined preconstruction surveys and clearance sweeps were performed at Vincent Material Yard South on

December 1, 15, 17, and 23, 2010, and January 11, 12, 14, 15, 17, 2011. Construction began within a week of the most recent preconstruction surveys. Woodrat midden relocations were also conducted within the BSA (ICF 2011bh, 2011bi). 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).

Vegetation communities within the Variance Project Component include Mojavean juniper woodland and scrub, Mojavean juniper woodland and scrub – disturbed, Mojave mixed woody scrub, ruderal grassland, and disturbed/developed. Vegetation communities within the 500-foot buffer include Mojavean juniper woodland and scrub, Mojavean juniper woodland and scrub – disturbed, Mojave mixed woody scrub, rabbitbrush scrub, ruderal grassland, and disturbed/developed. Short-joint beavertail cactus (*Opuntia basilaris brachyclada*) occur within the 500-foot buffer.

Special-status wildlife species observed within the BSA include loggerhead shrike (*Lanius ludovicianus*); and within the 500-foot buffer include coast horned lizard (*Phrynosoma coronatum*), legless lizard (*Anniella pulchra*), and yellow-headed blackbird (*Xanthocephalus xanthocephalus*). Potential burrowing owl (*Athene cunicularia*) features and San Diego desert woodrat (*Neotoma lepida intermedia*) potential middens occur within the BSA. Medium habitat potential bat roost occurs within the 500-foot buffer. The Variance Project Component does not overlap suitable habitat for special-status species as included in the Incidental Take Permit (ITP) or Biological Opinion (BO).

Jurisdictional resources within the Variance Project Component were evaluated during the 2010 jurisdictional delineation for Segments 4, 5, and 10 (ICF 2010l) and Segment 6 (ICF 2010aj). Jurisdictional feature 5-50-S-10 occurs within the 500-foot buffer. No mapped jurisdictional features are located within the Variance Project Component, and jurisdictional features located within the 500-foot buffer will not be impacted by the Variance Project Component. Any additional potential jurisdictional features will be staked as Environmentally Sensitive Areas (ESAs) and flagged 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 with the Variance Request regarding the SCE TRTP Cultural and Paleontological Resources Guidelines for Segment 6 Variance Request – Vincent Yard South Expansion. The memorandum states that no historical resources, historic properties or significant paleontological resources will be impacted by the expansion of Vincent Yard South in support of the TRTP. The proposed expansion area falls entirely within the cultural resources records search for TRTP (Pacific Legacy 2007 and 2010b). A portion of the expansion area was surveyed as part of earlier cultural assessments for TRTP (Pacific Legacy 2007, 2010a, Schneider et al. 2010a). To support the current variance, a supplemental field survey was conducted on the remaining portion of the proposed yard expansion, plus a 100-foot buffer (Sander 2012). One previously recorded cultural resource exists in the proposed expansion area. This site was assessed pursuant to Appendix K of the Programmatic Agreement for TRTP, and meets the definition of an Isolated Historic Refuse Deposit (IHRD) (Sander 2012). As an IHRD, this resource does not require further management. Therefore, no further cultural resources assessment or monitoring is required.

Previous paleontological assessments for TRTP define the sediment type in this area as “Quaternary Alluvium” (Gust and Scott 2009). These types of soils are considered as having low sensitivity for yielding significant paleontological resources. No further paleontological assessment or monitoring is required.

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:**

- Per SCE's proposal, junipers shall be trimmed, instead of removed, to the extent feasible. In addition, the proposed 50 foot buffer shall be installed.
- All conditions required by Notice to Proceed (NTP) #22 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #22, 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 written in a cursive style with a large initial "J" and a long horizontal stroke.

John Boccio  
CPUC Environmental Project Manager

cc: V. Strong, Aspen