

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



February 4, 2013

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) #140

Dear Ms. Nelson,

On December 10, 2012, Southern Californian Edison (SCE) submitted a variance request to add approximately 2.6006 acres of wire setup site (WSS) area and 1,134 linear feet of access roads to accommodate conductor installation activities associated with the Segment 7 Transmission Line (T/L) of the Tehachapi Renewable Transmission Project (TRTP) within the Cities of Irwindale and Montebello, County of Los Angeles. On January 14, 2013, SCE re-submitted the Variance Request with some revisions. On January 28, and February 1, 2013, SCE submitted some revised biological information. **This Variance Request is approved by CPUC based on the following factors:**

- SCE submitted the following information:

Wilson Construction is requesting to add approximately 2.6006 acres of wire setup site (WSS) area and 1,134 linear feet of access roads to accommodate conductor installation activities associated with Segment 7 T/L of the TRTP within the Cities of Irwindale and Montebello, County of Los Angeles. The five variance request (VR) areas are needed to complete wire stringing actions including: placement of temporary guard structures, guard or temporarily lower Triplex Cable lines, and access to wire stringing and guard structure areas. The total variance area (combined area of VR 1, VR 2, and VR 5) requested is 2.6006 acres. The total length of access roads (combined length of VR 3 and VR 4) requested is 1,134 linear feet.

The areas and lengths of the VR sites requested are listed below:

- VR 1 – 1.9862 acres
- VR 2 – 0.2990 acres
- VR 3 – 1,006 linear feet
- VR 4 – 128 linear feet
- VR 5 – 0.3151 acres

Proposed temporary disturbance activities for each VR site are described below:

- **VR 1** is located north of Structures M31-T4 and M58-J3, between WSS 7.17 and WSS 7.18, and is approximately 1.9862 acres in size. A portion of the requested area includes a red "No Access Permitted" ESA due to a drainage channel. The additional area is needed to lower a Triplex Cable, located above the drainage ditch, to accommodate conductor stringing actions. The additional space will also provide work area for rope and hardline rewinding actions. Activities to occur include: foot access (two groundmen) to the Triplex Cable and associated pole (located within VR 1 area), and removing and releasing tension in the cable allowing it to temporarily rest in the drainage (in preparation for conductor stringing). During wire stringing,

rope and hardline cables used to pull the conductor will be placed on the ground and rewound to WSS 7.17 multiple times. Temporary minimal disturbance to the riparian vegetation within the dry channel will occur as the rope and hardline are rewound. Upon completion of conductor stringing, foot access (two groundmen) will be required to access the Triplex Cable and associated pole to raise, and reattach the Triplex Cable. Foot traffic and minor temporary disturbance to vegetation will occur within the requested area. No vehicle or foot traffic will occur within the drainage. No vehicle traffic will occur within the requested area.

- **VR 2** is an area of approximately 0.2990 acres located immediately north of Structure M34-T3 and to the south of Ramona Boulevard. This proposed area is needed for the temporary placement of bucket trucks for distribution lines in the vicinity during wire stringing activities. The following activities would occur: drive and crush, equipment staging and placement of support vehicles, and foot traffic. Access to the requested area will be from approved roads within the immediate area.
  - **VR 3** is an existing road located southeast of Structure M35-T4, alongside the railroad tracks and parallel to East Valley Boulevard. The proposed access road is approximately 1,006 linear feet long. Currently, there is no approved access directly to the guard structure site. A raised double train track, chain link fence, and row of mature trees are blocking access from the approved road and guard structure. The proposed additional access is an existing gravel maintenance road between a chain link fence and a raised train track. The proposed road is needed in preparation for wire stringing at M35-T4. Minor drive and crush disturbance will occur. No additional impacts will occur within this proposed area.
  - **VR 4** is a proposed overland travel access road located west of Structure M39-T5, west of Rosemead Boulevard, and is approximately 128 linear feet long. The road is needed to facilitate wire stringing at Structure M39-T5. Currently, there is no approved access to the existing guard structure site here. A large decorative concrete wall (with Triple B Clays Club entrance gate attached), concrete delineators, mature trees, and a vegetated chain link fence prevent access to the approved guard structure site from the north and east. Minor drive and crush disturbance and vegetation removal will occur during use of the proposed overland travel access road.
  - **VR 5** is located southeast of Structure M41-T4 and is an extension of WSS 7.66 by approximately 0.3151 acres. The requested area is not located in mapped CAGN or LBV habitat. This area is requested to provide an alternate workspace so Wilson can avoid disturbing WSS 7.66, thereby avoiding impacts to (0.064 acres) occupied CAGN habitat contained within WSS 7.66. The conserved 0.064 acres of BO approved temporary impacts will be reserved for use at WSS 8-4.16. Activities in this area may include: minor blading to create a level workspace, equipment and vehicle staging, periodic foot traffic, temporary placement and rewinding of conductor, placement of cribbing, and temporary placement of winch lines and accessory equipment.
- **Biological Resources:** SCE submitted a biological survey report from ICF International dated December 5, 2012 for the Proposed Wire Site Extensions, Segment 7, TRTP, Los Angeles County. The report documents the biological conditions at five proposed Segment 7 wire site extensions (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, 2011 rare plant surveys (AMEC 2009o; ICF 2010at, 2011hc); 2010 and 2011 tree inventory surveys (ICF 2010av, 2011hd); 2009, 2010, 2011, and 2012 riparian bird focused surveys (AMEC 2007c, 2009n; ICF 2010ss, 2011fx; FRED Parent ID 000008); 2009, 2010 and 2012 coastal California gnatcatcher focused surveys (AMEC 2008d, 2009m; ICF 2010ww; FRED Parent ID 000011). The biological resources within the BSA were also evaluated during general biological preconstruction surveys, bat habitat assessment preconstruction surveys, and burrowing owl preconstruction surveys within the BSA (ICF 2010bg, 2010bi, 2010fv, 2010fz, 2010gk, 2011bo, 2011bp, 2011bq, 2011dm, 2011dn, 2011do, 2011dp, 2011dq, 2011fb, 2011fu, 2011hv). A literature review was also performed as part of the Biological Review for Segment 7

(ICF 2010ay). Construction monitoring has been ongoing regularly since the sites became active, and species events and nest events are recorded in the Field Reporting Environmental Database (FRED).

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 Area (ESAs) for avoidance.

#### **Site 1 (VR 1)**

Vegetation communities within the Variance Project Component are mapped as disturbed/developed and coastal sage scrub; however, based on a recent site visit, there are elements of disturbed mulefat scrub within the jurisdictional feature 7-11-S-1 including mulefat, tree tobacco, castor bean, laurel sumac, and black mustard at the southeastern end of the feature. Vegetation communities within the 500-foot buffer include disturbed/developed, coastal sage scrub, and Riversidean alluvial fan sage scrub. No special-status plant species or regulated tree species occur within the BSA. Special-status wildlife species observed within the Variance Project Component include Loggerhead shrike (*Lanius ludovicianus*) and least Bell's vireo (*Vireo bellii pusillus*) (FRED Species Event 001467, 005788). Special-status wildlife species observed within the 500-foot buffer include Swainson's hawk (*Buteo swainsoni*), yellow warbler (*Dendroica petechia*), Peregrine falcon (*Falco peregrinus*), Loggerhead shrike, and least Bell's vireo. San Diego desert woodrat (*Neotoma lepida intermedia*) middens were observed within the 500-foot buffer. Jurisdictional feature 7-11-S-1 occurs within the Variance Project Component. Jurisdictional features 7-11-S-2 and 7-11-L-3 occur within the 500-foot buffer.

#### **Site 2 (VR 2)**

Vegetation communities within the Variance Project Component include disturbed/developed. Vegetation communities within the 500-foot buffer include disturbed/developed, mule fat scrub, open water, ruderal wetland, and sparsely vegetated streambed. No special-status plant species or regulated tree species occur within the BSA. Special-status wildlife species observed within the 500-foot buffer include Peregrine Falcon and coastal California gnatcatcher (*Polioptila californica*). Potential burrowing owl (*Athene cunicularia*) feature occurs within the 500-foot buffer. Jurisdictional features 7-22-S-1 and 7-23-S-1 occur within the 500-foot buffer.

#### **Site 3 (VR 3)**

Vegetation communities within the Variance Project Component include disturbed/developed. Vegetation communities within the 500-foot buffer include disturbed/developed, non-native woodland, ruderal wetland, southern coast live oak riparian forest, and sparsely vegetated streambed. No special-status plant species or regulated tree species occur within the BSA. Special-status wildlife species, burrowing owl, potential feature occurs within the 500-foot buffer. Jurisdictional features 7-26-S-1, 7-26-S-300, 7-27-S-1, 7-27-W-1, and 7-27A-S-2 occur within the 500-foot buffer.

#### **Site 4 (VR 4)**

Vegetation communities within the Variance Project Component include disturbed/developed. Vegetation communities within the 500-foot buffer include disturbed/developed, non-native woodland, ruderal grassland, ruderal wetland, southern willow scrub, and water. No special status plant species or regulated tree species occur within the BSA. Special-status wildlife species observed within the 500-foot buffer include yellow-breasted chat (*Icteria virens*). Potential solitary bat roosts and least Bell's vireo occupied habitat occurs within the 500-foot buffer. Jurisdictional features 7-34-S-1, 7-34-W-1, 7-34-W-2, 7-34-W-3, 7-34-W-4, and 7-35-S-3 occur within the 500-foot buffer.

#### **Site 5 (VR 5)**

Vegetation communities within the Variance Project Component include disturbed/developed and ruderal grassland. Vegetation communities within the 500-foot buffer include coastal sage scrub,

disturbed/developed, and ruderal grassland. No special-status plant species or regulated tree species occur within the BSA. Special-status wildlife species, coastal California gnatcatcher, have been observed within the Variance Project Component and it is considered occupied habitat. Special-status wildlife species Cooper's hawk (*Accipiter cooperii*), Swainson's hawk, Merlin (*Falco columbarius*) and coastal California gnatcatcher have been observed within the 500-foot buffer. The 500-foot buffer is within California gnatcatcher occupied habitat. A red-tailed hawk (*Buteo jamaicensis*) nest has also been observed within the 500-foot buffer. No jurisdictional features occur within the BSA.

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 14, 2012 regarding the SCE TRTP Cultural and Paleontological Resources Guidelines for Segment 7 T/L Variance Request – Wire Setup Sites and Access Road Additions. The memorandum states that no historic resources, historic properties, or significant paleontological resources will be impacted by the proposed wire setup sites and access road additions in support of TRTP in the Cities of Irwindale and Montebello, Los Angeles County. All proposed areas fall entirely within the cultural resources records searches for TRTP (Pacific Legacy 2007, 2010a, 2010b, 2010c, 2010d, Wetherbee 2009). All but approximately 0.13 acre of Site VR 1 lies within previously survey area. Ground disturbance is not identified for this area; therefore, there is no potential for impacts to cultural resources, should they exist. Site VRs 2, 3, 4 and 5 were previously surveyed for cultural resources. The previous cultural resources inventory efforts show that seven historic-era transmission lines (Antelope-Mesa 220kV, Rio Hondo-Bradbury 66kV, Rio Hondo-Amador-Jose-Mesa 66kV, Mesa-Rush #2 66kV, Mesa-Anita-Eaton 66kV, Mesa-Narrows 66kV, and Mesa-Walnut 66kV) cross the areas in this variance request. All of these lines were evaluated and determined ineligible for the NRHP and CRHR in 2010. The historic-era Union Pacific Railroad lies adjacent to Site VR 3; however, no impacts to the railroad shall occur by temporary use of the existing road. Therefore, no further cultural resources assessment or monitoring is required to support this variance request.

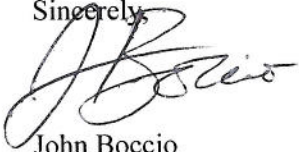
Previous paleontological assessments for TRTP define the following soil types at the proposed locations: VR 1, VR 2 and VR 3 = Gravels and Sands of Major Streams and Rivers, VR 4 = Quaternary Alluvium, VR 5 = Fernando Formation (Gust and Scott 2009). Gravels and sands of major streams and rivers are considered low potential for yielding significant paleontological resources. Quaternary alluvium is also considered low potential for yielding significant paleontological resources. The Fernando Formation is considered as having high sensitivity for yielding significant paleontological resources. Paleontological monitoring is required during ground disturbance associated with Site VR 5 to support 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:**

- Least Bell's vireo (*Vireo bellii pusillus*) surveys shall be conducted at Site VR 1 prior to work taking place at that location.
- Due to the high sensitivity for yielding significant paleontological resources, paleontological monitoring shall be conducted during any ground disturbance associated with Site VR 5.
- 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