

PUBLIC UTILITIES COMMISSION

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July 31, 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) #144

Dear Ms. Nelson,

On July 17, 2013, Southern Californian Edison (SCE) submitted a variance request for temporary use of four work areas and a trail for access to distribution poles on Segment 11B Transmission Line (T/L), of the Tehachapi Renewable Transmission Project (TRTP) in the City of Pasadena, within the County of Los Angeles, 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 temporary use of four work areas and a trail for access to distribution poles on Segment 11B T/L of the TRTP in the City of Pasadena, within the County of Los Angeles, California. Subsequent to approval of the NTPR (NTP #37 dated April 25, 2013) by the CPUC, additional work areas have been identified to provide construction crews access to a distribution line. The purpose of this variance is to request approval for several temporary work areas, just east of the Gould Substation, consisting of four work areas (30 ft. x 30 ft.) and a foot access trail.

An existing 66kV overhead line on steel poles runs parallel and adjacent to the approved project road that provides access from Gould Substation to the Gould Mesa Trail Camp. The 66 kV line crosses the Mesa-Vincent #2 T/L just east of Tower M0-T3. On a daily basis, workers will need to access (by foot) and climb each pole both before and after wire stringing operations for the new Mesa-Vincent #2 circuit. Three of the four steel poles can be accessed directly from the project road while the northerly most pole must be accessed using the mapped foot trail. Neither ground disturbance nor vegetation removal will be required. The contractor and the crews need to access to poles to disconnect the wire and lower the 66kV line. The lowered line will not be pulled, but may come in contact with the trees/vegetation. The contact is not anticipated to result in damage or removal of vegetation, but if this occurs, SCE will document any impacts.

The total new disturbance area is 0.161 acres including approximately 3,600 square feet (0.083 acre) for the pole access and approximately 3,400 square feet (0.078 acres) for the foot trail (assuming trail is 5 feet wide).

- **Biological Resources:** SCE submitted a biological survey report from ICF International dated July 12, 2013, regarding the *Proposed Poles and Foot Access Trail, Segment 11B, TRTP, Los Angeles County*. The report documents the biological conditions at the proposed Segment 11B temporary work areas for poles and a foot access trail (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 2010 and 2011, and 2013 rare plant surveys (ICF 2010au, 2011hk; FRED SCE 2013a); and 2010, 2011, and 2013 tree inventory surveys (ICF 2010dj, 2011hj;

FRED 2013). The biological resources within the BSA were also evaluated during general biological preconstruction surveys (FRED Survey Parent 000014). A literature review was also performed as part of the Biological Review for Segment 11B (ICF 2012i). Additionally, a clearance sweep was performed on July 8 and 9, 2013. 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).

Vegetation communities within the Variance Project Component include coast live oak woodland, mixed chaparral, scrub oak chaparral, and disturbed/developed. Vegetation communities within the 500-foot buffer include big cone Douglas-fir canyon oak forest, coast live oak woodland, mixed chaparral, nonnative woodland, scrub oak chaparral, southern coast live oak riparian forest, southern sycamore alder riparian woodland, and disturbed/developed. Special-status plant species within the 500-foot buffer include Plummer's mariposa lily (*Calochortus plummerae*) and San Gabriel oak (*Quercus durata* var. *gabrielensis*). Regulated tree species within the 500-foot buffer include blue elderberry (*Sambucus mexicanus*) and coast live oak (*Quercus agrifolia*). Special-status wildlife species, coastal California newt (*Taricha torosa torosa*), was observed within the 500-foot buffer (AMEC 2009a, October 19, 2006).

The Variance Project Component does not overlap suitable habitat for special-status species as included in the CDFW Incidental Take Permit (ITP) or the USFWS Biological Opinion (BO).

Jurisdictional resources within the BSA were evaluated during the 2010 jurisdictional delineation for Segments 6 and 11 (ICF 2010aj). No jurisdictional features were mapped within the BSA. Any additional potential jurisdictional features will be staked and flagged as Environmentally Sensitive Areas (ESAs) for avoidance.

Impacts associated with this Variance Request includes approximately 0.161 acres of additional temporary impacts. Temporary impacts will be mitigated on-site per the Habitat Mitigation and Monitoring Plan (HMMP) and APM BIO-1a, as well as SWPPP requirements, weed control (Mitigation Measure [MM] B-3a), dust control (MM AQ-1a), and visual resources (MM V-1 and APM AES-8 and APM AES-13).

No additional impacts to biological resources are anticipated with the implementation of this Variance and the conditions noted below.

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- **Cultural and Paleontological Resources:** SCE submitted a memorandum dated July 17, 2013 with the Variance Request titled the *TRTP Cultural and Paleontological Resource Guidelines for Segment 11B T/L Request for Variance – Temporary Use of Four Work Areas and a Trail Access to Distribution Poles*. The memorandum states that no cultural or paleontological resources will be impacted by the proposed use of four existing guard sites and an access foot trail, east of SCE's Gould Substation, in support of the TRTP Segment 11B. None of the four work areas or foot access trail had been previously surveyed in support of the TRTP (Pacific Legacy 2007). The four work areas and foot access trail were surveyed for cultural resources on June 26, 2013 (PCR 2013). These areas were comprised of previously disturbed soils and steep mountainous terrain, which have a low potential for encountering cultural resources. No cultural resources were identified during the survey. No ground disturbance is required for this variance request.


Previous paleontological assessments for TRTP define the geology at the proposed locations as Quartz diorite (Gust and Scott 2009). Based on the Potential Fossil Yield Classification (PFYC) system, Granitic is considered very low sensitivity for harboring significant paleontological resources (PFYC= 1).

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) #37 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #37, and this Variance shall be available on site for the duration of construction activities where applicable.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ken Lewis".

Ken Lewis,
CPUC Environmental Project Manager

cc: V. Strong, Aspen
