

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



October 17, 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) #147

Dear Ms. Nelson,

On October 9, 2013, Southern Californian Edison (SCE) submitted a variance request for the temporary use of an existing access road to stage construction equipment for wire stringing activities located east of an approved access road between Constructs 1 and 2 on the Segment 6A Transmission Line (T/L) 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 use of an existing access road to stage construction equipment for wire stringing activities located east of an approved access road between Constructs 1 and 2 on Segment 6A T/L in unincorporated Los Angeles County, California. Subsequent to the approval of the NTPR (NTP #32 dated November 8, 2011) by the CPUC, additional work areas have been identified for staging construction equipment for wire stringing activities. The purpose of this variance is to request approval to use several contiguous sections of access road. The proposed areas consist of existing access road, approximately 510 linear feet. The access road will be used to stage a truck-mounted puller and other equipment for wire stringing activities. The equipment will be positioned along this road for the duration of the activities.

- **Biological Resources:** SCE submitted a biological report from ICF International dated October 4, 2013 titled *Proposed Access Road Puller Variance, Segment 6, Tehachapi Renewable Transmission Project, Los Angeles County*. The report documents the biological conditions at the proposed Segment 6 Access Road Puller Variance (Variance Project Component) and the 500-foot buffer (Biological Study Area [BSA]). Biological resources within the BSA were evaluated during several focused surveys, including 2009, 2010, 2011, and 2012 rare plant surveys and vegetation mapping (AMEC 2009w; ICF 2010au, 2011hk, 2011bv; FRED Survey Parent 000006); 2010 and 2011 tree inventory surveys (ICF 2010dj, 2011hj); and 2009 and 2010 burrowing owl surveys (AMEC 2009z; ICF 2010dk). The biological resources within the BSA were also evaluated during Segment 6 general preconstruction surveys and burrowing owl preconstruction surveys (ICF and BonTerra 2011h, 2011i, 2011j, 2011k). A literature review was performed as part of the Biological Review for Segment 6 (ICF 2011gc). Additionally, clearance sweeps were performed on January 16, 2012 and March 3, 2012. 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 big sagebrush scrub and disturbed/developed. Vegetation communities within the 500-foot buffer include big sagebrush scrub, Mojave desert wash, Mojave juniper woodland and scrub, Mojave juniper woodland and scrub – disturbed, Mojave mixed woody scrub, Mojave mixed woody scrub – disturbed, ruderal grassland, and

disturbed/developed. Special-status plant species within the 500-foot buffer include Lemmon's syntrichopappus (*Syntrichopappus lemmonii*) and short-joint beavertail (*Opuntia basilaris* var. *brachyclada*). No regulated tree species occur within the BSA.

Special-status wildlife observed within the 500-foot buffer include Cooper's hawk (*Accipiter cooperii*) and loggerhead shrike (*Lanius ludovicianus*). An inactive barn owl (*Tyto alba*) nest was observed within the 500-foot buffer. Potential burrowing owl (*Athene cunicularia*) features, and San Diego desert woodrat (*Neotoma lepida intermedia*) have been observed within the 500-foot buffer. The Variance Project Component does not overlap suitable habitat for special-status species as included in the CDFW Incidental Take Permit (ITP) or USFWS Biological Opinion (BO).

Jurisdictional resources within the Variance Project Component were evaluated during the 2010 jurisdictional delineation for Segment 6 and 11 (ICF 2010aj). Jurisdictional features 11-2-S-3, 11-2-S-4, 11-2-S-6, 11-2-S-7, 11-2-S-8, 11-2B-S-200, and 11-2B-S-201 occur within the 500-foot buffer. Jurisdictional features identified within the 500-foot buffer will be avoided (ICF 2010aj). 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 dated September 19, 2013 with the Variance Request titled the *TRTP Cultural and Paleontological Resource Guidelines for Segment 6A, Variance Request – Access Road Near Constructs 1 and 2*. The memorandum states that no cultural or paleontological resources will be impacted by the use of the access road near Constructs 1 and 2 in support of the TRTP. The existing access road for this variance request falls within previous surveys in support of the TRTP and no cultural resources were identified (Pacific Legacy 2007, 2010a-b). Furthermore, no improvements to the existing access road are required for this variance request.

Previous paleontological assessments for TRTP define the geology at the proposed locations as Quaternary alluvium (Gust and Scott 2009). Based on the Potential Fossil Yield Classification (PFYC) system, Quaternary alluvium is considered low sensitivity for harboring significant paleontological resources (PFYC = 2).

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) #32 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #32, and this Variance shall be available on site for the duration of construction activities where applicable.

Sincerely,



Jason Coontz  
CPUC Environmental Project Manager

cc: V. Strong, Aspen