

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



November 7, 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) #148

Dear Ms. Nelson,

On October 25, 2013, Southern Californian Edison (SCE) submitted a variance request for two additional areas for vehicle parking and turnouts near Construct M57-T1 on the Segment 8 Transmission Line (T/L), Phase 1, 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 two additional areas for vehicle parking and turnouts near Construct M57-T1 on Segment 8 T/L Phase 1 of the TRTP, in unincorporated Los Angeles County, California. Subsequent to the approval of the NTPR (NTP #11 dated August 12, 2010) by the CPUC, project site conditions have been further evaluated, and two additional areas are needed for constructability purposes. Due to the limited work space at the CPUC-approved disturbance areas at Constructs (CT) M57-T1 and M24-T1A, two additional disturbance areas are proposed, as described below:

- A 0.028-acre area located on the north of CT M57-T1 and positioned on the west side of the CPUC-approved access road.
- A 0.076-acre area situated northeast of CT M57-T1 and positioned on the south side of the CPUC-approved access road.

The proposed disturbance areas would be used for vehicle parking and as turnouts. The additional proposed disturbance areas are unpaved with sparse vegetation; minimal vegetation removal will be needed for the area.

- **Biological Resources:** SCE submitted biological resource information with the variance request for the Segment 8 T/L Phase 1 parking and turnout areas near Construct M57-T1 (Project Component). The Project Component consists of two parking/turnout areas, located along Tonner Fire Road, and is within previously surveyed portions of the Segment 8 T/L.

The north parking/turnout area is characterized as mixed chaparral and disturbed/developed. Vegetation communities located within 500 feet of the Project Component include mixed chaparral, developed/disturbed, coast live oak woodland, and California walnut woodland (ICF 2012). These surrounding vegetation communities will not be impacted by the Project Component. 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*). Special-status species observed within 500 feet of the Project Component include coast range newt (*Taricha torosa torosa*) and southern California

rufous-crowned sparrow (*Aimophila ruficeps canescens*). As of October 10, 2013, no active nests are located within or adjacent to the Project Component. The nearest jurisdictional resource is located over 200 feet south of the Project Component and is identified as Feature 8-33-S-200. This feature will not be impacted by the Project Component. Special-status biological resources are demarcated in the field by Environmentally Sensitive Area staking, where applicable. Construction began in this area in September 2010. Biological preconstruction surveys (P30) were conducted in August 2010, November 2010, December 2010, and January 2011. Construction monitoring and surveys are ongoing in this area.

The northeast parking/turnout area is characterized as disturbed/developed. Vegetation communities located within 500 feet of the Project Component include mixed chaparral, developed/disturbed, coast live oak woodland, coastal sage scrub, and California walnut woodland (ICF 2012). These surrounding vegetation communities will not be impacted by the Project Component. The Project Component is not located within occupied habitat or critical habitat for coastal California gnatcatcher or least Bell's vireo. Special-status species observed within 500 feet of the Project Component include coast range newt and southern California rufous-crowned sparrow. As of October 10, 2013, no active nests are located within or adjacent to the Project Component. The nearest jurisdictional resource is located over 200 feet south of the Project Component and is identified as Feature 8-33-S-200. This feature will not be impacted by the Project Component. Special-status biological resources are demarcated in the field by Environmentally Sensitive Area staking, where applicable. Construction began in this area in September 2010. Biological preconstruction surveys (P30) were conducted in August 2010, November 2010, December 2010, and January 2011. Construction monitoring and surveys are ongoing in this area.

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 October 9, 2013 with the Variance Request titled the *TRTP Cultural and Paleontological Resource Guidelines for Segment 8 T/L Phase I, Variance Request – Additional Parking and Turnout Areas near M57-T1*. The memorandum states that no cultural or paleontological resources will be impacted by the two proposed parking and turnout areas near Construct M57-T1 on the TRTP Segment 8 Phase I. The proposed parking and turnout areas near Construct M57-T1 were included in previous surveys for the TRTP and no cultural resources were identified (Pacific Legacy 2010).

Previous paleontological assessments conducted for the TRTP indicate that the proposed parking and turnout areas are located within the Puente Formation, which has a high sensitivity for yielding paleontological resources (Gust and Scott 2009; Aron 2010). However, no improvements to these two proposed areas are required and both areas are highly disturbed.

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:**

- Prior to the start of construction, the area requested in this Variance shall be staked and reviewed and approved by the CPUC Environmental Monitor.
- All conditions required by Notice to Proceed (NTP) #11 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #11, 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. Coontz', with a long horizontal flourish extending to the right.

Jason Coontz  
CPUC Environmental Project Manager

cc: V. Strong, Aspen