

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



December 11, 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) #150

Dear Ms. Nelson,

On November 20, 2013, Southern Californian Edison (SCE) submitted a variance request for an additional Wire Setup Site (WSS) area and Guard Structure area near Tower M31-T4 on the Segment 11C Transmission Line (T/L), of the Tehachapi Renewable Transmission Project (TRTP) in 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 an additional Wire Setup Site (WSS) area and Guard Structure area near Tower M31-T4 on Segment 11C T/L of the TRTP, in Los Angeles County, California. Subsequent to the approval of the NTPR (NTP #39 dated October 10, 2013) by the CPUC, the construction contractor has identified additional work areas needed for construction. As part of the Segment 11C scope of work, wire along a portion of the new Pardee-Vincent #1 T/L will be removed and re-strung. These wire operations will take place from Tower M31-T4 (adjacent to Construct 5) to Tower M30-T2 (adjacent to Construct 11XX). In support of the wire operations, the construction contractor is requesting additional WSS area and guard structure area near Tower M31-T4. Wire operations will commence at the end of November 2013. Due to the existing topography, an area for wire pulling equipment will need to be created from the existing Construct 5 Work Area to the WSS north of Construct 5, rather than accessing the site from the northeast corner as mapped. Accessing the WSS from Construct 5 will significantly reduce the amount of improvement required. The additional area will also be necessary for foot traffic, as construction personnel will need to the ability to walk the pulling rope from the puller staging location directly to the base of Tower M31-T4. Activities that may occur within the newly requested area will be typical of activities pertaining to WSS areas. ESAs will not be impacted by the use of this additional WSS area. The additional area being requested consists of 1.65 acre.

There is currently a guard structure area located south of Construct 5 to provide protection for the existing distribution line during construction of the new Mesa-Vincent #2 T/L. This area will need to be extended easterly to provide required protection of the distribution line during the Pardee-Vincent #1 wire removal and re-stringing operations. All activities that may occur within the newly requested area will be typical of activities pertaining to guard pole areas. ESAs will not be impacted by the use of this additional guard pole area. The additional area being requested consists of 0.35 acre.

- **Biological Resources:** SCE submitted a biological survey report from ICF International dated November 15, 2013 with the Variance Request. The report documents the biological conditions at the proposed Segment 11C Construct 5 WSS and Guard Structure (Variance Project Component) and the 500 foot buffer (Biological Study Area [BSA]). Biological resources within the BSA were evaluated during several focused surveys, including 2010, 2011, and 2013 rare plant surveys (ICF 2010au, 2011hk; FRED Survey Parent

000024); 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 6A and Segment 11C general preconstruction surveys, burrowing owl preconstruction surveys, and preconstruction bat habitat assessment surveys (ICF 2011ax, 2011bl; ICF and BonTerra 2011d, 2011h, 2011i, 2011j, 2011k; FRED Survey Parent 000031, 000035). A literature review was also performed as part of the Biological Review for Segment 11C (ICF 2013f). Additionally, clearance sweeps were performed on January 16, 2012, and March 6, 2012; a clearance sweep will also be conducted prior to construction of the Variance Project Component. 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 and the 500-foot buffer include Mojave juniper woodland scrub and disturbed/developed. No special-status plant species or regulated tree species occur within the Variance Project Component. Special-status plant species within the 500-foot buffer include short-joint beavertail (*Opuntia basilaris* var. *brachyclada*). Regulated trees species within the 500-foot buffer include Tucker's oak (*Quercus john-tuckeri*). No special-status wildlife species have been observed within the Variance Project Component. Special-status wildlife species evidence observed within the 500-foot buffer includes potential burrowing feature, San Diego desert woodrat midden, and a red-tailed hawk (*Buteo jamaicensis*) inactive nest.

Jurisdictional resources within the Variance Project Component were evaluated during the 2010 jurisdictional delineation for Segments 6 and 11 (ICF 2010aj) and reevaluated during the 2013 Segment 11C supplemental jurisdictional delineation (ICF 2013b). No mapped jurisdictional features are located within the Variance Project Component. Jurisdictional resources within the 500-foot buffer include 11-4-S-7, 11-4-S-8, 11-4-S-9, 11-4-S-10, and 11-4-S-11. Jurisdictional features identified within the 500-foot buffer will be avoided. Any additional potential jurisdictional features will be staked as Environmentally Sensitive Areas (ESAs) and flagged for avoidance.

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). The proposed Variance Project Component includes a total of approximately 1.91 acres of new disturbance area in addition to 0.08 acre that was previously approved. 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.

- **Cultural and Paleontological Resources:** SCE submitted a memorandum dated November 5, 2013 with the Variance Request titled the *TRTP Cultural and Paleontological Resource Guidelines for Segment 11C, Variance Request – Wire Setup Site near Construct 5*. The memorandum states that no cultural or paleontological resources will be impacted by the proposed variance request for an additional WSS and Guard Structure area near Tower M31-T4 in support of the TRTP Segment 11C. The proposed sites in this variance request were included in previous surveys for the TRTP and no cultural resources were identified (Pacific Legacy 2007, 2013). The proposed additional WSS and Guard Structure areas do not have the potential to impact cultural resources.

Previous paleontological assessments conducted for the TRTP indicate that the geology of the additional proposed WSS and Guard Structure area is characterized by recent alluvium and artificial fill, which have a very low sensitivity for yielding paleontological resources (Gust and Scott 2009).

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) #39 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #39, 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