

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 3, 2014

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) #151

Dear Ms. Nelson:

On March 27, 2014, Southern Californian Edison (SCE) submitted a variance request for a temporary access road to Structure M7-T1 on the Segment 8 Transmission Line (T/L), Phase 4, 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 a temporary access road to Structure M7-T1 on Segment 8 T/L Phase 4 in unincorporated Los Angeles County, California. Subsequent to the approval of the NTPR (NTP #24 dated January 12, 2011) by the CPUC, project site conditions have been further evaluated, and an alternate access road to Structure M7-T1 is needed for constructability purposes. Due to the grade and soft soil conditions of the CPUC-approved access road to Structure M7-T1, temporary use of an existing access road is proposed. The portion of the existing access road to be used measures approximately 230 linear feet long and will not require any blading, grading, or vegetation removal.

- **Biological Resources:** SCE submitted biological resource information with the variance request. The variance request area consists of a previously disturbed access road south of Structure M7-T1, within previously surveyed portions of the Segment 8 T/L. The area is characterized as ruderal grassland. Vegetation communities located within 500 feet of the Project Component include ruderal grassland, disturbed/developed, coast live oak woodland, and agriculture (ICF 2012). Regulated trees observed in or within 500 feet of the Project Component include coast live oak (*Quercus agrifolia*). These surrounding vegetation communities will not be impacted by the Project Component.

The Project Component is not located within occupied or suitable habitat for least Bell's vireo (*Vireo bellii pusillus*). The Project Component is located within 500 feet of designated critical habitat for coastal California gnatcatcher (*Polioptila californica*). As of March 24, 2014, no active nests are located in or within 500 feet of the Project Component. Special-status species observed in or within 500 feet of the Project Component include blue grosbeak (*Passerina caerulea*), California gnatcatcher, Cooper's hawk (*Accipiter cooperii*), least Bell's vireo, loggerhead shrike (*Lanius ludovicianus*), Northern harrier (*Circus cyaneus*), peregrine falcon (*Falco peregrinus*), song sparrow (*Melospiza melodia*), Vaux's swift (*Chaetura vauxi*), and yellow-breasted chat (*Icteria virens*).

Jurisdictional resource 8-11-S-1 is located adjacent to the Project Component and will not be impacted by the Project Component; no wetland permits are required.

Special-status biological resources are demarcated in the field by Environmentally Sensitive Area staking, where applicable. Construction began in this area in December 2011.

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 March 24, 2014 with the Variance Request titled the *TRTP Cultural and Paleontological Resource Guidelines for Segment 8 T/L Phase IV, Variance Request – M7-T1 Temporary Alternative Access Road*. The memorandum states that no cultural or paleontological resources will be impacted by the use of an existing alternative access road to access Structure M7-T1 in support of the TRTP Segment 8 Phase IV. The proposed alternative access road for Structure M7-T1 was included in previous surveys for the TRTP and no cultural resources were identified (Pacific Legacy 2007, 2010).

Previous paleontological assessments conducted for the TRTP indicate that the proposed access road is located within the Fernando Formation, which has a high sensitivity for yielding paleontological resources (Gust and Scott 2009; Aron 2010). However, no improvements to the existing access road are required and the area is 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:

- The boundaries of the temporary access road (Project Component) shall be staked and flagged, and verified by a CPUC EM prior to use of the road.
- All conditions required by Notice to Proceed (NTP) #24 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #24, 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