

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 9, 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) #152

Dear Ms. Nelson,

On March 31, 2014, Southern Californian Edison (SCE) submitted a variance request for an additional temporary wire setup site (WSS) near Structure M30-T2 to safely conduct wire removal and pulling activities associated with the Segment 7 Transmission Line (T/L) of the Tehachapi Renewable Transmission Project (TRTP) within the City of Irwindale, County of Los Angeles. **This Variance Request is approved by CPUC based on the following factors:**

- SCE submitted the following information:

SCE requests a variance for an additional wire setup site (WSS) near Structure M30-T2 to safely conduct wire removal and pulling activities associated with the Segment 7 T/L of the TRTP within the City of Irwindale, County of Los Angeles. Subsequent to the approval of NTPR (NTP #17 dated September 24, 2010) by the CPUC, project site conditions have been further evaluated and an additional WSS is needed for constructability purposes. The additional WSS is situated between two CPUC-approved disturbance areas: WSS 7.13 and the work area for Structure M30-T2. The additional work area measures approximately 0.87 acre. Based on existing site conditions, no onsite vegetation removal or grading are planned. It is anticipated that onsite activities would be limited to drive and crush, and foot traffic.

- **Biological Resources:** SCE submitted biological information with the variance request. The variance consists of a 0.87 acre area between WSS 7.13 and Structure M30-T2, within previously surveyed portions of the Segment 7 T/L. The area is characterized as a combination of coastal sage scrub, ruderal grassland, and disturbed/developed. Vegetation communities located within 500 feet of the Project Component include coastal sage scrub, ruderal grassland, disturbed/developed, Riversidean alluvial fan sage scrub, and mule fat scrub (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 (*Polioptila californica*) or least Bell's vireo (*Vireo bellii pusillus*). As of March 28, 2014, no active nests are located in the Project Component. A common raven (*Corvus corax*) nest is located northeast of the Project Component; the nest buffer does not overlap the Project Component. San Diego woodrat (*Neotoma lepida intermedia*) middens are located south of the Project Component; the buffers do not overlap the Project Component. Special-status species observed in or within 500 feet of the Project Component include Northern harrier (*Circus cyaneus*), peregrine falcon (*Falco peregrinus*), southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*), and white-throated swift (*Aeronautes saxatalis*).

Jurisdictional resource 7-8-S-1 is located northeast of 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 February 2011.

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 0.87 acres of new temporary disturbance. 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 March 28, 2014 regarding the SCE TRTP Cultural and Paleontological Resource Guidelines for Segment 7 T/L Variance Request – Wire Setup Site Southwest of Structure M30-T2. The memorandum states that no cultural or paleontological resources will be impacted by the proposed variance request for a wire setup site in support of TRTP in the City of Irwindale, Los Angeles County. The proposed area for this variance request was included in the previous survey for the TRTP and no cultural resources were identified (Pacific Legacy 2007). Therefore, no further cultural resources work is required for this variance request.

Previous paleontological assessments conducted for the TRTP indicate that the proposed wire setup site is located within gravel and sand of major streams and alluvial fans, which has a very low sensitivity for yielding paleontological resources (Gust and Scott 2009; Aron 2010). In addition, no improvements to this area are required for this variance request.

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 wire setup site (Project Component) shall be staked and flagged, and verified by a CPUC EM prior to use.
- All conditions required by Notice to Proceed (NTP) #17 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #17, 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