PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

April 10, 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) #154

Dear Ms. Nelson:

On April 7, 2014, Southern Californian Edison (SCE) submitted a variance request for an additional temporary wire setup site (WSS) near Structure M55-T1 on the Segment 8 Transmission Line (T/L), Phase 4, of the Tehachapi Renewable Transmission Project (TRTP) in unincorporated Los Angeles County, California. SCE submitted additional information on April 9, 2014. **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) near Structure M55-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 additional WSS is needed for constructability purposes. Specifically, the additional WSS is situated between two CPUC-approved disturbance areas: a WSS adjacent to State Route 57 and the work area for Structure M55-T1. The additional work area, which measures approximately 1.2 acres, is needed to safely conduct wire removal and pulling activities. Wire pulling equipment (staged in the approved wire pull site east of Structure M55-T1) will be utilized to string the 500 kV conductor between M52-T2 and M55-T1; once the conductor is dead-ended into the insulators at Structure M55-T1, there will be excess wire (approximately 600 feet) suspended between M55-T1 and the wire pulling equipment staged in the wire pull site east of the structure. In order to remove that conductor, the contractor will need to wind up the excess conductor onto the wire pull equipment.

  It is anticipated that onsite activities would be limited to drive and crush and foot traffic. The contractor will utilize a boom truck positioned within the tower disturbance area for M55-T1 to prevent the wire from impacting the trees east of the structure. The boom will be extended out over the trees and the conductor will be guided over the trees during stringing operations.

- **Biological Resources**: SCE submitted biological resource information with the variance request. The variance request area consists of a 1.2 acre area between the work area for Structure M55-T1 and a WSS west of State Route 57, within previously surveyed portions of the Segment 8 T/L. The area is characterized as a combination of California annual grassland, California walnut woodland, and ruderal grassland. Vegetation communities located within 500 feet of the Project Component include California annual grassland, California walnut woodland, coast live oak woodland, ruderal grassland, disturbed/developed, and coastal sage scrub (ICF 2012). These surrounding vegetation communities will not be impacted by the Project Component. Special-status plant species observed in or within 500 feet of the Project Component

include California walnut (*Juglans californica*). Regulated trees observed in or within 500 feet of the Project Component include California walnut and coast live oak (*Quercus agrifolia*).

The Project Component is not located within occupied habitat or critical habitat for least Bell's vireo (*Vireo bellii pusillus*) or California gnatcatcher (*Polioptila californica*). As of April 2, 2014, no nests are located in the Project Component. A blue-gray gnatcatcher (*Polioptila caerulea*) nest #5825 is located north of the Project Component; its buffer overlaps the Project Component. Anna's hummingbird (*Calypte anna*) nests #5785 and #5926, and Nuttall's woodpecker (*Picoides nuttallii*) nest #5889 are located adjacent to the Project Component; their buffers do not overlap the Project Component. Low-potential bat habitat is located in the Project Component and other low- and medium-potential bat habitats are located north of the Project Component. Special-status wildlife species observed in or within 500 feet of the Project Component include sharp-shinned hawk (*Accipiter striatus*) and Southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*).

Jurisdictional resource 8-31-S-1 is located adjacent to the Project Component, but 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 July 2011.

The Variance Project Component does not overlap suitable habitat for special-status species as included in the CDFW ITP or the USFWS BO. The proposed Variance Project Component includes a total of approximately 1.2 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 April 3, 2014 with the Variance Request titled the *TRTP Cultural and Paleontological Resource Guidelines for Segment 8 T/L Phase IV West, Variance Request –Wire Setup Site East of Structure M55-T1*. The memorandum states that the proposed WSS provided in this variance request was included in the previous survey for the TRTP and no cultural resources were identified (Pacific Legacy 2007).

  Previous paleontological assessments conducted for TRTP indicate that the proposed WSS is located within the Miocene Puente Formation, which has a high sensitivity for yielding paleontological resources (Gust and Scott 2009; Aron 2010). If site grading is proposed in support of this variance request, in accordance with the Paleontological Resource Management Plan (Gust and Scott 2009), paleontological resources monitoring is required during any ground disturbing activities.

  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 WSS (Project Component) shall be staked and flagged, and verified by a CPUC EM prior to use of the area.

- In accordance with the Paleontological Resource Management Plan (Gust and Scott 2009), paleontological resources monitoring shall occur during any ground disturbing activities.

- 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