

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 30, 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) #156

Dear Ms. Nelson:

On June 17, 2014, Southern Californian Edison (SCE) submitted a variance request for an additional wire setup site (WSS) west of Structure M53-T3 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 an additional wire setup site (WSS) west of Structure M53-T3 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. The additional WSS is situated between two CPUC-approved disturbance areas: the work area for Structure M53-T3 and WSS 8-4.29. The additional work area, which measures approximately 0.491 acre, is needed to safely conduct wire stringing activities.

Based upon existing site conditions, no vegetation removal or grading is planned. It is anticipated that onsite activities would be limited to foot traffic.

- **Biological Resources:** SCE submitted a biological report with the variance request from ICF International dated June 10, 2014 and titled *Proposed Wire Setup Site West of Structure M53-T3, Segment 8 T/L Phase IV, TRTP, Los Angeles County*. The report documents the biological conditions for the proposed WSS west of Structure M53-T3 on Segment 8 Phase 4 (Variance Project Component), plus the 500-foot buffer (Biological Study Area [BSA]). Biological resources within the BSA were evaluated during several focused surveys, including 2007, 2009, 2010 and 2011 special-status plant surveys (AMEC 2007a, 2009o; ICF International [ICF] 2010at, 2011hc), 2010 and 2011 regulated tree inventory surveys (ICF 2010av, 2011hd), and the 2010 burrowing owl focused survey (ICF 2010xx). A literature review was also performed as part of the biological review for Segment 8 (ICF 2010dw). The biological resources within the BSA were also evaluated during Segment 8 Phase 4 general preconstruction surveys and preconstruction special-status bat habitat assessment surveys (ICF 2010cb, 2011fi, 2011gp). 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) (SCE 2014a). A clearance sweep will also be conducted prior to construction of the Variance Project Component.

Vegetation communities within the Variance Project Component include California walnut woodland, and within the 500-foot buffer include California annual grassland, California walnut woodland, nonnative woodland, ruderal grassland, and disturbed/developed. Special-status plant species observed within the BSA includes California walnut (*Juglans californica*). Regulated trees observed within the BSA include coast live oak (*Quercus agrifolia*).

Special-status wildlife species observed within the 500-foot buffer include Cooper's hawk (*Accipiter cooperii*), Ferruginous hawk (*Buteo regalis*), Northern harrier (*Circus cyaneus*), ringneck snake (*Diadophis punctatus*), western skink (*Eumeces skiltonianus*), and white-tailed kite (*Elanus caeruleus*). Nesting bird buffers exist within the BSA and bat habitat exists within the 500-foot buffer. The Variance Project Component does not overlap suitable habitat for special-status species, as included in the CDFW Incidental Take Permit or the USFWS Biological Opinion. The proposed Variance Project Component includes a total of approximately 0.491 acres of new temporary impacts. 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).

Jurisdictional resources within the Variance Project Component were evaluated during the 2010 jurisdictional delineation for Segments 7 and 8 (ICF 2010h). One mapped jurisdictional feature (8-28-S-4) is located within the Variance Project Component and will be staked as an Environmentally Sensitive Area (ESA) and avoided during construction activities because it was not previously permitted. Jurisdictional features identified within the 500-foot buffer will be avoided (ICF 2010h), and any additional potential jurisdictional features will be staked as ESAs and avoided.

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 June 12, 2014 with the Variance Request titled the *TRTP Cultural and Paleontological Resource Guidelines for Segment 8 T/L Phase IV, Variance Request –Wire Setup Site West of Structure M53-T3*. The memorandum states that no cultural or paleontological resources will be impacted by the proposed wire setup site west of Structure M53-T3 on the TRTP Segment 8 Phase IV. The proposed wire setup site 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 the TRTP indicate that the proposed wire setup site is located within the Miocene Puente Formation, which has a high sensitivity for yielding paleontological resources (Gust and Scott 2009; Aron 2010). However, no ground disturbance is 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:

- As described in the variance request, the onsite activities within the Variance Project Component shall be limited to foot traffic.
- The boundaries of the wire setup site (WSS) and any ESAs shall be staked and flagged, and verified by a CPUC EM prior to use of these areas.
- 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,

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