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

July 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) #157

Dear Ms. Nelson:

On June 27, 2014, Southern Californian Edison (SCE) submitted a variance request for an additional wire setup site (WSS) southeast of Structure M47-T2 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) southeast of Structure M47-T2 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: WSS 8-4.22 and a guard structure work area adjacent to Frame Avenue. The proposed WSS, which is needed to safely conduct wire stringing activities, measures approximately 1.598 acres. This area overlaps a CPUC-approved road and, as such, the total additional acreage associated with the proposed WSS is approximately 1.533 acres. Based upon existing site conditions, vegetation removal and minor grading are needed.

- **Biological Resources**: SCE submitted a biological resource report from ICF International dated June 24, 2014 with the variance request. The report documents the biological conditions at the proposed Segment 8 West (Phase 4) Wire Setup Site southeast of Structure M47-T2 (Variance Project Component) and associated 500-foot buffer. The Variance Project Component and 500-foot buffer are referred to as the 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 2010at, 2011hc); 2010 and 2011 tree inventory surveys (ICF 2010av, 2011hd); 2008 and 2010 coastal California gnatcatcher surveys (AMEC 2008d; ICF 2010ww); and 2010 burrowing owl surveys (ICF 2010xx). The biological resources within the BSA were also evaluated during Segment 8 West (Phase 4) general preconstruction surveys and preconstruction bat habitat assessment surveys (ICF 2011dv, 2011dw). A literature review was also performed as part of the biological review for Segment 8 West (Phase 4). (ICF 2010dw). Additionally, clearance sweeps were performed prior to the start of Segment 8 West (Phase 4) construction. 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 have been recorded in the SCE Field Reporting Environmental Database (FRED).

Vegetation communities within the Variance Project Component include coastal sage scrub, disturbed/developed, and ruderal grassland. Vegetation communities within the 500-foot buffer include coastal sage scrub, coastal sage scrub – disturbed, disturbed/developed, and ruderal grassland. Regulated tree species, blue elderberry (Sambucus nigra ssp. caerulea), occurs within the 500-foot buffer.

Special-status wildlife species or sign of species observed within the 500-foot buffer include sharp-shinned hawk (*Accipiter striatus*), potential burrowing owl features, and San Diego desert woodrat (*Neotoma lepida intermedia*) midden. An active common raven nest (*Corvus corax*) occurs within the 500-foot buffer. Coastal California gnatcatcher (*Polioptila californica*) designated critical habitat occurs within the 500-foot buffer. The Variance Project Component does not overlap suitable habitat for special-status species included in the CDFW incidental take permit or the USFWS biological opinion. 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). No mapped jurisdictional features are located within the Variance Project Component. 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.

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 9, 2014 with the Variance Request titled the *TRTP Cultural and Paleontological Resource Guidelines for Segment 8 T/L Phase IV West, Request for Final Engineering Concurrence –Wire Setup Site Southeast of Structure M47-T2.* The memorandum states that no cultural resources will be impacted, however, there is a potential for impacting paleontological resources during any grading activities for the proposed WSS southeast of Structure M47-T2 on the TRTP Segment 8 Phase IV West. The proposed wire setup site provided in this 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). 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 wire setup site (WSS) and any environmentally sensitive areas (ESAs) shall be staked and flagged, and verified by a CPUC EM prior to use of this 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