

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



July 14, 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) #158

Dear Ms. Nelson:

On July 2, 2014, Southern Californian Edison (SCE) submitted a variance request for an alternate access road to Structures M70-T3 and M70-T4 on the Segment 8 Transmission Line (T/L), Phase 3, of the Tehachapi Renewable Transmission Project (TRTP) in the City of Ontario, San Bernardino 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 alternate access road to Structures M70-T3 and M70-T4 on Segment 8 T/L Phase 3 in the City of Ontario, San Bernardino County, California. Subsequent to the approval of the NTPR (NTP #13 dated August 24, 2010) by the CPUC, project site conditions have been further evaluated and an alternate access road to Structures M70-T3 and M70-T4 is needed for constructability purposes. Large construction vehicles are not able to use the CPUC-approved access road to Structures M70-T3 and M70-T4. Therefore, temporary use of an existing access road is proposed. The portion of the existing access road to be used measures approximately 190 linear feet long. It is anticipated that activities would be limited to drive and crush; the proposed access road will not require any blading, grading, or vegetation removal.

- **Biological Resources:** SCE submitted a biological resource information with the variance request. The proposed access road near Segment 8 M70-T3 is within the SCE TRTP protocol and focused survey corridor. Based on an analysis of the proposed construction activity, no sensitive resources are anticipated to be impacted. The proposed access road will be located within developed/disturbed habitat. Vegetation communities within the 500-foot buffer include agriculture, disturbed/developed, and ruderal grassland. No special-status plants or regulated trees have been observed within the Variance Project Component or the 500-foot buffer. Special-status wildlife observed within the 500-foot buffer include Northern harrier (*Circus cyaneus*), and peregrine falcon (*Falco peregrinus*). Also, an inactive burrowing owl (*Athene cunicularia*) nest has been observed within the 500-foot buffer. Jurisdictional feature 8-56-S-1 occurs within the 500-foot buffer. A biological monitor will perform a clearance sweep of the proposed location prior to site occupation to ensure sensitive biological resources are identified and avoided during the proposed activities.

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 13, 2014 with the Variance Request titled the *TRTP Cultural and Paleontological Resource Guidelines for Segment 8 T/L*

Phase 3, Variance Request – Temporary Access Road to Structures M70-T3 and M70-T4. The memorandum states that no cultural or paleontological resources will be impacted by the use of an existing access road to Structures M70-T3 and M70-T4 in support of the TRTP Segment 8 Phase 3. The area for this request is located in the City of Ontario, San Bernardino County, California. The proposed access road identified in this variance request was included in previous surveys for the TRTP and no cultural resources were identified (Pacific Legacy 2007; Belcourt 2013). Previous paleontological assessments conducted for the TRTP indicate that the proposed access road is located within Quaternary alluvium and has a low sensitivity for yielding paleontological resources (Gust and Scott 2009; Aron 2010). 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:

- All conditions required by Notice to Proceed (NTP) #13 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #13, 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 'Jason Coontz', written over a horizontal line.

Jason Coontz
CPUC Environmental Project Manager

cc: V. Strong, Aspen