

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 5, 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) #159

Dear Ms. Nelson,

On July 31, 2014, Southern Californian Edison (SCE) submitted a variance request for the expansion of a temporary guard structure area at Structure M35-T4 on the Segment 7 Transmission Line (T/L) of the Tehachapi Renewable Transmission Project (TRTP) within the City of Industry, 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 a guard structure area expansion at Structure M35-T4 on Segment 7 T/L of the TRTP within the City of Industry, 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 a guard structure area needs to be expanded for constructability purposes. The additional guard structure area is situated between two CPUC-approved disturbance areas: the work area for Structure M35-T4 and the guard structure area situated northeast of this structure work area. The additional guard structure area, which is needed to support wire stringing operations, measures approximately 0.149 acre. Based upon existing site conditions, no vegetation removal or grading is planned.

- **Biological Resources:** SCE submitted biological information with the variance request. The proposed additional work area is within the SCE TRTP protocol and focused survey corridor. The proposed additional work area is developed/disturbed requiring no vegetation removal or grading; therefore, no biological resources are anticipated to be impacted. A biological monitor will perform a clearance sweep of the proposed location prior to site occupation to ensure that no sensitive biological resources are identified and avoided during the proposed activities.

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 July 24, 2014 regarding the SCE TRTP Cultural and Paleontological Resource Guidelines for Segment 7 T/L Variance Request – Guard Structure Area Expansion at M35-T4. The memorandum states that no cultural or paleontological resources will be impacted by the proposed variance request for a guard structure expansion area at Structure M35-T4 in support of TRTP in the City of Industry, 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 area 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).

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) #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,



John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen