

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) #160

Dear Ms. Nelson,

On August 04, 2014, Southern Californian Edison (SCE) submitted a variance request for an additional temporary Wire Setup Site (WSS) at Structure M36-T2 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 an additional wire setup site at Structure M36-T2 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 an additional Wire Setup Site (WSS) is needed for constructability purposes. The additional WSS extends from the west side of the Structure M36-T2 work area to a CPUC-approved WSS situated southwest of Structure M36-T2. The additional WSS also abuts two other CPUC-approved WSSs. The additional WSS, which measures approximately 1.220 acres, will provide additional area to support wire stringing activities. The area will also provide area needed to protect a distribution line during these activities. Based upon existing site conditions, vegetation removal will occur, but no grading is planned.

- **Biological Resources:** The biological information provided in this request notes that the proposed additional temporary WSS is within the SCE TRTP protocol and focused survey corridor. The area is identified as developed/disturbed, nonnative woodland, and ruderal grassland communities containing one potential resource; a potential burrowing owl feature that was identified in 2009, but has never been occupied. A biological monitor will perform a clearance sweep of the proposed location prior to site occupation to ensure that sensitive biological resources are identified and avoided during the proposed activities.

The WSS will require vegetation removal within the 1.22 acre site, but no grading is planned. 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 August 04, 2014 regarding the SCE TRTP Cultural and Paleontological Resource Guidelines for Segment 7 T/L Variance

Request – Additional Wire Setup Site at Structure M36-T2. The memorandum states that no cultural or paleontological resources will be impacted by the proposed variance request for the additional WSS at Structure M36-T2 in support of TRTP in the City of Industry, Los Angeles County. The proposed area for this variance request was included in previous surveys for the TRTP (Pacific Legacy 2007; Pacific Legacy et al. 2010; PCR Services 2010a, 2010b) and these cultural resource surveys yielded one cultural resource, the Woodland Duck Farm (CA-LAN-4079), which has been determined ineligible for listing on the National Register of Historic Places (NRHP) and the California Register of Historic Resources (CRHR). Therefore, no further cultural resources work is required for this variance request.

Previous paleontological assessments conducted for the TRTP indicate that the proposed wire setup site 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:

- Boundaries of the additional Wire Setup Site shall be flagged and verified by the CPUC EM prior to site use.
- 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