

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 28, 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) #162

Dear Ms. Nelson,

On August 20, 2014, Southern Californian Edison (SCE) submitted a variance request for an additional temporary Wire Setup Site (WSS) east of Structure M37-T3 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 (WSS) east of Structure M37-T3 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 WSS is needed for constructability purposes. The additional WSS is situated east of Structure M37-T3, between CPUC-approved WSSs 7.47 and 7.48/7.48a. The proposed WSS, which measures approximately 0.754 acre (temporary disturbance), will provide additional area to support wire stringing activities.

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 survey corridor. The proposed additional work area is within developed/disturbed lands. Vegetation communities within the 500-foot buffer include disturbed/developed, nonnative woodland, ruderal wetland, Southern arroyo willow riparian forest, Southern willow scrub, and open water. No special-status plants or regulated trees occur within the variance project component or 500-foot buffer.

No special-status wildlife was observed in the project component. Special-status wildlife observed within the 500-foot buffer include great blue heron (*Ardea herodias*), least Bell's vireo (*Vireo bellii pusillus*), least bittern (*Ixobrychus exilis*), Peregrine falcon (*Falco peregrinus*), willow flycatcher (*Empidonax traillii*), yellow-breasted chat (*Icteria virens*), and yellow warbler (*Dendroica petechial*). A potential burrowing owl (*Athene cunicularia*) feature was observed within the 500-foot buffer, as well as an inactive nest. Jurisdictional features within the 500-foot buffer include 7-30-S-1, 7-30-S-2, 7-30-W-1, 7-30-W-2, and 7-30-W-3. 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.

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 5, 2014 regarding the SCE TRTP Cultural and Paleontological Resource Guidelines for Segment 7 Variance Request – Additional Wire Setup Site at Structure M37-T3. The memorandum states that no cultural or paleontological resources will be impacted by the proposed variance request for an additional WSS at Structure M37-T3. 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:

- The boundaries of the WSS shall be staked and flagged, and verified by a CPUC EM prior to use of this area.
- 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