

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



November 11, 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) #165

Dear Ms. Nelson,

On November 6, 2014, Southern Californian Edison (SCE) submitted a variance request for an additional Guard Structure area near Structure M42-T6 on the Segment 7 Transmission Line (T/L) of the Tehachapi Renewable Transmission Project (TRTP) within the City of Monterey Park, 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 Guard Structure area near Structure M42-T6 on Segment 7 T/L of the TRTP within the City of Monterey Park, 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 Guard Structure area is needed for constructability purposes. The additional Guard Structure area lies adjacent to the north side of the CPUC-approved tower work area associated with Structure M42-T6. The proposed Guard Structure Area, which measures approximately 0.33 acre [temporary disturbance], will allow the construction contractor to stage a crane/boom truck in the area to protect distribution lines during Segment 7 wire stringing operations.

Based upon existing site conditions, vegetation trimming may be required; however, no grading is planned.

- **Biological Resources:** SCE submitted a biological report from ICF International dated November 5, 2014 with the variance request titled *Proposed Additional Guard Structure Area near Structure M42-T6, Segment 7, TRTP, City of Monterey Park, Los Angeles County*. The report documents the biological conditions at the proposed Segment 7 additional guard structure area near M42-T6 (Variance Project Component) and associated 500-foot buffer. The Variance Project Component and the 500-foot buffer are referred to as the Biological Study Area (BSA). Biological resources within the BSA were evaluated during several focused surveys, including 2009, 2010, 2011 special-status plant surveys (AMEC 2009o; ICF 2010at, 2011hc; 2010 and 2011 tree inventory surveys (ICF 2010av, 2011hd); and 2010 burrowing owl surveys (ICF 2010xx). The biological resources within the BSA were also evaluated during Segment 7 general preconstruction surveys, burrowing owl preconstruction surveys, and preconstruction bat habitat assessment surveys (ICF 2010bg, 2010bh, 2010fz, 2010ge, 2011fb, 2011fl, 2011fp, 2011hu). Also, a literature review was performed as part of the Biological Review for Segment 7 (ICF 2010ay). Additional clearance sweeps were performed prior to the start of construction at M42-T6. 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 are recorded in the SCE Field Reporting Environmental Database (FRED; SCE 2014a).

Vegetation communities within the Variance Project Component include ruderal grassland. Vegetation communities within the 500-foot buffer include disturbed/developed, mule fat scrub, mule fat scrub-disturbed, nonnative woodland, ruderal grassland, and sparsely vegetated streambed. Special-status plant species, California walnut (*Juglans californica*), occurs within the 500-foot buffer.

Special-status wildlife species observed within the BSA include coastal California gnatcatcher (*Polioptila californica*), and within the 500-foot buffer include Cooper's hawk (*Accipiter cooperii*), loggerhead shrike (*Lanius ludovicianus*), peregrine falcon (*Falco peregrinus*), prairie falcon (*Falco mexicanus*), and sharp-shinned hawk (*Accipiter striatus*). The 500-foot buffer also includes bat habitat, an inactive red-tailed hawk nest, and a vacant raptor nest. The Variance Project Component does not overlap suitable habitat for special-status species as included in the CDFW Incidental Take Permit (ITP) or USFWS Biological Opinion (BO).

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 within the 500-foot buffer include 7-39-S-1, 7-39-S-2, 7-39-S-3, 7-39A-S-2, 7-39-W-2, and 11-94-S-1. 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.

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 October 24, 2014 regarding the SCE TRTP Cultural and Paleontological Resource Guidelines for Segment 7 Variance Request – Additional Guard Structure Area near Structure M42-T6. The memorandum states that no cultural or paleontological resources will be impacted by the proposed variance request for an additional guard structure area near Structure M42-T6. 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.

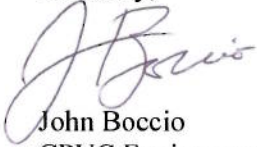
Previous paleontological assessments conducted for the TRTP indicate that the proposed area is located within the Fernando Formation, which has a high sensitivity for yielding paleontological resources (Gust and Scott 2009; Aron 2010). However, no improvements to this area are required for this variance request.

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 additional Guard Structure area 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,

A handwritten signature in black ink, appearing to read "J. Boccio". The signature is written in a cursive, flowing style.

John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen