

PUBLIC UTILITIES COMMISSION505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

November 18, 2010

Susan J. Nelson, AIA
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) #15

Dear Ms. Nelson,

On November 18, 2010, Southern Californian Edison (SCE) submitted a variance requesting to add an additional (.236 acres) disturbance area for the installation of a guard pole and move the guard structure nearest to the 14 Freeway further south approximately 25 feet. The new disturbance area (guard poles) would be located between Highway 14 and Sierra Highway, Segment 5, Tehachapi Renewable Transmission Project (TRTP). **This Variance Request is approved by CPUC for the proposed activities based on the following factors:**

- SCE submitted the following information:

SCE is requesting a variance to add an additional (.236 acres) disturbance area for the installation of a guard pole and move the guard structure nearest to the 14 Freeway further south approximately 25 feet. The new disturbance area (guard poles) would be located between Highway 14 and Sierra Highway. There is a distribution line (Bootlegger 12 kV) running just to the northwest of the approved access road that will need to be guarded during the wire demo and installation. The requested disturbance area would be centered under this distribution line. The work for this variance is planned for the weekend of November 20th to meet the scheduled "No Test Order". There is no approved disturbance area that can be used to install guard poles to safely protect the distribution line during wire removal and installation. Activities that will be required for this work will not impact the drainage area. This disturbance area would be needed for the duration of the work in the area, (i.e. removing the existing wire and installing the new wire).

- **Biological Resources:** SCE submitted a report titled *Biological Survey Report for the Proposed Guard Structures Variance for Tehachapi Renewable Transmission Project, Segment 5 Transmission Line, Los Angeles County, California* dated November 16, 2010 by ICF International. Biological resources within the project site and 500-foot buffer were evaluated during surveys, including focused species surveys and preconstruction biological surveys. A literature review was also performed as part of the biological review. Preconstruction surveys that included the project site and buffer area were completed on October 21 and 22, 2010. An updated preconstruction survey for this Variance was conducted on November 9, 2010. Six vegetation communities were mapped within the project site and buffer area and include Mojave juniper woodland scrub, disturbed Mojave juniper woodland scrub, Mojave mixed woody scrub, rabbitbrush scrub, ruderal grassland, and disturbed/developed habitat (ICF 2010ee). The Variance project sites occur within disturbed Mojave juniper woodland scrub habitat. Temporary vegetation removal may be required, but there will be no grading and the guard structures will be placed outside the jurisdictional drainage that crosses the Variance project site. No special-status plant species were observed in the project site or buffer area during the focused surveys (ICF 2010m) or the preconstruction surveys (ICF 2010bd). Several special-status wildlife species have been observed adjacent to the project site during previous biological surveys. These species include Cooper's hawk (*Accipiter cooperii*), loggerhead shrike (*Lanius ludovicianus*) and

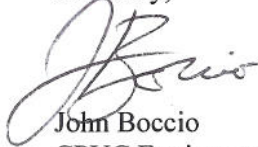
desert woodrat (*Neotoma lepida*). Potential burrowing owl features have been observed within the project site and surrounding area; however, no burrowing owls have been observed. Previously mapped jurisdictional features (5-37-S-1, 5-37-S-2, 5P-37-S1 and 5-37-S-1) occur within the Biological Survey Area which includes the project site and 500-foot buffer zone and will be staked and flagged as Environmentally Sensitive Areas (ESAs) for avoidance. Jurisdictional feature 5-37-S-1 occurs within the project site. Only vehicle crossing of 5-37-S-1 on the access road is permitted, and no impacts will occur to the drainage. No additional impacts to biological resources are anticipated.

- **Cultural Resources:** SCE submitted a memo titled *TRTP Variance – Segment 5–4 Guard Poles at Hwy 14 Cultural Clearance for a Segment 5 Guard Pole Area at Hwy 14*. The memo states that no cultural resources will be affected by the two proposed guard pole areas just east of Hwy 14 as part of this Variance request. A record search and both cultural and paleontological surveys (Gust and Scott 2009; Pacific Legacy 2007, 2008) of the proposed guard pole areas has been conducted for this portion of TRTP on Segment 5. No cultural resources were identified in the project areas included in the Variance request. Because there is a possibility that paleontological resources exist in this area, paleontological monitoring is recommended during guard pole excavation. No additional impacts to cultural or paleontological resources are anticipated.

The conditions noted below shall be met by SCE and its contractors:

- Previously identified jurisdictional features shall be staked and flagged as ESAs prior to the commencement of related guard pole installation activities.
- Due to the possibility that paleontological resources exist in this area, paleontological monitoring shall be conducted during guard pole excavation.
- All conditions required by NTP #15 shall apply to the subject site and activities.
- Copies of all relevant permits, compliance plans, NTP #15, 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