

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

November 19, 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) #16

Dear Ms. Nelson,

On November 12, 2010, Southern Californian Edison (SCE) submitted a variance requesting to temporarily realign an existing access road at the southeastern corner of the Vincent Substation 500 kV expansion area to allow for the construction of the Segment 5 transmission line, 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:

Section 3.21 (Access Roads) of SCE's Notice to Proceed Request for Segment 5 transmission line (T/L) identifies that construction of the new 500 kV structures will involve new temporary and permanent access roads, and existing access roads.

Due to the expansion of Vincent Substation (Notice to Proceed #2), an existing access road will need to be temporarily realigned to construction of the Segment 5 transmission lines and not interfere with the expansion of Vincent Substation. Additionally, the road will be used by SCE Operation & Maintenance crews to access an SCE groundwater well and to patrol the transmission tower right-of-way. The temporary road will be used until a permanent access road is established and permitted under Segments 6 and 11.

SCE requests a variance to temporarily realign the existing access road at the southeastern corner of the Vincent Substation 500 kV expansion area to allow the construction of the Segment 5 transmission lines. The access point at the southern substation expansion area boundary will be repositioned approximately 200 feet to the west. The temporary access road will be approximately 210 feet long and 14 feet wide. An additional two feet of disturbance will occur on each side of the road to accommodate the turning radius of equipment used during road construction. Berms or swales approximately two to three feet wide will be created on each side of the roadway where necessary. Thus, the total planned disturbance area is approximately 210 feet long and 18 feet wide. This area currently consists of disturbed (existing unpaved access roads) and undisturbed land (natural vegetation). The property is entirely SCE fee-owned. Road alignment construction activities would involve a grader and a pick-up truck with a wood chipper, hand tools, and a chain saw. As described in the Segment 5 T/L NTPR, and as specified in the Notice to Proceed #15, construction of new 500 kV structures will involve clearing and grading of new, temporary and permanent access roads. Improvements to existing access roads may also include grading, blading, and vegetation clearing or removal. The wood chipper with the pick-up truck will be utilized to clear and chip the brush that needs to be removed to accommodate the realignment. The chippings would be used on the temporary road as road base.

- **Biological Resources:** SCE submitted a report titled *Biological Survey Report for the SCE Tehachapi Renewable Transmission Project, Vincent Temporary Road, Segment 9 Vincent Substation, Los Angeles County, California* dated November 11, 2010 by ICF International.

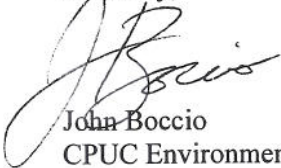
Biological resources within and adjacent to the project site were evaluated during surveys, including focused species surveys and preconstruction biological surveys. A literature review was also performed as part of the biological review for Segments 5 and 9. Three vegetation communities were mapped within the Variance project site at approximately 3,220 feet in elevation and include the following: disturbed/developed, Mojavean juniper woodland scrub, and Mojave mixed woody scrub (ICF 2010ag). No special-status plant species were observed during the focused surveys (ICF 2010ag) or the preconstruction survey (ICF 2010bd) for the project site. Special-status wildlife species were not observed on the project site during previous biological surveys; however, potential burrowing owl features and loggerhead shrike (*Lanius ludovicianus*) were observed within the 500-foot buffer and desert woodrat (*Neotoma lepida*) and Cooper's hawk (*Accipiter cooperii*) were observed in the vicinity. No special-status species were observed during the most recent preconstruction survey (ICF 2010bd). The Mojave juniper woodland that occurs in the southern portion of the project site has potential to support bat roost habitat; however, the preconstruction bat habitat assessment survey did not identify any potential solitary lasiurine bat foliage roost habitat or potential colonial bat roosting habitat within or adjacent to Segment 5 (ICF 2010be). No jurisdictional drainage features are located on the project site. No additional impacts to biological resources are anticipated.

- **Cultural and Paleontological Resources:** A cultural resources record search and field survey for the proposed disturbance area were conducted by Ecorps Consulting and Pacific Legacy as part of the TRTP (Ahmet et. al., 2006; Pacific Legacy, 2007 and 2008). Results of the record search and field survey indicate that no cultural resources have been previously recorded within the proposed disturbance area. The Paleontological Resources Management Plan (PRMP) Segments 4 – 11 of the TRTP area was prepared by Cogstone Resource Management Inc. (Gust and Scott 2009). The surface sediments (Quaternary Older Alluvium) have a high sensitivity for paleontological resources, and monitoring by a qualified paleontologist is required during all ground-disturbance activities in native soils. No additional impacts to cultural or paleontological resources are anticipated.

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

- 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