STATE OF CALIFORNIA ARNOLD SCHWARZENEGGER, Governor
PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

December 1, 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) #18

Dear Ms. Nelson,

On November 24, 2010, Southern Californian Edison (SCE) submitted a variance requesting to utilize two additional access roads near Constructs 36, 37, 45 and 46 for purposes of constructability on the Segment 5 500 kV transmission line of the 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:

  Subsequent to approval of the NTPR (NTP #15 dated August 16, 2010) by the CPUC, project site conditions have been further evaluated and two additional access roads near Constructs 36, 37, 45 and 46 are needed for purposes of constructability. The additional access roads proposed in this Variance will be used for construction of the Segment 5, 500 kV transmission line for TRTP.

  The proposed existing access road near Construct 36 and 37 begins approximately 250 feet north of the right-of-way (ROW) corridor off of an existing access road, which connects to Elizabeth Lake Road. The use of this access road will also include a pull-out space to be used for parking and to locate portable sanitary facilities. This existing access road is wider than the nearby approved access road and therefore allows a more efficient movement of equipment.

  The proposed existing access road near Construct 45 and 46 is located at the end of Parkwood Drive and is controlled by an Edison locked gate. The use of this access road will significantly reduce the time it takes concrete trucks to get to the nearby structures. This is a critical issue as the concrete trucks are only allotted a specific amount of time to deliver their loads. Additionally, the use of this access road will allow concrete trucks and other construction equipment to avoid traveling down the steep and potentially unsafe pre-approved access roads nearby.

  Lastly, the existing access roads proposed in this request are currently approved for use under separate Temporary Extra Work Space (TEWS) requests (dated November 5 and November 3, 2010); however, Henkels & McCoy would like to continue the use of these access roads throughout the duration of the Project.

- **Biological Resources**: SCE submitted a report titled *Biological Survey Report for the Proposed Access Road Variance for Tehachapi Renewable Transmission Project, Segment 5 Transmission Line, Los Angeles County, California* dated November 23, 2010 by ICF International. Biological resources within the two biological survey areas (BSAs = project component and 500-foot buffer zone) were evaluated during surveys within and adjacent to the BSAs, including focused species surveys and preconstruction biological surveys. A literature review was also performed as part of the biological review for Segment 5. The two proposed access roads are referred to as the Westland Drive and Parkwood Drive access roads. The Westland Drive proposed access road is situated east of the area between Construct 36 and 37 and existing towers M68-T3 and M68-T4. The Parkwood

Drive proposed access is situated east of the area between Construct 45 and 46 and existing towers M70-T3 and M70-T4. Both access roads are already developed and use of these existing roads will not require any vegetation clearing or grubbing. A jurisdictional feature occurs near each of the two proposed access roads within the BSA, but outside of the proposed access roads (project component).

Previous focused burrowing owl (*Athene cunicularia*) surveys in 2010 for Segment 5 were negative for burrowing owls or sign of the species within the BSAs; however, potential burrowing owl burrows and features were previously identified within both BSAs (ICF 2010o, ICF 2010ac). No burrowing owl features occur within the proposed access roads (project component). Preconstruction surveys for bats were negative (ICF 2010bc). The Construct 30 through 47 wreck-out area was largely burned in July and August 2010 and any trees or other roosting features that may have previously been in the area are now destroyed.

No special-status plants were observed in the proposed access roads during focused and preconstruction surveys. Two sensitive plant species were identified within the BSAs during previous focused surveys. Peirson's morning glory (*Calystegia peirsonii*) was detected during the 2009 and 2010 focused surveys within both the Westland and Parkwood BSAs. Another sensitive species, short-joint beavertail (*Opuntia basilaris* var. *brachyclada*), was observed within the Parkwood BSA during the 2009 focused surveys; however, during the 2010 focused surveys, it was determined that many of the short-joint beavertail cacti observed in 2009 were likely the more common beavertail cactus. ICF states that no short-joint beavertail cactus occurs within either of the BSAs. No additional impacts to biological resources are anticipated.

- **Cultural and Paleontological Resources**: SCE submitted a letter from Pacific Legacy dated November 4, 2010 regarding *Cultural Resources survey for the CT37 Access Road and Parking Area, Segment 5 Tehachapi Renewable Transmission Project, Los Angeles County, California*. A cultural resources record search was previously conducted for the TRTP area that encompasses the current study areas (Pacific Legacy 2007), and it was updated in 2010. Record search results indicate that 47 cultural resources have been recorded within a one mile radius of the access road and parking area; however, none of these resources lie within the Area of Direct Effect (ADE) or the Area of Potential Effect (APE) of the subject roadways. The APE was defined as a 100-foot buffer surrounding both the proposed access road and parking area. The CT37 Access Road and Parking Area were surveyed for cultural resources by Pacific Legacy archaeologists on October 29, 2010. A 100-foot buffer surrounding the access road and parking area was surveyed in linear transects using a 10 meter survey interval. Previously surveyed areas within the TRTP centerline corridor were not resurveyed. Results of the pedestrian survey indicate that the dirt access road and parking area had been previously graded and impacted by installation and maintenance of existing SCE transmission lines and towers. Surface visibility within the survey area ranged from 60% to 100%. No cultural resources were identified as a result of this field survey. No additional impacts to cultural or paleontological resources are anticipated.

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

- 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