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

January 13, 2011

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) #27

Dear Ms. Nelson,

On January 12, 2011, Southern Californian Edison (SCE) submitted a variance requesting an additional disturbance area due to the relocation of Tower M54-T3A in the City of Duarte on the Segment 7 Transmission Line (T/L) of the Tehachapi Renewable Transmission Project (TRTP). The tower relocation is within the existing SCE right-of-way (ROW) and will require an additional 200x200 foot disturbance area not originally approved under NTP #17; all work will occur within the SCE ROW. Note: The disturbance area for the original tower location was previously cleared prior to SCE determining that relocation of the subject tower was necessary. **This Variance Request is approved by CPUC based on the following factors:**

- SCE submitted the following information:

  Subsequent to approval of the NTPR (NTP #17 dated 9-24-10) by the CPUC, project site conditions have been further evaluated and the location of Tower M54-T3A, in the City of Duarte, has been relocated. This relocation is an in-line move, within the TRTP right-of-way.

- **Biological Resources**: SCE submitted *Biological Survey Report for the Relocated M54-T3A T/L Tower* dated January 10, 2010 by ICF International. The proposed tower footprint for Tower M54-T3A is considered the Variance Project Component, and the Variance Project Component plus a 500-foot buffer is considered the Biological Study Area (BSA). The biological resources within the Variance Project Component were evaluated during preconstruction surveys associated with Segment 7 T/L. Numerous other surveys have occurred within and adjacent to the access roads, including during focused surveys for special-status species, the jurisdictional delineation for Segment 7, and other preconstruction biological surveys. Surveys were performed by qualified ICF International biologists walking the entire site in meandering transects to ensure 100 percent visual coverage.

  The four vegetation communities observed in the BSA include: coast live oak woodland, coastal sage scrub, disturbed/developed, and non-native woodland. The Project Component is primarily disturbed/developed with a portion of coastal sage scrub vegetation. San Diego desert woodrat (*Neotoma lepida*) nests (3) occur within the 500-foot buffer. Coastal sage scrub within the 500-foot buffer was not surveyed for coastal California gnatcatcher (*Polioptila californica*) as it was determined to not support the species. Potential bat roosts are located within the Project Component. Previously mapped jurisdictional features within the 500-foot buffer will be staked and flagged as an environmentally sensitive area (ESA) for avoidance. No additional impacts to biological resources are anticipated.

- **Cultural Resources**: SCE submitted an email from Matthew Wetherbee, RPA, Contingent Archaeologist (PCR Services) stating that no cultural resources will be affected by the proposed relocation of Tower M54-T3A and associated disturbance area. The proposed tower relocation and structure work area were included in the previous survey for the TRTP right-of-way corridor and no cultural resources were identified. Work will not exceed outside of the TRTP ROW. No additional impacts to cultural resources are anticipated.

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

- All conditions required by 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