

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



March 8, 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) #42

Dear Ms. Nelson,

On March 4, 2011, Southern Californian Edison (SCE) submitted a variance request for additional roadway improvements to be performed on the Segment 4 Transmission Line (T/L) of the Tehachapi Renewable Transmission Project (TRTP) in Kern and Los Angeles County, California. **This Variance Request is approved by CPUC based on the following factors:**

- SCE submitted the following information:

SCE submitted a request for a Variance to allow roadway improvements to be performed on Segment 4 T/L of the TRTP in Kern and Los Angeles County.

The NTPR for Segment 4 T/L states the following regarding planned roadways associated with construction activities:

"In most areas, construction of the 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. New roads and planned improvements have been designed to be 14-foot-wide roadway plus additional roadway width to accommodate the necessary vehicles and equipment turning radii during construction. Additionally, some roads may be capped to protect archaeological resources. Berms or swales approximately 2 to 3 feet wide will be created on each side of the roadway where necessary and in compliance with applicable mitigation measures. Roadway width will also be required to accommodate vehicle turning, vehicle turnouts, sidecast, and backslope.

In some locations, access to construction areas will take place in the form of temporary overland travel. In these areas overland access will be made without the creation of new temporary or permanent access roads."

Subsequent to the approval of the NTPR (NTP #16 dated September 13, 2010) by the CPUC, project site conditions have been further evaluated and changes identified to the types of roadway improvements needed. Specifically, the roadway classifications for various roads have been changed from "Minimum Improvement" or "Medium Improvement" to "Heavy Improvement". These changes are illustrated in revised NTPR figures submitted by SCE with this Variance Request.

Additionally, as stated above, the NTPR indicated that roadway improvements would "also be required to accommodate vehicle turning." The revised set of NTPR figures illustrate the specific planned turning areas at roadway intersections, which are referred to as turning radius areas in the figures.

Biological Resources: The proposed roadway improvements for Segment 4 T/L have been reviewed and approved by CDFG and are consistent with the CDFG Incidental Take Permit (ITP - 2081 Permit). The ITP 2081 is required for Segment 4 T/L for Swainson's hawk, desert tortoise, and Mohave ground squirrel. USFWS has reviewed the proposed roadway improvements for Segment 4 T/L and found them to be consistent with the BO. The BO is required for Segment 4 T/L for desert tortoise.

Transmission Line construction began on December 2, 2010 at Const 34/35 and again on January 12, 2011 for the other Segment 4 components. Biologists have been on site full time to perform pre-construction surveys, clearance sweeps, and monitoring in support of Project activities. Identified resources requiring Environmentally Sensitive Area marking have been delineated and captured within the Field Reporting Environmental Database (FRED). No desert tortoise, Mohave ground squirrel, or active Swainson's hawk nest have been observed onsite to date. Focused, general, bat, and burrowing owl preconstruction surveys have been submitted to the CPUC and CDFG. No additional impacts to biological resources are anticipated.

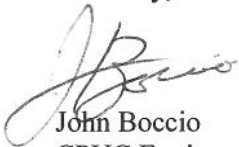
- **Cultural and Paleontological Resources:** SCE submitted the following information with the Variance Request. A number of previously recorded cultural resource Environmentally Sensitive Areas (ESAs) exist along roads in Segment 4 T/L of the TRTP. Signage will be maintained identifying the location of those ESAs that occur within 50 feet of roads and construction/work areas. Some ESAs have roads running through them. The following actions are required during road grading, road widening, or any other ground disturbing activities:
 1. Ground disturbing activities are not allowed within cultural ESAs. Signage specifying "No Grading" will be placed along roads that pass through cultural ESAs.
 2. Ground disturbing activities are allowed along roads running near ESAs as long as the ground disturbing activities do not occur within the designated ESA.
 3. Ground disturbing activities occurring in areas where fossils are known or likely to occur will require a paleontological monitor.

No additional impacts to cultural or paleontological resources are anticipated.

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

- Per SCE's Cultural Requirements for this Variance, the actions noted above are required during road grading, road widening, or any other ground disturbing activities:
- All conditions required by Notice to Proceed (NTP) #16 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #16, 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