

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 12, 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) #61

Dear Ms. Nelson,

On May 11, 2011, Southern Californian Edison (SCE) submitted a variance request to allow the use of an alternate access road off of Godde Hill Road on Segment 5 Transmission Line (T/L) of the Tehachapi Renewable Transmission Project (TRTP) in 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 the use of an alternate access road off Godde Hill Road on Segment 5 T/L of the TRTP in Los Angeles County. Subsequent to the approval of the NTPR (NTP #15 dated September 10, 2010) by the CPUC, project site conditions have been further evaluated and an additional access road to the Segment 5 right-of-way (ROW) is needed for constructability purposes.

The CPUC previously approved an access road near Elizabeth Lake Road for Segment 5 construction activities. However, this road crosses Armargosa Creek (a jurisdictional waterway), which cannot be crossed when water is present. As such, access to various Segment 5 tower locations is restricted.

An alternate access route from the north from Godde Hill Road would be established. The northern portion of the alternate access route (section that branches off of Godde Hill Road) was previously approved by the CPUC. The new portion of the alternative access route would begin at the approved road, extend approximately 2,400 linear feet to the south and southwest, and end at the ROW south of Construct 25. The alternative access road would have minimum improvement only.

- **Biological Resources:** SCE submitted a biological report by ICF International dated May 11, 2011, regarding the Proposed Segment 5 Godde Hill Alternative Access Variance. The report documents the biological conditions and surveys conducted at the Proposed Segment 5 Godde Hill Alternative Access (Variance Project Component). Preconstruction surveys that partially included the Project Component were performed on November 5, 2010 and November 9, 2010 (ICF 2010cq). Additionally, bat preconstruction surveys were conducted on September 27, 2010 and October 6, 2010 (ICF 2010bq).

No sensitive biological resources were identified within the Project Component or a 500-foot buffer during the 2010 preconstruction surveys (ICF 2010cq). Peirson's morning glory (*Calystegia peirsonii*) (CNPS List 4.2) was detected during the 2009 and 2010 focused surveys at locations throughout the 500-foot buffer (AMEC 2009c; ICF 2010ag). Another sensitive species, short-joint beavertail (*Opuntia basilaris* var. *brachyclada*) (CNPS List 1B.2), was observed during the 2009 focused surveys (AMEC 2009c) in the western portion of the BSA. However, during the 2010 focused surveys, it had been determined that much

of the short-joint beavertail cactus observed in 2009 was likely the more common cactus (ICF 2010yy; ICF 2010ag). Only four individuals of short-joint beavertail cactus were found during 2010 focused surveys, and none were in the vicinity of the Project Component.

Construction activities associated with Segment 5 are ongoing in the vicinity of the Project Component. Although no ESA-listed or special-status species were noted during daily sweeps of the Project Component, nesting birds were identified. One active northern mockingbird (*Mimus polyglottos*) nest (FRED Nest ID 001058) was identified on April 22, 2011, within the 500-foot buffer; the 300-foot nest buffer overlaps the Project Component. One active red-tailed hawk (*Buteo jamaicensis*) 300-foot nest (FRED ID 000011) buffer overlaps the 500-foot buffer.

Surveys of the Variance area were conducted on May 4, 2011 and on May 9, 2011 (ICF and ECORP). A common raven (*Corvus corax*) nest (FRED nest ID 1231) was identified within the 500-foot buffer during the May 4, 2011 clearance sweep. The nest and associated 50-foot buffer do not overlap the Project Component.

The Project Component was partially surveyed during the original jurisdictional delineation for Segments 4, 5 and 10 and was fully surveyed during preconstruction surveys and clearance sweeps. One jurisdictional feature, 5-20-S-12, was identified within the 500-foot buffer (ICF 2010l).

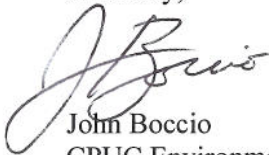
No additional impacts to biological resources are anticipated with the implementation of this Variance.

Cultural and Paleontological Resources: SCE submitted a memorandum with the Variance Request stating that no cultural resources will be affected by the use of the proposed access road on Segment 5 T/L of the TRTP. The entire new Godde Hills area access road was previously surveyed as part of TRTP for cultural and paleontological resources and a record search conducted. No cultural resources exist along the proposed access road or in the adjacent buffer areas. Paleontological monitoring is not recommended unless construction activities on the road disturb sediment to a depth greater than two feet. No additional impacts to cultural or paleontological resources are anticipated with the implementation of this Variance.

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

- Paleontological monitoring shall be conducted if construction activities on the road disturb sediment to a depth greater than two feet.
- All conditions required by Notice to Proceed (NTP) #15 shall apply to the subject area 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