

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



June 29, 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) #70

Dear Ms. Nelson,

On June 14, 2011, Southern Californian Edison (SCE) submitted a variance request for the addition of four wire stringing sites (WSSs) for constructability purposes of the Segment 5 Transmission Line (T/L) of the Tehachapi Renewable Transmission Project (TRTP) in Los Angeles County, California. **Variance Request #70 is approved by CPUC based on the following factors:**

- SCE submitted the following information:

SCE submitted a request for a Variance to add four additional wire stringing sites (WSSs) needed to construct the 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 four new WSSs have been requested for constructability purposes.

Information for each area requested was provided detailing the approximate sizes and location of each new WSS.

Tower	Location	Approximate Size (Acres)
22	Northwest of Tower	2.3
43	Northwest of Tower	1.0
51a	Northwest of Tower	1.8
57	Northwest of Tower	1.0

At each site, grubbing and light grading would be performed to create a level pad for equipment operation. The four WSSs would comprise a total of approximately 6.1 acres of ground disturbance.

- Biological Resources:** SCE submitted a biological report by ICF International dated June 6, 2011, regarding the Proposed Segment 5 Additional Wire Setup Sites Variance. The report documents the biological conditions and resources at the proposed wire setup sites (Variance Project Component) and a BSA (Biological Study Area [BSA]).

Site 1: Northwest of Tower 22

Vegetation communities within the Project Component were mapped as mixed Mojave woodland scrub; vegetation communities within the BSA were mapped as mixed Mojave woodland scrub, Mojavean juniper woodland scrub, and disturbed/developed (ICF 2011j).

No special-status wildlife species were observed within the BSA.

Special-status plants Peirson's morning glory (*Calystegia peirsonii*; CNPS List 4.2) and short-joint beavertail (*Opuntia basilaris* var. *brachyclada*; CNPS List 1B.2) were detected within the Site 1 BSA during the 2009 and 2010 focused surveys (AMEC 2009c; ICF 2010ag). Short-joint beavertail was observed during the 2009 focused surveys (AMEC 2009c) throughout the Site 1 BSA. However, during the 2010 focused surveys, it was determined that much of the short-joint beavertail cactus observed in 2009 was likely the more common beavertail cactus (ICF 2010yy; ICF 2010ag). Only four individuals of short-joint beavertail cactus were found during 2010 focused surveys, one of which is within the Project Component. San Gabriel Oaks, a regulated tree, were identified within the BSA (ICF 2010bf).

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. No jurisdictional features were identified within the BSA (ICF 2010l). If any potential features are subsequently identified, they will be staked and flagged as Environmentally Sensitive Areas (ESAs) for avoidance.

Construction activities associated with Segment 5 are ongoing in the vicinity of the Project Component. No ESA-listed or special-status species were noted during sweeps of the BSA. Sweeps of the Site 1 BSA have been regularly conducted since January 31, 2011.

Site 2: Northwest of Tower 43:

Vegetation communities within the Project Component were mapped as mixed Mojave woodland scrub and disturbed/developed, and vegetation communities within the BSA were mapped as mixed Mojave woodland scrub, disturbed/developed, and California annual grassland (ICF 2010ag, 2011j).

Within the Site 2 BSA, special-status plants Peirson's morning glory (*Calystegia peirsonii*; CNPS List 4.2)

and short-joint beavertail (*Opuntia basilaris* var. *brachyclada*; CNPS List 1B.2) were detected within the

Site 2 BSA during the 2009 and 2010 focused surveys (AMEC 2009c; ICF 2010ag). Short-joint beavertail

was observed during the 2009 focused surveys (AMEC 2009c) throughout the Site 1 BSA. However, during

the 2010 focused surveys, it was determined that much of the short-joint beavertail cactus observed in 2009

was likely the more common beavertail cactus (ICF 2010yy; ICF 2010ag). Only four individuals of

short-joint beavertail cactus were found during 2010 focused surveys, none of which are located within the

Project Component. Within the BSA, California androsace (*Androsace elongate* ssp. *Acuta*; CNPS List 4.2) was detected during 2010 focused surveys (ICF 2010ag).

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. No jurisdictional features were identified within the BSA (ICF 2010l). If any potential features are subsequently identified, they will be staked and flagged as ESAs for avoidance.

Construction activities associated with Segment 5 are ongoing in the vicinity of the Project Component. Two special-status species observations were made within the BSA including a Swainson's hawk (*Buteo swainsoni*) observed in flight on April 12, 2011 (FRED species Event 001668) over the Site 2 Project Component, and a golden eagle (*Aquila chrysaetos*) observed in flight on April 12, 2011 (FRED Species Event 001607) over the BSA. Sweeps of the Site 2 BSA have been conducted regularly since November 1, 2010.

Site 3: Northwest of Tower 51A:

Vegetation communities within the Project Component were mapped as mixed chaparral, mixed chaparral-burned, California annual grassland-burned, and disturbed/developed; vegetation communities within the BSA were mapped as mixed chaparral, mixed chaparral-burned, California annual grassland, California annual grassland-burned, and disturbed/developed (ICF 2011j).



Within the Site 3 BSA, short-joint beavertail was observed during the 2009 focused surveys (AMEC 2009c). However, during the 2010 focused surveys, it was determined that much of the short-joint beavertail cactus observed in 2009 was likely the more common beavertail cactus (ICF 2010yy; ICF 2010ag). Only four individuals of short-joint beavertail cactus were found during 2010 focused surveys, none of which are located within the BSA.

No special-status wildlife species were observed within the BSA.

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. No jurisdictional features were identified within the BSA (ICF 2010l). If any potential features are subsequently identified, they will be staked and flagged as ESAs for avoidance.

#### Site 4: Northwest of Tower 57:

Within the Site 4 BSA, short-joint beavertail was observed during the 2009 focused surveys (AMEC 2009c). However, during the 2010 focused surveys, it was determined that much of the short-joint beavertail cactus observed in 2009 was likely the more common beavertail cactus (ICF 2010yy; ICF 2010ag). Only four individuals of short-joint beavertail cactus were found during 2010 focused surveys, none of which are located within the BSA. Adobe yampah (*Perideridia pringlei*; CNPS List 4.3) was detected within the BSA during the 2010 focused surveys (ICF 2010ag).

Potential burrowing owl features were identified within the BSA during 2010 focused surveys (AMEC 2009f; ICF 2010cq).

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. Four jurisdictional features, 5-32-S-1, 5-32-S-2, 5P-32-S-1, and 5P-32-S-2, were identified within the BSA (ICF 2010l). Feature 5-32-S-2 has been issued permits (WDR/401, 404, and 1602) for maintenance grading.

The remaining features will not be impacted by the Project Component. If any potential features are subsequently identified, they will be staked and flagged as ESAs for avoidance.

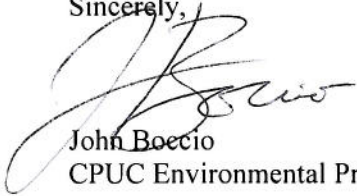
**Cultural and Paleontological Resources:** With the Variance Request, SCE submitted a memorandum dated June 2, 2011, stating that no cultural resources will be impacted by the requested four additional wire stringing sites near Towers 22, 43, 51a, and 57. All four proposed disturbance areas have been previously surveyed for cultural resources as part of the TRTP (Ahmet et al. 2006; Pacific Legacy 2007, 2008, 2010; Gust and Scott 2009). No cultural resources were identified within any of these wire stringing areas. Since no cultural resources were identified in these areas, a cultural resource monitor will not be required for any TRTP related work.

A paleontological review has indicated that the four proposed wire stringing areas are located within soils that have the potential to yield paleontological resources (Gust and Scott 2009). Since there is a possibility that paleontological resources exist, paleontological monitoring is recommended when ground disturbing excavation exceeds a depth of two feet.

**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.
- Within Site 1, the short-joint beavertail cactus has been flagged for avoidance. If avoidance is not feasible, the individual shall be relocated to adjacent, similar habitat.
- 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