

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



August 3, 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) #76

Dear Ms. Nelson,

On July 18, 2011, Southern Californian Edison (SCE) submitted a variance request to relocate the wire stringing site (WSS) near Tower 34, on Segment 5 Transmission Line (T/L) of the Tehachapi Renewable Transmission Project (TRTP), in Los Angeles County, California. Additional cultural resources information was submitted on August 2, 2011. **This Variance Request is approved by CPUC based on the following factors:**

- SCE submitted the following information:

SCE submitted a request for a Variance for the use of a new wire stringing site (WSS) southeast of Tower 34, on Segment 5 T/L of the TRTP, in Los Angeles County, California. 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 approved WSS on the Segment 5 T/L needs to be relocated for constructability purposes.

Specifically, the WSS situated northwest of Tower 34 would be relocated approximately 700 feet southeast. The new WSS would be the same dimensions as the existing WSS (i.e., approximately 100 feet by 100 feet).

Access to the WSS would occur from an approved access road. Grubbing and light grading would be performed at the WSS to create a level pad for equipment operation.

- **Biological Resources:** SCE submitted a biological report by ICF International dated July 14, 2011, regarding the Proposed Segment 5 Wire Setup Site Relocation near Construct 34. The report documents the biological conditions at the proposed wire setup site (Variance Project Component) and a 500-foot buffer (Biological Study Area [BSA]). Construction activities associated with Segment 5 are ongoing in the vicinity of the Variance Project Component. Preconstruction surveys were performed in September 2010 (ICF 2010bt) that partially included the Variance Project Component and daily sweeps were conducted where construction is active.

Vegetation communities within the BSA were mapped as disturbed/developed, California annual grassland, and California annual grassland-wildflower field (ICF 2010ag). Special-status plants, Peirson's morning glory (*Calystegia peirsonii*) and short-joint beavertail (*Opuntia basilaris* var. *brachyclada*) were detected within the 500-foot buffer during the 2009, 2010, and 2011 focused surveys (AMEC 2009c; ICF 2010ag, 2011cq). A regulated tree, California juniper (*Juniperus californica*), also occurs within the 500-foot buffer (ICF 2010bf).

Bat preconstruction surveys were conducted in September 2010 (ICF 2010bc) and no potential bat roosts were identified within the BSA. Several loggerhead shrikes were observed within the 500-foot buffer. No active nests occur within the BSA. Construction has been ongoing in the vicinity with corresponding sweeps of the BSA being conducted regularly since approximately October 1, 2010.

The BSA was fully surveyed during the original jurisdictional delineation for Segments 4, 5, and 10 (ICF 2010l). Four mapped jurisdictional features overlap the 500-foot buffer (5-21-S-1, 5-21-S-2, 5-21-S-100, 5-21-S-102) but will not be impacted by the proposed Variance Project Component. Features 5-21-S-2 and 5-21-S-100 have been permitted for temporary and permanent impacts related to the construction of M97-T1XXX; however, there are no impacts to jurisdictional features as a result of the Variance Project Component. The features will be staked and flagged as Environmentally Sensitive Areas (ESAs) for avoidance, and if any additional potential features are subsequently identified, they will also be staked and flagged as ESAs for avoidance.

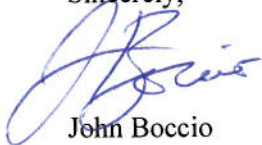
**Cultural and Paleontological Resources:** SCE submitted a memorandum with the Variance Request stating that no cultural resources will be impacted by the requested WSS relocation southeast of CT-34 in support of the TRTP on Segment 5. By moving the WSS southeast by roughly 600 feet, the archaeological sites in the vicinity are completely avoided. The isolated find near the new location (PL-SCE-SEG5-ISO-04) is not an eligible resource and does not require management per the Project Programmatic Agreement (Ahmet, email 8-2-11).

A paleontological review has indicated that the proposed WSS is within an area containing 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 ground disturbing excavation exceeds a depth of two feet.
- Short-joint beavertail cactus and Pierson's morning glory shall be 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