

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 11, 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) #79

Dear Ms. Nelson,

On August 6, 2011, Southern Californian Edison (SCE) submitted a variance request for an additional guard pole site west of Tower 52 on Segment 4 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 for an additional guard pole site west of Tower 52 on Segment 4 T/L of the TRTP in Los Angeles County, California. Subsequent to the approval of the NTPR (NTP #16 dated September 13, 2010) by the CPUC, project site conditions have been further evaluated and an additional guard pole structure disturbance area at Tower 52 is needed to protect an existing distribution line. The specific requested changes are described below.

- **Tower 52.** The proposed guard pole structure area consists of a total of 0.46 acre. A portion of the proposed area (approximately 0.09 acre) overlaps a CPUC-approved guard pole area. Therefore, the total new disturbance area would comprise approximately 0.37 acre. Within the proposed guard pole structure disturbance area, grubbing and light grading would be performed to create a level pad for equipment operation.
- **Biological Resources:** SCE submitted a biological report by ICF International dated August 4, 2011, regarding the *Proposed Segment 4 Installation of Additional Guard Pole Structure Area at Tower 52, Tehachapi Renewable Transmission Project, Los Angeles County*. The report documents the biological conditions at the proposed Segment 4 guard pole site near Construct 52 Variance (Variance Project Component) and the 500-foot buffer (Biological Study Area [BSA]).

General preconstruction surveys that partially included the Variance Project Component were completed on November 5 and 9, 2010 (ICF 2010cp), and January 10, 2011 (ICF 2011f). Sweeps were performed three to seven days prior to construction. Construction activities associated with Segment 4 are ongoing in the vicinity of the Variance Project Component. Daily sweeps are conducted where construction is active. Burrowing owl (*Athene cunicularia*) preconstruction surveys that partially included the Variance Project Component were completed on November 5, 9, 15, and 16, 2010 (ICF 2010cr). Bat preconstruction surveys were conducted on October 31, 2010 (ICF 2010bw).

Vegetation communities within the Variance BSA were mapped as California annual grassland and disturbed/developed. California annual grassland provides potential foraging habitat for Swainson's hawk.

Special-status plants were not detected within the 500-foot buffer during the 2009, 2010, or 2011 focused surveys (AMEC 2009c; ICF 2010ag, 2010bf, 2011cq).

The Variance BSA was partially surveyed and the impact area was fully surveyed during the original jurisdictional delineation for Segments 4, 5 and 10 (ICF 2010l). No jurisdictional features were mapped within the BSA. If any additional potential features are subsequently identified, they will also be staked and flagged as Environmentally Sensitive Areas (ESAs) for avoidance.

The Variance Project Component will impact Swainson's hawk habitat. Impacts to California annual grassland are 0.31 acres.

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

Cultural and Paleontological Resources: SCE submitted a memorandum dated July 11, 2011, titled *TRTP Variance Request – Seg 4, CT-52 Guard Pole Site, Cultural Clearance for a new Guard Pole Site at CT-52 on Segment 4* with the Variance Request stating that no cultural resources will be impacted by the requested guard pole site on Segment 4 near CT-52 as part of this Variance Request in support of the TRTP. A cultural record search and surveys (Ahmet et al. 2006; Pacific Legacy 2007, 2010a, 2010b), and a paleontological literature review (Gust and Scott 2009), have been previously conducted for this area of Segment 4. This research identified no cultural resources, but suggested the possibility that paleontological resources may exist.

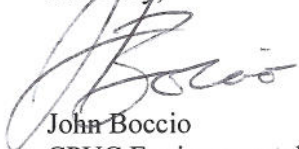
The area being requested as a new guard pole area is located approximately 120 feet west of CT-52. This guard pole location is an additional area located between existing guard pole areas. The new guard pole area measures 100 by 200 feet. Light grading and grubbing are proposed within the new guard pole area. Due to the absence of resources in this area, no further cultural studies or monitoring is recommended at this location.

The paleontological review indicated that this guard pole area contains 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 disturb soils to a depth greater than two feet.
- 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