

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



September 28, 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) #90

Dear Ms. Nelson,

On September 26, 2011, Southern Californian Edison (SCE) submitted a variance request to allow for the use of a portion of the existing access road south of Tower 30 for parking equipment and stockpiling soil, 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 a portion of the existing access road south of Tower 30 for parking equipment and stockpiling soil, 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 additional storage area is needed near Tower 30 on Segment 5 T/L.

Specifically, a portion of the existing unpaved roadway situated south of Tower 30 is proposed for temporary parking of construction vehicles and equipment, and stockpiled soil obtained from excavation work on Segment 5. The area, which measures approximately 0.02 acres, is unpaved and devoid of vegetation. The area would be used in its current condition and no modifications are planned.

**Biological Resources:** SCE submitted biological resource information with the Variance Request dated September 23, 2011. A Segment 5 T/L Tower 30 biological sweep was performed by ECORP Consulting Inc. on September 23, 2011. The sweep included the soil pile and 500 foot buffer (Project Component). The Project Component is located near Construct 30 and consists of developed/disturbed land form (vegetation type). Surrounding areas consist of mixed chaparral vegetation. No special-status biological resources were detected near the Project Component. Preconstruction general and bat surveys were completed on September 23, and October 8, 2010, respectively. No burrowing owl preconstruction surveys have been completed within the Project Component since no suitable burrows have been identified. Construction biological monitoring has been on-going since October 2010.

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

**Cultural and Paleontological Resources:** SCE submitted a memorandum dated September 23, 2011, titled *TRTP Variance Request – Seg 5, CT-30 Additional Disturbance Area – Cultural Clearance for Disturbance Area at CT-30 on Segment 5* with the Variance Request. The memorandum states that no cultural resources will be impacted by the additional disturbance area requested at CT-30 on Segment 5 as part of this Variance Request in support of 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 5. This research identified a cultural resource directly adjacent to the proposed disturbance area. The proposed disturbance area is a small, triangularly-shaped area measures 43 to 55 feet on each side, and located 140 feet south of CT-30. This area was previously graded, is currently devoid of vegetation, and is proposed for parking of construction vehicles and equipment. Although no cultural resources are recorded within this smaller area, prehistoric cultural resource CA-LAN-3736 is located just to the east. The 50 foot Environmentally Sensitive Area (ESA) buffer around site LAN-3736 overlaps the eastern portion of the requested Variance area. Normally, a 50 foot extension is added to a site boundary as a protective ESA "buffer." In this area, although the archaeological site itself does not overlap the proposed Variance area, the ESA buffer does. Rather than flagging the ESA buffer area, SCE will avoid adverse effects to this site by flagging the actual site boundary for avoidance while allowing the use of the proposed Variance area. The flagged site will be outside of the requested Variance area. An archaeological monitor will be required during all ground disturbing activities associated with TRTP work here. The Construction Phase Management Plan (CPMP) will be updated to include the information associated with this Variance area and the updated management recommendations for site LAN-3736.

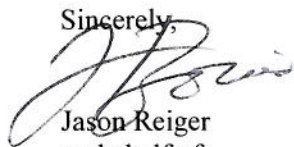
Previous research also suggested the possibility that paleontological resources may exist at the Variance location. The paleontological review indicated that the requested disturbance areas contain soil that has the potential to yield paleontological resources (Gust and Scott 2009). Since there is a possibility that paleontological resources exist, paleontological monitoring is recommended during all ground disturbing project construction activities at that location.

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:**

- As proposed, an archaeological monitor shall be present during ESA installation. In addition, the Construction Phase Management Plan (CPMP) will be updated to include the information associated with this Variance area and the updated management recommendations for site LAN-3736.
- As proposed, due to the potential for paleontological resources, paleontological monitoring shall be conducted during all ground disturbing project construction activities at the Variance project area.
- 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,



Jason Reiger  
on behalf of  
John Boccio  
CPUC Environmental Project Manager

cc: V. Strong, Aspen