

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



November 8, 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) #102

Dear Ms. Nelson,

On November 2, 2011, Southern Californian Edison (SCE) submitted a variance request to allow for the use of a parking/staging area near Construct 18, 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 for the use of a parking/staging area near Construct 18, 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 disturbance area is needed to support construction activities along Segment 5 T/L. Specifically, a temporary equipment parking and material staging area is proposed east of Construct (CT) 18. This area is needed to support construction of the Segment 5 T/L because the nearest storage areas are situated over 15 miles away. The proposed parking/staging area is currently disturbed and no additional improvements would be needed. The area comprises approximately 0.5 acres.

Biological Resources: SCE submitted biological resources information in a memorandum dated October 31, 2011 titled *Proposed Use of Existing Disturbed Area near Construct S5-18*. The memorandum discusses biological resources at the proposed parking/staging area near Construct 18 on Segment 5 (Variance Project Component), previous surveys, clearance sweep results, and permit conditions. The Variance Project Component is an existing disturbed area immediately adjacent to an access road and is surrounded by Mojavean juniper woodland scrub, Mojave mixed woody scrub, and disturbed/developed areas. No special-status biological resources were detected near the Variance Project Component. No CDFG jurisdictional drainages were identified in the proposed area. Preconstruction general, burrowing owl (*Athene cunicularia*), and bat surveys were completed on January 12 and 13, 2011, and September 27 and October 8, 2010. No resources were observed within the vicinity of the proposed existing disturbed area. No desert tortoise (*Gopherus agassizii*), Mojave ground squirrel (*Spermophilus mohavensis*), or active nests have been observed in the vicinity. A preconstruction sweep was performed by ECORP Consulting, Inc. (ECORP) on October 31, 2011. No special-status species were observed.

No additional impacts to biological resources are anticipated with the implementation of this Variance and the conditions noted below.

- **Cultural and Paleontological Resources:** SCE submitted a memorandum from SCE dated September 8, 2011 regarding *TRTP Variance Request – Segment 5, CT-18 Staging Area, Cultural Clearance for an*

Equipment Staging and Storage Area near CT-18 on Segment 5. The memorandum states that no cultural resources will be impacted by the proposed equipment staging and storage area on Segment 5 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 on Segment 5. The research showed that the eastern edge of the proposed staging and storage area was not surveyed. The previously unsurveyed eastern side of this staging and storage area and a 100-foot buffer were surveyed for cultural resources (Pacific Legacy 2011). The research and survey identified no cultural material (prehistoric or historic) or paleontological resources within the proposed staging and storage area. The paleontological review indicated that the proposed equipment staging and storage area contains soils that have no potential to yield paleontological resources (Gust and Scott 2009).

No additional impacts to cultural or paleontological resources are anticipated with the implementation of this Variance and the conditions noted below.

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

- 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