

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



January 3, 2012

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) #109

Dear Ms. Nelson,

On December 22, 2011, Southern Californian Edison (SCE) submitted a variance request to add an additional Wire Setup Site (WSS) disturbance area at Tower M24-T3 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 to add an additional Wire Setup Site (WSS) disturbance area at Tower M24-T3 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 WSS disturbance area near Tower M24-T3 is needed for constructability purposes. An additional WSS would be added along the northwest side of the Tower M24-T3 tower work area. The proposed WSS area consists of a total of approximately 1.8 acres. Within the proposed WSS disturbance area, grubbing and light grading would be performed to create a level pad for equipment operation.

- **Biological Resources:** SCE submitted a biological survey report from ICF International with their Variance Request dated December 20, 2011, titled *Proposed M24-T3 Wire Setup Site, Segment 4, TRTP, Los Angeles County*. The survey report documents the biological conditions at the proposed M24-T3 WSS (Variance Project Component) and the 500-foot buffer (Biological Study Area [BSA]). Biological resources within the BSA were evaluated during several focused surveys, including 2009, 2010, and 2011 rare plant surveys (AMEC 2009c, ICF 2010ag, 2011gu); 2010 and 2011 tree inventory surveys (ICF 2010bf, 2011ga); 2009, 2010, and 2011 Swainson's hawk (*Buteo swainsoni*) surveys (AMEC 2009ah; ICF and Bloom 2010a, 2011c); and 2009 and 2010 burrowing owl (*Athene cunicularia*) surveys (AMEC 2009f; ICF 2010cq1). The biological resources within the BSA were also evaluated during general preconstruction surveys, burrowing owl preconstruction surveys, and preconstruction bat habitat assessment surveys (ICF 2010bq, 2010bw, 2010ch, 2010co, 2010cp, 2010cr, 2010dp, 2010dq, 2011b, 2011c, 2011f, 2011g, 2011bz, 2011ca). A literature review was also performed as part of the Biological Review for Segment 4 (ICF 2010ad) and Segment 9 – Whirlwind (ICF 2010al). Additionally, clearance sweeps were performed on the Variance Project Component on November 11, 2010, December 7, 9, 28-29, 2010, and February 23, 2011. Construction began within a week of the most recent preconstruction surveys for Segment 4 Constructs 48 to Antelope Substation, and therefore updated clearance sweeps were not conducted for that portion of the Variance Project Component. Construction monitoring has been ongoing regularly since the site became active, and species events and nest events are recorded in the SCE Field Reporting Environmental Database (FRED).

Vegetation communities within the Variance Project Component include California annual grassland. Vegetation communities within the 500-foot buffer include California annual grassland and disturbed/developed. No special-status plant species or regulated tree species were observed within the Variance Project Component or the 500-foot buffer.

No special-status wildlife species were observed within the Variance Project Component. Loggerhead shrike (*Lanius ludovicianus*) (ICF 2010cr), Ferruginous hawk (*Buteo regalis*), and potential burrowing owl features (ICF 2010cr, 2011c, 2011g) have been observed within the 500-foot buffer. One active burrowing owl nest (FRED Nest ID 002461) 150-foot nest buffer overlaps the 500-foot buffer. The Variance Project Component overlaps Swainson's hawk foraging habitat and will have a temporary impact of 1.808 acres.

Jurisdictional resources within the Variance Project Component were evaluated during the 2010 jurisdictional delineation for Segments 4, 5, and 10 (ICF 2010I). No mapped jurisdictional features are located within the Variance Project Component. Any additional potential jurisdictional features will be staked as Environmental Sensitive Areas (ESAs) and flagged for avoidance.

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

- **Cultural and Paleontological Resources:** SCE submitted a memorandum dated December 21, 2011, titled *TRTP Variance Request – M24-T3 Wire Stringing Site (WSS) - Cultural Clearance for a WSS at Tower M24-T3 near Antelope Substation on Segment 4* with the Variance Request. The memorandum states that no cultural resources will be impacted by the requested WSS at Tower M24-T3 on Segment 4 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 indicates that the proposed WSS area is located within an area previously surveyed for the TRTP and shows that cultural resources do not exist at this location. The research also suggests the possibility that paleontological resources may exist at this location.

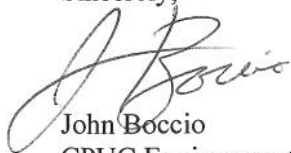
The paleontological review indicated that the requested Tower M24-T3 WSS area contains soils that have the potential to yield paleontological resources (Gust and Scott 2009). Since there is a possibility that paleontological resources exist, paleontological spot-check monitoring is recommended when ground disturbing excavation at these locations exceeds a depth of two feet.

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:**

- Paleontological spot-check 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,

A handwritten signature in cursive script, appearing to read "J. Boccio".

John Boccio  
CPUC Environmental Project Manager

cc: V. Strong, Aspen