

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



March 20, 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) #121

Dear Ms. Nelson,

On March 16, 2012, Southern Californian Edison (SCE) submitted a variance request to widen the access road to Construct (CT) 19 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 widen the access road to CT 19 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) for Segment 5 T/L by the CPUC, project site conditions have been further evaluated and an additional temporary disturbance area is needed near CT 19 for constructability purposes. To enable a large crane to utilize the access road to CT 19, additional disturbance area is needed along the north side of the existing access road. Grading will be required to widen the road by approximately 20 feet. The additional proposed disturbance area measures approximately 0.05 acres, and is unpaved and partially vegetated.

- **Biological Resources:** SCE submitted a biological resources report from ICF dated March 14, 2012 titled *Proposed Additional Disturbance Area for Road Construction near Construct 19, Segment 5, Tehachapi Renewable Transmission Project, Los Angeles County*. The report documents the biological conditions at the proposed additional disturbance area near Construct 19 on Segment 5 T/L (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); and 2009 and 2010 Swainson's hawk (*Buteo swainsonii*) surveys (AMEC 2009ah; ICF and Bloom 2010a). The biological resources within the BSA were also evaluated during Segment 5 general preconstruction surveys, burrowing owl (*Athene cunicularia*) surveys, and preconstruction bat habitat assessment surveys (ICF 2010bq, 2010cq, 2011h, 2011i). A literature review was also performed as part of the Biological Review for Segment 5 (ICF 2010yy). Additionally, clearance sweeps were performed on November 22, 2010, and January 13, 2011. 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 Mojavean juniper woodland scrub and disturbed/developed. Vegetation communities within the 500-foot buffer include Mojave mixed woody scrub, Mojavean juniper woodland scrub, and disturbed/developed. Special-status plant species, Peirson's morning glory (*Calystegia peirsonii*), occurs within the Variance Project Component and the 500-foot

buffer (BSA). Swainson's hawk foraging habitat occurs within the BSA. The Variance Project Component overlaps Swainson's hawk foraging habitat. The additional impact is 0.008 acre of temporary impact to Mojavean Juniper Woodland and Scrub.

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 BSA (ICF 2010I). Any additional potential jurisdictional features will be staked as Environmentally Sensitive Areas (ESAs) and flagged for avoidance.

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 with the variance request regarding the *TRTP Variance Request – Additional Disturbance Area at AM31-T1 (CT19) Extended Area to Fit Crane – Cultural Clearance on Segment 5, Palmdale, Los Angeles County*. The memorandum states that no cultural or paleontological resources will be impacted by the use of an additional disturbance area near M31-T1 (CT19) on Segment 5 as part of this variance request in support of the TRTP. A cultural record search and survey (Pacific Legacy 2007) and a paleontological literature review (Gust and Scott 2009) have been previously conducted for this area of Segment 5. This research indicates that the requested variance is located within an area previously surveyed for the TRTP and shows that no cultural resources will be impacted. This research also shows that the additional disturbance area overlies Portal Schist that is classified as having a low paleontological sensitivity.

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