

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



March 29, 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) # 124

Dear Ms. Nelson,

On March 26, 2012, Southern California Edison (SCE) submitted a variance request for an additional temporary disturbance area along the north side of Structure M18-T5 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 add a temporary disturbance area 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 Structure M18-T5 for constructability purposes. This area is needed along the north side of the work area associated with Structure M18-T5 to enable rehabilitation of the tower work area. Access to the area will occur via an existing unpaved roadway that was previously approved for use as a Temporary Extra Work Space (TEWS) The additional proposed disturbance area measures approximately 0.05 acre, and is unpaved and partially vegetated.

- **Biological Resources:** SCE submitted a biological resources report from ICF dated March 23, 2012 titled *Proposed Additional Disturbance Area near Structure M18-T5, Segment 5, Tehachapi Renewable Transmission Project, Los Angeles County*. The report documents the biological conditions at the proposed additional disturbance area near Structure M18-T5 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 burrowing owl surveys (AMEC 2009f; ICF 2010cq1). The biological resources within the BSA were also evaluated during Segment 5 general preconstruction surveys, burrowing owl (*Athene cumicularia*) surveys, and preconstruction bat habitat assessment surveys (ICF 2010bd, 2010bq, 2010br). A literature review was also performed as part of the Biological Review for Segment 5 (ICF 2010yy). Additionally, clearance sweeps were performed on November 2, 2010. 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 Mojave mixed woody scrub and disturbed/developed. Vegetation communities within the 500-foot buffer include Mojave mixed woody scrub, Mojavean juniper woodland scrub, Ruderal grassland, and disturbed/developed. No special-status species occurs within the Variance Project Component and the 500-foot buffer (BSA). The additional

impact is 0.011 acre of temporary impact to Disturbed/developed and 0.042 acre of temporary impact to Mojave mixed woody scrub.

Jurisdictional resources within the Variance Project Component were evaluated during the 2010 jurisdictional delineation for Segments 4, 5, and 10 (ICF 2010). No mapped jurisdictional features are located within the Variance Project Component. Jurisdictional features identified within the 500-foot buffer will be avoided (ICF 2010). 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.

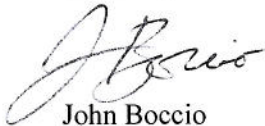
- **Cultural and Paleontological Resources:** SCE submitted a memorandum with the variance request regarding the *TRTP Variance Request – Additional Disturbance Area at M18-T5 (CT68) Cultural Clearance on Segment 5, Palmdale, Los Angeles County*. The memorandum states that no cultural or paleontological resources will be impacted by the use of an additional disturbance area near M18-T5 (CT68) 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