

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



July 6, 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) #131

Dear Ms. Nelson,

On July 3, 2012, Southern Californian Edison (SCE) submitted a variance request for additional work space at two locations west of Construct 25 and south of Aliso Canyon Road on the Segment 6A Transmission Line (T/L) of the Tehachapi Renewable Transmission Project (TRTP) in unincorporated Los Angeles County. **This Variance Request is approved by CPUC based on the following factors:**

- SCE submitted the following information:

SCE submitted a variance request for additional work space at two locations west of Construct 25 and south of Alisa Canyon Road on Segment 6A T/L of the TRTP in unincorporated Los Angeles County. As part of the scope of work for TRTP Segment 6, the Antelope-Mesa transmission line needs to be removed. The removal of the transmission line requires a distribution line to be de-energized for safety purposes. As a result of the de-energizing of the distribution line, two residents will be without power temporarily. SCE has agreed to provide the residents with generation for the duration of the outage, and therefore it will be necessary to place two generators outside of the right-of-way, next to the residences. Secondary containment will be established for the generators at the two locations. The generators (each less than 50 hp) will be hauled with a truck to the given locations, staged, grounded and connected to the residences. SCE is requesting additional work area for each generator and an additional access road to deliver one of the generators. The dimensions of the additional work areas are 40 ft. x 40 ft. and a 73 ft. diameter circle. The total disturbance area is 0.13 acres. The length of the additional access road is approximately 336 ft.

The generators will be needed between 2 – 6 times during construction for the bootlegger 16kV on Segment 6A, primarily during wire demolition and conductor installation. They will be operating approximately 2 – 3 weeks each time.

It will be necessary to access the source poles by foot, to climb the poles, de-energize the line, and then again access the site to put the line back into service once the transmission line has been removed. During the removal of the transmission line, it will be necessary to walk outside of the right-of-way to catch the rope being utilized for the wire removal.

No road improvements will be required.

- **Biological Resources:** SCE submitted biological resources information with the variance request. The Segment 6A Bootlegger 16kV additional work space area (Project Component) and a 500-foot buffer (Biological Study Area [BSA]) were reviewed for biological resources. A biological survey sweep was performed by ECORP Consulting, Inc. and Forde Biological Consultants on June 30, 2012. The Project Component is a disturbed/developed area. Vegetation communities within the 500-foot buffer include

mixed chaparral, southern cottonwood willow riparian forest, and disturbed/developed. No special-status species were detected within the Project Component or the 500-foot buffer. Several regulated trees occur within the 500-foot buffer, but will not be impacted by activities covered under this Variance. Several drainages occur within the survey area adjacent to access roads. Drainages within the survey area are staked as environmentally sensitive areas and will not be impacted by activities covered under this Variance. Generators will be staged approximately 200 feet away from any drainages.

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 cultural resources memorandum titled *SCE Tehachapi Renewable Transmission Project Cultural and Paleontological Resources Guidelines for Segment 6 – Variance Request – Bootlegger Outage* dated July 3, 2012. The areas described in the variance request were included in the cultural resources records search for TRTP (Pacific Legacy 2007) and surveyed as part of a supplemental study (Pacific Legacy 2010). Four previously recorded cultural resources are known to exist in these area, the historic-era Bootlegger Distribution Circuit (P-19-186925), the Historic Aliso Creek/Mill Creek Wagon Roads and Monte Cristo Mining District Wagon Road (P-19-186545), a dispersed trash scatter (PL-SCE-Seg6-06) and a prehistoric campsite with lithic flakes, cores, and ground stone items (CA-LAN-1947). The activities identified in the variance request will completely avoid three of the resources (P-19-186925, PL-SCE-Seg6-06, and CA-LAN-1947). Access to the two generator locations; however, will require driving along P-19-186545 for a distance of 570 meters. Driving along this historic road will not cause significant impacts or adverse effects since the road has been used and maintained routinely by the local residents who live within private in-holdings in the Angeles National Forest (ANF). Furthermore, P-19-186545 was evaluated and recommended as ineligible for the National Register of Historic Places (NRHP) in 2010 (Compass Rose 2010). Prior to SHPO concurrence, this resources is being managed according to ANF's Regional Programmatic Agreement (PA), which allows for general maintenance of historic roads. The management of this resource is consistent with the Third Revised Construction Phase Management Plan, approved on 11/17/2011 (Pacific Legacy 2011). Due to the proximity of the generators to previously recorded resources, SCE will use cultural resources monitors to ensure avoidance of CA-LAN-1947 and PL-SCE-Seg6-06. The Bootlegger Distribution was determined not eligible in 2010.

Previous paleontological assessments for TRTP define the sediment type in all of these areas as Low Granodiorite and Older Quaternary Alluvium (Gust and Scott 2009). The former is considered as having a low sensitivity and the latter as having a medium sensitivity for yielding paleontological resources. Since the activities identified in the variance request do not require digging, they will not impact paleontological resources. As a result, no paleontological monitoring is required to support this variance request.

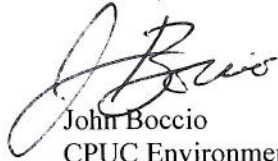
No additional impacts to cultural or paleontological resources are anticipated with the implementation of this Variance and the conditions noted below.

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

- Due to the proximity of cultural resources CA-LAN-1947 and PL-SCE-Seg6-06, cultural monitors shall be on site during deliver and removal of the generators.
- As proposed, secondary containment for the generators shall be maintained at all times while the generators are on site.
- All conditions required by Notice to Proceed (NTP) #32 shall apply to the subject area and activities.

- Copies of all relevant permits, compliance plans, NTP #32, and this Variance shall be available on site for the duration of construction activities where applicable.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Boccio". The signature is fluid and cursive, with the first letter of each name being significantly larger and more stylized.

John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen