

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



January 11, 2013

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) #139

Dear Ms. Nelson,

On January 9, 2013, Southern Californian Edison (SCE) submitted a variance request for an access road improvement designation change near Construct 54 on Segment 5 Transmission Line (T/L) of the Tehachapi Renewable Transmission Project (TRTP) in Los Angeles County. **This Variance Request is approved by CPUC based on the following factors:**

- SCE submitted the following information:

SCE is requesting an access road improvement designation change near Construct 54 on Segment 5 T/L of the TRTP in Los Angeles County. Subsequent to the approval of the NTPR (NTP #15 dated September 10, 2010) by the CPUC, project site conditions have been further evaluated and additional modifications to the access road south of Segment 5 Construct (CT) 54 are needed for constructability purposes.

To allow the berm along the CPUC-approved access road south of CT 54 to be modified, the roadway designation needs to be changed from Minimum Improvement to Medium Improvement. This change would only be needed at two approximate 20-linear-foot portions of the access road. At each location, the berm needs to be graded to improve stormwater flow into existing flume structures, thereby reducing the potential for soil erosion in the area.

The roadway designation change would not result in any increase to total project disturbance area.

- **Biological Resources:** SCE submitted a biological survey report by ICF International dated January 7, 2013 and titled *Proposed Access Road Improvement Designation Change near Construct 54, Segment 5, Tehachapi Renewable Transmission Project, Los Angeles County*. The report documents the biological conditions at the proposed Segment 5 access road improvement designation change near Construct 54 (Variance Project Component). The Variance Project Component plus a 500-foot buffer is referred to as the Biological Study Area (BSA). A literature review was performed as part of the Biological Review for Segment 5 (ICF 2010yy). 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, 2011, and 2012 Swainson's hawk surveys (AMEC 2009ah; ICF and Bloom 2010a, 2011c; FRED Survey Parent 000002); 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 and preconstruction bat habitat assessment surveys (ICF 2010bq, 2010bs). Additionally, a clearance sweep was performed on October 18, 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). Focused surveys conducted in 2012 are also documented in FRED.

Vegetation communities within the Variance Project Component include disturbed/developed. Vegetation communities within the 500-foot buffer include mixed chaparral, Mojavean juniper woodland scrub, and disturbed/developed. No special-status plant species occur within the BSA. Regulated tree species canyon live oak (*Quercus chrysolepis*) and Tucker's oak (*Quercus john-tuckeri*) occur within the 500-foot buffer.

Special-status wildlife species, Loggerhead shrike (*Lanius ludovicianus*), has been observed within the 500-foot buffer. The Variance Project Component does not include any additional impacts to special-status species habitat or vegetation.

Jurisdictional resources within the Variance Project Component were evaluated during the 2010 jurisdictional delineation for Segments 4, 5, and 10 (ICF 2010). Jurisdictional features 5-31-S-4, 5-43-S-10, 5-43-S-11, and 5-44-S-10 occur within the 500-foot buffer. Jurisdictional features identified within the 500-foot buffer will be avoided. 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 SCE TRTP Cultural and Paleontological Resource Guidelines for Segment 5 Variance Request – Road Designation Change – Segment 5 Access Road from CT 54 to CT 55 dated January 9, 2013. The memorandum states that no significant cultural or paleontological resources will be impacted by the proposed road designation change associated with SCE's TRTP Segment 5. Previous surveys and records searches for the TRTP project included the proposed work area (Ahmet et al, 2006; Pacific Legacy 2007; Pacific Legacy et al. 2010). One cultural resource, the historic-era Antelope Mesa 220 kV transmission line, lies in the vicinity of this area. This resource was formally evaluated and determined ineligible for listing on the National Register of Historic Places (NRHP) and the California Register of Historic Resources (CRHR) (Urbana 2010). The transmission line will not be impacted as a result of the proposed work along the road between CT 54 and 55. Therefore, an archaeological monitor is not required during the proposed work activities.

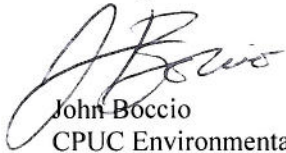
The paleontological assessments for the TRTP indicate that the geology of the proposed work area is characterized by ferruginous syenite. This type of rock has a very low potential for yielding paleontological resources. Therefore, paleontological monitoring is not required during the proposed work.

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,

A handwritten signature in black ink, appearing to read "J. Boccio". The signature is fluid and cursive, with the first letter "J" being particularly large and stylized.

John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen