STATE OF CALIFORNIA Edmund G. Brown Jr., Governor

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

April 4, 2011

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) #46

Dear Ms. Nelson,

On March 25, 2011, Southern Californian Edison (SCE) submitted a variance request for temporary disturbance areas associated with the 66kV Relocation of the Rio Hondo-Amador and the Rio Hondo-Anita #2 underground trench lines in the City of Irwindale, Los Angeles County, California. **This Variance Request is approved by CPUC based on the following factors:**

- SCE submitted the following information:

  SCE requests a Variance to allow for temporary disturbance areas associated with the 66kV Relocation of the Rio Hondo-Amador and the Rio Hondo-Anita #2 underground trench lines, on Segments 7 and 8 66kV sub Transmission Lines (T/L) of the TRTP in the City of Irwindale, Los Angeles County. Subsequent to approval of the NTPR (NTP #10, dated August 03, 2010) by the CPUC, it was determined that additional disturbance areas were needed measuring 100 feet wide (50 feet on either side of the trench centerline) and extending the entirety of the trench lines. The temporary disturbance areas will allow for material and equipment set-up during construction of the underground trenches.

- **Biological Resources**: SCE submitted a letter from ICF International to SCE dated March 23, 2011 titled *Biological Survey Report for the Proposed 66kV Temporary Disturbance Area Variance for Tehachapi Renewable Transmission Project, Segments 7 and 8 66kV Relocation, Los Angeles County, California.* The letter documents the biological conditions at the proposed Variance location (Project Component). The Project Component and a 500-foot buffer (Biological Study Area [BSA]) were included in the analysis. The Project Component was mapped as disturbed/developed, non-native woodland, California annual grassland, coastal sage scrub, and ruderal grassland. Eight vegetation communities were mapped within the BSA and include mule fat scrub, California annual grassland, ruderal grassland, coastal sage scrub, Riversidean alluvial fan sage scrub, open water, and disturbed/developed habitat. No riparian habitat suitable for least Bell's vireo or other listed species occurs within the San Gabriel River. Suitable burrowing owl habitat (potential burrow features) is present within the 500-foot buffer along the San Gabriel River; however, this area was previously surveyed for Segment 7 (ICF 2010xx) with negative results. Coastal sage scrub, which can provide habitat for coastal California gnatcatcher, is present within the Variance Project Component; however, the area was surveyed for coastal California gnatcatcher and the results were negative for the BSA (AMEC 2008d and 2009m; ICF 2010ww). A biological preconstruction survey completed for this report did not identify any special-status wildlife species. A potential solitary bat roost was observed within the Variance Project

Component (ICF 2010bg). The San Gabriel River is situated within the BSA, and the four jurisdictional features will be avoided by the Variance Project Component.

- **Cultural and Paleontological Resources:** SCE submitted a memorandum with the Variance Request from Matthew Wetherbee, Archaeologist, MSc, RPA, dated March 21, 2011, stating that no cultural or paleontological resources will be impacted by the temporary construction disturbance areas. The proposed temporary construction disturbance areas were included in the previous cultural resources surveys for the TRTP right-of-way corridor and no cultural resources were identified (Pacific Legacy 2007, 2010a, 2010b, PCR 2010). The Paleontological Resources Management Plan (PRMP) Segments 4 through 11 of the TRTP project area was prepared by Cogstone Resource Management Inc. (Gust and Scott 2009). No paleontological localities have been previously discovered in the project vicinity and the surface sediments (Quaternary wash and artificial fill) have low sensitivity for paleontological resources. No additional impacts to cultural or paleontological resources are anticipated.

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

- Prior to construction, a pre-construction biological survey shall be conducted within the entire BSA and submitted to the CPUC for review and approval.
- All conditions required by NTP #10 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #10, 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