STATE OF CALIFORNIA Edmund G. Brown Jr., Governor

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

April 14, 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) #52

Dear Ms. Nelson,

On April 11, 2011, Southern Californian Edison (SCE) submitted a variance request to allow use of an existing access road leading up to structure M54-T3A and extending south past structure M28-P1 near Royal Oaks Drive, and a crossing road extending between the proposed eastern access road and the approved access that extends north/south down the center of the Arbor Nursery Plus facility on Segment 7 Transmission Line (T/L) of the Tehachapi Renewable Transmission Project in the City of Duarte, 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 use of an existing access road leading up to structure M54-T3A and extending south past structure M28-P1 near Royal Oaks Drive, and a crossing road extending between the proposed eastern access road and the approved access that extends north/south down the center of the Arbor Nursery Plus facility on Segment 7 Transmission Line (T/L) of the Tehachapi Renewable Transmission Project (TRTP) in the City of Duarte, Los Angeles County, California. Wilson Construction has requested a Variance for use of this existing access road that was not included in the NTP (NTP #17 dated September 24, 2010) authorized by the CPUC. The proposed eastern access road is approximately 10 feet wide and approximately 1,750 feet long. The proposed crossing road is approximately 14 feet wide and approximately 85 feet long.

  There are currently two approved access roads to these structures. However, the westernmost approved access is blocked and does not allow passage to the site. Therefore, the proposed eastern access road is necessary to ensure that access to and from the site is not obstructed by delivery vehicles, such as the staging of concrete trucks waiting to pour. Additionally, the connecting road is necessary to allow smaller vehicles to cross to the existing or proposed access road in the event any of the access roads are obstructed, or partially obstructed, by construction or nursery vehicles.

- **Biological Resources**: SCE submitted a report from ICF International dated April 8, 2011 titled *Biological Survey Report for the M54-T3A Access Road Variance for TRTP, Segment 7, Los Angeles County, California*. The report documents the biological conditions at an existing access road near tower M54-T3A and a crossing road extending between the proposed eastern access road and the approved access that extends north/south down the center of the Arbor Nursery Plus facility (Variance Project Component) and a 500-foot buffer (Biological Study Area [BSA]) located near Royal Oaks Drive, in the City of Duarte. Biological resources within the Variance Project Component site and BSA were evaluated during general preconstruction surveys associated with M54-T3A (ICF 2011ah, 2010bh, 2010dc). Biological resources in the area also were evaluated during several focused surveys, including plant (ICF 2010at), tree inventory

(ICF 2010av), focused burrowing owl (AMEC 2009j; ICF 2010xx), and a preconstruction special-status bat habitat assessment (ICF 2010de). Additional clearance sweeps have been performed on the Variance Project Component between January and March 2011. A literature review was also performed as part of the Biological Review for Segment 7 T/L (ICF 2010ay).

The Variance Project Component is composed of disturbed/developed vegetation. Other vegetation communities observed within the BSA include: coast live oak woodland, coastal sage scrub, and disturbed/developed. No special status plants have been identified in the Variance Project Component or the BSA. A regulated tree species, coast live oak, has been observed in the northern part of the BSA.

Focused habitat assessments for burrowing owl (AMEC 2009j; ICF 2010xx) did not identify potential burrowing owl features within the BSA. Preconstruction surveys for special-status bat species (ICF 2010bg, 2010de) were conducted in compliance with biological Mitigation Measure B-33a. These surveys detected multiple potential solitary and colonial bat roosts within the 500-foot BSA north of the Variance Project Component. Two San Diego desert woodrat nests (ICF 2011ah), and one active California thrasher nest (FRED nest ID# 000504) were identified in the BSA north of the Variance Project Component.

The Variance Project Component impact areas and the BSA were partially surveyed during previous delineation surveys (ICF 2010h). Jurisdictional water features (7-3-S-4 and 7-3-S-9) were identified at the northern edge of the BSA and will be avoided. No additional jurisdictional features have been observed during the numerous biological preconstruction surveys (ICF 2011ah, 2010bh, 2010dc).

No additional impacts to biological resources are anticipated.

Cultural and Paleontological Resources: SCE submitted a memorandum with the Variance Request from Matthew Wetherbee, MSc, RPA, Archaeologist, dated March 25, 2011, stating that no cultural or paleontological resources will be impacted by the use of the existing access and crossing roads to tower M54-T3A on the TRTP Segment 7, within the City of Duarte, Los Angeles County, California. The existing access and crossing roads were included in the previous survey for the TRTP right-of-way (ROW) and no cultural resources were identified (Pacific Legacy 2007). The Paleontological Resources Management Plan (PRMP) Segments 4 – 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 in the area are mapped as Quaternary alluvium (Qa) and have low sensitivity for yielding paleontological resources. The TRTP ROW for Segment 7 was surveyed for paleontological resources in August 2010 and no paleontological resources were encountered (Aron 2010). No additional impacts to cultural or paleontological resources are anticipated.

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

- All conditions required by NTP #17 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #17, 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