

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



October 3, 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) #92

Dear Ms. Nelson,

On October 1, 2011, Southern Californian Edison (SCE) submitted a variance request to utilize an existing access road near Tower 31 on Segment 4 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 utilize an existing access road near Tower 31 on Segment 4 T/L of the TRTP in Los Angeles County, California. Subsequent to the approval of the NTPR (NTP #16 dated September 13, 2010) by the CPUC, project site conditions have been further evaluated and an additional access road near Tower 31 is needed. The proposed access road consists of an approximate 1,200-foot portion of an existing unpaved road. The road is needed to allow the biological resources field monitoring team to safely observed planned wire stringing activities along the right-of-way in this portion of Segment 4. No improvements or modifications to the road would be performed.

- **Biological Resources:** SCE submitted biological resource information with their Variance Request dated September 30, 2011. The Project Component (access road and 500-foot buffer) is located near Tower 31 and consists of developed/disturbed land. Surrounding areas consist of California Annual Grassland. Preconstruction general, burrowing owl, and bat surveys were completed on January 27 and 28, 2011, and November 10, 2010, respectively. Construction biological monitoring has been ongoing since February 2011. The Segment 4 Tower 31 Access Road biological resource sweep of the Project Component was performed by ECORP Consulting Inc. on September 28, 2011. There is a single occupied burrowing owl burrow (ID 2417) west of the Project Component, south of Tower 31, whose buffer extends into the surveyed 500-foot buffer. The buffer does not extend into the Project Component and ESA signs have been previously installed around this resource. No additional special-status biological resources were detected near the Project Component.

No additional impacts to biological resources are anticipated with the implementation of this Variance.

- **Cultural and Paleontological Resources:** SCE submitted a memorandum dated September 30, 2011, titled *TRTP Variance Request - Seg 4, CT-31 Bio Observation Road - Cultural Clearance for Biological Monitor Observation Use of Road near CT-31 on Segment 4* with the Variance Request stating that no cultural resources will be impacted by the requested use of an existing dirt road for

biological monitors to observe wire stringing activities near Construct Tower 31 on Segment 4 as part of this Variance Request in support of the TRTP. A cultural record search and surveys (Ahmet et al. 2006; Pacific Legacy 2007, 2010a, 2010b), and a paleontological literature review (Gust and Scott 2009), have been previously conducted for these areas of Segment 4. This research indicates that the biological observation road is located within an area previously surveyed for the TRTP and that cultural resources do not exist at this location.

The previous paleontological review indicated that the biological monitor observation road area contains soils that have the potential to yield paleontological resources (Gust and Scott 2009). Since there is a possibility that paleontological resources exist, paleontological spot-check monitoring is recommended when ground disturbing excavation at this location exceeds a depth of two feet; however, no improvements or medications to the road are proposed.

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

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

- Paleontological spot-check monitoring shall be conducted if construction activities disturb soils to a depth greater than two feet.
- All conditions required by Notice to Proceed (NTP) #16 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #16, 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