

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 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) #96

Dear Ms. Nelson,

On October 12, 2011, Southern Californian Edison (SCE) submitted a variance request to use a guard structure site and access road to Structure MA1-T3 on Segment 8 Transmission Line (T/L) West (Phase 4) of the Tehachapi Renewable Transmission Project (TRTP), in Rowland Heights, 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 use a guard structure site and access road to Structure MA1-T3 on Segment 8 T/L West (Phase 4) of the TRTP, in Rowland Heights, Los Angeles County, California. Both the guard structure site and the access road were previously approved as temporary extra work space (TEWS) areas. Specifically, this request includes approximately 0.21 acres of area for a guard structure on the southeast corner of the intersection of Fullerton Road and Pathfinder Road for wire work on the Fullerton Shoofly. Wilson Construction is also requesting the use of a 137 linear feet of roadway off Fullerton Road to access the work site at Structure MA1-T3. Both the proposed guard structure area and access road are located in disturbed areas. There is no disturbance activity needed to utilize the guard area.

Biological Resources: SCE submitted a biological summary of the proposed site with the Variance Request. The Segment 8 West guard structure and access road to MA1-T3 (Project Component) are within disturbed/developed vegetation communities. The access road is located within critical habitat for coastal California gnatcatcher (*Polioptila californica*); however the road follows an existing roadway and no improvements will occur to the road. The guard structure is located outside critical habitat. Surrounding areas consist of California annual grassland, non-native woodland, coast live oak woodland, ruderal wetland, and coastal sage scrub. These surrounding vegetation communities will not be impacted by the Project Component. No hydrologic jurisdictional resources occur within the work areas. No active bird nests occur within the work areas. Biological resources including bat habitat, jurisdictional resources (wetland 8-24-W-1), and woodrat middens within the 500-foot buffer are demarcated in the field by Environmentally Sensitive Area (ESA) staking. Construction has been on-going in this area and the following surveys have been conducted in the area: general biological preconstruction (January 18 and 19, and June 13 and 17, 2011) bat habitat assessment (January 20 and June 17, 2011). A burrowing owl preconstruction survey was not conducted as no suitable burrowing owl burrows were present.

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

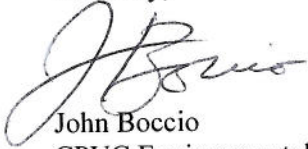
Cultural and Paleontological Resources: SCE submitted a memorandum dated October 12, 2011 from Matthew Wetherbee, MSc, RPA, SCE Archaeologist, regarding the TRTP Cultural and Paleontological Resources Guidelines for Segment 8 T/L Phase 4 Variance Request – Guard Structure and Access to MA1-T3. The memorandum states that no cultural or paleontological resources will be impacted by the proposed additional 0.21 acres of an area for a guard structure and the use of the existing paved road to access Structure MA1-T3 on Segment 8 Phase 4 of TRTP. The guard structure area and existing access road were included in the previous surveys for the TRTP and no cultural resources were identified (Pacific Legacy 2007, 2010). Previous paleontological assessments prepared for the TRTP project area indicate that paleontological localities have been previously discovered in the project vicinity and the subsurface sediments are mapped as the Fernando Formation and have a high sensitivity for yielding paleontological resources (Gust and Scott 2009; Aron 2010). However, the proposed access road is currently paved and the guard structure site is disturbed and vehicles use the area for parking and no ground disturbance or road improvements are required for use of these area.

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) #24 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #24, 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