

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

August 13, 2010

Susan J. Nelson, AIA  
Project Manager  
Southern California Edison  
2244 Walnut Grove Ave.  
Rosemead, CA 91770

RE: Tehachapi Renewable Transmission Project (Segments 4-11), Variance Request (VR # 4)

Dear Ms. Nelson,

On August 11, 2010, Southern California Edison (SCE) submitted a variance requesting that the contractor be allowed to utilize a fire hydrant located along an unpaved spur road just east of West Carson Mesa Road and to also place two 10,000-gallon elevated water storage tanks adjacent to the hydrant. The water would be used for dust abatement purposes for the Vincent Substation expansion construction. **This Variance Request is approved by CPUC for the proposed activities based on the following factors:**

- SCE submitted the following information:

SCE requests a variance to allow the contractor to utilize a fire hydrant located along an unpaved spur road just east of West Carson Mesa Road. Use of this fire hydrant has been permitted by the Los Angeles County.

Subsequent to approval of the NTPR by the California Public Utilities Commission (CPUC), it was determined that onsite water source at Vincent Substation could not be utilized because doing so could create an unsafe reduction in water available in the event of an onsite fire.

Two 10,000-gallon elevated temporary water storage tanks will be placed adjacent to the hydrant. The water tanks will be equipped with hydraulic lifts to elevate the tanks. The hydraulic lifts have small hydraulic fluid reservoir tanks, which will be provided with secondary containment (e.g., plastic sheeting with berms).

The tanks will be connected to the hydrant by aboveground temporary piping. The tanks will be filled with hydrant water, which will be transferred directly to a water trucks via gravity flow. Water trucks will be parked adjacent to the tanks during filling operations.

The proposed disturbance area associated with the hydrant, water tanks, and water truck parking area measures approximately 150 feet by 50 feet. This area consists of disturbed (unpaved access road) and undisturbed land (area around hydrant and planned tank storage area). The hydrant and water storage area will be cleared and grubbed, but will not require grading. The access road and proposed disturbance area is privately owned. SCE will obtain a Temporary Entry Permit (TEP) prior to equipment installation.

- **Biological Resources:** SCE submitted a biological survey report conducted by ICF International on August 5, 2010. No nesting birds or sensitive species were identified within the proposed disturbance area or 500-foot buffer. Pre-recorded potential burrowing owl burrows were inspected during the preconstruction survey (ICF 2010) and verified to still be potential burrowing owl burrows. However, no burrowing owls or sign of the species were detected during the 2010 ICF surveys or the current

preconstruction survey. Ruderal grassland and disturbed/developed communities will be physically disturbed. No impacts to biological resources are anticipated with the implementation of the conditions noted below.

- **Cultural Resources:** Cultural resource records searches for the proposed disturbance area were conducted by Ecorps Consulting and Pacific Legacy as part of the Tehachapi Renewable Transmission Project (Ahmet et al., 2006; Pacific Legacy, 2007 and 2008). Results of the records searches indicate that no cultural resources have been recorded within the proposed disturbance area. Two previously recorded historic debris scatters, 19-003536 and 19-003729, are located in the vicinity of the disturbance area. These historic debris scatters will not be impacted by the proposed construction work at the hydrant area or any other construction work currently planned for the Vincent Substation expansion activities. However, due to the proximity of 19-003536 to the work site, SCE will implement additional avoidance measures to ensure that there are no impacts to 19-003536. SCE submitted a cultural resource survey conducted by ICF International on August 9, 2010. No historic or prehistoric cultural resources were identified within the disturbance area. No significant impacts to cultural resources are anticipated with the implementations of the conditions noted below.

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

- All conditions required by NTP #2 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #2, and this Variance shall be available on site for the duration of construction activities where applicable.
- The following additional avoidance measures shall be implemented to ensure that there are no impacts to scatter 19-003536: 1) Flagging the site boundary as an environmentally sensitive area (ESA) prior to placement of the above-ground tanks, 2) Using a cultural resources monitor during ground disturbing activities associated with tank installation, 3) Not allowing vehicles to drive off established roads, and 4) Not allowing any ground disturbing activities outside the proposed 150ft x 50ft disturbance area.
- As proposed, a preconstruction burrowing owl survey and report will be completed and submitted to the CPUC prior to the initiation of construction activities.
- As proposed, a clearance survey will be performed 3 days prior to construction activities and any sensitive resources will be flagged for avoidance.
- Implement dust control as needed on the unpaved access road leading to the hydrant site and prevent tracking of mud onto paved Vincent View Road.

Sincerely,



John Boccio  
CPUC Environmental Project Manager

cc: V. Strong, Aspen