

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



February 11, 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) #34

Dear Ms. Nelson,

On February 9, 2011, Southern Californian Edison (SCE) submitted a variance request to allow for temporary access to an additional interim construction area in a previously disturbed, unpaved area (approved under Variance #32 dated February 7, 2011) to support vehicle and equipment transport into the Whirlwind Substation site, and the installation of a temporary 50-foot by 18-foot concrete slab to protect the underground LADWP aqueduct pipeline while construction vehicles and equipment exceeding 26,000 pounds are driven onto the substation site. The location is southwest of the intersection of 170th Street West and West Rosamond Boulevard near the Whirlwind Substation on Segment 9 of the Tehachapi Renewable Transmission Project (TRTP) in Kern County. **This Variance Request is approved by CPUC based on the following factors:**

- SCE submitted the following information:

As specified in the NTPR for Whirlwind Substation, access to the site would occur from the east along 170th Street West and/or Rosamond Boulevard. Subsequent to submittal of the NTPR, it was determined that construction vehicles and equipment greater than 26,000 pounds could not be directly driven over the Los Angeles Department of Water and Power's (LADWP) underground water aqueduct pipeline, which is situated along the west side of 170th Street West. In response, SCE plans to construct a permanent below-grade support structure ("bridge") over the aqueduct pipeline; an addendum for the support bridge, which will be situated south of the area addressed in this variance request, is forthcoming.

In the interim and in order to allow construction activities to continue, SCE proposes installed a temporary 50-foot long by 18-foot wide and 12-inch thick concrete slab that will have 1-foot wide and 4-foot deep footings along both sides. This slab will be situated below-grade and flush with the existing surface over the LADWP aqueduct, and will be situated in an unpaved, disturbed area adjacent to the Whirlwind Substation property. The concrete slab and associated work area is situated within the footprint of the temporary loading/unloading area for Whirlwind Substation that was approved for use under Variance #32.

SCE requests a variance to allow for temporary access to an additional interim construction area in a previously disturbed, unpaved area (approved under Variance #32) to support vehicle and equipment transport into the Whirlwind Substation site, and the installation of a temporary 50-foot by 18-foot concrete slab to protect the underground LADWP aqueduct pipeline while construction vehicles and equipment exceeding 26,000 pounds are driven onto the substation site. The location is southwest of the intersection of 170th Street West and West Rosamond Boulevard. The concrete slab will be used until the permanent, below-grade support bridge is installed along the west side of 170th Street West near the Whirlwind Substation. An addendum for this structure is forthcoming.

The proposed disturbance area associated with the installation of this temporary concrete slab is approximately 58 feet by 28 feet and the footprint occurs entirely within an unpaved, pre-disturbed area owned by SCE. The sub-grade installation requires no scarification and will be re-compacted back to grade at 95%. SCE will perform soil testing to confirm the compaction rate. The location will require no additional preparation, and no underground obstructions, utilities or water issues will be encountered. The slab will be pre-formed with wood supports, the concrete and re-bar will be added in-situ.

- **Biological Resources:** SCE submitted a memorandum dated February 8, 2011 regarding the proposed construction area and temporary concrete slab location. The Project Component is an existing disturbed area connected with several access roads and is surrounded by Mojave creosote bush scrub, Mojave mixed woody scrub, and disturbed/developed areas. Biologists have been on site full time to perform clearance sweeps and monitoring the Whirlwind Substation and the proposed construction and concrete slab area. The Project Component buffer was confirmed to have occupied burrowing owl (*Athene cunicularia*) burrows during previous preconstruction and focused burrowing owl surveys. A previously known desert kit fox complex was observed during the sweep. Burrows were collapsed within the Whirlwind Substation footprint per the CDFG approved burrowing owl and desert kit fox passive relocation plans. Environmentally sensitive area signage and flagging was established for the occupied burrows. No potential bat roosting habitat was observed within or adjacent to the impact areas of the Project Component. Drainages within the survey area were staked as environmentally sensitive areas and no impacts are expected to occur. No new special-status biological resources were detected on or near the Project Component.

Temporary desert tortoise fencing will be installed around the perimeter of the requested area under Variance #32, which encompasses the construction area requested under this Variance. As documented under Variance Request #32, CDFG finds the use of the additional work space consistent with the 2081 Initial Take Permit (ITP). USFWS has no objection to the use of the additional work space. No additional impacts to biological resources are anticipated.

- **Cultural and Paleontological Resources:** SCE states that no cultural resources will be affected by the temporary installation of the concrete slab. Ground disturbance will remain within an approximate 58-foot by 28-foot footprint. This area has been covered by two previous cultural resources surveys for the Tehachapi Renewable Transmission Project, and no cultural resources were identified in the vicinity of the proposed construction area (Pacific Legacy, 2007 and 2009). 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 #26 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #26, 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