STATE OF CALIFORNIA Edmund G. Brown Jr., Governor

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

August 6, 2012

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) #133

Dear Ms. Nelson,

On July 18, 2012, Southern Californian Edison (SCE) submitted a variance request for additional temporary work areas to conduct guy wire staking on Segment 6A and 6C Transmission Lines (T/L) of the Tehachapi Renewable Transmission Project (TRTP) in the City of Duarte, and unincorporated Los Angeles County. **This Variance Request is approved by CPUC for the non-ANF portions of Segments 6A and 6C based on the following factors:**

- SCE submitted the following information:

  SCE submitted a variance request for additional temporary work areas to conduct guy wire staking on Segment 6A (Construct 1-35) and 6C (Construct 72-113) T/L of the TRTP in unincorporated Los Angeles County. This extension of the work area is required to help guide and secure loads suspended by the crane to ensure crew member safety. Failure of proper guy support of the tower members could result in the replacement of the tower foundation or serious injury to a worker. Prior to construction, foremen will be provided with information on available structures including any relevant environmental constraints. Crews will strictly adhere to the construction maps provided by SCE. PAR will hold daily tailboards to discuss environmental constraints and ESA buffers near the planned work for the day.

  The construction contractor is requesting a work area with a 300-foot radius measured from the center of the tower hub, around all new towers outside the Angeles National Forest. The area would be used to walk with tag lines and guy wires, staking them as necessary. Steel stakes, ranging from 1 to 3 feet in length, will be used as needed as anchors for temporary guying of tower parts for safety. The stakes would be installed by a crew member using hand tools. In addition, at tubular steel poles construction locations, the contractor may walk within the 300-foot radius with taglines but no staking of guy wires will be conducted.

  For guy wire staking, ground disturbance would be minimal and the stakes can be removed by hand. Each tower will require four to six work areas, approximately 10 ft. by 10 ft., to work in to accomplish the guy wire staking. The actual ground disturbance created by staking will be limited to setting and removing the stakes. The work and disturbance areas may be located anywhere within the 300 foot radius circle, but they are typically approximately 150 feet from center hub radius. The optimum distance would be based on a 1 to 1 slope from the attachment point of the member being guyed for support.

  No grubbing will be required for these activities. Trees and bushes will be avoided as much as possible, and although trimming of vegetation is not anticipated, it may be necessary in some locations. Environmentally sensitive areas will be avoided.

- Notices to Proceed (NTP) #32 and #35 were issued by CPUC for the non-ANF portions of Segments 6A and 6C, respectively. On August 6, 2012, ANF approved the requested guy wire staking on Segments 6A and 6C for those towers located on ANF lands.

- **Biological Resources**: SCE submitted biological resource information with the variance request. SCE anticipates that impacts associated with the implementation of tag lines and guy wires would be equal to those associated with surveying and monitoring. Due to the limited duration of the activity, it is anticipated that the impacts associated with the implementation of tag lines and guy wires would not disrupt the breeding or foraging behaviors of local biological resources. Direct impacts associated with foot traffic will be minimized through the following best management practices:

  - Biological Monitoring: Biological monitors will survey the proposed tag line and guy wire use areas to document locations of active nests, water resources, burrows, and other resources and implement the necessary buffers. Biological monitors will remain on site during the implementation of tag lines and guy wires to help ensure native vegetation, wildlife habitat, water resources, and special-status species are avoided to the fullest extent feasible.

  - Resource Buffer Areas: Construction personnel will not traverse or loiter through or within marked resource buffer or seasonal restriction areas.

  - Vegetation Disturbance Minimization. Adjacent previously disturbed areas would be utilized to the greatest extent feasible. If no adjacent disturbed areas are available to support the use of tag lines and guy wires, disturbance to vegetation will be minimized through the avoidance of shrubs and trees. Only foot traffic, suspended ropes, and small stakes will be utilized within the tag line and guy wire area. All vehicles and equipment will be restricted to approved disturbance areas.

  SCE will document any disturbance to vegetation above and beyond regular foot traffic. Calculations will include impacts to woody vegetation. Disturbance impacts will not exceed the allotted permit acreages.

  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 cultural resource information with the variance request, which states that the areas described in the variance request were included in the cultural resources records search for TRTP (Pacific Legacy 2007). Five previously recorded cultural resources are known to exist in these area, the historic-era Antelope-Vincent #1 (Vincent 220 kV) transmission line, Angeles Forest Hwy (P-19-187713), the historic-era Bootlegger Distribution Circuit, the Historic Aliso Creek/Mill Creek Wagon Roads and Monte Cristo Mining District Wagon Road (P-19-186545), and the Historic Rincon-Red Box-Sawpit Road. However, the activities identified in the variance request are not of the nature to significantly impact or adversely affect any of these resources. No further cultural resources assessment or monitoring is required to support this variance request.

  Previous paleontological assessments for TRTP define the sediment type in all of these areas as Quaternary Alluvium (Gust and Scott 2009). These types of soils are considered as having low sensitivity for yielding significant paleontological resources. Furthermore, the activities identified in the variance request are not of the nature to impact paleontological resources. No further paleontological assessment or monitoring is required to support this variance rquest.

  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 Notices to Proceed (NTP) #32 and #35 shall apply to the subject area and activities.

- Copies of all relevant permits, compliance plans, NTP #32, NTP #35, 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