

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 3, 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) #136

Dear Ms. Nelson,

On September 25, 2012, Southern Californian Edison (SCE) submitted a variance request to add approximately 0.626 acre of work area to facilitate wire stringing activities between Structures M30-T2 and M31-T2 on Segment 7 Transmission Line (T/L) of the Tehachapi Renewable Transmission Project (TRTP) within the City of Irwindale, County of Los Angeles. **This Variance Request is approved by CPUC based on the following factors:**

- SCE submitted the following information:

Wilson Construction is requesting to add approximately 0.626 acre of work area to facilitate wire stringing activities between Structures M30-T2 and M31-T2 on Segment 7 T/L of the TRTP within the City of Irwindale, County of Los Angeles.

To complete wire stringing activities, Wilson Construction will string rope between WSS 7.15 and WSS 7.14 using conventional ground-based methods; a helicopter cannot be used for this activity due to the proximity to the I-605 freeway off-ramp in this area. A rope will be pulled by hand (two ground men) from WSS 7.15 to Structure M31-T2, and then to WSS 7.14, where it will be attached to a hardline (which will be installed using a sock-line flown by helicopter from Structure M30-T2). The hardline will then be mechanically pulled back to WSS 7.15. The heavier line will subsequently be attached to conductor and mechanically pulled to WSS 7.11 from WSS 7.15.

To complete these wire stringing activities, Wilson Construction will first need to install wire guards and wire covers in the vicinity of Structure M31-T2 to protect existing distribution wires. This work will be completed using bucket trucks staged in approved TRTP T/L or 66kV work areas. Wilson Construction will also need to temporarily lower a portion of distribution wire to the ground within the proposed work area because it is not feasible to guard this wire when raised. The lowered distribution wire will be placed on temporary cribbing (installed by hand within and on either side of the floodway) and will be reinstalled after the conductor is strung. Up to two ground men will briefly enter the floodway (within the proposed work area) on foot to place the cribbing and during lowering and raising actions to prevent kinking or damaging the wire. Upon completion of wire stringing activities, ground men will re-enter the floodway to remove the cribbing.

Once the distribution lines are out of the way, the rope will be strung conventionally from WSS 7.15 to WSS 7.14, where it will be attached to the hardline (strung from WSS 7.11 to WSS 7.14 and brought to the ground). To attach the hardline to the rope, tension will be temporarily relieved while the rope is being attached. The hardline will then be raised and wound to the puller staged at WSS 7.15 using the rope. The hardline will then be attached to the conductor and pulled back to WSS 7.11. The conductor will be secured to Structure M31-T2 and the hardline will then be lowered and rewound to WSS 7.15 (crossing the floodway). This process will be completed three times on the western phase and three times on the eastern

phase for a total of six repetitions. Once the conductor has been sagged and clipped to the insulators, the wire spacers have been installed, and the temporary travelers removed, and underlying distribution wire will be reinstalled, and the wire guards removed.

- **Biological Resources:** SCE submitted biological information with the variance request stating that the Segment 7 T/L work area and drainage crossing (Project Component) are located within previously surveyed portions of the Segment 7 Transmission Line work areas for TRTP. The following surveys have been conducted in the area: bat habitat assessment (November 4, 2010), and biological preconstruction and sweep (January 20, 2011, March 31, 2011, May 5, 2011, and February 9, 2012).

The Project Component is in an unvegetated flood control channel. Vegetation communities located within 500 feet of the Project Component include additional developed land, ruderal grassland, mulefat scrub, Riversidean alluvial fan sage scrub, coastal sage scrub, and disturbed coastal sage scrub (ICF 2012). No vegetation communities will be impacted by the Project Component. The Project Component is not located within occupied habitat or critical habitat for coastal California gnatcatcher or least Bell's vireo. As of September 12, 2012, no active bird nests are located within 500 feet of the Project. Special-status biological resources observed within 500 feet of the project include San Diego desert woodrat (*Neotoma lepida intermedia*) and Swainson's hawk (*Buteo swainsoni*). Special-status biological resources are demarcated in the field by Environmentally Sensitive Area staking where applicable. The Project Component is located within a jurisdictional resource; however, the proposed activities do not require a permit under Sections 401 and 404 of the Clean Water Act or Section 1600 of the California Department of Fish and Game Code. Construction has been on-going in this area since March 2011 (i.e., wire removal).

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 September 12, 2012 regarding the SCE TRTP Cultural and Paleontological Resources Guidelines for Segment 7 Variance Request – M31-T2 Work Area/Drainage Crossing. The memorandum states that no cultural or paleontological resources will be impacted by the work area/drainage crossing associated with Structure M31-T2, City of Irwindale, Los Angeles County, as part of this Variance Request in support of the TRTP. The proposed area falls within the surveyed corridor for TRTP (Pacific Legacy 2007). The previous cultural survey shows two historic transmission lines (Rio Hondo-Bradbury 66kV and Antelope-Mesa 220kV) crossing the additional work area. These lines were evaluated and determined ineligible for the NRHP and CRHR in 2010.

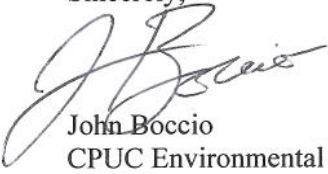
Previous paleontological assessments for TRTP define the sediment type in this area as “gravels and sands of major streams and alluvial fans” (Gust and Scott 2009; Aron 2010). These types of soils are considered as having very low sensitivity for yielding significant paleontological resources. Therefore, no further cultural or paleontological resources assessments or monitoring are required for this Variance Request.

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) #17 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #17, and this Variance shall be available on site for the duration of construction activities where applicable.

Sincerely,

A handwritten signature in black ink, appearing to read "John Boccio". The signature is stylized with a large, looping initial "J" and a cursive "B".

John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen