### Variance Request Form

**Variances**

**Spread/ Location**
- Section 3 Underground

**Alignment Sheet/Sta.**
- Attachment A: Southern Access Road

**No.:**
- Refinement – No Longer Required Areas

**Landowner:**
- Bureau of Land Management (BLM)

**Current Land Use/ Vegetative Cover:**
- Public Agency Land/ Juniper Woodland

**Nearby Features**
- Water body, T&E Habitat, Wetland, Noxious Weed

**Area, Residence, Cultural Resource Site (distance, etc.):**
- Several unnamed tributaries to Carrizo Creek and one cultural resource site are located within and/or directly adjacent to the component removal areas.

**Variance Level:**
- level 1
- level 2
- level 3

**Variance From:**
- Permit
- Plan/Procedure
- Specification
- Drawing
- Mitigation Measure
- Other

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**Detailed Description of Variance:**

This variance request provides notification to the BLM of San Diego Gas & Electric Company’s (SDG&E’s) intent to reroute a portion of the 138 kilovolt (kV) underground transmission route and associated transition poles from BLM-managed land to private land. Specifically, the reroute will relocate steel pole (SP-) 105A and SP-105B, and eliminate the proposed gate at Old Highway 80 from BLM-administered land. In addition, the reroute will relocate approximately 1,000 feet of underground transmission line and associated vaults from BLM-administered land to the East County (ECO) Substation’s southern access road. In total, approximately 1.5 acres of land in Township 18 S, Range 8 E, Section 2 that is described in Right-of-Way (ROW) Grant CACA-51204 will not contain ECO Substation Project (Project) permanent facilities located above or below ground. The new 138 kV transmission line route and portions of the original alignment that will not be constructed are depicted in detail in Attachment A: Southern Access Road Refinement – No Longer Required Areas.

The Proposed Action—shown on page 26, Section 4.1.1 of the Record of Decision (ROD), dated August 2012—describes the 138 kV transmission line route to include 0.8 mile, resulting in approximately 5.5 acres of disturbance—0.3 of which would be permanent—on BLM-administered public lands. The reroute described in this variance request would reduce the distance of the 138 kV transmission line crossing BLM-administered land to approximately 0.6 mile and reduce the amount of disturbance to approximately 4 acres (of which less than 0.01 acre would be permanent). No new or additional impacts would occur on BLM-administered lands.

According to the description provided on page 35 of the Mitigation Monitoring, Compliance, and Reporting Program, Level 1 variances (Field Decisions) are minor changes to Project specifications, construction methods, or mitigation measures that provide equal or better protection to environmental resources or better constructability. The reroute will result in both greater protection of environmental resources and better constructability. In addition, the reroute will result in the construction of Project facilities on private land instead of BLM-administered land; thus, it will not result in any new impacts to BLM-administered land. As a result, this variance request involves only an administrative change to the Project description in the ROD and a change to the location of facilities that will be constructed on BLM-administered land, from that described in the ROW Grant.

**Variance Justification:**

The reroute of the 138 kV transmission line facilities included in this variance request is proposed to avoid potential impacts to cultural resources. Approximately 1.8 acres of known cultural resource areas, including 0.1 acre on BLM-administered land, will be avoided as a result of the new alignment. The reroute is part of SDG&E’s continued efforts to avoid and minimize the effects of the Project on cultural resources.

With the reroute of the 138 kV transmission line and resulting removal of the pads for the poles that were originally sited on BLM-administered land, all of the Project components on BLM-administered lands will be constructed in previously disturbed areas. As a result, permanent impacts to approximately 0.3 acre of juniper woodland on BLM-administered land will be avoided. In addition, temporary impacts to approximately 0.07 acre of juniper woodland and 0.04 acre of mixed desert scrub will be avoided. Because all construction on BLM-administered land will be limited to within the road and the disturbed road shoulder, no native habitat will be...
Impacted, and no habitat restoration will be required. At the completion of construction activities, Old Highway 80 and the adjacent road shoulder will be repaired per San Diego County requirements. As construction activities will be limited to the road and road shoulder and permanent maintenance pads for poles will no longer be located on BLM-administered land, invasive species will not require treatment on an ongoing basis. In order to prevent the introduction of weed species that do not currently occur within the Project area and to prevent the spread of weed species from the Project to outside of the Project area, SDG&E will implement best management practices, including cleaning equipment prior to mobilizing to the ROW and ensuring that straw wattles, gravel, mulch, and soil, are free of weeds.

For SDG&E Use Only

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<th>Additional Surveys Required</th>
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<th>Additional Surveys Completed</th>
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<td>T&amp;E Survey</td>
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<td>Reporting Document Survey</td>
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<th>Sign-off (as appropriate)</th>
<th>Name (print)</th>
<th>Approval Signature</th>
<th>Conditions (See Attached)</th>
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<td>Don Houston</td>
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<td>Environmental Compliance Lead</td>
<td>Kirstie Reynolds</td>
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<td>Lead Environmental inspector</td>
<td>Jeffrey Coward</td>
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<td>Construction Manager</td>
<td>Molly Amendt</td>
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<td>Cultural Resource Lead</td>
<td>Nicole Morgan</td>
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<td>ROW Agent</td>
<td>Pete McMorriss</td>
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For BLM Project Manager or Compliance Contract Use Only

Variance Approved: □
Signature: [Signature]

Variance Denied: □

Date: 7/12/13

For Compliance Manager and Monitor Use Only

Variance Approved: □
Signature: [Signature]

Variance Denied: □

Date: 

Stipulations
impacted, and no habitat restoration will be required. At the completion of construction activities, Old Highway 80 and the adjacent road shoulder will be repaired per San Diego County requirements. As construction activities will be limited to the road and road shoulder and permanent maintenance pads for poles will no longer be located on BLM-administered land, invasive species will not require treatment on an ongoing basis. In order to prevent the introduction of weed species that do not currently occur within the Project area and to prevent the spread of weed species from the Project to outside of the Project area, SDG&E will implement best management practices, including cleaning equipment prior to mobilizing to the ROW and ensuring that straw wattles, gravel, mulch, and soil, are free of weeds.

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<td>Yes</td>
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Reported Document Survey:

- Sign-off (as appropriate): Name (print): Approval Signature: Conditions (See Attached):
  - Environmental Project Manager: Don Houston DH Yes: No
  - Environmental Compliance Lead: Kirstie Reynolds KR Yes: No
  - Lead Environmental Inspector: Jeffry Coward JC Yes: No
  - Construction Manager: Molly Amendt MA Yes: No
  - Construction Manager: Brian Telesmanic BT Yes: No
  - Cultural Resource Lead: Nicole Morgan NM Yes: No
  - ROW Agent: Pete McMorris PM Yes: No

### For BLM Project Manager or Compliance Contract Use Only

Variance Approved: Signature: Variance Denied: Date:

### For Compliance Manager and Monitor Use Only

Variance Approved: Signature: Variance Denied: Date:

Stipulations
## VARIANCE CONDITIONS

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Attachment A: Southern Access Road Refinement – No Longer Required Areas

East County Substation Project

**Relocated Facilities**
- 138 kV Pole
- 138 kV Underground
- 138 kV Overhead

**Poles to Be Relocated**
- Riser
- 138 kV Pole
- 138 kV Underground
- 138 kV Overhead
- Gate

**Removed from Project**
- Existing Transmission Line
- 138 kV Underground
- ECO Substation Pad
- Permanent Grading
- Temporary Construction Area
- Vault

**Existing Work Area**
- Work Area
- 138 kV Overhead
- 138 kV Underground

**Pull Site/Vault Pad**
- Permanent Project
- Retention Basin
- Staging Area

**Existing Access Road Centerline**
- Drainage
- Bureau of Land Management Land