PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



August 2, 2012

Susan J. Nelson, AIA Regulatory Affairs Southern California Edison 2244 Walnut Grove Avenue, Quad 3D, GO1 Rosemead, CA 91770

RE: SCE Antelope-Pardee 500 kV Transmission Project, Segment 1 – Revision to HRRP

Dear Ms. Nelson,

On June 6, 2012, Southern Californian Edison (SCE) submitted a revised request to exclude restoration sites 98, 107, 108, 109, 110, 111, 112, and WSS 29 from success criteria requirements of the approved Habitat Restoration and Revegetation Plan (HRRP), Antelope-Pardee, due to damage by livestock grazing on Segment 1, Section 3 of the Antelope-Pardee 500kV Transmission Project in Los Angeles County. This Variance Request is approved by CPUC for the proposed activities based on the following factors:

- Prior to the start of construction, the pre-existing condition of the subject sites was livestock grazing pasture lands. Subsequent to construction, the subject sites have continued to be used as pasture lands.
- SCE submitted the following information:

SCE submitted a request to the HRRP to remove restoration sites 98, 107, 108, 109, 110, 111, 112, and WSS 29 from the success criteria due to damage by livestock grazing on Segment 1, Section 3 of the Antelope-Pardee/TRTP, in Los Angeles County. Subsequent to the submittals of the Habitat Restoration and Revegetation Plan, Antelope-Pardee, Segment 1 non-Angeles National Forest (February 2008), restoration sites have been damaged by livestock grazing. SCE is requesting a variance to Mitigation Measure B-1a (Provide Restoration/Compensation for Impacts to Native Vegetation Communities) for the Antelope-Pardee Transmission Project to exclude eight (8) restoration sites from the success criteria due to unforeseen and uncontrollable circumstances.

Within the first year of planting (December 2009), there were two (2) isolated occurrences of sheep grazing in the restoration sites. The sites that were affected included Towers 110 and 112 in Section 3. The grazing caused a total loss of the above-ground vegetation. Additionally, six (6) restoration sites since December 2011 have been impacted by livestock at Towers 98, 107, 108, 109, 111, and WSS 29. There is sufficient evidence that sheep or cattle have been present on these sites because the vegetation has been consumed and trampled and the soil has been compacted. Considering the livestock cannot be prohibited from entering the restoration sites and have adverse effects on the implemented restoration, success criteria of the sites cannot be achieved. SCE requests to exclude these sites from restoration success criteria.

• Biological Resources: The subject sites are all located on private lands that have historically and are currently being utilized for sheep or cattle grazing by the owners. Current and future grazing operations will prevent the successful implementation of the HRRP at these locations.

Because the subject sites were historically used for sheep and cattle grazing, the subject sites provided little habitat value. Therefore, no additional impacts to biological resources are anticipated with the revision of the HRRP as proposed.

Sincerely,

John Boccio

CPUC Environmental Project Manager

cc: V. Strong, Aspen