## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



August 19, 2014

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 - Variance Request #74

Dear Ms. Nelson,

On July 29, 2014, Southern Californian Edison (SCE) submitted a variance request to exclude several restoration sites from success criteria detailed in the Habitat Restoration and Revegetation Plan, along with the performance standards from the Habitat Restoration Monitoring Plan, due to damage by recreational off-highway vehicle activity, pedestrian traffic, non-Project utility maintenance crews, livestock grazing/trampling, and dominance of nonnative species within adjacent habitat on Segment 1, Sections 1 and 3 of the Antelope-Pardee/Tehachapi Renewable Transmission Project (TRTP), in Los Angeles County. This Variance Request is approved by CPUC for the proposed activities based on the following factors:

SCE submitted the following information:

SCE submitted a request for a Variance to exclude several Segment 1 restoration sites from the success criteria detailed in the Habitat Restoration and Revegetation Plan (HRRP; LSA 2008), along with performance standards from the Habitat Restoration Monitoring Plan (HRMP; ECORP 2010). Site conditions that influenced the decision to request that these sites should be excluded include those such as damages due to recreational off-highway vehicle (OHV) activity, pedestrian traffic, non-Project utility maintenance crews, livestock grazing/trampling, as well as, high cover and dominance of nonnative species within adjacent habitat. Factors supporting this request include site visits, site evaluations based on the tier system developed for the Adaptive Management Plan (ECORP 2013), and SCE interface with other utilities.

Sites Outside Boundaries of Angeles National Forest

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Site Category	Site	Rationale	
		SECTION 1	
Wire Stringing Site	WSS-4A	Tire tracks from unauthorized vehicles and worn human foot paths indicate WSS-4A is affected by non-project impacts resulting in compaction and little to no vegetative growth.	
Wreck-Out	W/O 27-5	SCE confirmed that AT&T is using area for maintenance of cell equipment.	
Guard Pole	GP-21	Located at the junction of several roads and it is constantly being impacted by hikers and the occasional off-road vehicle.	
		SECTION 3	
Tower	101A	Within Foothill Ranch Property and sites are subjected to continuous grazing and trampling by cattle.	
Tower	101B	Within Foothill Ranch Property and sites are subjected to continuous grazing and trampling by cattle.	
Tower	102	Within Cochems Ranch, an agricultural area that is routinely disturbed by farming activities.	

Site Category	Site	Rationale
Tower	103	Non-native plant cover dominates adjacent habitat and area has been historically grazed.
Tower	104	Non-native plant cover dominates adjacent habitat and area has been historically grazed.
Tower	105	Non-native plant cover dominates adjacent habitat and area has been historically grazed.
Tower	106	Non-native plant cover dominates adjacent habitat and area has been historically grazed.
Tower	112A	Non-native plant cover dominates adjacent habitat and area has been historically grazed.
Tower	113	Non-native plant cover dominates adjacent habitat and area has been historically grazed.
Tower	113A	Non-native plant cover dominates adjacent habitat and area has been historically grazed.

Biologists Scott White and Carla Wakeman of Aspen Environmental Group (Aspen) conducted a site visit to Segment 1, Sections 1 and 3 on January 16, 2014 to evaluate sites that had been identified by SCE as having non-project impacts. The site visit included WSS-4A, W/O 27-5, GP-21, and Towers 103, 104, 105, 106, 112A, and 113, as well as observations of the adjacent areas. Based on the site visit, Aspen is able to confirm on-site and adjacent conditions as presented in the variance. No additional impacts to biological resources are anticipated with the implementation of this Variance.

Sincerely,

John Boccio

CPUC Environmental Project Manager

cc: V. Strong, Aspen