

PUBLIC UTILITIES COMMISSION505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

September 16, 2008

Donald Johnson
Project Manager
Southern California Edison
2131 Walnut Grove Ave.
Rosemead, C 911770

RE: SCE Antelope-Pardee 500 kV Transmission Project, Segment 1 – Variance Request #11

Dear Mr. Johnson,

On September 12, Southern Californian Edison (SCE) submitted Variance Request #11 requesting a new temporary road between Wreck Out Structure 22-3 and Tower Construct 97 on the Peterson property located north of Elizabeth Lake Road in Segment 1, Section 3. **This Variance Request is approved by CPUC for the proposed activities based on the following factors:**

- SCE's subcontractor has stated that the modification from overland travel to new temporary road construction is needed between Wreck Out Structure 22-3 and Tower Construct 97 in order to safely mobilize equipment onsite for construction. The new temporary access road will be approximately 300 feet in length and 15 feet in width (18 feet with side-cast), and will impact about 12.3 acres of non-native grassland/scrub vegetation.
- A focused biological field survey was conducted along the proposed new temporary road alignment on August 25, 2008 by a Burns & McDonnell biologist. In addition, this area was included in the initial biological surveys conducted by LSA biologists. These surveys focused on biological issues as described in the mitigation measures of the Final EIR/EIS. No target special interest wildlife species were observed during the focused biological field survey. No active bird nests were present in the area.

According to the Burns & McDonnell biological report dated September 11, the area surrounding the proposed new temporary access road supports non-native grassland vegetation that appears to be routinely grazed by cattle, and buckwheat scrub vegetation. Vegetation along the new temporary road alignment is dominated by, in order of relative abundance, grasses including bulbous bluegrass (*Poa bulbosa*), rat-tail fescue (*Vulpia myuros*), and brome grasses (*Bromus* spp.), as well as California buckwheat (*Eriogonum fasciculatum*), buckwheat (*Eriogonum nudum*), devil's lettuce (*Amsinckia tessellate*), Peirson's morning glory (*Calystegia peirsonii*), Juncus (*Juncus* sp.), California juniper (*Juniperus californica*), and short-pod mustard (*Hirschfeldia incana*). Peirson's morning glory, included on California Native Plant Society List 4 (plants of limited distribution, a watch list) is present along the alignment, and is common throughout this area. No significant impacts to biological resources are anticipated with the implementation of the measures noted below.

- In an email dated September 5, 2008, Adam Siro, SCE Archaeologist, stated that "Based on the ECORP report (Ahmet & Mason 2006) and the adjacent Jones & Stokes report (Wilson 2007) results, a new temporary road located at Construction 97 will not have an effect on known cultural resources". No impacts to cultural resources are anticipated.

The conditions noted below shall be met by SCE and its contractors:

- All project mitigation measures, compliance plans, and permit conditions shall be implemented during construction activities. Some measures are on-going/time-sensitive requirements and shall be implemented prior to and during construction where applicable.
- Copies of all relevant permits, compliance plans, and this Variance shall be available on site for the duration of construction activities.
- SCE has assigned Biological Monitors to the Project. They are responsible for ensuring that impacts to special-status species, native vegetation, wildlife habitat, or unique resources are minimized to the fullest extent possible. The Biological Monitor shall be on-site to monitor all work and shall conduct sweeps of the approved areas which will be impacted. If breeding birds with active nests are found, a biological monitor shall establish a 300-foot buffer around the nest and no activities will be allowed within the buffer until the young have fledged from the nest or the nest fails. The 300-foot buffer may be adjusted to reflect existing conditions including ambient noise and disturbance only with the approval of the CDFG and/or USFWS (Please note that the CPUC must be notified prior to the onset of construction). The biological monitor shall conduct regular monitoring of the nest to determine success/failure and to ensure that project activities are not conducted within the buffer until the nesting cycle is complete or the nest fails. If nesting birds move into the work area SCE will monitor the nest to ensure that their activities do not result in the loss or failure of the nest. A preliminary 300-foot buffer area around the nest will be established and SCE shall coordinate with the CPUC, CDFG and/or USFWS.
- Prior to roadway preparation, SCE shall consult with CDFG regarding the treatment of Peirson's morning glory present with the proposed roadway alignment.
- Construction activities shall avoid disturbing California junipers as much as feasible.
- After use, all areas proposed under this Variance shall be completely restored to preexisting conditions following the construction activities.
- Prior to the commencement of construction activities, all crew personnel including crane, haul truck and concrete truck drivers shall be appropriately WEAP trained on environmental issues including protocols for air quality, hazardous materials, biological resources, known and unanticipated cultural materials, as well as SWPPP BMPs. A log shall be maintained on-site with the names of all crew personnel trained.
- All work boundaries shall be flagged prior to construction. No movement or staging of construction vehicles or equipment shall be allowed outside of the approved areas.

Sincerely,

John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen