STATE OF CALIFORNIA ARNOLD SCHWARZENEGGER, Governor
PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

March 26, 2009

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

RE: SCE Antelope Transmission Project, Segment 2 – Variance Request #35

Dear Mr. Johnson,

On March 20, 2009, Southern Californian Edison (SCE) submitted a variance requesting to modify the road alignment for Access Road 62 to Construct 83 on Segment 2 of the Antelope Transmission Project in unincorporated Los Angeles County, California. **This Variance Request is approved by CPUC for the proposed activities based on the following factors:**

- SCE submitted the following information:

  Access Road (AR) 62 would provide permanent access to Construct 83. The new road alignment is necessary to avoid impacting a cultural site and existing underground gas lines that the approved alignment traversed. The cultural site was discovered after the Segment 2 Access and Spur Roads plan had been submitted and approved by the California Public Utilities Commission (CPUC). The revision to AR 62 will deviate from the alignment in the approved Segment 2 Access and Spur Road Plan; however, will end within the approved disturbance area for the tower site.

  The re-alignment of AR 62 also parallels an existing access road immediately to the west. This existing road traverses the SoCal Gas line corridor and it was requested that SCE restrict use to light vehicles only, therefore an additional parallel access road to CT 83 was needed. SoCal Gas has also requested wood mat covers over existing roads that intersect the existing gas line to avoid their high-pressure gas line in the vicinity of Construct 83. These wood mat covers will be located in existing roadways and within existing disturbance areas and are not part of this variance request.

  The new road alignment will not be visible from any of the Key Observation Points (KOP) noted in the Final EIR (Aspen 2006).

- **Biological Resources**: On February 26, 2009 a biological survey was conducted by BioResources for the proposed alternate route (to avoid impacting the cultural site that the original proposed new road traversed) at Consruct 83. The road was surveyed for 15 feet on either side of the center line for Juniper (*Juniperus californica*) and Joshua trees (*Yucca brevifolia*), and 50 feet to either side for other biological resources. On March 12, 2009 a biological survey was conducted again by BioResources for the proposed alternate route that was re-designed to avoid Southern California Gas Company gas pipelines (SoCal Gas) beneath the existing road between Construct 83 and Const 84. The road was surveyed for 50 feet on either side of the center line for biological resources. As a result of these surveys, one non-sensitive cactus (*Opuntia sp.*) and one location of Peirson's morning glory (*Calystegia peirsonii*) with approximately 45 individuals was observed. In addition, the initial 500 kV ROW survey conducted on February 18th, 2009, identified two patches of Peirson's morning glory

approximately 450 feet southeast of Construct 83. No significant impacts to biological resources are anticipated with the implementation of the conditions noted below.

- **Cultural & Paleontological Resources**: A search for archeological and historic records for Segment 2 of the Tehachapi Renewable Transmission Project was conducted by ECORP Consulting, Inc. (Ahmet et al. 2006). ECORP consulted the South Central Coastal Information Center, the Angeles National Forest Heritage Resources Section, the National Register of Historic Places, the California Inventory of Historic Resources, California Points of Historical Interest, and the California Historical Landmarks. The proposed project area falls within the one-mile search radius and no cultural resources are known. The Paleontological Resources Management Plan Segments 2 and 3 of the Tehachapi Renewable Transmission Project was prepared by Cogstone Resource Management Inc. (Gust and Scott 2008). No paleontological localities are known and the rock unit, Pelona schist, has no sensitivity for paleontological resources (Figure 6c in Gust and Scott 2008).

  Cogstone Resource Management conducted a survey of the proposed project area on March 12, 2009. The survey consisted of a two person crew walking the project area while closely inspecting the ground surface. Transects were walked at 10 meter intervals. The survey area is approximately 1,600 linear feet long and consists of the entire access road. There was no indication of prehistoric or historic archaeological resources or paleontological resources in the disturbance area of the proposed project. No significant impacts to cultural or paleontological resources are anticipated with the implementation of the conditions noted below.

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

- Biological survey sweeps shall be conducted and results submitted to the CPUC for review and approval prior to equipment and vehicles mobilizing into an area. After complete surveys have been submitted and approved by the CPUC, site occupation can occur; however, if occupation does not occur within seven calendar days of survey submittals, biological clearance sweeps shall be re-conducted prior to site occupation, including nesting bird surveys during the breeding season.

- As proposed, *Calystegia peirsonii* will be flagged for avoidance where feasible. In addition, a biological monitor will be present during the activity covered under this variance request to help minimize impacts to biological resources.

- As proposed, due to proximity of a known archaeological site the Environmentally Sensitive Area will be flagged and all work in the vicinity will be monitored to ensure recovery of any significant cultural materials.

- If unanticipated cultural discoveries occur, work must halt in the immediate vicinity until the find can be evaluated by a qualified archaeologist to determine if it meets significance criteria under CEQA.

- 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.

- Prior to the commencement of construction activities, all crew personnel including 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 occupation. In addition, all approved access roads, spur roads and overland travel routes to be used shall be flagged prior to construction.

- If construction debris or spills enter into environmentally sensitive areas, the jurisdictional agencies and CPUC EM shall be notified immediately.

- Copies of all relevant permits, compliance plans, and this Variance shall be available on site for the duration of construction activities where applicable.

Sincerely,

John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen