

**PUBLIC UTILITIES COMMISSION**505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298

May 4, 2009

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

RE: SCE Antelope Transmission Project, Segment 2 – Variance Request #41

Dear Mr. Johnson,

On April 24, 2009, Southern Californian Edison (SCE) submitted a variance requesting three additional disturbance areas to conduct wire stringing work between Const 105 and 108 on Segment 2 of the Antelope Transmission Project in 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:

SCE requests a variance for three additional disturbance areas to conduct wire stringing work between Const 105 and 108 in Segment 2. Between these towers, the three additional disturbance areas are located adjacent to existing disturbance work areas. The following polygon areas are necessary to support wire stringing activities: 0.60 acres between Const 105 and 106; 0.63 acres between Const 106 and 107; and 0.52 acres between Const 107 and 108. As such, SCE requests authorization for disturbance of approximately 1.75 additional acres of land.

In addition, SCE is requesting a variance for extended work hours at the crossing, between Const 106 and 107. Due to the uncertainty of outage timeframes, SCE is requesting that construction work be extended to a 24 hour, seven day a week time frame. This is necessary because the outage may only be available during night and/or on a Sunday.

The Segment 2, 500-kV Line crosses two Los Angeles Department of Water and Power (LADWP) 500 kV transmission lines between Const 106 and 107. Initially, wire pulling was planned to occur between Const 105 and Cont 110 span. The existing disturbance areas would accommodate this wire pull. However, due to outage restrictions during wire pulling operations on the Segment 2 500 kV transmission line, it may be required that the available outage time will only permit a wire pull between Const 106 and 107. As a result, this stand-alone pull section requires these three additional disturbance areas to safely and efficiently conduct wire stringing operations.

It is uncertain at this time when the outage will be granted by LADWP. However, it is anticipated that the outage will take place sometime in May. The specific time and day of the week when this outage is granted, and most importantly the outage schedule, may require night and Sunday work (in addition to the permitted construction hours) to safely and efficiently complete these operations and return power back to the grid. Working continuously is imperative not only due to outage restrictions, but also due to the nature of the wire stringing work. There are some stages of wire stringing activity which cannot come to a complete stop without posing either a safety hazard, a failure to meet specifications, or the possibility of conductor damage. Although the stages (including flying sockline, haulbacks, pulling conductor, sagging) can be stopped in emergency situations, these activities are not generally stopped until the operation is complete. Therefore, it is for these reasons, SCE is requesting a variance from the County noise ordinance regarding construction activities.



**Biological Resources:** On April 14, 2009, a biological resource survey was performed for the subject wire stringing areas on Segment 2 near Const 105, 106, and 107. Three separate polygons were surveyed for biological resources, including a 500 foot buffer for each polygon. In addition, all juniper trees (*Juniperus californica*) within each polygon and a 15 foot buffer were counted for later mitigation as required by the EIR. Weather conditions at the survey site were partly cloudy, with temperatures between 62 and 65 degrees Fahrenheit. The survey identified 46 junipers within the three proposed disturbance areas, as well as an additional 48 junipers within a 15-foot buffer around each of the three polygons. No sensitive plant species were observed. Within the disturbance area, one woodrat midden, which could be either that of the San Diego desert woodrat (*Neotoma lepida intermedia*), a California Species of Special Concern (CSC), or big-eared woodrat (*Neotoma macrotis*), was found. Other middens have been previously mapped nearby, but are outside of the proposed disturbance area. No active bird nests were found within any of the disturbance areas. Within the 500-foot radius buffer area around the disturbance areas, five active bird nests were found in addition to others that were previously identified. No concentrations of rodent burrows or larger burrows (mid- or large size mammal or burrowing owl) were observed. No additional sensitive resources were found.

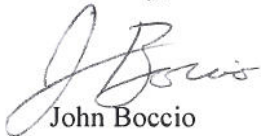
- **Cultural & Paleontological Resources:** The three disturbance areas (stringing sites) are within the survey corridor investigated by Ahmet and Mason in 2005 during the initial TRTP cultural resources survey. One cultural resource is recorded within 200 feet of the southernmost pulling site. This resource is outside of the proposed disturbance area and was found not eligible for CRHR listing. The cultural resource is flagged and should be avoided during wire pulling activities. In addition, the area between towers 105 and 108 is known to contain sediments sensitive for paleontological resources. As a result of the cultural resource and paleontologically sensitive sediments, a cultural resources/paleontological monitor must be present during initial setup activities at all three pulling locations.

**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.
- 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.

- If avoidance of the woodrat midden is not feasible, it can be raked out by the monitoring biologist to minimize impacts to woodrats, following consultation with California Department of Fish and Game (CDFG).
- Per Mitigation Measures B-4b and B-13d, CDFG and CPUC shall field verify temporary and permanent impacts to Juniper woodland habitat. SCE shall coordinate with CDFG and CPUC to acquire and ensure permanent protection of mitigation lands.
- If special-status plant or animal species are observed within the project area, the CPUC EM and CDFG shall be notified immediately.
- One cultural resource is recorded within 200 feet of the southernmost pulling site. Also, the area between towers 105 and 108 is known to contain sediments sensitive for paleontological resources. As a result of the cultural resource and paleontologically sensitive sediments, a cultural resources/paleontological monitor shall be present during initial setup activities at all three pulling locations.
- 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.
- In accordance with approved project revegetation plans, all disturbed areas shall be restored.
- Copies of all relevant permits, compliance plans, and this Variance shall be available on site for the duration of construction activities where applicable, *including the variance request and maps.*

Sincerely,



John Boccio  
CPUC Environmental Project Manager

cc: V. Strong, Aspen