

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

August 25, 2009

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

RE: SCE Antelope Transmission Project, Segment 2 – Variance Request #54

Dear Mr. Johnson,

On August 13, 2009, Southern Californian Edison (SCE) submitted a variance to modify the areas of wire setup sites (WSS) and to add guard setup sites (GUARD), identified as WSS 106A, WSS 107 (A and B), GUARD 108, WSS 111 (A and B), GUARD 112, and WSS/GUARD 114, and to extend work hours along the 500-kV transmission line and highway crossing locations in 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:

Southern California Edison (SCE) is requesting a variance to modify the areas of wire setup sites (WSS) and to add guard setup sites (GUARD) in Segment 2. The sites are identified as WSS 106A, WSS 107 (A and B), GUARD 108, WSS 111 (A and B), GUARD 112, and WSS/GUARD 114. In addition, two previously approved disturbance areas will no longer be needed near Const 110 and 111. Overall, 8.65 acres of new disturbance areas are being proposed and 0.85 acres of approved disturbance areas will no longer be necessary for construction activity. As a result, this variance request seeks authorization for disturbance to approximately 7.8 additional acres of land. Some of the proposed disturbance areas overlap approved disturbance areas. Therefore, the actual area of disturbance would be less than 7.8 acres. SCE is also requesting a variance for extended work hours along the 500-kV transmission line and highway crossing locations. 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 to accommodate the traffic on highway 14 during the work day and the outage that may only be available at night and/or on a Sunday. The Segment 2 right-of-way (ROW) crosses two SCE 220-kV transmission lines between structures 110 and 111, and it crosses two SCE 220-kV transmission lines and also the Florida Power and Light (FPL) Sagebrush transmission line between structures 113 and 114. Caltrans, the permit administrator for the highway crossing at State Route 14 (SR-14) between structures 111 and 112 has required that the SR-14 crossing only occur during the day on weekends, and may also require certain work activities to be performed during the nighttime hours. It is for these reasons that SCE is requesting a variance from the County noise ordinance regarding construction activities. Preparatory work is schedule mid-August and the SR-14 crossing is planned on Saturday, August 29th and Sunday, August 30th. An exemption from the County's noise ordinance will be obtained prior to work performed outside of daytime, weekday hours.

WSS 106A

The Project right-of-way (ROW) from structures 105 to 107 spans three high-voltage transmission lines: the Antelope-Vincent 220-kV line, Antelope-Mesa 220-kV line, and the Florida Power and light (FPL) Sagebrush line. The original wire stringing plan for this area was calculated to pull from towers 98 to 110, utilizing the existing wire setup sites between towers 98 and 99 and between towers 110 and 111. Due to safety and outage

concerns, the span from 105 to 107 was conducted as a stand-alone pull (Variance #41). In order to complete the wire stringing from tower 105 back-on-line, a wire setup site is needed between towers 105 and 106. However, the presence of the Sagebrush line between that span eliminates the possibility of using the existing disturbance areas at tower 106 because the wire setup cannot be underneath or behind the Sagebrush corridor. Therefore, SCE is proposing WSS 106A. SCE will utilize the approved disturbance area for Sagebrush tower 250 to the maximum extent possible; however, additional area between that site and tower 105 is needed in order to provide access for the equipment to sag the wire. The proposed disturbance area is approximately 85,172 square feet (1.96 acres). Some areas of this new disturbance area overlap with previously approved disturbance areas between Const 105 and 106. Grading is not anticipated at WSS 106A. Minor brush clearing may be needed and tracked equipment will be used to perform the sag work.

WSS 107A & 107B

The aforementioned stand-alone pull between 105 to 107 also necessitates a wire site between towers 106 and 107 in order to complete the wire stringing from 107 ahead-on-line. The presence of the FPL Sagebrush line eliminates the possibility of using existing disturbance areas at tower 106. In order to maximize the use of existing pre-disturbed areas and minimize disturbance to an environmentally sensitive area near tower 107, SCE has developed two very specific areas for the wire setup site at tower 107. SCE will utilize the existing area (currently approved as a guard site for the Sagebrush line crossing), but two additional areas to the north and south of that guard site will also be needed. These two areas are referred to as WSS 107A and WSS 107B. Both of these proposed areas overlap approved disturbance areas. WSS 107A is approximately 25,965 square feet (0.60 acres) and is an existing predisturbed area that was previously approved as a Temporary Extra Workspace to complete the Sagebrush crossing. WSS 107A is not within an environmentally sensitive area (ESA), so the use of this area as a wire setup site is requested to help minimize the impact to both areas of native vegetation and sensitive resources. As a large portion of this site falls underneath the Sagebrush transmission line, it will be used primarily for support vehicles and equipment. Some minor grading of the site within the right-of-way corridor may be needed. A small additional area, WSS 107B, will be needed to properly "hold" the wire when stringing. WSS 107B is approximately 9,576 square feet (0.22 acres). CAT dozers will need to travel down the ROW towards tower 107 as they hold back the wire during pulling, until it can be safely "caught" into the tower. The guard site area has been expanded 50 feet ahead-on-line to accommodate the wire equipment, and a small area of 20 feet by 100 feet has been designated for the tracked equipment to perform the "hold back." Vegetation removal or ground disturbance (other than tracked equipment treads) will not occur within the boundaries of the environmentally sensitive area, although some minor grading will be needed for the portion of the site outside of the ESA area.

Guard Site 108

An additional guard pole site is requested to safely guard a distribution line between towers 107 and 108. This new disturbance area is proposed to measure approximately 15,684 square feet (0.36 acres). An existing dirt road will be used to access the guard site from the approved Project roads.

WSS 111A & 111B

In order to complete the wire pulls from 110 to 111, SCE is requesting to change the location of two disturbance areas. Two approved disturbance areas will not be used and instead, two new smaller areas are proposed. The total amount of disturbance for the site will be reduced by 5,000 square feet (0.11 acres). These sites have been labeled WSS 111A and WSS 111B. WSS 111A is proposed at approximately 20,428 square feet (0.47 acres) and WSS 111B is proposed at 11,460 square feet (0.26 acres). A portion of WSS 111B overlaps a previously approved disturbance area, so the area proposed is actually less. An existing dirt road will be used to access WSS 111A and, to the maximum extent practicable, this existing road will be utilized for the wire site setup. Disturbance area 111A is being requested in order to obtain the proper 3:1 ratio (relation between the setback of the wire setup site to the height of the tower) for safe pulling operations. A previously identified disturbance area measuring 16,229 square feet (0.37 acres), located to the northwest of tower 110 is being deleted and will not be used. WSS 111B is requested in order to obtain the proper angle for wire pulling. As a result, a previously

identified area measuring 20,766 square feet (0.48 acres) located to the west of tower 111 will no longer be necessary.

Guard Site 112

Additional guard sites are requested to safely guard a distribution line between towers 111 and 112, and to meet guard requirements for crossing State Route 14 (SR14) and Sierra Highway. Existing dirt or paved roads will be used to access the sites from Project roads, as well as the use of an existing dirt road to provide access to the northern side of the Metrolink crossing guard setup. A guard area of approximately 6,381 square feet (0.15 acres) has been delineated between the paved Forest View Road and SR14. This site has been identified based on the safety requirements of the contractor and in conjunction with Caltrans requirements for state highway crossings. A larger guard area measuring approximately 47,189 square feet (1.08 acres) has also been identified to guard a distribution line between SR14 and Sierra Highway. Some of this larger area overlaps previously approved disturbance areas, so the area of land proposed to be impacted will actually be less. Access to this guard site will utilize an existing dirt road. California juniper trees (*Juniperus californica*) in the drive-and-crush area will be avoided to the maximum extent practicable; it is not anticipated that any California junipers in the area will need to be removed. The drive and crush area will provide a support area for both the SR14 and Sierra Highway crossings that allows crews to be a safe distance from SR14 and Sierra Highway. This area will also provide a safe access route between guard sites that will help to avoid multiple ingress and egress, and minimize traffic disruptions to Sierra Highway.

WSS/Guard Site 114

An additional disturbance area is requested between structures 113 and 114 for wire pulling and to accommodate crossing the East Wind Vincent-West Wind Wilderness 220-kV transmission line and the two SCE 220-kV transmission lines, the Antelope-Vincent and Antelope-Mesa lines. WSS/Guard Site 114 is proposed to measure 154,930 square feet (3.56 acres) and overlaps previously approved disturbance areas located to the north and south of Harbea-Carson Mesa Road. This guard pole area is necessary to support wire stringing operations by allowing the aforementioned lines to be safely guarded while the wire is pulled over their corridor. This disturbance area will also support the installation of conductors over Highway 14. Due to the very limited days of the week and time of day that this work can be performed, and the need to ensure public safety, the wire stringing crew needs the ability to move throughout this area during the pulling operation and to secure the conductor.

- **Biological Resources:** LSA conducted preconstruction surveys of the right-of-way corridor in 2007 and 2008 (LSA 2007a-k, 2008a-e). Burns & McDonnell conducted a preconstruction burrowing owl survey in 2009 and found potential habitat between Const 108 and 112 (Burns & McDonnell 2009). On July 20, 21, and 24, 2009, biological surveys were performed for the Disturbance Areas for Wire Stringing and Guard Pole Sites between Const 105 and 114. The mapped disturbance area for the Wire Stringing and Guard Pole Sites with a 500-foot buffer was surveyed for biological resources. In addition, all juniper and Joshua trees within the Wire Stringing and Guard Pole Sites and a surrounding 15-foot buffer were counted for mitigation as required by the EIR (Mitigation Measure B-4).

Proposed WSS 106A

The survey resulted in 107 California junipers and three woodrat middens (San Diego desert woodrat (*Neotoma lepida intermedia*), a California Species of Special Concern (CSC) or bigeared woodrat (*N. macrotis*)) within the disturbance area. Within the 500-foot buffer survey area 32 woodrat middens and seven old and abandoned nests were found. The bird nests were inactive (no eggs or chicks) and removed. Three potential burrowing owl burrows (*Athene cunicularia*) were found, but none had any sign of habitation (feathers, pellets, white wash, etc.). One active house finch (*Carpodacus mexicanus*) nest was found within the 500 foot disturbance area and north of Const 105. This nest will

fledge (estimated fledging date July 31, 2009) prior to scheduled work at this site. No other sensitive resources were found.

Proposed WSS 107A and WSS107B

The survey of WSS 107A resulted in two California junipers within the disturbance area. Within the 500-foot buffer survey area, eight woodrat middens were found. The survey of WSS 107B resulted in eight California junipers and one woodrat midden within the disturbance area. Within the 500-foot buffer area, one woodrat midden was found. No other sensitive resources were found.

Proposed Guard Pole Const 108

The survey resulted in six California junipers within the disturbance area. Within the 500-foot buffer survey area 13 woodrat middens and two nests were found. On July 29, 2009, Burns & McDonnell checked the status of these nests using an extended mirror pole and found the nests to be inactive. These nests were left intact. One potential burrowing owl burrow was found, but it had no sign of burrowing owl habitation. No other sensitive resources were found.

Proposed WSS 111A

The survey resulted in nine California junipers and one woodrat midden within the disturbance area. No other sensitive resources were found.

Proposed WSS 111B

The survey resulted in 20 California junipers within the disturbance area. Within the 500-foot buffer survey area eight woodrat middens and five inactive bird nests were found. The bird nests were not removed. Two were Cactus Wren (*Campylorhynchus brunneicapillus*) but it is unknown if they were active or not. On July 29, 2009, Burns & McDonnell checked the status of these nests and found them to be inactive. The cactus wren nests were not removed. Two were not identified by species and looked old and abandoned. One was an unoccupied common raven (*Corvus corax*) nest in a billboard. This nest was previously identified in past surveys of the area. No other sensitive resources were found.

Proposed Guard Pole Const 112

The survey resulted in no sensitive resources within the disturbance area, which is mostly paved roadway. Within the 500-foot buffer survey area, 13 woodrat middens and six inactive bird nests were found. These bird nests were not removed. Three of these nests are the unidentified nests found in the WSS 111B survey area and the raven nest in the billboard. The other three nests are old, empty and abandoned nests. No other sensitive resources were found.

Proposed Guard Pole Const 112

The survey resulted in 26 California junipers and 19 woodrat middens within the disturbance area. Within the 500-foot buffer survey area, 31 woodrat middens and two empty, inactive nests were found. The inactive nest in the cholla was not removed since it may be a cactus wren nest. No other sensitive resources were found.

Proposed WSS/Guard Pole 114

The survey resulted in 45 California junipers and one woodrat midden found within the disturbance area. Within the 500-foot buffer survey area, eight additional woodrat middens were found as well as an active mourning dove (*Zenaida macroura*) nest with two eggs. This nest is over 300 feet from the closest edge of the disturbance area. No other sensitive resources were found.

- **Cultural & Paleontological Resources:** Cogstone Resource Management prepared a report titled *Supplemental Cultural and Paleontological Resources Assessment, Segment 2 Section 4 of the TRTP, Variance for Modifying Available Work Space at Wire and Guard Pole Sites 105-117, Los Angeles County, California* dated July 2009. The Paleontological Resources Management Plan Segments 2 and 3 of the TRTP was prepared by Cogstone Resource Management Inc. (Gust and Scott 2008). A search for paleontological records was completed at the Natural History Museum of Los Angeles County (Gust and Scott 2008). The record search included the SCE right-of-way and a one mile perimeter. No paleontological localities are known, although geologic formations within the subject area are known to contain sensitive paleontological sediments.. A search for archeological and historic records for Segment 2 of the TRTP 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 areas fall within the one-mile search radius of the ECORP study.

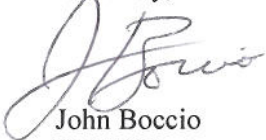
Three resources have previously been identified adjacent to some of the project areas. Cogstone Resource Management conducted the survey of the proposed project area on July 14, 16, and 21, 2009. The cultural resources survey identified one isolated artifact at GUARD 108 and identified a locus of cultural resource P-19-003729 at WSS/GUARD 114. Cultural resources P-19-003729 has been formally evaluated and does not meet criteria as a historical resource under CEQA (Auck and Tinsley 2008). WSS 106A, WSS 107A, WSS 107B, and GUARD 108 are located within geologic formations known to contain sensitive paleontological sediments.

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.
- The woodrat midden(s) will be flagged for avoidance, if feasible. 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.
- The Cogstone study found that the area contains Quaternary Older Alluvium (Qoa), a geologic formation known to produce significant vertebrate and invertebrate fossil resources. As a result of paleontological sensitivity, a paleontological monitor shall be present during all ground disturbing activities at WSS 106A, WSS 107A, WSS 107B, and GUARD 108.
- The Cogstone study found several cultural resources in the area. As a result of the cultural sensitivity, archaeological monitoring shall be conducted during all construction activities at WSS 107B and GUARD 108. Also, the historic scatter at GUARD 114 shall be avoided.
- 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. In addition, all disturbed areas shall be restored in accordance with approved restoration plans and permit conditions.
- 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.
- SCE shall submit to the CPUC their Caltrans permit and the variance to the noise ordinance from Los Angeles County prior to the start of construction outside of previously approved work hours.
- 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