

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

November 9, 2009

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

RE: SCE Antelope Transmission Project, Segment 2 – Modification to Variance Request #55

Dear Mr. Johnson,

On November 6, 2009, Southern Californian Edison (SCE) submitted a request to modify Variance #55 to shift the previously approved wire stringing site between Constructs 86 and 88, along the right-of-way closer to Construct 88 in Segment 2 of the Antelope Transmission Project in Los Angeles County, California. **This Modification to Variance #55 is approved by CPUC for the proposed activities based on the following factors:**

The modification activities have already been completed. The request by SCE to modify Variance #55 is after the fact; however, the CPUC Environmental Monitor approved the modification activities in the field.

- SCE submitted the following information:

Southern California Edison (SCE) is requesting a modification to Variance #55 to shift the previously approved wire stringing site, between Constructs 86 and 88 along the right-of-way closer to Construct 88. Variance Request #55 was approved by the CPUC on September 9, 2009 granting permission to SCE for additional wire splice sites on Segment 2. The approved disturbance areas included a new wire splice site located between Constructs 86 and 88. This approved splice site is a 120 foot by 180 foot area, accessible by overland travel. An existing utility road was also used for a portion of the access. Minor grading was needed where the overland travel route joins existing roads to level out the road berm and allow vehicles to pass.

During wire pulling activities, it was determined that the wire splicing site did not fall within the area approved by Variance Request #55. To accomplish sleeving of the conductor at the new location, the disturbance area was shifted within the right-of-way towards Construct 88 with a field approval from the CPUC EM on October 9, 2009. Construction equipment utilized the existing overland travel route to access the variance-approved disturbance area and positioned the equipment within the shifted new disturbance area. The conductor was subsequently caught at the new location, and the equipment then moved into position for splicing, creating a single track underneath the wire phase for approximately 150 feet. The conductor was sleeved and the equipment left the area using the same track that they had used for ingress. This procedure was repeated for the remaining two phases.

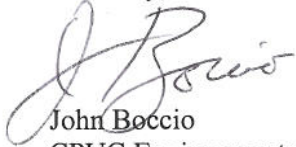
Once conductor sleeving was complete for all three phases, crews were able to exit the disturbance area along the same overland travel route that they initially used to access the shifted disturbance site. This method of exiting the site was accomplished without excessive ground disturbance, and eliminated the need for an overland travel through-route.

Biological Resources: SCE submitted a report from Burns & McDonnell dated October 21, 2009 titled *Biological Clearance Survey of Modified Disturbance Areas for a Splice Site near Construct 86 with Drive and Crush Routes (Modification to Variance #55) for the Antelope Transmission Project, Segment 2 in Los Angeles County, California*. On October 10, 2009, biological surveys were performed by BioResource Consultants prior to work activities beginning on Splice Site 86A and drive and crush routes. Biological surveys were repeated on October 20, 2009 after work activities on Splice Site 86A and drive and crush were completed. The flagged disturbance areas for Splice Site 86A and drive and crush were surveyed for biological resources. In addition, all scrub oaks, juniper trees, and Joshua trees within the disturbance areas and a surrounding 15-foot buffer were counted for later mitigation as required by the EIR. The survey found one California juniper (*Juniperus californica*) and 67 scrub oaks within the disturbance area for Splice Site 86A and drive and crush routes. No other sensitive resources were found within the disturbance area. Within the 500-foot buffer area, the survey found several patches of Peirson's Morning Glory (*Calystegia peirsonii*), one woodrat midden (San Diego desert woodrat, *Neotoma lepida intermedia*, or big-eared woodrat, *N. macrotis*), and two inactive songbird nests. The inactive nests were left intact since they were outside of the disturbance areas. There were scattered rodent burrows, but no concentrations of burrows and no burrows that might have been used by burrowing owls or larger mammals. No other sensitive resources were found in the buffer area. The Peirson's Morning Glory, woodrat midden, and inactive bird nests were flagged for avoidance and were not impacted by work activities. No California junipers were damaged or removed. Seven scrub oaks were damaged by drive and crush activities. These scrub oaks will be added to the tally for the Project for mitigation purposes as required by the EIR.

- **Cultural & Paleontological Resources:**

The additional wire splicing disturbance area located between Constructs 86 and 88 was investigated for archaeological and paleontological resources by ECORP Consulting, Inc. (Ahmet, Mason, and Bholat 2006), Pacific Legacy Incorporated (O'Neil, et al 2008) and Cogstone Resources Management (Scott and Gust 2008). No cultural or paleontological resources were identified within or adjacent to the additional wire splicing area. After wire splicing activities were completed, cultural resource monitor David Morrill confirmed that no cultural or paleontological resources were impacted as a result of the additional wire splicing activities.

Sincerely,



John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen