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

September 9, 2009

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

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

Dear Mr. Johnson,

On August 31, 2009, Southern Californian Edison (SCE) submitted a variance requesting additional disturbance areas for a wire splice site between Construct 86 and 88, a new wire setup site (WSS) between Construct 95 and 96, and a new WSS adjacent to Construct 113 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 for an additional disturbance area for a wire splice site measuring 21,380 square feet (0.49 acres) between Construct 86 and 88, a new disturbance area for a wire setup site (WSS) measuring 11,501 square feet (0.26 acres) between Construct 95 and 96, and a new disturbance area for a wire setup site measuring 14,797 square feet (0.34 acres) adjacent to Construct 113 in Segment 2. In addition, an approved disturbance area measuring 72,540 square feet (1.67 acres) will not be necessary between Construct 98 and 99. The three new disturbance areas totaling 1.09 acres are needed to support wire stringing activities. This variance request will result in avoiding disturbance to approximately 0.58 acres of land.

  Evaluating the remainder of wire splice sites for Segment 2 was completed and it was determined that only one additional splice site and two additional wire setup sites would be needed. It was also determined that one of the existing WSS needed to be shifted to a new location. This new location between Construct 95 and 96 requires a much smaller working area and therefore reduces the disturbance needed for that wire pull.

  One additional wire site is located between structures 86 and 88. An overland travel route (approximately 852 feet long) is proposed between these two structures to access the new disturbance area. This is a temporary road requiring vegetation crushing to provide access. Vegetation will be crushed using tracked equipment or an equivalent method that will remove high vegetation, but leave root systems intact. An existing utility road would be used for a portion of the access, at which point the route would become an overland travel route. Minor blading may be required at the beginning and end of the overland travel route (where it joins existing roads) to smooth down the road berm and allow vehicles to pass safely from the existing road to the overland travel road. Small disturbance areas measuring between approximately 1,444 and 1,463 square feet represent these areas for the proposed berms. The overland travel route would be proposed with one-way traffic. Access would begin from the top of the hill at the terminus of the existing utility access road, and would travel downslope until the overland travel route reaches the existing road at the bottom of the hill. By creating a through-road, this will allow ingress and egress via downhill travel. Traveling downhill will prevent creating additional disturbance that would be caused if vehicles and equipment were required to turn around and travel uphill in sandy soils.

A new WSS location has been identified on the west side of the alignment, between structures 95 and 96. The WSS will utilize the existing tower site disturbance areas at structures 95 and 96, thus helping to reduce the amount of new disturbance needed. With the use of this new WSS, much of the existing wire setup site between structures 98 and 99 can be eliminated, further reducing the amount of disturbance area required. The new WSS is approximately 11,501 square (0.26 acres) and it will replace the area needed for the previously approved WSS between Constructs 98 and 99 (approximately 72,540 sf/1.67 acres), so that the total reduction in disturbance area for this WSS shift is 61,039 square feet or 1.40 acres. It should be noted that only the disturbance area between structures 98 and 99 is not necessary; however, the new road within this area will remain in the right-of-way as part of this Project.

An additional wire setup site near structure 113 is being requested. This additional area is approximately 14,797 square feet (0.34 acres) in size. The proposed wire pull from structure 111 to Vincent Substation crossed over three transmission lines between structures 113 and 114: the East Wind Vincent-West Wind Wilderness 220-kV, SCE's Antelope-Vincent 220-kV, and SCE's Antelope-Mesa 220-kV transmission lines. Due to the cancellation of the planned outages to the Antelope-Vincent and Antelope-Mesa 220-kV transmission lines on August 12, 2009, an additional wire setup site at structure 113 would be needed in order to avoid crossing these transmissions lines and still complete the scheduled pull across State Route-14 (SR-14). Use of this area will accessed by overland travel and grading will not be necessary. Access to this disturbance area will utilize an existing SCE access road, previously approved for use under a Temporary Extra Workspace. A short overland travel road, approximately 88 feet long, with a pullout area (2,097 square feet/0.05 acres) is requested to allow longer equipment to access the wire site from the existing SCE road.

- **Biological Resources:** LSA conducted preconstruction surveys of the right-of-way corridor in 2007 and 2008 (LSA 2007a-k, 2008a-e). Biological surveys were conducted on August 5, 2009, for the disturbance areas for the WSS between Construct 95 – 96 and splice site between Construct 86 and the proposed overland travel route. The mapped disturbance area for the WSS and splice site along with a 500-foot buffer that included the overland travel route and its 40 foot buffer survey area were surveyed for biological resources. In addition, all scrub oaks, juniper trees, and Joshua trees (*Yucca brevifolia*) within the disturbance areas and a surrounding 15-foot buffer were counted for later mitigation as required by the EIR. Biological surveys were also performed on August 21, 2009, of the disturbance areas for WSS near Construct 113 and the associated pull out area. The mapped disturbance area for the WSS along with a 500-foot buffer 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.

  <u>Proposed Splice Site between Construct 86 and Overland Travel Route</u>
  The survey area as well as the overland travel route consisted mainly of red brome, California buckwheat, California juniper, scrub oak (*Quercus berberidifolia*), devil's lettuce, dense eriastrum (*Eriastrum densifolium*), and chaparral yucca. The survey resulted in one scrub oak within the disturbance area. Approximately 100 individuals of Peirson's morning glory (*Calystegia peirsonii*) were found along the overland travel route that may be impacted by vehicle traffic. There were also four scrub oaks within 15 feet of the overland travel route. Several more patches of Peirson's morning glory, one woodrat midden, and two inactive nests were found within the 500-foot buffer survey area. The inactive nests were left intact since they were outside 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.

Proposed WSS between Construct 95-96

The survey area consisted mainly of California buckwheat (*Eriogonum fasciculatum*), California juniper (*Juniperus californica*), chaparral yucca (*Hesperoyucca whipplei*), red brome (*Bromus madritensis*), and devil's lettuce (*Amsinckia tessellate*). The survey resulted in 15 California junipers and one woodrat midden (San Diego desert woodrat (*Neotoma lepida intermedia*), a California Species of Special Concern (CSC) or big-eared woodrat (*N. macrotis*)) within the disturbance area. Within the 500-foot buffer survey area one woodrat midden was found, in addition to four middens that had been previously flagged and recorded during surveys for the disturbance and buffer areas for Construct 95 and 96. No bird nests were found. 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.

Proposed WSS between Construct 113 and Pull Out Area

The survey area consisted mainly of California buckwheat, California juniper, cheat grass (*Bromus tectorum*), Cooper's goldenbush (*Ericameria cooperi*), four-wing saltbush (*Atriplex canescens*), Nevada joint-fir (*Ephedra nevadensis*), peach thorn (*Lycium cooperi*), common beavertail cactus (*Opuntia basilaris* var. *basilaris*), and Russian thistle (*Salsola tragus*). The survey resulted in 17 California juniper trees within the disturbance area. Within the 500-foot buffer, eight woodrat middens were identified and flagged, in addition to the 21 woodrat middens that had been previously recorded and mapped. No woodrat middens were found with in the disturbance area. One inactive cactus wren nest was observed in a cholla cactus (*Cylindropuntia echinocarpa*) in the buffer area. The nest was left intact. Four previously mapped bird nests are within the buffer area. All four nests have been tracked through the nesting season and are currently inactive. No nests were observed within the disturbance area. A small drainage was found at the edge of the 500 foot buffer. This drainage will not be impacted by construction activities. 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.

No significant impacts to biological resources are anticipated with the implementation of the mitigation measures noted below.

- **Cultural & Paleontological Resources**:

Proposed Splice Site between Construct 86 and Construct 88

The proposed wire splicing disturbance area and associated overland travel route between Construct 86 and 88 was investigated for archaeological and paleontological resources by ECORP Consulting, Inc. (Ahmet, Mason, and Bholat 2006), Pacific Legacy Incorporated (Way, Jackson and Holm 2006) and Cogstone Resources Management (Scott and Gust 2008). No cultural or paleontological resources were identified. No impacts to cultural or paleontological resources are anticipated during wire splicing activities or overland travel between Construct 86 and Construct 88.

Proposed WSS between Construct 95-96

The proposed location for a new disturbance area between Construct 95 and Construct 96 was investigated for cultural and paleontological resources by ECORP Consulting, Inc. (Ahmet, Mason, and Bholat 2006) and Cogstone Resources Management (Scott and Gust 2008). The proposed disturbance area is located within granite (gr), which has a low paleontological sensitivity. No cultural resources were identified. As a result, no impacts to cultural or paleontological resources are anticipated during wire activities between Construct 95 and Construct 96.

Proposed WSS between Construct 113 and Pull Out Area

Cogstone Resource Management prepared a report titled *Supplemental Cultural Resources Assessment, Segment 2, Section 4 of the TRTP, Variance for Additional Wire Setup Site 113, Los Angeles County, California* dated August 2009. Cogstone Resource Management conducted the cultural resource studies. A search for archaeological 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 area falls within the one-mile search radius of the ECORP study and four cultural resources have previously been identified within ½ mile of the proposed WSS 113. One resource, P-19-003729, overlaps the northern portion of the project area. Due to the proximity of WSS 113 to P-19-003729, this requested workspace has the potential to impact the southern portion of the site. Paleontological background contexts were developed under the Paleontological Resources Management Plan Segments 2 and 3 of the TRTP 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. The sediments in the project area consist of Quaternary alluvium which is low in sensitivity for paleontological resources (Figure 6d in Gust and Scott 2008). Cogstone Resource Management conducted the survey of the proposed project area on August 24, 2009. They survey consisted of a one-person crew walking the project area while closely inspecting the ground surface. Transects were walked at 10 meter intervals. The survey area is 125 feet long by 150 feet wide and consists of the work area and an access road. Sediments in the project area are Quaternary alluvium and consist of light brown silty sand with pebble to cobble sized rock inclusions. No prehistoric resources were observed, however several historic artifacts were identified including lavender glass, pattered pearlized glass and a potentially historic can scatter. Modern trash was also observed, in some cases mixed in with the historic objects. The artifacts were identified both in the project area and along the western edge of the "figure 8" in the access road. Pedestrian survey confirmed that WSS 113 is located within the southern boundaries of cultural resource P-19-003729 and the current construction activities will impact the site. This resource was formally evaluated and found not eligible for listing on the CRHR (Auck and Tinsley 2008). No monitoring is recommended.

No significant impacts to cultural resources are anticipated with the implementation of the condition 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.

- 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.

- On June 20, 2008, Dan Blankenship of CDFG provided: "All Pierson's morning glory and other sensitive plants shall be delineated with flagging and avoided. If avoidance is determined not possible, consultation with CDFG is required to minimize impacts. ….."

- 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.

- 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