

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

September 11, 2009

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

RE: SCE Antelope Transmission Project, Segment 2 – Variance Request #56

Dear Mr. Johnson,

On September 10, 2009, Southern Californian Edison (SCE) submitted a variance requesting to perform a temporary relocation of the 12 kV distribution line, named Bootlegger, at the Vincent Substation 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 perform a temporary relocation of the 12 kV Distribution Line named Bootlegger at the Vincent Substation. This 12 kV circuit runs along the northern boundary of the Vincent Substation and crosses under the existing and future 500 kV slack spans, which terminate into the substation racks. As part of the Segment 2 Project, the existing Midway Vincent #3 slack span will be removed from the existing tower and a new slack span will be installed from new Construct 115 into the existing position. To accomplish this work, the 12 kV will need to either be de-energized for an extended period of time or portions of it temporarily relocated. Since this line cannot be energized from an alternate source, de-energizing the section under the 500 kV slack spans would result in a significant number of customers being without electric service for extended periods of time.

As an alternate, the Contractor proposes to temporarily relocate the 12 kV line underground, between existing 12 kV pole #1634132E and existing 12 kV pole #1634129E. The two-phase 12 kV overhead line will first be double dead-ended on pole #1634132E and an underground riser will be installed down the pole. The line will be rerouted through two #2 aluminum underground cables which will be direct buried in a 460-foot long, hand dug trench measuring 18 inches deep by approximately 12 inches wide. The trench and cables will terminate at pole #1634129E, where a second riser will be installed up the pole. The cables running up the pole will be covered with U Guard molding. At pole #1634129E the 12 kV overhead line will also be double dead-ended. The run of the underground cable will then be energized and the parallel overhead line disconnected at each of the double dead-end poles. The Contractor will drop the overhead conductor to the ground and roll up and secure it on the intermediate pole #1634131E. After the Contractor has finished installing and removing the 500 kV slack spans, the Contractor will return the 12 kV line to its original overhead position and remove the underground bypass.

A Temporary Extra Work Space (TEWS) is currently pending approval to allow the Contractor to begin work on the double dead-ends for pole #1634132E. The Contractor will require the temporary use of an existing road in order to facilitate access to the 12 kV line for these modifications. This maintenance road, to the north of pole #1634132E, has also been covered under the same TEWS request and is pending approval. To prevent non-project related vehicle access, the Contractor will close off access to the road with barricades. If approved, the

TEWS will not allow any disturbance to vegetation, or allow any trenching to occur. Therefore, this variance request will be needed in order to complete this relocation.

- **Biological Resources:** Burns & McDonnell submitted a report dated September 9, 2009 for the *Biological Clearance Survey of the Disturbance Area for the Temporary Relocation of the Bootlegger 12 kV Circuit north of Vincent Substation*. On September 9, 2009, biological surveys were performed on the disturbance areas for the temporary relocation of the Bootlegger 12 kV circuit just north of the Vincent Substation. The mapped disturbance area for the relocation trenching 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. Biologists conducted the survey by walking meandering transects spaced 20-25 feet apart out to a distance of 500 feet on all sides to cover the buffer area (with the exception of the developed area within the substation boundaries). The survey found one California juniper 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, six woodrat middens were found along with one inactive cactus wren nest (*Campylorhynchus brunneicapillus*) in a cholla cactus (*Cylindropuntia echinocarpa*). 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.

An ephemeral drainage runs north of the disturbance area and parallel to it, and is in between the Bootlegger 12 kV and the adjacent disturbance areas for Const 115 and Vincent Shoofly 1. The drainage is approximately 40 to 60 feet from the Bootlegger disturbance area and ranges from about one to six feet deep. Vehicle and foot access to the site will be via an existing dirt road that is covered under a separate Temporary Extra Work Space (TEWS). The drainage crosses under this road through a culvert. The drainage area will be red-flagged with a continuous line of flagging tape along both sides to prevent any foot traffic between the Bootlegger disturbance area and the adjacent disturbance area for Construct 115 and Vincent Shoofly 1. Therefore, the drainage should not be impacted by construction activities.

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

- **Cultural & Paleontological Resources:** The proposed disturbance area for the 12 kV relocation at the Vincent Substation was investigated for archaeological and paleontological resources by ECORP Consulting, Inc. (Ahmet, Mason, and Bholat 2006), Pacific Legacy Inc. (Way, Jackson and Holm 2008) and Cogstone Resources Management (Scott and Gust 2008). No archaeological or historical resources were identified. The proposed disturbance area is located within Quaternary Older Alluvium, sediment known to contain paleontological resources. As a result of paleontological sensitivity, the presence of a paleontology monitor is required during earth moving activities. Earth moving activities include grading, trenching, and drilling.

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.

- 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.
- Due to paleontological sensitivity in this area, the presence of a paleontology monitor is required during earth moving activities. Earth moving activities include grading, trenching, and drilling.
- 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