

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

April 18, 2008

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

RE: SCE Antelope-Pardee 500 kV Transmission Project, Segment 1 – Variance Request #2

Dear Mr. Johnson,

On April 17, Southern Californian Edison (SCE) submitted a variance requesting changes to be made to wire (identified as WSS), guardpole, and snub sites along the Right of Way in accordance with stringing wire and removal of 500 kV line for energizing the Shoo-fly portion of Section 1, Segment 1. **This Variance Request is approved by CPUC for the proposed activities based on the following factors:**

- Per the request in order to do this work, an outage must take place on the existing transmission line. There is a scheduled outage for Monday and Tuesday, April 21 and 22. If the approval is not possible by April 21, the outage can be rescheduled at a later date.
- Per the variance request the additional work locations include:
 1. **WSS 13** The proposed changes to WSS 13 include extending the boundary from 100 feet by 100 feet to 120 feet by 120 feet. This will allow effective maneuvering space for the three CAT bulldozers while snubbing the line.
 2. **WSS 11** The proposed changes to WSS 11 include extending the boundary from 200 feet by 400 feet to 200 feet by 475 feet to include the area on the east side of the existing road. A CAT bulldozer will be placed to hold tension on the line while removing wire over the Los Angeles Department of Water and Power corridor in Haskell Canyon. This site represents a secondary safety precaution for the cutover to the Shoo-fly to keep tension on the wire in the unlikely event the snubs break loose.
 3. **WSS 8A** An additional wire site, WSS 8A, will be located just east of Construct Structure 17. The proposed site will extend from the fence line along the canal and continue west for approximately 225 feet. The width will be about 180 feet. This site will be utilized for tension and the removal of wire at Construct Structure 17 associated with energizing the Shoo-fly. Equipment needed in this area includes but is not limited to a sag CAT, crane, and a rewind machine. No substantial habitat disturbance is anticipated as PAR will utilize a drive and crush procedure on this site.
 4. **WSS 14A** An additional wire site, WSS 14A, will be located near the Blue Cloud soil disposal site haul road. The dimensions for this area will be 150 feet by about 180 feet. The site will be located on previously disturbed areas, in an existing access road to a tower adjacent to the Blue Cloud soil disposal site haul road. A CAT bulldozer will also be placed here as a secondary precaution to hold tension on the line during wire removal from existing tower 25.
 5. **Guard Pole Site** A guard pole structure is needed to cross a distribution line running up a drainage feature that ends at an existing concrete detention basin and associated structures just north of the intersection of Shadow Valley Lane and Woodside Drive. This site will be accessed off of the Blue Cloud soil disposal site haul road, where the feature will be driven up for about 100 feet. The guard poles will be set in 'flower pots', pre-existing boxed containers with rocks

that secure the actual guard poles. As such, no drilling will be necessary, and very little ground disturbance is anticipated.

6. **Construct Structure 24** Newly proposed activities near the 500kV line Construct Structure 24 include the addition of a snub site and the cutting of a bank next to the existing tower. This site will utilize buried field snubs. In order to safely remove the line from existing tower 25, a snub site needs to be constructed to hold the tension on the line. This process involves digging a series of trenches 12 feet long by 14 feet deep and burying a log which will have a snub attached. Three trenches will be dug next to a leg of Construct Structure 24. The other three trenches will be dug to the east of Construct Structure 24. Another change needed is to modify an area of about 40 feet by 35 feet on the hillside to the south of the structure. The bank needs to be cut down approximately 8 feet in height in order to safely lower the wire. Dirt removal in this location is part of tower construction activities and all the areas in this proposed modification are currently included in the disturbance for the crane pad and work zone. This soil will be placed onto the existing roadway and smoothed, such that no additional area will be required for soil disposal.

- As provided in the request, based on the project locations requiring a variance, all ground disturbing activities were covered within the archeological survey corridor in the Shoofly Cultural Resources Survey Report (Compass Rose 2007). No know resources will be impacted by the proposed activities.
- Biological field surveys were conducted on April 4, 7 and 8, 2008 at the various sites including a 500 foot buffer from the limits of the ground disturbing work. Areas west of Tower 22 support coastal sage scrub/chaparral habitat, and represent potential, yet marginal, habitat for coastal California gnatcatcher. Protocol surveys were conducted in 2007, and recorded no gnatcatchers. Five of six protocol surveys have been conducted during the 2008 season, again with no gnatcatchers recorded. No target special interest plant or wildlife species were found during the site visits conducted during April 2008. No raptor or other bird nests were recorded. Two coast live oak trees were discovered adjacent to an existing access road south of and across the canyon from WSS 8A. This road will be used to access the WSS 8A, but no disturbance to these trees is anticipated from these activities. In addition, four woodrat nests are located near the bottom of the canyon southwest of WSS 8A. While it is unclear which woodrat species has constructed these nests, SCE is assuming that they may be occupied by the San Diego woodrat (*Neotoma lepida intermedia*), a California Species of Special Concern. These nests are not located on the WSS 8A site, rather they are located within the surveyed buffer area. Exclusion buffer areas around these middens were marked in the field with lathes and flagging, and the middens will not be disturbed by the activities covered under this variance request. At the guard pole site near the existing detention basin structure, the substrate is sandy and supports blue elderberry (*Sambucus mexicana*), tree tobacco (*Nicotiana glauca*), Santa Barbara locoweed (*Astragalus trichopodus* var. *lonchus*), and short-pod mustard (*Hirschfeldia incana*). On 4 April 2008, Burns & McDonnell met with Mr. Dan Blankenship of the California Department of Fish and Game to evaluate the drainage feature and to discuss the proposed placement of the 'flower pot' guard poles. Mr. Blankenship agreed the best access to this site was to drive north from the access road near the existing debris basin, staying in the sandy substrate of the drainage feature. Mr. Blankenship further agreed that the feature was not jurisdictional relative to Fish and Game Code Sections 1600 et seq. Finally, Mr. Blankenship endorsed the proposal to remove between 25 and 40 tree tobacco plants from the sandy substrate area, and place them into an approved landfill. These plants are non-native and are considered weedy and invasive. In addition, the native blue elderberry shrubs in the sandy substrate will be avoided. The sandy substrate will be re-contoured and smoothed upon removal of the guard pole structures.
- Per biological survey findings submitted for the approved Variance Request #1 "Several species of finch were observed displaying pre-nesting behavior along the steep cliff faces to the southwest of the

site. Violet-green swallows were observed entering crevices in the cliff face, presumably to nest. An old raptor nest is also located in this cliff face, but no sign of recent activity has been recorded. These resources are located no closer than about 175 feet to the Structure 18 site.” These resources are in close proximity to the proposed work covered by this variance request as well. CDFG representative Dan Blankenship was contacted in order to reduce the 300-foot buffer. Dan Blankenship visited the site on April 4 and agreed to a buffer reduction, however he stated in a follow-up e-mail sent April 4 “We looked at a spur road variance at the top of the ridge next to a cliff. It is within the 300 foot buffer of potential violet green swallows and canyon wren nesting and possible old raven nest. I approved the variance but would like the crews to minimize their time spent in the area, because it is a high quality cliff habitat feature.”

The conditions noted below shall be met by SCE and its contractors:

- All project mitigation measures, compliance plans, and permit conditions shall be implemented during construction activities and use of the proposed yard spaces. Some measures are on-going/time-sensitive requirements and shall be implemented prior to and during construction where applicable.
- Copies of all relevant permits, compliance plans, and this Variance shall be available on site for the duration of construction activities.
- 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.
- Per the request a biological monitor will be present south of WSS 8 during the activities covered under this variance request to ensure the two oak trees and woodrat middens will not be disturbed. In addition a biological monitor will be present in the drainage area during the activities covered under this variance request to ensure the blue elderberry shrubs are avoided and the tree tobacco shrubs are removed.
- A biological monitor will be present during the activities covered under this variance at the high quality cliff habitat to ensure that nesting birds are not disturbed as referenced in the April 4, CDFG correspondence.
- After use, all areas proposed under this variance shall be completely restored to preexisting conditions following the Shoofly work.
- Prior to the commencement of construction activities, all crew personnel including crane, 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 construction. No movement or staging of construction vehicles or equipment shall be allowed outside of the approved areas.

Sincerely,

John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen