

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

February 23, 2009

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

RE: SCE Antelope Transmission Project, Segment 2 – Variance Request #31

Dear Mr. Johnson,

On February 19, 2009, Southern Californian Edison (SCE) submitted a variance requesting to modify the road alignment for Access Road 56 to Construction 67 on Segment 2 of the Antelope Transmission Project in unincorporated 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:

SCE would like to modify the road alignment for Access Road 56 to Construction 67. The revised alignment has a lower gradient, which reduces the potential for erosion and provides safer access to the tower site. The revision to Access Road 56 will deviate slightly from the alignment in the approved Segment 2 Access and Spur Road Plan, however, will end within the approved disturbance area for the tower site. Additionally, these roads will not be visible from any of the Key Observation Points (KOP) noted in the Final EIR (Aspen 2006).

- **Biological Resources:** Biological field surveys were conducted along the proposed revised Access Road 56 alignment to Construction 67 site on January 19, February 10 and 11, 2009. In addition, this area has also been covered during previous sensitive species surveys conducted in July 2008 by LSA (LSA 2008). Preconstruction surveys were also conducted by BRC biologists in September 2008. These surveys focused on biological issues as described in the mitigation measures of the Final EIR (Aspen 2006). These surveys represented focused surveys for burrowing owls, American badger, nesting raptors, breeding birds, San Gabriel oak, short-joint beavertail, and other sensitive species. In addition, an approximately 500-foot buffer from the limits of the proposed activity area was surveyed. Several sensitive biological resources have been recorded at and near the Construction 67 site, which include several woodrat (*Neotoma* sp.) middens and two locations of Pierson's morning glory (*Calystegia perisonii*). Construction of Access Road 56 along the variance alignment could result in disturbance to one additional woodrat midden, depending upon the exact placement of the road. However, as this midden is located upslope and immediately adjacent to the variance alignment, it may be able to be avoided during construction of the road. If avoidance of the 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). No significant impacts to biological resources are anticipated with the implementation of the conditions noted below.
- **Cultural & Paleontological Resources:** A search for archeological and historic records for Segment 2 of the Tehachapi Renewable Transmission Project 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 researched by ECORP. Three cultural resources are located within a ½ mile of the area of impact for this variance. Resource P-19-001639 is a historical structure and resource P-19-003654 is recorded as a historic mining/prospecting pit. Neither of these resources is located within the area of impact for this variance. The third resource, P-19-186876, is located within the area of impact but does not meet CEQA eligibility criteria and is therefore not a significant resource. P-19-186876 is a linear arrangement of steel lattice transmission towers constructed in 1928 that extend nearly 30 kilometers south from Antelope Substation near Lancaster, CA through Vincent Substation near Acton, CA to Gould Substation near Pasadena, CA. Large portions of resource P-19-186876 run parallel to the new transmission line and will be within or adjacent to new construction activities, including Access Road 56. The Paleontological Resources Management Plan Segments 2 and 3 of the Tehachapi Renewable Transmission Project was prepared by Cogstone Resource Management Inc. (Gust and Scott 2008). No paleontological localities have been previously discovered in the project vicinity and the sediments (Pelona Schist) have no potential to contain paleontological resources (Figure 6b and 6c in Gust and Scott 2008).

Cogstone Resource Management conducted a survey of the proposed project area on January 29, 2009. The survey consisted of crew members walking the project area while closely inspecting the ground surface. Due to the small size of the survey area, transects were walked at 5 meter intervals. Within the area of impact, surveyors noted a 13 foot long concrete and rebar cylinder approximately 2.5 feet in diameter. This concrete cylinder was located along a 45 degree slope and is presumed to have been a tower leg foundation that was removed and had rolled down hill. This concrete foundation is a typical example of a common type of structure that does not meet significance criteria under CEQA and therefore does not merit protection. There was no indication of prehistoric archaeological resources in the vicinity of the proposed project. There is no sensitivity for paleontological resources in the area of impact. If unanticipated 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. No significant impacts to cultural or paleontological resources are anticipated if Unanticipated Discovery protocols are implemented in the event of a find.

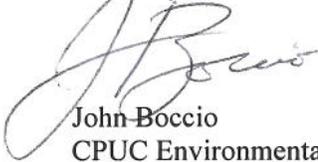
The conditions noted below shall be met by SCE and its contractors:

- 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.
- 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).
- 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.
- Per Mitigation Measure H-4, if it is determined that known groundwater resources would be unavoidable during construction, SCE will submit a Groundwater Remediation Plan to the CPUC

and RWQCB for review and approval prior to the onset of any construction activities. If unknown groundwater resources are encountered, SCE will stop the disruptive excavation activity and submit a site-specific remediation plan to the CPUC and RWQCB for review and approval. Water may not be discharged on site, but may be held in a Baker Tank until the Plan is approved.

- 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.
- 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.

Sincerely,



John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen