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

March 24, 2014

Susan J. Nelson, AIA
Regulatory Affairs
Southern California Edison
2244 Walnut Grove Avenue, Quad 3D, GO1
Rosemead, CA 91770

RE: SCE Antelope Transmission Project, Segment 3B: Variance Request (VR) #73

Dear Ms. Nelson,

On March 7, 2014, Southern Californian Edison (SCE) submitted a variance request for additional temporary work areas for two gradient control mats on the Segment 3B Transmission Line (T/L), of the Antelope Transmission Project (ATP) in unincorporated Kern County, California. **This Variance Request is approved by CPUC based on the following factors:**

- SCE submitted the following information:

  SCE submitted a request for a Variance for additional work areas for two gradient control mats on Segment 3B T/L of the ATP, in Kern County, California. Subsequent to the approval of the NTPR (NTP #32 dated March 20, 2012) by the CPUC, and the addendum for gas pipeline protection facilities (dated March 14, 2012) by the CPUC, final design was completed resulting in the need for additional work areas at two gradient control mat installation locations.

  The following changes are proposed for Segment 3B T/L (note that all measurements are approximate):

  1. Additional work areas are required at two of the three gradient control mat installation locations east of Structure 3B-31 (the two westernmost mat locations). The currently approved work areas are 100 feet x 100 feet; this variance requests approval to expand these mat work areas to 100 feet x 200 feet (an extra 50 feet on both the eastern and western sides of the approved disturbance areas). This would result in additional temporary disturbance of 0.46 acres (0.23 acres per control mat).

- **Biological Resources**: SCE submitted a biological review with the Variance Request. The variance request areas were included in P30 preconstruction surveys for general biological resources (FRED Survey Form 000141), Owl30 burrowing owl surveys (FRED Survey Form 000142), and S7 clearance sweeps (FRED Survey Form No. 000145) performed April 19 and 26, 2014. Morning clearance sweeps and biological construction monitoring has been occurring in this area from March 3 to 6, 2014. No biological resources have been detected during the surveys, sweeps, and monitoring efforts. The proposed variance areas occur within rabbitbrush scrub, California annual grassland, and disturbed/developed vegetation communities. A jurisdictional feature and wetland (3B-6-R-39 and 3B-6-W-38) occur to the north of the proposed variance areas, but will not be impacted by work and no permits or permit amendment will be required. A morning sweep and biological construction monitoring will be conducted during work for these proposed variance areas. If any biological resources are detected during sweep and monitoring efforts, the applicable FEIR mitigation measures, NTP conditions, and RFEC conditions will be implemented.

No additional impacts to biological resources are anticipated with the implementation of this Variance and the conditions noted below.

- **Cultural and Paleontological Resources**: SCE submitted a memorandum dated March 7, 2014 with the Variance Request titled the *TRTP Cultural and Paleontological Resources Assessment and Requirements – Segment 3B Additional work areas for Gradient Control Mats – AC Mitigation*. The memorandum states that no cultural or paleontological resources will be impacted by the proposed additional work areas at two of the three proposed gradient control mats. The proposed extended gradient areas in this variance request were included in a recent survey in support of Request for Final Engineering Concurrence 3B #9 and no cultural resources were identified (Wetherbee 2014). The installation of the gradient control mats and use of existing access roads identified in the variance request do not have the potential to impact cultural resources.

  Previous paleontological assessments for TRTP define the geology at the proposed locations as Quaternary older alluvium (Gust and Scott 2008). Based on the Potential Fossil Yield Classification (PFYC) system, Quaternary older alluvium is considered as having moderate sensitivity for yielding significant paleontological resources (PFYC = 3). No paleontological resources have been observed during surveys or construction monitoring in areas characterized by Quaternary Older alluvium. According to the results of extended monitoring efforts along Segment 3B, Aron and Kelly (2013) recommend that paleontological spot-checking of earthmoving activities including trenching, scraping and drilling occur only when the depth of disturbance is greater than ten feet as no significant resources or any paleontological resources were found in this area at a shallower depth.

  No additional impacts to cultural or paleontological resources are anticipated with the implementation of this Variance and the conditions noted below.

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

- Paleontological spot-checking of earthmoving activities including trenching, scraping and drilling shall occur when the depth of disturbance is greater than ten feet.

- All conditions required by Notice to Proceed (NTP) #32, and the addendum for gas pipeline protection facilities (dated March 14, 2012), shall apply to the subject area and activities.

- Copies of all relevant permits, compliance plans, NTP #32, the addendum for gas pipeline protection facilities (dated March 14, 2012), and this Variance shall be available on site for the duration of construction activities where applicable.

Sincerely,

Jason Coontz
CPUC Environmental Project Manager

cc: V. Strong, Aspen