

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

June 4, 2010

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 #70

Dear Mr. Johnson,

On June 2, 2010, Southern Californian Edison (SCE) submitted a variance requesting additional disturbance areas for the new Sagebrush 220 kV transmission line structures assembly and erection at the Antelope Substation, Segment 1, of the Antelope-Pardee 500 kV Transmission Project, in unincorporated Los Angeles County. **This Variance Request is approved by CPUC for the proposed activities based on the following factors:**

- SCE submitted the following information:

Southern California Edison is requesting a variance for additional disturbance areas for the new Sagebrush 220 kV transmission line structures assembly and erection at the Antelope Substation. The Sagebrush 220 kV transmission line relocation was approved by the CPUC on March 2, 2010 under Notice to Proceed (NTP) #29. The Contractor has determined that additional disturbance areas will be needed in order to assemble and erect the new 220 kV structures. The approximate new temporary disturbance area associated with each of the 220 kV structures includes the following:

- Structure 168 – 7,250 square feet of new additional temporary disturbance area
- Structure 169 – 7,500 square feet of new additional temporary disturbance area
- Structure 170 – 6,250 square feet of new additional temporary disturbance area
- Structure 171A – 15,000 square feet of new additional temporary disturbance area
- Structure 172 – 5,750 square feet of new additional temporary disturbance area

The total new additional temporary disturbance area is 41,750 square feet.

- **Biological Resources:** Burns & McDonnell submitted a report dated September 29, 2009 entitled *Biological Survey Report for the Expansion of the Antelope Substation and Undergrounding of Portions of Six Existing 66kV Lines to Accommodate the Expansion of the Antelope Substation for the Antelope-Pardee 500kV Transmission Project, Segment 1, Los Angeles County, California*. Surveys were conducted on September 21-22, 2009 by ECORP. The proposed area consists mainly of disturbed California Annual Grassland Series with small pockets of Rubber Rabbitbrush Series (Sawyer and Keeler-Wolfe 1995) located on relatively flat topography. The area is grazed by sheep annually and also has disturbances associated with existing utility facilities (roads and poles/towers). The survey area included a 500-foot buffer around the Project site and all of its proposed components (with the exception of the developed area within the existing substation boundaries). Meandering transects were walked throughout the proposed construction area and the buffer area at a spacing of approximately 50 feet apart in the grassland areas and 20 feet apart in the rabbitbrush scrub areas, with an emphasis on locating California ground squirrel (*Spermophilus beechyi*), American Badger (*Taxidea taxus*), and canid burrows that could potentially be used by western burrowing owls (*Athene cunicularia*).

A brief assessment of potential nesting habitat and impacts to additional wildlife was also conducted during the survey. Breeding bird surveys were conducted throughout the 2009 nesting season in and near the existing Antelope Substation and the vicinity of the project site. Those surveys found nests of a number of species in structures at the existing substation, in existing transmission towers near the substation, in construction equipment staged at adjacent marshalling yards, and in non-native vegetation planted for screening along the existing Antelope Substation fence line. Therefore, there is potential for nesting birds in the area during the spring breeding season.

No special-status species were observed during the survey. Two small areas were found with concentrations of active California ground squirrel burrows. Only one of these areas contained burrows of suitable size for use by burrowing owls, but the biologist stated that they did not exhibit any owl sign (whitewash, feathers, pellets, etc.). Surveys for burrowing owls were conducted in 2007 and 2008 on the adjacent Segment 1 of the Antelope-Pardee 500 kV Transmission Project (LSA 2007c, 2008a). No potential burrowing owl locations were found during those surveys. Biological clearance surveys were conducted in the vicinity of the Project site throughout 2009 for Segment 1 (Burns & McDonnell 2009d) and Segments 2 and 3 (Burns & McDonnell 2009e, 2009f). No active burrowing owl burrows or potential burrowing owl burrows were found during those surveys. No American badger burrows or signs were found. Pierson's morning-glory (CNPS List 4) can be difficult to find and is potentially present on the Project site. However, the 2007 and 2008 surveys did not find any occurrences of Pierson's morning-glory in the vicinity of the Project site, and none were observed during the current survey. No significant impacts to biological resources are anticipated with the implementation of the conditions noted below.

- **Cultural Resources:** SCE submitted a report from Cogstone Resource Management, Inc. titled *Supplemental Cultural and Paleontological Resources Assessment, TRTP, Antelope Substation Expansion, Los Angeles County, California* dated September 2009. Archaeological and historical background contexts were developed by ECORP Consulting, Inc. for the Antelope Substation under Segment 2 of the TRTP (Ahmet et al. 2006). The proposed project area is undeveloped and has no known historic uses. A search for archaeological and historic records for Segment 2 of the TRTP was also 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 three cultural resources have previously been identified within 1 mile of the proposed project, including two historic-era resources located within the project area. Both of the historic-era resources (Antelope Substation and Antelope Transmission Line) located within the project area have been evaluated and found not eligible for listing on the National Register of Historic Places. Both have also been evaluated as not significant under CEQA. A historic can scatter is within ¼ mile radius of the structure locations, but will not be impacted by this work.

Paleontological background contexts were developed for Antelope Substation 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. No paleontological localities are known within the project boundaries and the sediments in the project area consist of Quaternary alluvium, which is low in sensitivity for paleontological resources (Gust and Scott 2008).

Cogstone Resource Management conducted an intensive-level pedestrian survey on September 21, 2009 within the Antelope Substation parcel. The survey consisted of a one-person crew walking the

project area while closely inspecting the ground surface. Transects were walked at 20 meter intervals. No prehistoric archaeological or paleontological resources were observed, but a potentially historic-era can scatter was identified partially inside the parcel boundary acquired for the Antelope Substation. Modern trash has also been dumped in the area. The site is not considered significant, but should be flagged for avoidance. No significant impacts to cultural or paleontological resources are anticipated with the implementation of the condition noted below.

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

- Biological surveys shall be re-conducted and results (as well as updated maps with resources identified) submitted to the CPUC for review and approval **prior** to equipment and vehicles mobilizing to the project 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 conducted prior to site occupation, including nesting bird surveys.
- As identified in **APM BIO-5** and **Mitigation Measure B-6**, SCE would assign Biological Monitors to the Project. They would be responsible for ensuring that impacts to special-status species, native vegetation, wildlife habitat, or unique resources would be minimized to the fullest extent possible. The Biological Monitors shall be on-site to monitor all work and will conduct sweeps of the approved areas, especially areas with high burrow concentrations which will be impacted. Monitors would flag the boundaries of areas where activities need to be restricted in order to protect wildlife including special-status species. These restricted areas would be monitored to ensure their protection during construction. This will include protecting species covered under the MBTA and CDFG codes regarding the protection of nests and eggs. 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 with the approval of the CDFG and USFWS (as well as CPUC notification). The Biological Monitors 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.
- Per **Mitigation Measure B-1a**, SCE shall provide restoration/compensation for impacts to native vegetation communities and shall include the area covered under this Variance in their Habitat Restoration and Revegetation Plan.
- All topsoil displaced or removed shall be preserved properly for restoration activities.
- 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. Consultation with CDFG is required prior to construction that will impact any wetland areas in order to determine on site mitigation measures."
- All work boundaries shall be flagged and approved by the CPUC Environmental Monitor (EM) **prior** to occupation of the project area. In addition, all approved access roads, spur roads and overland travel routes to be used shall be flagged and approved by the CPUC EM **prior** to construction.
- All sensitive resources buffers shall be flagged **prior** to construction.
- An archeologist shall flag all culturally sensitive areas for avoidance **prior** to construction.

- If unanticipated biological or cultural resources are detected at the project sites, the CPUC EM shall be notified immediately.
- If construction debris or spills enter into environmentally sensitive areas, the jurisdictional agencies and CPUC EM shall be notified immediately.
- 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.
- Storm Water Pollution Prevention Plan (SWPPP) will be implemented at all times during the use of the project area, as will Best Management Practices. Implementation of all necessary erosion control devices will be properly installed and maintained throughout the duration of project area use. A copy of the SWPPP will be available on-site for reference.
- No movement or staging of construction vehicles or equipment shall be allowed outside of the approved areas. If additional temporary workspace areas or access routes, or changes to construction technique or mitigation implementation to a lesser level are required, a Variance Request shall be submitted for CPUC review and approval.
- 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. Restoration of disturbed areas shall occur in accordance with approved restoration plans.
- 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