

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 8, 2012

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

RE: SCE Antelope Transmission Project (Antelope-Tehachapi 500kV and 220kV Transmission Line), Segment 3B: Final Engineering Concurrence for the Segment 3B Access Roads/Grading Changes and Additional Gradient Control Mat for Natural Gas Line Protection

Dear Ms. Nelson,

On September 6, 2012, Southern California Edison (SCE) submitted a request for Final Engineering Concurrence for access roads and grading changes, and additional gradient control mat for natural gas line protection throughout Segment 3B Transmission Line (T/L) of the Antelope Transmission Project (ATP) in unincorporated Kern County, California. SCE submitted additional information on September 27, 2012. **This Concurrence to Final Engineering is approved by the CPUC for the proposed activities based on the following factors:**

- SCE submitted the following information:

SCE requests Final Engineering Concurrence for access roads and grading changes, and additional gradient control mat for natural gas line protection throughout Segment 3B T/L of the ATP in unincorporated Kern County, California. Subsequent to approval of Segment 3B T/L NTPRs (NTP # 30 dated February 21, 2012, and NTP #32 dated March 20, 2012), and the addendum for gas pipeline protection facilities (dated March 14, 2012) by the CPUC, final design was completed, resulting in modifications to permanent access roads and permanent grading limits. Additionally, a previously unidentified gradient control mat is required for natural gas pipeline protection, and SCE has identified existing roads in the project vicinity to utilize for access to various work areas.

New impacts associated with this Final Engineering Concurrence includes: 0.018 acres of additional temporary impacts, and 0.535 acres of permanent impacts.

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

1. A shift of the permanent access road from Structures 3B-1 to 3B-3. The access road is 995 feet long and has a total disturbance area of 0.3 acre (of this, less than 0.01 acre is new disturbance not previously approved in NTP #30).
2. A shift of the permanent access road from Structures 3B-4 to 3B-7. The access road is 2,190 feet long and has a total disturbance area of 0.865 acre (of this, 0.00 acre is new disturbance not approved in NTP #30).
3. A 0.14 acre temporary crane pad located within the approved work area at Structure 3B-5.

4. A grading area along a gas line mitigation access road to be improved northwest of Structure 3B-48. The permanent grading area has a total disturbance area of 0.05 acre (of this, 0.01 acre is new disturbance not approved in NTP #32 or the gas pipeline protection facilities addendum).
5. A grading area along an existing wind farm access road northwest of Structure 3B-50. The permanent grading area has a total disturbance area of 0.039 acre (none of the new disturbance area was approved in NTP #32 or the gas pipeline protection facilities addendum).
6. A grading area along an existing wind farm access road and a gas line mitigation road not to be improved southeast of Structure 3B-52. The permanent grading area has a disturbance area of 0.41 acre (of this, 0.18 acre is new disturbance area not approved in NTP #32 or the gas pipeline protection facilities addendum).
7. A new gradient control mat south of Structure 3B-61. The gradient control mat has a total disturbance area of 0.03 acre (of this, 0.01 acre is new disturbance area not approved in NTP #32 or the gas pipeline protection facilities addendum).
8. Use of 27,183 feet of existing wind farm access roads. These existing wind farm access roads are needed to facilitate the transport of heavy haul loads for wire stringing activities due to the challenging nature of the terrain. Some of these access roads are outside the tortoise survey area. However, the habitat in the vicinity of these roads is marginal and at the edge of the elevation restriction for tortoise; tortoise surveys have so far been negative. Travel on these existing roads would stay within the roadway and is not ground-disturbing. These access roads would not require any improvement.

The above-described access road and grading limit modifications will conform to the approved Kern County grading plans.

- **Biological Resources:** SCE submitted a biological survey report titled *Biological Survey Report Access Roads, Crane Pad, Grading Areas, Gradient Control Mat, and Use of Existing Windfarm Access Roads, Segment 3B Transmission Line, Antelope Transmission Project, Kern County, California* dated August 24, 2012. The report documents the biological conditions for Segment 3B Access Roads, Crane Pad, Grading Areas, Gradient Control Mat, and Use of Existing Wind Farm Access Roads Request for Final Engineering Concurrence (Project Component). The Project Component plus the 500-foot buffer are referred to as the Biological Study Area (BSA). Biological resources within and adjacent to the Project Component were evaluated during several focused surveys, including 2010 and 2011 rare plant surveys (LSA 2010e, ICF 2011gt); 2008, 2010, and 2011 Swainson's hawk surveys (LSA 2008b, 2010c; ICF and Bloom 2011e); 2007, 2008 through 2011 desert tortoise surveys (LSA 2007, 2008a, 2009b, 2010a; ICF and ECORP 2011b); 2008, 2010, and 2011 Mohave ground squirrel surveys (Vanherweg 2008, LSA 2010b, ICF and ECORP 2011c); and burrowing owl and American badger burrow surveys in 2010 (LSA 2010d). The Project Component areas were also included in the 2012 focused surveys for special-status plants, including vegetation mapping; desert tortoise; Swainson's hawk; and Mohave ground squirrel. The biological resources within and adjacent to the Project Component and BSA were also evaluated during preconstruction surveys for general biological resources and burrowing owl for Segment 3B T/L. As part of the Segment 3B T/L and Wilderness Line Relocation work, biological construction monitoring has been ongoing regularly since the sites became active, and species events and nest events are recorded in the Field Reporting Environmental Database (FRED). As a Biological Opinion or an Incidental Take Permit was not obtained for the ATP, work will avoid impacts to listed plants and wildlife.

Vegetation communities within the Project Component include Mojave mixed woody scrub, Mojavean juniper woodland and scrub, rabbitbrush scrub, and disturbed/developed. Vegetation communities within the 500-foot buffer include bunchgrass grassland, California annual grassland, desert bunchgrass grassland, Joshua tree woodland, Mojave creosote bush scrub, Mojave desert wash scrub, Mojave mixed woody scrub, Mojavean juniper woodland and scrub, rabbitbrush scrub, southern willow scrub, sparsely vegetated streambed, and disturbed/developed. No special-status plants were observed within the Project Component.

Bakersfield cactus (*Opuntia basilaris* var. *treleasei*) and Mojave Indian paintbrush (*Castilleja plagiotoma*) were observed within the 500-foot buffer during the 2011 and 2012 special status plant focused surveys. All previously identified Bakersfield cactus that occur within 50 feet of any work area, overland travel, or access road to be improved have been further analyzed to confirm identification. Those individuals confirmed as Bakersfield cactus will be protected with 50-foot Environmentally Sensitive Area (ESA) buffers.

Previous focused burrowing owl (*Athene cunicularia*) surveys for Segment 3B were negative for burrowing owls and sign of the species within the Project Component. Potential burrowing owl burrows were identified within the 500-foot buffer. No desert tortoise (*Gopherus agassizii*), Mohave ground squirrel (*Xerospermophilus mohavensis*), or Swainson's hawk (*Buteo swainsoni*) were observed within the BSA. American badger (*Taxidea taxus* - occupied den), desert kit fox (*Vulpes macrotis* - potential dens), ferruginous hawk (*Buteo regalis*), and loggerhead shrike (*Lanius ludovicianus*) were observed within the 500-foot buffer.

Jurisdictional resources within the Project Component were evaluated during the 2011 jurisdictional delineation for Segment 3B (LSA 2011) and a separate field visit on May 16, 2012, to evaluate potential jurisdictional features for additional areas that were not included in the 2011 jurisdictional delineation. Jurisdictional features do occur within the Project Component, and jurisdictional resource permits will be required for areas that cannot be avoided by construction. Jurisdictional feature 3B-1-S-3 overlaps the access road between Structures 3B-4 and 3B-5; however, this access road will not be constructed and the feature will be avoided. Permits for impacts to jurisdictional resources have been submitted to the regulatory agencies and all permits have been received. All non-permitted features that will be avoided will be marked as ESAs. If any potential features are subsequently identified, they will be flagged for avoidance or the applicable permits will be obtained.

Impacts associated with this Final Engineering Concurrence includes: 0.535 acres of additional permanent impacts and 0.018 acres of temporary impacts. Permanent impacts to special-status vegetation communities and special-status species habitat will be mitigated per off-site per agreements with CDFG and USFWS, and Applicant Proposed Mitigation (APM) BIO-7. Temporary impacts will be mitigated on-site per the Habitat Restoration and Revegetation Plan (HRRP) and APM BIO-2, which include SWPPP requirements, weed control (Mitigation Measure [MM] B-27b), and visual resources (MM V-1c and MM V-9).

No additional impacts to biological resources are anticipated.

- **Cultural Resources:** SCE submitted a memorandum titled *Southern California Edison Tehachapi Renewable Transmission Project Cultural and Paleontological Resources Requirements for Segment 3B – Request for Final Engineering Concurrence #5 for Additional Ground Disturbance Areas within or in the Vicinity of Structures 3B-1 to 3B-3, 3B-4, 3B-5 to 3B-7, 3B-48, 3B-50, 3B-52 and 3B-61 and the use of Existing Wind Farm Access Roads*, dated August 20, 2012. The memorandum states that all the construction areas where this Request for Final Engineering Concurrence (RFEC) #5 will take place were previously surveyed for cultural resources and assessed for paleontological resources (Ahmet et al 2006, Aron 2012, Gust and Scott 2009, Holm 2012a, Holm 2012b, Pacific Legacy 2012a, Pacific Legacy 2012b, Pacific Legacy 2012c). The results of the previous investigations show that no known cultural resources will be impacted as a result of the construction activities associated with this RFEC #5.

The paleontological assessments indicate that some of the work will be conducted in areas that have the potential to yield paleontological resources and therefore a paleontological monitor will be required at certain locations. The Paleontological Resources Management Plan (PRMP) indicates that some of the proposed areas associated with this Request for Final Engineering Concurrence #5 have a low to high potential for yielding paleontological resources (Gust and Scott 2009). However, during paleontological monitoring at the Highwind Substation, no fossils were found and the sediment observed was not conducive

to fossil preservation. As a result, paleontological monitoring was reduced to spot checking during ground disturbing activities within the substation. The proposed RFEC #5 includes ground disturbing activities in areas that have the same geology (Older Quaternary Alluvium) underlain the substation (access roads to Structures 3B-1 to 3B-7) as well as Quaternary Alluvium, which has a lower paleontological sensitivity. Based on the monitoring results, SCE recommends spot checking for paleontological resources during ground disturbing activities associated with these structures. Monitoring requirements during ground disturbing activities are as follows:

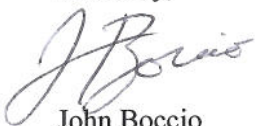
- Paleontological Monitor Spot Checking Required at the following Proposed Change Sites: 1, 2, and 3.
- Paleontological Monitor Required only if excavations exceed 2 feet in depth at the following Proposed Change Sites: 4, 5, 6, and 7.
- No Paleontological Monitor is required at Proposed Change Site 8.

No additional impacts to cultural or paleontological resources are anticipated.

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

- Per the Paleontological Resources Management Plan (PRMP), a paleontological monitor is required to spot check at the following Proposed Change Sites: 1, 2, and 3.
- Per the PRMP, a paleontological monitor is required if excavations exceed 2 feet in depth at the following Proposed Change Sites: 4, 5, 6, and 7.
- All conditions required by Notice to Proceed (NTP) #30 and #32 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #30 and #32, and this Concurrence of Final Engineering shall be available on site for the duration of construction activities where applicable.

Sincerely,



John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen