

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



October 12, 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 Test Pins, Relocation of Test Stations, and Access Roads

Dear Ms. Nelson,

On September 28, 2012, Southern California Edison (SCE) submitted a request for Final Engineering Concurrence for test pins, relocation of test stations, and access roads for Segment 3B Transmission Line (T/L) of the Antelope Transmission Project (ATP) in unincorporated Kern County, California. SCE provided additional information on October 11, 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 test pins, relocation of test stations, and access roads for Segment 3B T/L of the ATP in unincorporated Kern County, California. Subsequent to approval of Segment 3B T/L NTPRs (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 the need for additional test pins and access route for natural gas pipeline protection facilities and the shift of an access road and test stations based on new data showing the location of the natural gas pipelines.

New impacts associated with this Final Engineering Concurrence includes: 0.029 acre of temporary impacts. The previous temporary impact for the test station disturbance area was 0.018 acre. The new temporary impact for the *relocation* of the test station disturbance area is 0.011. No permanent impacts to special-status vegetation communities will occur.

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

1. Temporary use of an existing wind farm access road to place test pins for natural gas pipeline protection testing north of Structure 3B-44. The existing access road would not be improved. The test pins would be located within the shoulder of the existing road and would not result in additional disturbance area.
2. Permanent relocation of two gas pipeline test stations north of Structure 3B-49. Potholing activities showed that the gas pipelines were in different locations than previously believed, and the test stations have been relocated to match the location of the pipelines. A previously approved overland travel access road would be used to reach these test stations. This change would not result in any additional disturbance, but would reduce the length of overland travel required.

- **Biological Resources:** SCE submitted a biological survey report titled *Biological Survey Report for Proposed Test Pins and Access Route North of Structure 3B-44 and Access Road and Relocation of Test Stations North of Structure 3B-49, Segment 3B Transmission Line, Antelope Transmission Project, Kern County, California* dated September 24, 2012. The report documents the biological conditions for Segment 3B test pins and access route north of Structure 3B-44 and access road and relocation of test stations north of Structure 3B-49 (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, 2010, and 2011 desert tortoise surveys (LSA 2007, 2008a, 2010a; ICF and ECORP 2011b); 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; and Swainson's hawk. 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 AC Gas Line Mitigation work, biological construction monitoring has been ongoing regularly since the sites became active, and species event 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 BSA include California annual grassland, Mojave desert wash scrub, Mojave mixed woody scrub, Mojavean juniper woodland and scrub, rabbitbrush scrub, and disturbed/developed. The Project Component sites occur within Mojave mixed woody scrub vegetation community. A large portion of the BSA for the proposed test route has not been surveyed for vegetation communities; however, no impacts will occur to these vegetation communities as work will not occur beyond the test route, which overlaps an existing road. The entire test pin and test route portion of the Project Component occurs only within the new, existing wind farm access road that consists of disturbed vegetation communities and developed land. No special-status plants were observed within the Project Component during special-status plant focused surveys. 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.

No special-status wildlife species were observed within the Project Component during prior surveys. No burrowing owls (*Athene cunicularia*), sign of the species, or potential burrows were detected in the BSA during the 2010 focused surveys or during the 2012 focused burrowing owl preconstruction surveys. No desert tortoise (*Gopherus agassizii*) or Swainson's hawk (*Buteo swainsoni*) were observed within the BSA during previous surveys.

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. No jurisdictional features occur within the Project Component; however, several jurisdictional features are present within the 500-foot buffer. These features will not be affected by construction activities. 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: 0.029 acre of temporary impacts. The previous temporary impact for the test station disturbance area was 0.018 acre. The new temporary impact for the *relocation* of the test station disturbance area is 0.011. No permanent impacts to special-status vegetation communities will occur. 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 #6 for Proposed Test Pins and Access Route North of Structure 3B-44 and Access Road and Relocation of Test Stations North of Structure 3B-49* dated September 25, 2012. The memorandum states that all the construction areas where this Request for Final Engineering Concurrence #6 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). The results of the previous investigations show that there are no known resources along the wind farm access roads where the test pins will be located. The results of the previous investigations indicate that there is a known cultural resource in the vicinity of the two test stations and the road that has been approved for improvement. However, the proposed activities will not cause an impact to the resource and the area will be marked as an Environmentally Sensitive Area in the field.

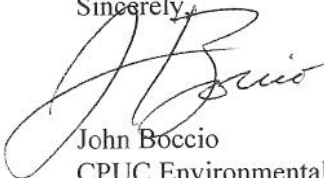
The paleontological assessments indicate that the test stations are located within a geologic formation that has the potential to yield paleontological resources. However, the work associated with the test stations is not conducive to yielding paleontological resources since the work is occurring within an existing roadbed and therefore a monitor will not be required during these activities.

No additional impacts to cultural or paleontological resources are anticipated.

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

- All conditions required by Notice to Proceed (NTP) #32 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #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