

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



January 22, 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 (Antelope-Tehachapi 500kV and 220kV Transmission Line), Segment 3B: Final Engineering Concurrence for the Segment 3B Installation of Gradient Control Mats

Dear Ms. Nelson,

On December 13, 2013, Southern California Edison (SCE) submitted a request for Final Engineering Concurrence for installation of gradient control mats at four existing test stations to provide additional gas pipeline protection on Segment 3B Transmission Line (T/L) of the Antelope Transmission Project (ATP) in unincorporated Kern County, California. SCE provided additional information on January 13, 2014. **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 installation of gradient control mats at four existing test stations to provide additional gas pipeline protection on Segment 3B T/L of the ATP in unincorporated Kern County, California. Subsequent to approval of Segment 3B T/L NTPR (NTP #32 dated March 20, 2012), and the addendum for gas pipeline protection facilities (dated March 14, 2012) by the CPUC, final design on Kinder Morgan (previously El Paso Natural Gas) gas pipelines was completed, resulting in the need for installation of gradient control mats at four existing test stations to provide additional gas pipeline protection.

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

1. Permanent installation of three gradient control mats at existing test stations east of Structure 3B-31. This would result in the permanent disturbance of approximately 0.68 acres (approximately 0.23 acres per control mat).
2. Permanent installation of one gradient control mat at an existing test station east of Structure 3B-61. This would result in the permanent disturbance of approximately 0.23 acres.
3. Use of access roads to the test stations. These access roads would not require improvement for use.

A technician, using a vacuum truck, will locate and mark the pipelines to be excavated. A request to perform the excavations will then be sent to Underground Service Alert of Southern California (DigAlert). Following clearance, a crew of three technicians will excavate the pipelines and attach ground fault equipment. The equipment required for use of this project includes: two 4x4 pickup trucks, necessary hand tools, one 4x4 rubber-tired excavator, and one water truck. The pipelines are expected to be buried between 4 and 15 feet below ground. Exact depths of the excavations will be determined once the vacuum

truck locates the pipelines. It is anticipated that one excavation will be completed per day (four total excavations), with a total project duration of approximately 10 working days.

The control mats are made up of lengths of zinc ribbon and wire attached to the gas pipeline and brought to above the ground surface. No slurry mix will be used.

- **Biological Resources:** SCE submitted a biological survey report titled *Biological Survey Report for Alternating Current Gas Pipeline Mitigation Request for Final Engineering Concurrence 3B-#9, Segment 3B Transmission Line, Antelope Transmission Project, Kern County, California* dated December 9, 2013. The report documents the biological conditions for Segment 3B Final Engineering Concurrence 3B-#9 (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 2010-2012 rare plant surveys (LSA 2010e, ICF 2011gt, ICF and ECORP 2012a); 2008 and 2010-2012 Swainson's hawk surveys (LSA 2008b, 2010c; ICF and Bloom 2011d, ICF and Bloom, 2012); 2007, 2008 through 2011 desert tortoise surveys (LSA 2007, 2008a, 2009b, 2010a; ICF and ECORP 2011b, ICF and ECORP 2012b); 2008, 2010, and 2011 Mohave ground squirrel surveys (Vanherweg 2008, LSA 2010b, ICF and ECORP 2011c, ICF and ECORP 2012c); and burrowing owl and American badger burrow surveys in 2010 (LSA 2010d). The biological resources within and adjacent to the Project Component and BSA were also evaluated during preconstruction surveys for general biological resources (P30) and burrowing owl (Owl30) for the Segment 3B Transmission Line, Wilderness Line, and AC Mitigation. A reconnaissance survey of the Project Component and a portion of the BSA, which was not previously surveyed, was conducted by SCE and CH2M Hill on November 21, 2013.

Vegetation communities within the Project Component include bunchgrass grassland, California annual grassland, 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, Joshua tree woodland, Mojave desert wash scrub, Mojave mixed woody scrub, Mojavean juniper woodland and scrub, rabbitbrush scrub, southern willow scrub, and disturbed/developed. Within the previously un-surveyed portion of the BSA, California annual grassland and disturbed/developed vegetation communities were observed. No special-status plants were observed within the Project Component during 2010-2012 rare plant focused surveys.

Previous focused burrowing owl (*Athene cunicularia*) surveys in 2010 for Segment 3B were negative for burrowing owls, sign of the species, and potential burrowing owl features within the Project Component. However, sign of the species and potential burrowing owl burrows were identified within the 500-foot buffer (LSA 2010d). New potential burrows were identified within the 500-foot buffer during 2011 desert tortoise (*Gopherus agassizii*) focused surveys, preconstruction surveys and burrowing owl preconstruction surveys for the Segment 3B transmission line, AC Mitigation, and the Wilderness Line Relocation. None of the burrows from these surveys showed evidence of burrowing owl use (ICF 2011gw; ICF and ECORP 2011b). Additional potential burrows were also identified within the 500-foot buffer during 2012 Segment 3B desert tortoise focused surveys (ICF and ECORP 2012b). No Swainson's hawk (*Buteo swainsoni*) were observed within the Project Component; migratory Swainson's hawk were observed incidentally in 2012 within the BSA. Within the 500-foot buffer, horned lark (*Eremophila alpestris*) and loggerhead shrike (*Lanius ludovicianus*) were observed during 2012 surveys. Additionally, a potential desert kit fox (*Vulpes macrotis arsipus*) den, desert woodrat (*Neotoma lepida intermedia*) middens, and potential burrowing owl features were observed within the 500-foot buffer during 2012 surveys.

Jurisdictional resources within and adjacent to 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 BSA, but jurisdictional resource permits are not expected to be required because there are existing stream crossings on access roads or impacts are not expected to occur. Jurisdictional features mapped within the BSA will be

avoided by the Project Component areas. Within the previously un-surveyed portion of the BSA, a desktop analysis revealed a potential jurisdictional resource within the BSA. However, during the site reconnaissance survey, this feature was determined to be non-jurisdictional because it was a topographical swale that was previously disturbed from road construction. All features 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: 0.91 acre of permanent impacts. Permanent impacts to special-status vegetation communities and special-status species habitat will be mitigated off-site per agreements with CDFG and USFWS, and Applicant Proposed Mitigation (APM) BIO-7.

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 Assessment and Requirements Segment 3B – Request for Final Engineering Concurrence – AC Mitigation* dated November 22, 2013. The memorandum states that no cultural or paleontological resources will be impacted by the proposed installation of gradient control mats east of Structure 3B-31 and east of Structure 3B-61, and use of existing access road in support of Segment 3B. Portions of the gradient areas and access roads provided in this Request for Final Engineering Concurrence were included in previous surveys for TRTP Segment 3B and no cultural resources were identified (Ahmet et al. 2006; Armstrong et al. 2011; Holm 2011a, 2011b, 2012; Holson 2011; Pacific Legacy 2011). The remaining portions of the proposed gradient areas and access road areas lay outside of the previous surveys for TRTP and required additional cultural resources survey (*Supplemental Cultural Resources Survey for the Request for Final Engineering Concurrence No. 9: Proposed Installation of Gradient Control Mats, AC Mitigation, Segment 3B, TRTP, Kern County, California*. PCR 2013). No cultural resources were identified during this survey.

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 moderate sensitivity for harboring significant paleontological resources (PFYC = 3). However, no paleontological resources were observed during the current field survey. Furthermore, based on previous paleontological monitoring efforts for the TRTP 3B project (Aron and Kelly 2013) for areas mapped as both Quaternary older alluvium and Quaternary alluvium, it is recommended that spot-checking of earthmoving activities - including trenching, scraping, and drilling - occur only when the depth of disturbance is greater than 10 feet as no significant resources were found in this area at a shallower depth. It is unlikely that any significant fossils will be discovered during further activities in this area at a depth of less than ten feet.

No additional impacts to cultural or paleontological resources are anticipated.

**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 only when the depth of disturbance is greater than 10 feet.
- 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,

Jason Coontz  
CPUC Environmental Project Manager

cc: V. Strong, Aspen