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

December 12, 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 to Notice to Proceed (NTP) #30 and #32

Dear Ms. Nelson,

On September 5, 2014, Southern Californian Edison (SCE) submitted a Final Engineering Concurrence Request to Notice to Proceed (NTP) #30 and #32 seeking authorization from the California Public Utilities Commission (CPUC) for permanent Operations and Maintenance (O&M) work areas and permanent access road segments on the Segment 3B Transmission Line (T/L) of the Antelope Transmission Project (ATP) in unincorporated Kern County, California. Additional information was submitted on December 4 and December 11, 2014.

The SCE Antelope 500 kV Transmission Project (Project) was evaluated in accordance with the California Environmental Quality Act and a Certification of Public Convenience and Necessity (CPCN) was granted by CPUC Docket #A.04-12-008, SCH #2006041160 on March 15, 2007. NTP #30 for Segment 3B Structures 1 – 14 was issued by the CPUC on February 21, 2012. NTP #32 for Segment 3B Structures 3B-15 through 3B-78 was issued by the CPUC on March 20, 2012. **This Final Engineering Concurrence to NTP #30 and NTP #32 is granted by CPUC for the proposed activities based on the following factors:**

- SCE submitted the following information:

  SCE is requesting a Final Engineering Concurrence to Notice to Proceed #30 and #32 (NTP #30 dated February 21, 2012, NTP #32 dated March 20, 2012) for permanent Operations and Maintenance (O&M) work areas and permanent access road segments on Segment 3B T/L of the ATP in unincorporated Kern County. Subsequent to completion of the Segment 3B T/L consistent with NTPR for Structures 1-14 (NTP #330) and the Segment 3B T/L NTPR for Structures 15-78 (NTP #32) by the CPUC, the need for approval of permanent O&M work areas and permanent access road segments was identified. These permanent work areas and roads were previously approved as temporary disturbance areas. There will be no additional work or ground disturbance associated with this Final Engineering Concurrence. The following are requested for approval for Segment 3B T/L (note that all measurements are approximate):

  1. Fifty-five permanent O&M work areas around specified structures. The following table contains additional information about the location and disturbance acreage of each site. Previously approved permanent access roads would be used to reach the work areas.

Location	Total Acreage*	New Disturbance Acreage**
3B-5	0.237	0.184
3B-7	0.108	0.028
3B-8	0.192	0.192
3B-9	0.167	0.088

Location	Total Acreage*	New Disturbance Acreage**
3B-10	0.052	0.052
3B-11	0.049	0.049
3B-12	0.055	0.020
3B-13	0.142	0.0
3B-14	0.182	0.122
3B-15	0.112	0.085
3B-16	0.092	0.083
3B-17	0.156	0.042
3B-18	0.224	0.123
3B-19	0.145	0.119
3B-20	0.256	0.215
3B-21	0.322	0.284
3B-22	0.182	0.109
3B-23	0.237	0.207
3B-24	0.102	0.102
3B-25	0.158	0.140
3B-26	0.033	0.020
3B-27	0.094	0.090
3B-28	0.128	0.097
3B-29	0.186	0.176
3B-32	0.165	0.121
3B-33	0.515	0.422
3B-34	0.087	0.087
3B-35	0.258	0.258
3B-36	0.172	0.162
3B-37	0.067	0.063
3B-38	0.274	0.177
3B-39	0.407	0.355
3B-42	0.098	0.098
3B-44	0.174	0.174
3B-45	0.111	0.111
3B-46	0.105	0.105
3B-47	0.061	0.052
3B-48	0.099	0.091
3B-49	0.056	0.055
3B-50	0.051	0.050
3B-52	0.099	0.049
3B-53	0.079	0.032
3B-54	0.159	0.153
3B-55	0.075	0.075
3B-57	0.058	0.055
3B-58	0.321	0.211
3B-59	0.153	0.120
3B-61	0.088	0.088
3B-63	0.158	0.158
3B-66	0.136	0.101
3B-67	0.103	0.103
3B-68	0.202	0.202
3B-69	0.140	0.140
3B-72	0.088	0.088
3B-76	0.081	0.071

*Values in the “Total Acreage” field represent the full acreage of each permanent O&M work area.

**Some sites overlap disturbance areas that were previously approved in NTP #30 and NTP #32. The values in the “New Disturbance Acreage” field represent the acreage of permanent disturbance at each site that has not been previously approved.

2. Fifteen permanent access road segments not previously approved in an NTPR or RFEC were identified. The following table contains additional information about the location and disturbance acreage at each site.

Location	Total Acreage*	New Disturbance Acreage**
3B-2	0.119	0.119
3B-4	0.184	0.133
3B-6	0.145	0.105
3B-20	0.087	0.081
3B-31	0.215	0.215
3B-40	0.077	0.077
3B-41	0.151	0.151
3B-43	0.127	0.127
3B-56	0.134	0.105
3B-62	0.225	0.225
3B-64	0.176	0.176
3B-66	0.152	0.152
3B-73	0.180	0.180
3B-74	0.260	0.260
3B-75	0.183	0.183

*Values in the "Total Acreage" field represent the full acreage of each permanent access road segment.

**Some sites overlap disturbance areas that were previously approved in NTP #32 or in the gas pipeline protection facilities addendum. The values in the "New Disturbance Acreage" field represent the acreage of permanent disturbance at each site that has not been previously approved.

The O&M work areas have a total permanent disturbance of 8.25 acres, and new permanent disturbance of 6.65 acres. The permanent access road segments have a total permanent disturbance of 2.42 acres, and new permanent disturbance of 2.29 acres.

- **Biological Resources:** SCE submitted a biological report titled *Biological Survey Report for Permanent Operations and Maintenance (O&M) Work Areas and Permanent Access Road Segments Request for Final Engineering Concurrence 3B-#10, Segment 3B Transmission Line, Antelope Transmission Project, Kern County, California* dated November 24, 2014. The biological report documents the biological conditions for the Segment 3B T/L permanent O&M work areas and permanent access road segments (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, ICF and ECORP 2012a); 2008, 2010, and 2011 Swainson's hawk (*Buteo swainsoni*) surveys (LSA 2008b, 2010c; ICF and Bloom 2011d, 2012); 2007, 2008 through 2011 desert tortoise (*Gopherus agassizii*) surveys (LSA 2007, 2008a, 2009b, 2010a; ICF and ECORP 2011b, 2012b); 2008, 2010, and 2011 Mohave ground squirrel (*Xerospermophilus mohavensis*) surveys (Vanherweg 2008; LSA 2010b; ICF and ECORP 2011c, 2012c); and burrowing owl (*Athene cunicularia*) and American badger (*Taxidea taxus*) burrow surveys in 2010 (LSA 2010d). 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 T/L. A literature review was also performed. As part of the Segment 3B T/L and Wilderness Line Relocation work, biological construction monitoring was ongoing regularly since the sites became active, and species events and nest events recorded in the Field Reporting Environmental Database (FRED).

Wildlife

Previous focused burrowing owl 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 focused surveys, preconstruction surveys and burrowing owl preconstruction surveys for the Segment 3B T/L and the Wilderness Line Relocation. Additional potential burrowing owl burrows were documented within the Project Component during general preconstruction and focused preconstruction surveys in 2012 (ICF and ECORP 2012a). None of the burrows from these surveys showed evidence of burrowing owl use (ICF 2011gw, ICF and ECORP 2011b; FRED). Additional potential burrows were also identified within the 500-foot buffer during 2012 Segment 3B desert tortoise focused surveys (ICF and ECORP 2012b).

Focused surveys conducted for desert tortoise, Mohave ground squirrel, and Swainson's hawk in 2010, 2011, and 2012 were negative for the species within the Project Component and BSA. However, Swainson's hawk were observed in flight over the BSA during the general preconstruction survey and 2012 focused survey for desert tortoise on April 10, 2012 (FRED). No desert tortoise sign was observed within the Project Component and BSA during the Segment 3B focused survey for desert tortoise. Additionally, desert woodrat (*Neotoma lepida*) middens, a loggerhead shrike (*Lanius ludovicianus*), and an inactive cactus wren (*Campylorhynchus brunneicapillus*) nest were observed within the Project Component. A desert kit fox (*Vulpes macrotis arsipus*), desert woodrat middens, horned lark (*Eremophila alpestris*), and loggerhead shrike were observed within the 500-foot buffer during the 2011 Segment 3B desert tortoise focused survey (ICF and ECORP 2011b). Loggerhead shrike and prairie falcon (*Falco mexicanus*) were observed within the BSA during 2012 Segment 3B desert tortoise focused surveys (FRED). Additionally, loggerhead shrike, prairie falcon, willow flycatcher (*Empidonax traillii extimus*), potential American badger den, potential desert kit fox den, and potential burrowing owl features were observed within the 500-foot buffer during the 2012 Segment 3B desert tortoise focused survey (FRED). Loggerhead shrike were also observed during the Wilderness Line general preconstruction survey (ICF 2011gv), and during the Segment 3B T/L preconstruction survey (FRED).

Plants

Vegetation communities that occur within the Project Component include bunchgrass grassland, California annual grassland, desert bunchgrass grassland, Joshua tree woodland, Mojave mixed woody scrub, Mojavean juniper woodland and scrub, rabbitbrush scrub, and disturbed/developed. Vegetation communities that occur within the 500-foot buffer include agriculture, bunchgrass grassland, California annual grassland, canyon oak forest, desert bunchgrass grassland, desert saltbush scrub, 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, Tucker oak scrub, valley oak woodland, and disturbed/developed. One special-status plant species, Bakersfield cactus (*Opuntia basilaris* var. *treleasei*), was observed within the Project Component. Special-status plant species that were identified within the BSA during focused rare plant surveys in 2012 include adobe yampah (*Perideridia pringlei*), Bakersfield cactus, and Mojave Indian paintbrush (*Castilleja plagiotoma*) (FRED); however, these species were not located within the Project Component.

Jurisdictional Features

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 BSA, but no additional impacts are anticipated. Jurisdictional permits were obtained when applicable prior to construction. All features are marked as Environmentally Sensitive Areas (ESAs).

Habitat Impacts

Impacts associated with the Project Component include the following: Permanent O&M work areas have a total acreage impact of 8.25 acres, with 6.65 acres being new disturbance. New permanent access road segments have a total acreage impact of 2.42 acres, with 2.29 acres being new disturbance. Permanent

impacts to special-status vegetation communities and special-status species habitat will be mitigated off-site per agreements with CDFW and USFWS.

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 – RFEC #10 Permanent Operations and Maintenance (O&M) Work Areas and Permanent Access Road Segments*, dated August 25, 2014, with the Request for Final Engineering Concurrence. The memorandum states that no known cultural or paleontological resources will be impacted by this Request for Final Engineering Concurrence (RFEC) #10. All the areas addressed in this RFEC were included in previous cultural resources surveys in support of Segment 3B and several cultural resources were identified (Ahmet et al. 2006; Armstrong et al. 2011; Holm 2011a, 2011b, 2012; Holson 2011; Pacific Legacy 2011, 2012a, 2012b, 2014; Wetherbee 2014). Per the mitigation measures outlined in the Cultural Resources Management Plan (Pacific Legacy 2012) for Segment 3B all resources that had the potential to be impacted were evaluated for inclusion in the California Register of Historic Resources (CRHR) and data recovery efforts were conducted as appropriate. One archaeological resource eligible for listing in the CRHR is associated with Structure 3B-45; however, there will be no additional ground disturbance associated with this RFEC.

Previous paleontological assessments for Segment 3B 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 ground disturbing activities along Segment 3B (Aron and Kelly 2013). Furthermore, there are no ground disturbing activities associated with RFEC #10 and no additional paleontological efforts are required.

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 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 Final Engineering Concurrence shall be available on site for the duration of construction activities where applicable.

- At the completion of Segment 3B construction activities, including AC mitigation, SCE shall submit to CPUC, USFWS, and CDFW the final temporary and permanent impact acreages for all special status species habitat and special vegetation communities resulting from Segment 3B construction, in accordance with Mitigation Measures B-4b, B-6b, B-10c, B-13d, and B-19b. These acreages shall be compared to the available excess TRTP off-site habitat compensation lands.

Sincerely,

John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen