

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



June 8, 2015

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 Protective Cover for Exposed Section of PG&E Pipeline

Dear Ms. Nelson,

On May 25, 2015, Southern California Edison (SCE) submitted a request for Final Engineering Concurrence for the burial of an exposed section of the PG&E pipeline near Structure 46 on Segment 3B Transmission Line (T/L) of the Antelope Transmission Project (ATP) in unincorporated Kern County, California. **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 the burial of an exposed section of the PG&E pipeline near Structure 46 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 was completed, resulting in the need to bury an exposed section of pipeline. The purpose for burying this section of pipeline is for the protection of operation and maintenance personnel when working on this specific portion of pipeline. Burying the pipeline below grade mitigates all Step Touch Potential issues (IEEE 80) identified in the engineering model and will eliminate the possibility of inadvertent contact by any persons or equipment including the general public. This issue exists only at this specific span due to its proximity to Segment 3B Structure 46.

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

1. The above-ground pipe of interest is a 50-foot long section of 34-inch diameter natural gas carrying pipeline, located at N35.053687 W118.337313. An area of 50 feet by 50 feet will be filled with material similar to the native well-graded, gravelly soil, to a depth that provides three feet of pipe cover, six feet total depth. An additional 12 inches of native soil will be graded above the fill to provide a crown with a gentle slope to minimize erosion and encourage revegetation. The fill material will be compacted to 90% dry density and will provide adequate long-term protection for the pipe. A temporary work area measuring 0.11 acre will be required for construction (of this, 0.0 acre is new disturbance area not previously approved in NTP #32 or the gas pipeline protection facilities addendum). A previously approved access road would be used to reach the site.
- **Biological Resources:** SCE submitted a biological survey report titled *Biological Survey Report for the Protective Cover for Exposed Section of PG&E Pipeline Request for Final Engineering Concurrence 3B-#13, Segment 3B Transmission Line, Antelope Transmission Project, Kern County, California* dated May 12, 2015. The report documents the biological conditions for Segment 3B Final Engineering Concurrence 3B-#13 (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 surveys (LSA 2008b, 2010c; ICF and Bloom 2011d, 2012); 2007, 2008 through 2011, and 2014 desert tortoise surveys (LSA 2007, 2008a, 2009b, 2010a; ICF and ECORP 2011b, 2012b; CH2M Hill 2014); 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 and AC Mitigation work.

Vegetation communities within the Project Component include Mojavean juniper woodland and scrub. Vegetation communities within the 500 foot buffer include Mojave mixed woody scrub, Mojavean juniper woodland and scrub, rabbitbrush scrub, Joshua tree woodland, Mojave desert wash scrub (non-jurisdictional), and disturbed/developed. No special-status plant species were identified within the Project Component. Two individuals of Bakersfield cactus (*Opuntia basilaris* var. *treleasei*), were identified within the BSA during focused rare plant surveys in 2012.

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, a potential burrowing owl burrow was identified within the 500-foot buffer (LSA 2010d). New potential burrows were identified within the 500-foot buffer during preconstruction surveys and burrowing owl preconstruction surveys for the Segment 3B T/L and AC Mitigation in 2012; however, none of these burrows were found to be occupied by burrowing owl. No new potential burrows were found during 2014 focused surveys (CH2M Hill). Focused surveys conducted for desert tortoise (*Gopherus agassizii*) and Swainson's hawk (*Buteo swainsoni*) in 2010, 2011, 2012, and 2014 were negative for the species within the Project Component and BSA. No desert tortoise sign was observed within the Project Component and BSA during the Segment 3B focused survey for desert tortoise. No special-status wildlife species were identified within the Project Component. Additionally, a prairie falcon (*Falco mexicanus*) and desert woodrat (*Neotoma lepida intermedia*) middens were observed within the 500-foot buffer. No active nests are currently documented within the Project Component.

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 500-foot buffer, but not the Project Component. No additional impacts are anticipated. Jurisdictional resource permits were obtained when applicable prior to construction. All features were marked as ESAs.

No new temporary or permanent impacts are associated with this Final Engineering Concurrence.

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 #13 Segment 3B T/L – Protective Cover for Exposed Section of PG&E Pipeline* dated May 21, 2015. The areas addressed in this RFEC were included in previous cultural resources surveys in support of Segment 3B and no cultural resources were identified in the immediate vicinity or within the boundaries of the proposed work area and access roads (Ahmet et al. 2006; Armstrong et al. 2011; Holm 2011; Pacific Legacy 2011, 2012, 2014). No archaeological monitors are required to support the proposed work.

Previous paleontological assessments for Segment 3B define the geology at the proposed location as Quaternary recent alluvium (Qa) (Gust and Scott 2008). Based on the Potential Fossil Yield Classification (PFYC) system, Quaternary recent alluvium has a low potential for containing paleontological resources. As a result and based on previous field observations during monitoring activities along the transmission line

(Aron and Kelly 2014, Aron et al. 2014), a paleontological monitor is not necessary to support the proposed activities in RFEC #13.

No additional impacts to cultural or paleontological resources are anticipated.

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

- Prior to bringing imported soil onto the project site, SCE shall provide the CPUC with documentation that the soil is clean and weed free.
- 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