

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



May 24, 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: Modification #1 to Notice to Proceed (NTP) #32

Dear Ms. Nelson,

On May 11, 2012, Southern California Edison (SCE) submitted a variance request for a Modification to Notice to Proceed (NTP) #32 to modify access roads for construction of Structures 3B-16, 3B-33, 3B-34, 3B-35, 3B-36, 3B-37, and 3B-38. Additionally, a tower and road shift is required at Structure 3B-39 to avoid an underground distribution line. Segment 3B Transmission Line (T/L) of the Antelope Transmission Project (ATP) is in unincorporated Kern County, California. Additional information was submitted on May 17 and 21, 2012. **This Modification #1 to NTP #32 is approved by the CPUC for the proposed activities based on the following factors:**

- SCE submitted the following information:

SCE requests a Modification to Notice to Proceed (NTP) #32 to modify access roads for construction of Structures 3B-16, 3B-33, 3B-34, 3B-35, 3B-36, 3B-37, and 3B-38. Additionally, a tower and road shift is required at Structure 3B-39 to avoid an underground distribution line. Segment 3B T/L of ATP is in unincorporated Kern County, California. Subsequent to approval of the Segment 3B NTPR (NTP #32 dated March 20, 2012) by the CPUC, final design and engineering was completed resulting in modification to access for construction to the structures listed above as well as a tower and road shift. All changes are per final engineering design due to terrain.

The proposed changes at 3B-16 include a relocated access road that will result in less disturbance overall, and a relocated crane pad and associated grading area that will remain entirely within the footprint of the previously approved grading area. The disturbance area for the relocated access road would be reduced from 1.37 acre to 0.17 acre.

The proposed change at 3B-33 includes shifting the access road slightly to the west and south of the approved access road and adding a temporary crane pad that was missing from the approved project. The disturbance area for the relocated access road would be reduced from 0.34 acre to 0.33 acre.

The proposed changes at 3B-34, 3B-35, 3B-36, and 3B-37 include slight changes to the access road that connects these structures. The disturbance area for the relocated access road would be reduced from 1.4 acres to 1.2 acres.

The proposed change at 3B-38 includes an expanded access road disturbance area to account for terrain. The modified access road would result in an additional 0.06 acre of disturbance.

Lastly, to avoid an underground distribution line that crosses the 3B transmission line alignment, 3B-39 and associated access road and turning radii would be shifted approximately 60 feet to the east (inline, still within the right-of-way and primarily within the structure work area approved in NTP #32).

- **Biological Resources:** SCE submitted a letter dated May 5, 2012 by SCE Biologist, Rachael Poston, documenting the previous and current biological conditions at five sites throughout Segment 3B Structures 3B-16 through 3B-39 (Variance Project Component) and a 500-foot buffer (Biological Study Area [BSA]).

Biological resources within the BSA 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, LSA 2010c, ICF and Bloom 2011d); 2007 through 2011 desert tortoise surveys (LSA 2007, LSA 2008a, LSA 2009b, LSA 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 Variance Project Component areas were also included in the 2012 focused surveys for special-status plants, desert tortoise, Swainson's hawk and Mohave ground squirrel (surveys on-going or reports pending).

The biological resources within the BSA were also evaluated during preconstruction surveys for general biological resources (P30) and burrowing owl (Owl30). For Structures 3B-1 through 3B-42, construction monitoring has been ongoing regularly since the sites became active, and species and nest events are recorded in the Field Reporting Environmental Database (FRED). Jurisdictional resources within the Variance Project Component were evaluated during the 2011 jurisdictional delineation for Segment 3B (LSA 2011).

**Site 1 (Structure 3B-16):** Vegetation communities within the Site 1 Project Component include, California annual grassland, canyon oak forest, disturbed/developed, rabbitbrush scrub, southern willow scrub, and valley oak woodland. No special-status plant species were observed. Wildlife species observed included potential burrowing owl features and potential desert kit fox dens. No jurisdictional features were observed. Vegetation communities within the Site 1 500-foot buffer include California annual grassland. No special-status plant species were observed. Wildlife species observed included potential burrowing owl features, potential desert kit fox dens, and a Cooper's hawk. Jurisdictional features include, Stream 3B-2-S-13 west of Structure 3B-15 which will be avoided and Stream 3B-2-S-15 and Riparian Area 3B-2-R-15 south of Structure 3B-16 (permit pending for NTP approved work area).

**Site 2 (Structure 3B-33):** Vegetation communities within the Site 2 Project Component include desert bunchgrass grassland. No special-status plant or wildlife species or jurisdictional features were observed. Vegetation communities within the Site 2 500-foot buffer include, California annual grassland, disturbed/developed, desert bunchgrass grassland, Joshua tree woodland, rabbitbrush scrub, and Tucker oak scrub. No special-status plant or wildlife species were observed. Jurisdictional features include Stream 3B-6-S-43 which overlaps Structure 3B-33 (permit pending for NTP approved work areas).

**Site 3 (Structures 3B-34, 3B-35, 3B-36, and 3B-37):** Vegetation communities within the Site 3 Project Component include, bunchgrass grassland, California annual grassland, and disturbed/developed. No special-status plant or wildlife species were observed. Jurisdictional features include Stream 3B-6-S-44 between Structures 3B-36 and 3B-37 which will be avoided. Vegetation communities within the Site 3 500-foot buffer include, bunchgrass grassland, California annual grassland, desert bunchgrass grassland, disturbed/developed, Joshua tree woodland, Mojave mixed woody scrub, rabbitbrush scrub, and southern willow scrub. No special-status plant species were observed. Potential burrowing owl features were observed. Jurisdictional features include Oak Creek which will be avoided and Stream 3B-6-S-43 west of Structure 3B-34 (permit pending for NTP approved work area).



**Site 4 (Structure 3B-38):** Vegetation communities within the Site 4 Project Component include California annual grassland. No special-status plant or wildlife species or jurisdictional features were observed. Vegetation communities within the Site 4 500-foot buffer include bunchgrass grassland, California annual grassland, and disturbed/developed. No special-status plant or wildlife species were observed. Jurisdictional features include Stream 3B-6-S-45 west of Structure 3B-38 which will be avoided.

**Site 5 (Structure 3B-39):** Vegetation communities within the Site 5 Project Component include California annual grassland. No special-status plant or wildlife or jurisdictional features were observed. Vegetation communities within the Site 5 500-foot buffer include California annual grassland and disturbed/developed. No special-status plant species were observed. Wildlife species observed include potential and formerly occupied burrowing owl features and potential desert kit fox dens. Jurisdictional features include Stream 3B-7-S-46 between Structure 3B-38 and 3B-39 which will be avoided.

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 Guidelines for Segment 3B T/L Const 15 to Const 78 Grading Modification at 3B-16, Road Modification at 3B-33, Road Modifications at 3B-34 through 3B-37, Road Modification at 3B-38, Tower and Road Shift at 3B-3* dated May 9, 2012, with the variance request. The memorandum states that no known cultural resources will be impacted by this request in support of the TRTP on Segment 3B. A cultural record search and survey (Ahmet et al, 2006; Armstrong et al, 2011; Pacific Legacy 2012a, and Pacific Legacy 2012b), and a paleontological literature review (Gust and Scott 2009), have been previously conducted for these areas. No cultural resources were found during the surveys. Due to the absence of resources, no further cultural studies or monitoring is required at these locations during construction activities.

The Paleontological Resources Management Plan (PRMP) indicates that the locations of the proposed variance are within an area that has a low to moderate potential for yielding paleontological resources (Gust and Scott 2009). Per the PRMP, the following measures are required during construction work involving ground disturbance:

1. All ground disturbing activities associated with Structures 3B-36, 37, and 38 require a full time paleontological monitor.
2. All ground disturbing activities associated with Structures 3B-34 and 3B-35 that exceed depths of two (2) feet require spot checking by a paleontological monitor.
3. No monitors are required for ground disturbing activities associated with 3B-16.

No additional impacts to cultural or paleontological resources are anticipated.

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

- Per the PRMP, paleontological monitoring shall be conducted for all ground disturbing activities associated with Structures 3B-36, 37, and 38.
- Per the PRMP, paleontological spot-check monitoring shall be conducted for all ground disturbing activities associated with Structures 3B-34 and 3B-35 that exceed depths of two (2) feet.
- All conditions required by NTP #32 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #32, and this Modification #1 to NTP #32 shall be available on site for the duration of construction activities where applicable.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Boccio', written over the printed name.

John Boccio

CPUC Environmental Project Manager

cc: V. Strong, Aspen