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

June 16, 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: Modification of Final Engineering Concurrence for the Segment 3B Installation of Ground Rods

Dear Ms. Nelson,

On June 12, 2015, Southern California Edison (SCE) submitted a request for the Modification of Final Engineering Concurrence (approved on April 21, 2015 by the CPUC) for the relocation of ground rod PGE-A_GR17 to provide additional gas pipeline protection on Segment 3B Transmission Line (T/L) of the Antelope Transmission Project (ATP) in unincorporated Kern County, California. **This Modification of 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 a Modification of Final Engineering Concurrence (approved on April 21, 2015 by the CPUC) for the relocation of ground rod PGE-A_GR17 to provide additional gas pipeline protection on Segment 3B T/L of the ATP in unincorporated Kern County, California. Subsequent to approval of Request for Final Engineering Concurrence (RFEC) 3B-#12, dated April 21, 2015, by the CPUC, it was determined that the proposed location of ground rod PGE-A_GR17 would need to be relocated due to safety concerns and outage restrictions. The original location was deemed unsafe for drilling because of the close proximity of energized transmission lines. Taking an outage on these lines, which interconnect renewable wind generation in the area, would be extremely difficult and not desirable at this time of year.

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

  1. One ground rod (PGE-A_GR17) will be installed 120 feet east of the originally proposed location. The new proposed location is 320 feet southeast of Construct 3B-61 and the ground rod will be installed to a depth of approximately 341 feet. A temporary work area measuring 0.147 acre will be required for construction (of this, 0.143 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 the Location Adjustment for Installation of Ground Rod PGE-A_GR17, Modification to RFEC #12, Segment 3B Transmission Line, Antelope Transmission Project, Kern County, California* dated June 10, 2015. The report documents the biological conditions for Segment 3B – Location Adjustment for Installation of Ground Rod PGE-A_GR17 Modification to RFEC 3B-#12 (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 20111 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.

Vegetation communities within the Project Component include Mojavean juniper woodland and scrub, Mojave mixed woody scrub, and disturbed/developed. Vegetation communities within the 500 foot buffer include Mojavean juniper woodland and scrub, Mojave mixed woody 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 or the 500-foot buffer.

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, one potential burrowing owl burrow (inactive with whitewash) was identified within the 500-foot buffer in 2010. Two new potential burrows were identified within the 500-foot buffer during preconstruction surveys and burrowing owl preconstruction surveys for the Segment 3B transmission line and AC Mitigation in 2012. None of these burrows were found to be occupied by burrowing owl. No new potential or occupied burrows were found during 2014 focused surveys or 2015 preconstruction 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. Loggerhead shrike (*Lanius ludovicianus*) and desert woodrat (*Neotoma lepida*) middens were observed within the 500-foot buffer. No active nests are currently documented within the Project Component, but have been observed in the past.

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 BSA, but not within the Project Component. The jurisdictional resource is Oak Creek south of Oak Creek Road. No additional impacts will occur.

Impacts associated with this Modification of Final Engineering Concurrence includes: 0.143 acre of new temporary impacts. Per **Mitigation Measure B-1a**, SCE shall provide restoration/compensation for impacts to native vegetation communities and shall include the area covered under this Final Engineering Concurrence in the TRTP Work Package 1 (Segments 4/5/10) Habitat Mitigation and Monitoring Plan which as reported by SCE will include Antelope Segment 3B.

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 #12 Modification, Location Adjustment for Installation of Ground Rod PGE-A_GR17* dated June 8, 2015. The new location PGE-A_GR17 was included in previous cultural resources surveys in support of Segment 3B and no cultural resources were identified within the boundaries of the new proposed location (Pacific Legacy 2011, 2012); therefore, an archaeological monitor is not required to support this work.

  Previous paleontological assessments for Segment 3B define the geology at the proposed location as Quaternary older alluvium (Qoa) (Gust and Scott 2008). Based on the Potential Fossil Yield Classification (PFYC) system, Quaternary older alluvium is considered to have a moderate sensitivity for yielding

significant paleontological resources. During the construction of the Segment 3B Transmission Line, Highwind Substation, and installation of previous ground rods in support of AC Mitigation Activities, all ground disturbing activities were monitored for paleontological resources between 2012 and 2013 (Aron and Kelly 2014; Aron et al. 2014a, 2014b). In addition, the adjacent areas were also monitored for paleontological resources for SCE's East Kern Wind Resource Area – EKWRA – project during 2014. No paleontological resources were observed. During drilling, the sediment gets pulverized and does not allow for the identification of fossils. Furthermore, the area close to the surface has been previously disturbed. As a result, a paleontological monitor is not necessary to support the proposed activities in RFEC #12 - Modification.

No additional impacts to cultural or paleontological resources are anticipated.

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

- Per Mitigation Measure B-1a, SCE shall provide restoration/compensation for impacts to native vegetation communities and shall include the area covered under this Final Engineering Concurrence in the TRTP Work Package 1 (Segments 4/5/10) Habitat Mitigation and Monitoring Plan which as reported by SCE will include Antelope Segment 3B.

- 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 Modification of 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