

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



June 20, 2018

Ryan Stevenson  
Principal Advisor  
Regulatory Affairs  
Southern California Edison  
8631 Rush St, General Office 4 – 235E (2nd Floor)  
Rosemead, CA, 91770

RE: Tehachapi Renewable Transmission Project (TRTP), Segments 4-11: Final Engineering Concurrence for Segments 7 & 8

Dear Mr. Stevenson,

On July 25, 2016, SCE requested to exclude disturbance sites in Segments 7 (10 sites) and 8 (37 sites) from restoration requirements in the approved Habitat Mitigation and Monitoring Plan (HMMP) of the Tehachapi Renewable Transmission Project (TRTP), in Los Angeles and Riverside Counties, California. Additional information was provided by SCE on February 9, 2017 and March 15, 2017, and a year later on March 16 and March 23, 2018, in which two additional sites in Segment 7, and one in Segment 8 were requested for exclusion. On June 6, 2018, SCE submitted additional information and another five sites were added for exclusion. **This Final Engineering Concurrence is approved by CPUC based on the following factors:**

Information submitted by SCE and a timeline of events:

On July 25, 2016, SCE requested to exclude disturbance sites in Segments 7 and 8 from restoration requirements in the approved HMMP of the TRTP. Additional information was provided by SCE on February 9, 2017 and March 15, 2017. Table 1 is a summary of the restoration sites proposed for exclusion. The restoration sites were proposed for exclusion because of one or more of the following reasons:

- Vegetation mapping reclassification [developed and/or disturbed, ruderal grassland].
- The site was not disturbed by construction.
- The site is permanently developed.
- The site has limitations of property rights with conflicting land use.

**Table 1. Summary of Segment 7 & 8 Restoration Sites Proposed for Exclusion (July 25, 2016)**

Site ID	Nearest Construct	Extent (Size) [Acres]	Restoration Type	Reason for Exclusion
<b>Segment 7</b>				
S7 R04	M28-T4	Full extent of restoration site (0.17 acre)	Hydroseed and weed control	Vegetation mapping reclassification.
S7 R05	M29-T2	Full extent of restoration area (0.33 acre)	Weed control only	Vegetation mapping reclassification, and site was not disturbed by construction.
S7 R06	M29-T3	Partial extent of restoration site (approx. 1.2 acres)	Hydroseed and weed control	Vegetation mapping reclassification.

Site ID	Nearest Construct	Extent (Size) [Acres]	Restoration Type	Reason for Exclusion
S7 R11	M30-T1	Partial extent of restoration site (approx. 0.5 acre)	Hydroseed and weed control	Site was not disturbed by construction.
S7 R19	M58-J3	Partial extent of restoration site (approx. 0.6 acre)	Hydroseed and weed control	Vegetation mapping reclassification.
S7 R20	M59-T1D	Full extent of restoration site (0.22 acre)	Weed control only	Vegetation mapping reclassification.
S7 R21	M32-T3	Partial extent of restoration site (approx.. 0.5 acre)	Weed control only	Vegetation mapping reclassification.
S7 R22	M32-T3	Partial extent of restoration site (0.47 acre)	Weed control only	Vegetation mapping reclassification.
S7 R23	M32-T3	Full extent of restoration site (0.57 acre)	Weed control only	Vegetation mapping reclassification.
S7 R25	M33-T3	Full extent of restoration site (0.02 acre)	Weed control only	Vegetation mapping reclassification, and site was not disturbed by construction.
<b>Segment 8</b>				
S8 R001A*	M40-T3/ M40-T4	Full extent of restoration site (0.21 acre)	Hydroseed and weed control	Limitations of property rights with conflicting land use.
S8 R009*	M42-T5	Full extent of restoration site (0.70 acre)	Container plants, hydroseed, and weed control	Limitations of property rights with conflicting land use.
S8 R016*	M44-T2	Full extent of restoration site (0.01 acre)	Hydroseed and weed control	Permanently developed.
S8 R020	M6-T3	Partial extent of the restoration site (0.07 acre)	Hydroseed and weed control	Vegetation mapping reclassification.
S8 R043*	M50-T3	Full extent of restoration site (0.03 acre)	Hydroseed and weed control	Limitations of property rights with conflicting land use.
S8 R045*	M50-T4	Full extent of the restoration site (0.04 acre)	Hydroseed and weed control	Limitations of property rights.
S8 R048	M51-T3	Full extent of restoration site (0.07 acre)	Hydroseed and weed control	Vegetation mapping reclassification.
S8 R055*	M52-T2	Full extent of the restoration site (0.29 acre)	Hydroseed and weed control	Limitations of property rights.
S8 R056*	M52-T3	Full extent of the restoration site (2.24 acres)	Hydroseed and weed control	Limitations of property rights.
S8 R057*	M52-T4	Full extent of the restoration site (0.64 acre)	Hydroseed and weed control	Limitations of property rights.
S8 R058*	M52-T5	Full extent of the restoration site (0.49 acre)	Hydroseed and weed control	Limitations of property rights.
S8 R059	M53-T1	Full extent of the restoration site (0.45 acre)	Weed control only	Site was not disturbed by construction.
S8 R062*	M53-T3	Full extent of the restoration site (0.08 acre)	Hydroseed and weed control	Limitations of property rights.
S8 R063*	M53-T3	Full extent of the restoration site (0.93 acre)	Hydroseed and weed control	Limitations of property rights.
S8 R064*	M54-T1	Full extent of the restoration site (0.03 acre)	Hydroseed and weed control	Limitations of property rights.
S8 R065*	M54-T2	Full extent of the restoration site (0.33 acre)	Hydroseed and weed control	Limitations of property rights.
S8 R066*	M54-T3	Full extent of the restoration site (0.03 acre)	Hydroseed and weed control	Limitations of property rights.
S8 R067*	M55-T1	Full extent of the restoration site (0.57 acre)	Hydroseed and weed control	Limitations of property rights.
S8 R069*	M39-T1; 53	Full extent of the restoration site (0.71 acre)	Hydroseed and weed control	Limitations of property rights.

Site ID	Nearest Construct	Extent (Size) [Acres]	Restoration Type	Reason for Exclusion
S8 R070	M22-T1	Full extent of the restoration site (0.75 acre)	Container plants, hydroseed, and weed control	Limitations of property rights.
S8 R071*	M22-T2; M56-T1	Full extent of the restoration site (0.20 acre)	Container plants, hydroseed, and weed control	Limitations of property rights.
S8 R072*	M22-T3	Full extent of the restoration site (0.08 acre)	Hydroseed and weed control	Limitations of property rights.
S8 R073*	M22-T4; M56-T3	Full extent of the restoration site (0.25 acre)	Hydroseed and weed control	Limitations of property rights.
S8 R080	M23-T2A	Full extent of restoration site (0.28 acre)	Container plants, hydroseed, and weed control	Vegetation mapping reclassification.
S8 R084	M58-T2	Full extent of restoration site (0.29 acre)	Hydroseed and weed control	Vegetation mapping reclassification.
S8 R085	M58-T1	Full extent of restoration site (0.09 acre)	Hydroseed and weed control	Vegetation mapping reclassification.
S8 R086	M58-T1	Full extent of restoration site (0.08 acre)	Hydroseed and weed control	Vegetation mapping reclassification.
S8 R087	M58-T1	Full extent of restoration site (0.72 acre)	Hydroseed and weed control	Vegetation mapping reclassification.
S8 R093*	M59-T3	Full extent of restoration site (0.05 acre)	Container plants, hydroseed, and weed control	Limitations of property rights with conflicting land use.
S8 R095*	None	Full extent of restoration site (0.04 acre)	Weed control only	Permanently developed.
S8 R096*	M64-T2	Full extent of restoration site (0.17 acre)	Weed control only	Limitations of property rights with conflicting land use.
S8 R097	M67-T2	Full extent of restoration site (0.08 acre)	Weed control only	Permanently developed.
S8 R099	M0-T6	Full extent of restoration site (1.22 acres)	Weed control only	Vegetation mapping reclassification.
S8 R100-A	None	Full extent of restoration site (0.58 acre)	Weed control only	Vegetation mapping reclassification.
S8 R100-B	None	Full extent of restoration site (0.79 acre)	Weed control only	Vegetation mapping reclassification.
S8 R101	M0-T4	Full extent of restoration site (2.86 acre)	Hydroseed and weed control	Vegetation mapping reclassification.
S8 R102	M5-T5	Full extent of restoration site (0.07 acre)	Hydroseed and weed control	Vegetation mapping reclassification.

\*Sites needing restoration mitigation compensation as required by FEIR Mitigation Measure B-1a.

On behalf of the CPUC, Aspen Environmental Group conducted a site visit of the exclusion sites as part of their review. The CPUC Response memo dated March 21, 2017 accepted the sites proposed for exclusion for reasons where sites had been categorized incorrectly by vegetation type, or never disturbed by construction [includes all 10 sites in Segment 7 and 13 sites in Segment 8].

The CPUC Response Memo dated March 21, 2017, requested SCE to submit a strategy for compensation for restoration sites that were impacted by construction but are unable to be restored due to private property rights and access issues, conflicting land use (i.e. cattle grazing, no herbicide allowed, orchard, utility conflicts), or Puente Hills Habitat Authority using the sites for their own mitigation. Restoration or compensation for lands supporting native vegetation is conditioned in the FEIR under Mitigation Measure

B-1a: *Provide Restoration/Compensation for Impacts on Native Vegetation Communities* (Aspen, 2009). [These sites are noted in Table 1 with an asterisk\*].

March 2018 Additions

In addition to the restoration sites originally proposed for exclusion, SCE requests two additional sites on Segment 7 and one on Segment 8 [see Table 2]. On Segment 7, two sites are requested for exclusion due to conflicting land use: 1) Restoration site S7 R36 where 0.04 acres of mule fat scrub will be impacted due to construction of the Mesa Substation, and 2) restoration site S7 R02 where access road repairs to Tower M27-T3 will result in an estimated 0.81 acres of impacts to coastal sage scrub. One site on Segment 8 is requested for exclusion: S8 R039, which consists of 0.41 acres of California annual grassland due to overlap with Puente Hills Habitat Authority compensatory mitigation. Table 2 below details the remaining sites proposed for exclusion, the associated acreages and native vegetation community.

June 2018 Additions

In addition to the original request and subsequent March 2018 additions, two (2) sites have been added for proposed exclusion for a total of 26 sites. These sites are S8 R075 (M57-T1) and S8 R074 (M22-T4, M56-T3) and are proposed for exclusion for the following reasons:

- S8 R074 (M22-T4, M56-T3): This site has been subject to repeated grazing by goats (2017 and 2018), causing damage to the installed plants and seed within the restoration site.
- S8 R075 (M57-T1): The restoration site is subject to ongoing vegetation management/mowing by the Firestone Boy Scout Reservation.

On March 16, 2018 (revised March 23, 2018), SCE proposed to mitigate for the remaining sites listed in Table 2 below through preservation of compensatory mitigation lands acquired for the TRTP. On June 6, 2018, SCE submitted additional information regarding impacts to specific vegetation communities reflected in Table 3, and two restoration sites were added for exclusion as discussed above. A total of **11.01 acres** are proposed for exclusion from further restoration.

**Table 2. TRTP Segments 7 and 8 Exclusion Site Vegetation Community Acreages**

Restoration Site ID	Nearest Construct	Vegetation Community	Impact Area (acres)
<b>Bunchgrass Grassland</b>			
S8 R063	M53-T3	Bunchgrass Grassland	0.93
<b>Subtotal</b>			<b>0.93</b>
<b>California Annual Grassland</b>			
S8 R039	M50-T1	California Annual Grassland	0.41
S8 R043	M50-T3	California Annual Grassland	0.03
S8 R045	M50-T4	California Annual Grassland	0.02
S8 R055	M52-T2	California Annual Grassland	0.29
S8 R056	M52-T3	California Annual Grassland	2.24
S8 R057	M52-T4	California Annual Grassland	0.09
S8 R058	M52-T5	California Annual Grassland	0.49
S8 R067	M55-T1	California Annual Grassland	0.39
S8 R069	M39-T1	California Annual Grassland	0.71
S8 R073	M22-T4/M56-T3	California Annual Grassland	0.18
S8 R097	M67-T2	California Annual Grassland	0.08
<b>Subtotal</b>			<b>4.93</b>
<b>California Walnut Woodland</b>			
S8 R045	M50-T4	California Walnut Woodland	0.03
S8 R057	M52-T4	California Walnut Woodland	0.55
S8 R062	M53-T3	California Walnut Woodland	0.08

Restoration Site ID	Nearest Construct	Vegetation Community	Impact Area (acres)
S8 R066	M54-T3	California Walnut Woodland	0.03
S8 R067	M55-T1	California Walnut Woodland	0.18
S8 R069	M39-T1	California Walnut Woodland	0.03
S8 R070	M22-T1	California Walnut Woodland	0.02
S8 R071	M22-T2/M56-T1	California Walnut Woodland	0.04
S8 R073	M22-T4/M56-T3	California Walnut Woodland	0.02
S8 R075	M57-T1	California Walnut Woodland	0.17
<b>Subtotal</b>			<b>1.15</b>
<b>Coast Live Oak Woodland</b>			
S8 R070	M22-T1	Coast Live Oak Woodland	0.05
S8 R071	M22-T2/M56-T1	Coast Live Oak Woodland	0.08
S8 R073	M22-T4/M56-T3	Coast Live Oak Woodland	0.05
S8 R069	M39-T1	Coast Live Oak Woodland	0.14
<b>Subtotal</b>			<b>0.32</b>
<b>Coastal Sage Scrub</b>			
S7 R02	M27-T3	Coastal Sage Scrub	0.81
S8 R009	M42-T5	Coastal Sage Scrub	0.70
S8 R016	M44-T2	Coastal Sage Scrub	0.01
S8 R045	M50-T4	Coastal Sage Scrub	0.02
S8 R064	M54-T1	Coastal Sage Scrub	0.03
S8 R065	M54-T2	Coastal Sage Scrub	0.20
S8 R070	M22-T1	Coastal Sage Scrub	1.02
S8 R075	M57-T1	Coastal Sage Scrub	0.08
<b>Subtotal</b>			<b>2.87</b>
<b>Mixed Chaparral</b>			
S8 R065	M54-T2	Mixed Chaparral	0.13
S8 R071	M22-T2/M56-T1	Mixed Chaparral	0.08
S8 R072	M22-T3	Mixed Chaparral	0.08
S8 R074	M22-T4, M56-T3	Mixed Chaparral	0.27
<b>Subtotal</b>			<b>0.56</b>
<b>Southern Coast Live Oak Riparian Forest</b>			
S8 R001A	M40-T3/M40-T4	Southern Coast Live Oak Riparian Forest	0.21
<b>Subtotal</b>			<b>0.21</b>
<b>Mule Fat Scrub</b>			
S7 R36	M42-T5	Mule Fat Scrub	0.04
<b>Subtotal</b>			<b>0.04</b>
<b>TOTAL</b>			<b>11.01</b>

Table 3 below reflects the excluded acreage by vegetation community and the FEIR permanent impact mitigation ratio applied. Compensation will be fulfilled in-kind based upon vegetation community, with the exception for bunchgrass grassland and southern coast live oak riparian forest, both of which have been addressed in the Conversion Memo submitted to the CPUC on January 18, 2018 and revised on March 16, 2018. These two vegetation communities will be compensated for through substitution of other vegetation communities at a higher compensation mitigation ratio. SCE has provided details of this mitigation in a memo dated June 4, 2018, which is under review, summarizing the final mitigation for the project.

**Table 3. Proposed Mitigation of Exclusion Sites by Vegetation Community**

Vegetation Community	Excluded Acreage	Mitigation Ratio	Mitigation Acreage
Bunchgrass Grassland	0.93	1.5:1	1.40
California Annual Grassland	4.93	1:1	4.93
California Walnut Woodland	1.15	1.5:1	1.73

<b>Vegetation Community</b>	<b>Excluded Acreage</b>	<b>Mitigation Ratio</b>	<b>Mitigation Acreage</b>
Coast Live Oak Woodland	0.32	1.5:1	0.48
Coastal Sage Scrub	2.87	1.5:1	4.31
Mixed Chaparral	0.56	1:1	0.56
Mule Fat Scrub	0.04	3:1	0.12
Southern Coast Live Oak Riparian Forest	0.21	3:1	0.63
<b>Total</b>	<b>11.01</b>		<b>14.16</b>

The CPUC has completed the review of the requested restoration exclusion sites in Segments 7 and 8. These sites are being mitigated through offsite compensation per FEIR Mitigation Measures B-1a. The CPUC has confirmed that available offsite compensation lands are available for this purpose; therefore, this request is approved.

Sincerely,

John Boccio  
CPUC Environmental Project Manager

cc: V. Strong, Aspen