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

August 13, 2012

Susan J. Nelson, AIA
Regulatory Affairs
Southern California Edison
2244 Walnut Grove Avenue, Quad 3D, GO1
Rosemead, CA 91770

RE: Tehachapi Renewable Transmission Project (TRTP), Segments 4-11: Final Engineering Concurrence to NTP #10

Dear Ms. Nelson,

On August 6, 2012, Southern Californian Edison (SCE) submitted a request for Final Engineering Concurrence for structure installation, various reframing, installation of ground and guy wire, and shift activities for Segment 7 and Segment 8 66 kV Relocation (NTP #10, dated August 3, 2010 and NTP #24, dated January 12, 2011) of the Tehachapi Renewable Transmission Project (TRTP), in the Cities of Montebello, Pico Rivera and Industry, Los Angeles County, California. **This Concurrence to Final Engineering is approved by CPUC based on the following factors:**

- SCE submitted the following information:

  SCE requests a Concurrence of Final Engineering for structure installation, reframing, grounding and shift activities on Segment 7 and Segment 8 66 kV of the TRTP. Subsequent to approval of the NTPRs (NTP #10 dated August 3, 2010) by the CPUC, final design was completed and additional work was identified. Specifically, approval is needed for the following activities:

  Mesa-Narrows and Walnut-Hilgen-Industry-Mesa-Reno Line

  Reframing Activities

  Reframe structure 1031107E (City of Montebello, County of Los Angeles). Reframing activities include replacing cross arms and associated hardware. Activities will occur from the edge of San Gabriel Boulevard. No additional work area is proposed at this location.

  Installation of Grounds

  Installation of grounds at structures 1031106E, 1031114E, 2184513E, 2317241E, M7-T1 (City of Montebello, County of Los Angeles), and M8-T6 (City of Pico Rivera, County of Los Angeles). Installation of grounds includes attaching a wire to each phase to protect the crew members. Activities at structure 1031106E will occur from the edge of San Gabriel Boulevard. Activities at structure 1031114E will occur from the edge of Lincoln Avenue (Franchise Access). Activities at structure 2317241E will occur from the edge of San Gabriel Boulevard. Activities at structure M7-T1 will occur within existing San Gabriel Junction disturbance areas. Structure M8-T6 will be accessed from the proposed existing access road (approximately 50 ft). This activity will not require additional ground disturbance.

Shift Activities

Structure 4773799E (City of Montebello, County of Los Angeles) will shift approximately 40 feet to the northwest. This shift is needed to maintain appropriate distribution clearances. Removal of the old 4773799E structure will occur within the existing approved pole work area. Existing footings will be excavated and removed to a depth of 2 feet below grade. Any remaining footing foundation will remain in place, and the excavation filled and compacted to match the surrounding grade. Installation of structure 4773799E at the proposed new location will occur within the proposed 50 ft x 50 ft construction work area. The structure will be accessed from San Gabriel Boulevard.

Install Span Guy Wires and Remove Overhead Wire

Installation of span guy wires and removal of overhead conductor will occur from structures 4774418E to 2317240E (and includes 2317242E). Installation of span guy wires includes placing steel wires to support/replace tension for conductor being removed. Removal of overhead wire includes installing wire to rollers and rolling the conductor onto the rollers. Structure 4774418E will be accessed via the existing access from San Gabriel Boulevard to the San Gabriel Dip. Structures 2317240E and 2317242E will be accessed from San Gabriel Boulevard.

Rio Hondo-Amador-Jose-Mesa Line

Installation Activities

Installation of interset structures 4787833E, 4787834E, 4787835E (City of Industry, County of Los Angeles) to support overhead reconductor activities south of the Duck Farm underground installation. Structure installation will occur with proposed 50 ft x 50 ft construction work areas and will be accessed from existing approved access roads.

- **Biological Resources**: SCE submitted biological resources information with the Request for Final Engineering Concurrence. The areas for the various removal, reframing, guy wire installation, and shift activities (Project Component) are located within previously surveyed portions of the Segments 7/8 66 kV work areas. The reframing, installation of grounds, shift activities, and installation of ground wire on the Walnut-Hilgen-Industry-Mesa-Reno line is referred to as Site 1. The installation of interset structures on the Rio-Hondo-Amador-Jose-Mesa line is referred to as Site 3.

  Site 1: The Site 1 Project Component is described as disturbed/developed and non-native woodland. Site 1 is within coastal California gnatcatcher designated critical habitat and contains active least Bell's vireo and coastal California gnatcatcher nests (FRED Nest ID #s: 34144 and 3849). Additionally, Site 1 contains potential solitary bat roost habitat. Vegetation communities within 500 feet of Site 1 include coast live oak woodland, coastal sage scrub, mixed chaparral, Exotic-giant reed, mule fat scrub additional developed land and ruderal grassland. These surrounding vegetation communities will not be impacted by the Project Component. Jurisdictional resources 7-35-S-1, 7-35-S-2 and 8-6-R-1 are located within 500 feet of the Project Component, but will not be impacted by the Project Component and no permit amendment is required. Construction has been on-going in this area since October 2011. Previous preconstruction surveys conducted in the area include: bat habitat assessment, and biological preconstruction survey and sweep (September 9, 2011 and September 29, 2011).

  Site 3: Site 3 is described as disturbed/developed. Vegetation communities within 500 feet of Site 3 include agriculture, mule fat scrub, Southern arroyo willow scrub and non-native woodland. These surrounding vegetation communities will not be impacted by the Project Component. Site 3 is within 500 feet of occupied least Bell's vireo habitat, as well as five active bird nests (FRED ID#s: 2954, 3179, 3896, 3898 and 3871). Jurisdictional resources 7-222-S-1, 7-23-S-1, 7-30-S-1, 7-30-S-2, 7-30-S-3, 7-30-W-W-1, 7-30-W-2, 7-30-W-3 are within 500 feet of the Project Component, but will not be impacted by the Project Component and no permit amendment is required. Construction has been on-going in this area since

October 2011. Previous preconstruction surveys conducted in the area include a biological preconstruction survey and sweep (July 19, 2011).

Biological resources including vegetation communities, special-status plants, regulated trees, special-status wildlife species and jurisdictional features at both Site 1 and Site 3 will be staked and flagged as Environmentally Sensitive Areas (ESAs) for avoidance. No additional impacts to biological resources are anticipated.

- **Cultural and Paleontological Resources**: SCE submitted a memorandum dated May 24, 2012 regarding the TRTP Request for Final Engineering Concurrence, Cultural and Paleontological Resource Guidelines for Segment 7/8 66 kV Relocation. The memorandum states that no cultural resources will be impacted by reframing, installation of ground wire, and shift activities as part of this Request for Final Engineering Concurrence in support of the TRTP. The proposed structures fall within several cultural records surveys and record searches for TRTP (Pacific Legacy 2007 (Applied Earthworks 2008; Pacific Legacy 2007, Pacific Legacy 2010a, 2010b, 2010c, 2010d; Wetherbee 2010a, 2010b, 2010c, 2010d). Nine previously recorded cultural resources are recorded in the areas identified for this variance, consisting of one archaeological site and eight historic-era transmission lines. A historic era trash scatter, 07-H-003, was formally evaluated and determined ineligible by consensus for listing in NRHP/CRHR (Pacific Legacy 2010a). This resource does not require additional management or cultural resources monitoring during work associated with this Final Engineering Request for Concurrence (Pacific Legacy 2011). Eight historic-era transmission lines (Mesa-Narrows 66kV, Antelope-Mesa 220kV, Rio Hondo-Amador-Jose-Mesa 66kV, Mesa-Walnut 220kV, Walnut-Hilgen-Industry-Mesa-Reno 66kV, Mesa-Anita-Eaton 66kV, Mesa-Rush No. 2 66kV, and Rio Hondo-Bradbury 66kV) are located within the project areas, but have been determined ineligible by consensus for listing in NRHP/CRHR (Tinsley-Becker 2010a, 2010b, 2010c, 2010d and 2010e). Work affecting the lines does not require cultural resources monitoring (Pacific Legacy 2011).

  In addition, the paleontological literature review (Gust and Scott 2009, Aron 2010) shows that most of the areas identified in the Request lie with "gravels and sands of major streams and alluvial fans", which are soils considered low sensitivity for paleontological resources. However, one remaining area at the San Gabriel Junction is located within soils consisting of quaternary older alluvium which is considered moderately sensitive for harboring significant paleontological resources. This area requires spot-check monitoring in non-drilling ground disturbance extending deeper than two feet below surface.

  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 Notices to Proceed (NTP) #10 and #24 shall apply to the subject area and activities.

- Copies of all relevant permits, compliance plans, NTP #10, NTP #24, 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