

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 3, 2014

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 December 18, 2014, Southern Californian Edison (SCE) submitted a request for Final Engineering Concurrence (FEC) for the replacement of a distribution pole including new work area, and new underground duct bank to accommodate rerouting of an existing telecommunications line for the Segment 7 and 8 66kV Transmission Line (T/L), of the Tehachapi Renewable Transmission Project (TRTP) in the City of Chino, San Bernardino County, California. SCE submitted additional information on December 2, 2014. **This Final Engineering Concurrence is approved by CPUC based on the following factors:**

- SCE submitted the following information:

SCE submitted a request for Final Engineering Concurrence for the replacement of a distribution pole and a new work area and new underground duct bank to accommodate rerouting of existing telecommunications line for Segment 7 and 8 66kV T/L in the City of Chino, San Bernardino County, California. Subsequent to the approval of the Notice to Proceed Request (NTPR) for Segment 7 and 8 66kV T/L Relocation (NTP #10, dated August 3, 2010) by the CPUC, a new work area to accommodate rerouting of an existing telecommunications (telecom) line and new underground duct bank to accommodate rerouting of existing telecom are necessary. Descriptions of the construction activities are provided below:

- Pole Replacement. A new distribution pole will be installed along Edison Avenue, west of Central Avenue. The new pole will be positioned approximately 8 feet west of the existing pole, which will be removed. Crews will also access the adjacent poles in this area to assist with distribution line grounding and re-installation. This work area overlaps several CPUC-approved disturbance areas and, as such, the total new disturbance area is approximately 0.387 acre.
- New Underground Duct Bank for Telecom Relocation. Subsequent to construction of the distribution/telecom underground duct bank in the City of Chino, it was determined that an additional underground duct bank is required to accommodate an existing telecom line. The new duct bank will begin southwest of the intersection of Edison Avenue and Central Avenue and extend generally easterly to its terminus near the intersection of Edison Avenue and Magnolia Avenue.

Construction will include installation of the following features:

- 1 pole at the west end of the route
- 6 vaults at various locations along the route
- Approximately 5,802 feet of new underground duct bank and cable

The majority of the telecom relocation activities will occur within CPUC-approved areas. Additional temporary disturbance areas will be needed along various portions of the route. These additional disturbance areas comprise approximately 0.930 acre. The work area for the underground duct bank will be 80 feet wide, including the 2-foot wide trench.

- **Biological Resources:** SCE submitted biological resource report from ICF International dated November 7, 2014 with the Request for FEC. The report documents the biological conditions at the proposed Segment 8 66 kV Relocation, pole relocation and new underground duct bank (Variance Project Component) and associated 500-foot buffer. The Variance Project Component plus the 500-foot buffer is referred to as the Biological Study Area (BSA). Biological resources within the BSA were evaluated during several focused surveys, including 2010 and 2011 special-status plant surveys (ICF 2010at, 2011hc); 2010 and 2011 tree inventory surveys (ICF 2010av, 2011hd); and 2007, 2009, and 2010 burrowing owl (*Athene cunicularia*) surveys (AMEC 2008b, 2009a, 2009j; ICF 2010xx). The biological resources within the BSA were also evaluated during Segment 8 66 kV and Segment 8 East (Phases 2 and 3) general preconstruction surveys, burrowing owl preconstruction surveys, and preconstruction bat habitat assessment surveys (ICF 2010fj, 2010gr, 2011w, 2011x, 2011at, 2011bc, 2011bd, 2011be, 2011bf, 2011ib, 2011if, 2011il). A literature review was also performed as part of the Biological Review for Segments 7 and 8 66 kV (ICF 2010kk). Jurisdictional resources within the Variance Project Component were evaluated during the 2010 jurisdictional delineation for Segments 7 and 8 (ICF 2010h). Additionally, clearance sweeps were performed prior to the start of construction. A clearance sweep will also be conducted prior to construction of the Variance Project Component. Construction monitoring has been ongoing regularly since the sites became active, and species events and nest events are recorded in the SCE Field Reporting Environmental Database (FRED; SCE 2014a).

Site 1 - Pole Relocation and Work Area: The Variance Project Component and 500-foot consist of disturbed/developed vegetation. No special-status plant species or regulated tree species occur within the BSA. Potential bat habitat and an inactive burrowing owl nest occur within the 500-foot buffer.

Site 2 – Underground Duct Bank: The Variance Project Component consists of disturbed/developed vegetation. The 500-foot buffer consists of agriculture, disturbed/developed, mule fat scrub, nonnative woodland, ruderal grassland, ruderal wetland, and sparsely vegetated streambed. Special-status plant species, Santa Barbara morning glory (*Calystegia sepium* ssp. *binghamiae*) occurs within the Variance Project Component. Regulated tree species, carrotwood (*Cupaniopsis anacardioides*) and goldenrain tree (*Koelreuteria paniculata*), occur within the Variance Project Component. Special-status wildlife observed within the BSA include burrowing owl, Cooper's hawk (*Accipiter cooperii*), and loggerhead shrike (*Lanius ludovicianus*). Merlin (*Falco columbarius*) and peregrine falcon (*Falco peregrinus*) were also observed within the 500-foot buffer. Potential, inactive, occupied and unoccupied burrowing owl burrows occur within the BSA. Potential bat habitat occurs within the Variance Project Component. The Variance Project Component does not overlap suitable habitat for special-status species as included in the CDFW Incidental Take Permit (ITP) or USFWS Biological Opinion (BO). Jurisdictional resources (8-50-S-3 and 8-50-S-4) occur within the 500-foot buffer and will be avoided. Any additional potential jurisdictional features will be staked as Environmentally Sensitive Areas (ESAs) and flagged for avoidance.

The proposed pole relocation/work area and new underground duct bank would result in a total of 1.317 acre of new disturbance including: 0.022 acre of new permanent disturbance (excludes former temporary disturbance) and 1.295 acre of new temporary disturbance. Note that this Request for FEC includes changing approximately 0.224 acre of previously approved temporary disturbance area into areas of permanent disturbance. Temporary impacts will be mitigated on-site per the Habitat Mitigation and Monitoring Plan (HMMP) and APM BIO-1a, as well as SWPPP requirements, weed control (Mitigation Measure [MM] B-3a), dust control (MM AQ-1a), and visual resources (MM V-1 and APM AES-8 and APM AES-13). Permanent impacts to special-status vegetation communities and special-status species habitat will be mitigated off-site per agreements with CDFW and USFWS, and Applicant Proposed Mitigation (APM) BIO-7.

No additional impacts to biological resources are anticipated with the implementation of this FEC and the conditions noted below.

- **Cultural and Paleontological Resources:** SCE submitted a memorandum dated October 21, 2014 with the Request for Final Engineering Concurrence (FEC) titled the *TRTP Cultural and Paleontological Resource Guidelines for Segments 7 and 8 66kV Relocation, Request for Final Engineering Concurrence – Pole Relocation and New Underground Duct Bank*. The memorandum states that no cultural or paleontological resources will be impacted by the proposed pole relocation and new underground duct bank in support of the TRTP Segments 7 and 8 66kV relocation. All proposed areas identified in this RFEC were included in the previous surveys for the TRTP and no cultural resources were identified (Pacific Legacy 2007, 2010; PCR 2009).

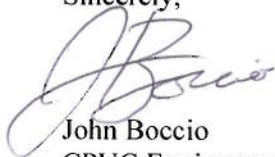
Previous paleontological assessments conducted for the TRTP indicate that the proposed areas identified in this Request for FEC are located within the Quaternary alluvium (Qa), which has a low sensitivity for yielding paleontological resources (Gust and Scott 2009; Aron 2010).

No additional impacts to cultural or paleontological resources are anticipated with the implementation of this FEC and the conditions noted below.

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

- SCE shall submit the Traffic Control Plan from the City of Chino and all encroachment permits prior to the start of work activities covered under this Final Engineering Concurrence.
- All conditions required by Notice to Proceed (NTP) NTP #10 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #10, and this Final Engineering Concurrence shall be available on site for the duration of construction activities where applicable.
- Santa Barbara morning glory (*Calystegia sepium* ssp. *binghamiae*) occurs within the Variance Project Component and shall be avoided.

Sincerely,



John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen