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

July 17, 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 #15

Dear Ms. Nelson,

On June 25, 2014, Southern Californian Edison (SCE) submitted a request for Final Engineering Concurrence for the installation of four access road stormwater drains near Constructs 19, 20, 25, and 43 on the Segment 5 Transmission Line (T/L) of the Tehachapi Renewable Transmission Project (TRTP), in Los Angeles County, California. **This Final Engineering Concurrence is approved by CPUC based on the following factors:**

- SCE submitted the following information:

  SCE requests a Concurrence of Final Engineering for the installation of four access road stormwater drains near Constructs 19, 20, 25, and 43 on Segment 5 T/L of the TRTP, in Los Angeles County, California. Subsequent to approval of NTPR (NTP #15 dated September 10, 2010) by the CPUC, project site conditions have been further evaluated. To appropriately manage stormwater runoff and minimize erosion, stormwater drains are included in the final engineering design for the access roads at Segment 5 Constructs 19, 20, 25, and 43.

  Four stormwater drains (McCarthy drains) are proposed to be installed, as follows:

  - CT 19 – Southeast side of the access road
  - CT 20 – Southeast side of the access road
  - CT 25 – Southeast side of the access road
  - CT 43 – Northwest side of the access road

  The stormwater drains would be situated within CPUC-approved disturbance areas. The permanent disturbance areas associated with the drains would measure approximately 0.0028 acre each (approximately 0.0114 acre total).

- **Biological Resources**: SCE submitted a biological report from ICF International dated June 20, 2014 titled *Proposed Segment 5 Installation of Stormwater Drains near Constructs 19, 20, 25, 43, TRTP, Los Angeles County*. The report documents the biological conditions at the proposed Segment 5 stormwater drain installation sites near Constructs 19, 20, 25, and 43 (Variance Project Component) and associated 500-foot buffer. The Variance Project Component and the 500-foot buffer are referred to as the Biological Study Area (BSA). Biological resources within the BSA were evaluated during several focused surveys, including 2009, 2010, 2011, special-status plant surveys (AMEC 2009c; ICF 2010ag, 2011gu); 2010 and 2011 tree inventory surveys (ICF 2010bf, 2011ga); 2009 burrowing owl surveys (AMEC 2009f); and 2014 conifer tree stump surveys (FRED Survey Parent 000040). The biological resources within the BSA were also evaluated during Segment 5 general preconstruction surveys, burrowing owl preconstruction surveys, and

preconstruction bat habitat assessment surveys (ICF 2010bc, 2010bt, 2010cq2, 2011h, and 2011i). A literature review was performed as part of the biological review for Segment 5 (ICF 2010yy). Additionally, clearance sweeps were performed prior to the start of Segment 5 construction. Construction monitoring has been ongoing since the sites became active, with species events and nest events recorded in the SCE Field Reporting Environmental Database (FRED). Jurisdictional resources within the Variance Project Component were evaluated during the 2010 jurisdictional delineation for Segments 4, 5, and 10 (ICF 2010l). A clearance sweep will also be conducted prior to construction of the Variance Project Component.

CT 19. Vegetation communities in the Variance Project Component include Mojave mixed woody scrub. Vegetation communities in the 500-foot buffer include disturbed/developed, Mojave mixed woody scrub, and Mojavean juniper woodland and scrub. Special-status plant species, Peirson's morning glory (*Calystegia peirsonii*) occurs within the 500-foot buffer. Special-status wildlife observed within the 500-foot buffer includes northern harrier (*Circus cyaneus*). An active common raven (*Corvus corax*) also occurs within the 500-foot buffer. No jurisdictional features occur within the BSA.

CT 20. Vegetation communities within the Variance Project Component include disturbed/developed and Mojave mixed woody scrub. Vegetation communities within the 500-foot buffer include disturbed/developed, Mojave mixed woody scrub, and Mojavean juniper woodland and scrub. Special-status plant species within the 500-foot buffer include short joint beavertail cactus (*Opuntia basilaris* var. *brachyclada*) and Peirson's morning glory. Special-status wildlife species observed within the 500-foot buffer includes Southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*). A San Diego desert woodrat midden (*Neotoma lepida intermedia*) also occurs within the 500-foot buffer. No jurisdictional features occur within the BSA.

CT 25. Vegetation communities within the Variance Project Component include Mojave mixed woody scrub. Vegetation communities within the 500-foot buffer include disturbed/developed, Mojave mixed woody scrub, and Mojavean juniper woodland and scrub. Special-status plant species within the 500-foot buffer include short joint beavertail cactus and Peirson's morning glory. An active common raven nest occurs within the 500-foot buffer. Jurisdictional feature 5-15A-S-1 occurs within the 500-foot buffer.

CT 43. Vegetation communities within the Variance Project Component include disturbed/developed and Mojave mixed woody scrub. Vegetation communities within the 500-foot buffer include California annual grassland, disturbed/developed, and Mojave mixed woody scrub. Special-status plant species within the Variance Project Component includes Peirson's morning glory. Special-status plant species within the 500-foot buffer include short joint beavertail cactus, Peirson's morning glory, and California androsace (*Androsace elongate* ssp. *acuta*). Special-status wildlife observed within the 500-foot buffer includes golden eagle (*Aquila chrysaetos*) and Swainson's hawk (*Buteo swainsoni*). No jurisdictional features occur within the BSA.

The Variance Project Component does not overlap suitable habitat for special-status species, as included in the California Department of Fish and Wildlife (CDFW) Incidental Take Permit or U.S. Fish and Wildlife Service (USFWS) Biological Opinion.

Impacts associated with this Final Engineering Concurrence include 0.0114 acres of new permanent impacts. Permanent impacts to special-status vegetation communities will be mitigated off-site per agreements with CDFW and USFWS, and Applicant Proposed Mitigation (APM) BIO-7. Any 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).

No additional impacts to biological resources are anticipated.

- **Cultural and Paleontological Resources**: SCE submitted a memorandum dated June 11, 2014, regarding the *TRTP Cultural and Paleontological Resource Guidelines for Segment 5, Request for Final Engineering Concurrence – Installation of Access Road Stormwater Drains Near Constructs 19, 20, 25 and 43*. The memorandum states that no cultural or paleontological resources will be impacted by the installation of four stormwater drains in support of the TRTP Segment 5 T/L. The areas identified for the four stormwater drains fall within the previous survey in support of the TRTP and no cultural resources were identified (Pacific Legacy 2007).

  Previous paleontological assessments for TRTP define the geology at the proposed locations as Portal and Pelona Schist (Gust and Scott 2009). Based on the Potential Fossil Yield Classification (PFYC) system, Portal and Pelona Schist is considered low sensitivity for harboring significant paleontological resources (PFYC=1).

  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 Notice to Proceed (NTP) #15 shall apply to the subject area and activities.

- Copies of all relevant permits, compliance plans, NTP #15, and this Concurrence of Final Engineering shall be available on site for the duration of construction activities where applicable.

Sincerely,

Jason Coontz
CPUC Environmental Project Manager

cc: V. Strong, Aspen