

PUBLIC UTILITIES COMMISSION

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SAN FRANCISCO, CA 94102-3298



November 20, 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 #16

Dear Ms. Nelson,

On November 15, 2012, Southern Californian Edison (SCE) submitted a request for Final Engineering Concurrence for the addition of a transposition pole and associated permanent access road near Structure M74-T1X on Segment 4 Transmission Line (T/L) of the Tehachapi Renewable Transmission Project (TRTP), in Kern County, California. Additional information was submitted on November 20, 2012. **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 the addition of a transposition pole and associated permanent access road near Structure M74-T1X on Segment 4 T/L of the TRTP, in Kern County, California. Subsequent to approval of NTPR (NTP #16 dated September 13, 2010) by the CPUC, project site conditions have been further evaluated, and a transposition pole and an associated permanent access road are included in the final engineering design for Segment 4 T/L. One tubular steel transposition pole is needed in the northernmost portion of Segment 4 T/L to exchange conductor positions and reduce EMF. A permanent access road would be constructed, extending from an existing Segment 4 T/L access road to the new transposition pole. The transposition pole and road would be situated within an area that was disturbed for use as a Wire Stringing Site (WSS) during the Work Package 1 (WP 1) construction activities. A portion of this WSS area extends east/southeast outside of the CPUC-approved WSS disturbance areas. This additional disturbance occurred as a result of a boundary staking error in the field. Note that the actual WSS was appropriately cleared for biological resources and desert tortoise exclusionary fencing installed prior to ground disturbance.

The acreage associated with the CPUC-approved WSS comprises approximately 1.988 acres (total area of WSS excluding overlap with other CPUC-approved disturbance areas). To minimize overall habitat disturbance on WP 1, the remaining undisturbed portion of the CPUC-approved WSS will not be used for TRTP. The acreage for the disturbed WSS is 2.046 acres. Accounting for this new acreage (2.046 acres) less the CPUC-approved WSS that will not be used (1.988 acres), the net disturbance area increase associated with this RFEC is approximately 0.058 acre.

The permanent impact area associated with the transposition pole and access road is approximately 0.124 acre.

In accordance with the CDFG Incidental Take Permit (ITP), desert tortoise exclusionary fencing has been installed around the work areas associated with the transposition pole and new access road. These work areas were all previously disturbed during earlier construction phases.

- **Biological Resources:** SCE submitted biological resources information with the Request for Final Engineering Concurrence. The proposed transposition pole and associated road are situated within a previously surveyed portion of the Segment 4 T/L work area. The proposed area is within previously developed/disturbed habitat surrounded by Mojave creosote bush scrub, Mojave desert wash scrub, and desert saltbush scrub. As of November 14, 2012, there are no burrows, active resources, or CDFG jurisdictional drainages within the 500-foot biological survey area buffer.

Impacts associated with this Final Engineering Concurrence includes: 0.124 acres of additional permanent impacts and 0.058 acres of temporary impacts. Permanent impacts to special-status vegetation communities and special-status species habitat will be mitigated per off-site per agreements with CDFG and USFWS, and Applicant Proposed Mitigation (APM) BIO-7. 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.

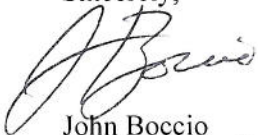
- **Cultural and Paleontological Resources:** SCE submitted a memorandum titled *TRTP Request for Final Engineering Concurrence – Transposition Structure Installation Near Construct M74-T1X, Segment 4, Kern County, Cultural Clearance*. The memorandum states that no cultural or paleontological resources will be impacted by the proposed transposition structure installation near Construct M74-T1X on Segment 4 as part of this Request for Final Engineering in support of the TRTP. A cultural record search and survey (Pacific Legacy 2007, 2009), and a paleontological literature review (Gust and Scott 2009) have been previously conducted for this area of Segment 4. This research indicates that no cultural resources will be impacted. This research also shows that the proposed tower location overlies Quaternary Alluvium which is classified as having a low sensitivity for yielding significant paleontological resources. Work will not extend beyond the approved contractor work areas.

No additional impacts to cultural or paleontological resources are anticipated.

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

- SCE shall submit the revised disturbance acreages for habitat covered under the ITP to CDFG by COB, November 30, 2012, or else all work under this Final Engineering Concurrence shall cease.
- All conditions required by Notice to Proceed (NTP) #16 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #16, 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