

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 25, 2013

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 #17

Dear Ms. Nelson,

On September 10, 2013, Southern Californian Edison (SCE) submitted a request for Final Engineering Concurrence for new access roads to Structures M31-T3 and M58-J3, and Wire Setup Site 7.17 on the Segment 7 Transmission Line (T/L) of the Tehachapi Renewable Transmission Project (TRTP), in the City of Irwindale, Los Angeles County, California. Additional information was submitted by SCE on September 24, 2013. **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 new access roads to Structures M31-T3 and M58-J3, and Wire Setup Site (WSS) 7.17 on Segment 7 T/L of the TRTP, in the City of Irwindale, Los Angeles County, California. Subsequent to approval of NTPR (NTP #17 dated September 24, 2010) by the CPUC, new access roads were identified to access Structures M31-T3 and M58-J3, and WSS 7.17. Descriptions of the proposed access roads are provided below:

- Access road to Structure M31-T3. The proposed new permanent access road measures approximately 130 feet long with a permanent grading limit that ranges from approximately 20 to 55 feet wide. The total disturbance area, located within disturbance area previously approved in the NTP, is approximately 0.351 acre.
- Access road to Structure M58-J3. The new permanent access road measures approximately 180 feet long with a permanent grading limit that ranges from approximately 20 to 35 feet wide. The total disturbance area is approximately 0.342 acre. A portion of the road overlaps CPUC-approved disturbance areas and, as such, the new disturbance area is approximately 0.031 acre.
- Access road to WSS 7.17. The proposed temporary access road would extend from Structure M58-J3 northward to WSS 7.17. The road consists of three segments:
 - The first segment is an existing road that extends approximately 290 linear feet (0.199 acre) north from Structure M58-J3. This road is designated for Medium Improvement.
 - The second segment consists of a new temporary road that continues from the first segment (described above) approximately 130 linear feet northwest to WSS 7.17. The road has temporary grading limits ranging from approximately 20 to 55 feet wide. The total disturbance area associated with this road segment is approximately 0.337 acre. A

portion of the road overlaps CPUC-approved disturbance areas and, as such, the new disturbance area is approximately 0.262 acre.

- The third segment is an approximate 200 linear-foot new temporary road situated within WSS 7.17. No additional disturbance area is needed for this road.
- **Biological Resources:** SCE submitted biological resource information with the Request for Final Engineering Concurrence. The first component consists of a proposed new permanent access road at Segment 7 T/L Structure M31-T3, located within previously surveyed portions of the Segment 7 T/L. The site is characterized as a combination of coastal sage scrub and developed/disturbed land. Vegetation communities located within 500 feet of the Project Component include developed/disturbed, coastal sage scrub, Riversidean alluvial fan sage scrub, and ruderal grassland (ICF 2012). These surrounding vegetation communities will not be impacted by the Project Component. The Project Component is not located within occupied habitat or critical habitat for coastal California gnatcatcher (*Polioptila californica*) or least Bell's vireo (*Vireo bellii pusillus*). Suitable habitat for least Bell's vireo is present within 500 feet; protocol surveys for the species were conducted as appropriate and are repeated on an annual basis. Jurisdictional resources are not located within and/or adjacent to the Project Component. As of August 5, 2013, no active nests are located within the Project Component. A common raven nest is located approximately 45 feet to the northeast of the Project Component; the nest buffer does not overlap the Project Component. Special-status biological resources are demarcated in the field by Environmentally Sensitive Area (ESA) staking, where applicable. Construction began in this area in March 2011. Biological preconstruction surveys (P30) were conducted in January, March, and May, 2011, and a bat habitat survey was conducted in October 2010. Construction monitoring and surveys are ongoing in this area.

The second component consists of a new permanent access road to Segment 7 Structure M58-J3 and a new temporary access road from M58-J3 to WSS 7.17 both located within previously surveyed portions of the Segment 7 T/L. The site is characterized as coastal sage scrub and developed land. Vegetation communities located within 500 feet of the Project Component included developed/disturbed, coastal sage scrub, Riversidean alluvial fan sage scrub, and ruderal grassland (ICF 2012). These surrounding vegetation communities will not be impacted by the Project Component. The Project Component is not located within occupied habitat or critical habitat for coastal California gnatcatcher or least Bell's vireo. Suitable habitat for least Bell's vireo is present within 500 feet; protocol surveys for the species were conducted as appropriate and are repeated on an annual basis. Jurisdictional resources identified as Features 7-11-S-1 and 7-11-S-2 are located within 500 feet of the Project Component. These jurisdictional resources will not be impacted by the Project Component; no amendments to the wetland permits are required. As of August 5, 2013, no active nests are located in or within 500 feet of the Project Component. Special-status species observed in or within 500 feet of the Project Component include peregrine falcon (*Falco peregrinus*), least Bell's vireo, Swainson's hawk (*Buteo swainsoni*), and loggerhead shrike (*Lanius ludovicianus*). Special-status biological resources are demarcated in the field by ESA staking, where applicable. Construction began in this area in March 2011. A biological preconstruction survey (P30) was conducted in May 2011 and a bat habitat survey was conducted in October 2010. Construction monitoring and surveys are ongoing in this area.

No additional impacts to biological resources are anticipated as a result of this Request for Final Engineering Concurrence.

- **Cultural and Paleontological Resources:** SCE submitted a memorandum dated August 1, 2013 regarding the SCE TRTP Cultural and Paleontological Resource Guidelines for Segment 7 T/L, Request for Final Engineering Concurrence – M31-T3, M58-J3, and Wire Setup Site 7.17 Access Roads. The memorandum states that no cultural or paleontological resources will be impacted by the proposed access roads to Structures M31-T3 and M58-J3, and WSS 7.17, in support of the TRTP Segment 7. The proposed access roads provided in this Request for Final Engineering Concurrence were included in previous surveys for the TRTP and no cultural resources were identified (Belcourt 2010; Pacific Legacy 2007, 2010).

Previous paleontological assessments for TRTP define the geology at the proposed locations as Recent alluvium or gravels and sands of major streams and alluvial fans (Qg) (Gust and Scott 2009; Aron and Kelly 2010). Based on the Potential Fossil Yield Classification (PFYC) system, Recent alluvium is considered low sensitivity for harboring significant paleontological resources (PFYC = 2).

No cultural or paleontological resources impacts are anticipated as a result of this Request for Final Engineering Concurrence.

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

- SCE shall provide a copy of the City of Irwindale grading permit to the CPUC prior to the start of construction.
- All conditions required by Notice to Proceed (NTP) #17 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #17, and this Concurrence of Final Engineering shall be available on site for the duration of construction activities where applicable.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Coontz', with a long horizontal flourish extending to the right.

Jason Coontz
CPUC Environmental Project Manager

cc: V. Strong, Aspen