

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 20, 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 #17

Dear Ms. Nelson,

On June 6, 2014, Southern Californian Edison (SCE) submitted a request for Final Engineering Concurrence for erosion repairs associated with the access road to Structure M27-T3 on the Segment 7 Transmission Line (T/L) of the Tehachapi Renewable Transmission Project (TRTP), in the City of Duarte, 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 the erosion repairs associated with the access road to Structure M27-T3 on Segment 7 T/L of the TRTP, in the City of Duarte, Los Angeles County, California. Subsequent to approval of NTPR (NTP #17 dated September 24, 2010) by the CPUC, erosion caused by stormwater runoff has resulted in the need for an additional work area associated with the access road to Structure M27-T3. This work area is needed to perform erosion repairs, including the following:

- Re-grade the area to restore the slope to its original contour
- Install jute netting over the hillside
- Repair and re-grade the eroded areas under the existing McCarthy drain
- Install 8 to 12-inch rip-rap at the outlet of the McCarthy drain

The additional work area measures approximately 0.0154 acre.

- **Biological Resources:** SCE submitted biological report from ICF International dated June 3, 2014 with the Request for Final Engineering Concurrence. The report documents the biological conditions for the proposed Segment 7 erosion repair associated with the access road to Structure M27-T3 (Variance Project Component) and the 500-foot buffer 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) and the 2010 and 2011 regulated tree inventory surveys (ICF 2010av, 2011hd). The biological resources within the BSA were also evaluated during Segment 7 general preconstruction surveys and preconstruction special-status bat habitat assessment surveys (ICF 2010bg, 2010df). Also, a literature review was performed as part of the biological review for Segment 7 (ICF 2010ay). Additionally, a clearance sweep was performed on May 17, 2011. 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). A clearance sweep will also be conducted prior to construction of the Variance Project Component.

Vegetation communities within the Variance Project Component include coastal sage scrub. Vegetation communities within the 500-foot buffer include coastal sage scrub and coast live oak woodland. No special-status plant species occur within the Variance Project Component or 500-foot buffer. Regulated tree species, blue elderberry (*Sambucus cerulea*), occurs within the 500-foot buffer.

Special-status wildlife species observed within the 500-foot buffer include merlin (*Falco columbarius*), Southern California rufous-crowned sparrow (*Aimophila ruficeps*), and sign of San Diego desert woodrat (*Neotoma lepida intermedia*). The Variance Project Component does not overlap suitable habitat for special-status species, as included in the CDFW Incidental Take Permit or the USFWS Biological Opinion.

Jurisdictional resources within the Variance Project Component were evaluated during the 2010 jurisdictional delineation for Segments 7 and 8 (ICF 2010h). Jurisdictional feature 7-3-S-9 occurs within the Variance Project Component and will be staked as an Environmentally Sensitive Area (ESA) and avoided until appropriate permits are obtained. Jurisdictional features within the 500-foot buffer include 7-3-S-2, 7-3-S-6, 7-3-S-7, 7-3-S-8, 7-3-S-9, and 7-3A-S-5, and will be avoided.

Impacts associated with this Final Engineering Concurrence include 0.0001 acre of new permanent impacts, 0.0003 acre of permanent impacts that were previously temporary impacts, and 0.015 acre of new temporary impacts. 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.

- **Cultural and Paleontological Resources:** SCE submitted a memorandum dated June 5, 2014 regarding the SCE TRTP Cultural and Paleontological Resource Guidelines for Segment 7 T/L, Request for Final Engineering Concurrence – Erosion Repair Associated with the Access Road to Structure M27-T3. The memorandum states that no cultural or paleontological resources will be impacted by the proposed erosion repair activities associated with the access road to Structure M27-T3 on Segment 7 T/L in support of the TRTP. The proposed area for the erosion repair activities associated with the access road to Structure M27-T3 provided in the RFEC was included in previous surveys for the TRTP and no cultural resources were identified (Pacific Legacy 2010; PCR 2011).

Previous paleontological assessments for TRTP define the geology at the proposed location as quartz diorite (Gust and Scott 2009; Aron and Kelly 2010). Based on the Potential Fossil Yield Classification (PFYC) system, these sediments are considered low sensitivity for harboring significant paleontological resources.

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 copies of the applicable jurisdictional permits to the CPUC prior to the start of construction within the jurisdictional feature.
- The boundaries of the work area covered under this Concurrence of Final Engineering shall be staked and flagged, as well as any ESAs, and verified by a CPUC EM prior to use.
- 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