

PUBLIC UTILITIES COMMISSION

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January 27, 2015

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 January 17, 2014, Southern Californian Edison (SCE) submitted a request for Final Engineering Concurrence (FEC) for earth removal at several locations near the Santa Fe Dam area on Segment 7 and Segment 8, Phase 4, of the Tehachapi Renewable Transmission Project (TRTP), in the City of Irwindale, Los Angeles County, California. Information requests were submitted to SCE regarding this FEC request on February 25 and October 21, 2014. On January 20, 2015, SCE requested that the two Segment 7 locations adjacent to Wire Setup Site (WSS) 7.11 and Structure M31-T2 be processed at this time. SCE submitted additional information on January 27, 2015. **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 earth removal at two locations near the Santa Fe Dam area adjacent to WSS 7.11 and Structure M31-T2 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, SCE has been directed by the U.S. Army Corps of Engineers (ACOE) to remove earth at these locations. Construction of new TRTP Segment 7 foundations subtract flood control volume from the Santa Fe Dam flood control basin managed by the ACOE. For this reason, and at the direction of the ACOE, SCE has identified two areas where earth will be removed from the flood control basin to give back the equal amount of volume dispersed by the new foundation. These give back areas are described below:

- Give Back Area 3 is located in the Santa Fe Dam area of Segment 7. Give Back Area 3 is approximately 0.026 acre. Access to Give Back Area 3 will be along an existing unpaved access road that extends south from WSS 7.11. This access road is approximately 5,289 feet.
- Give Back Area 4 is located in the Santa Fe Dam Area of Segment 7, adjacent to structure M31-T2. Give Back Area 4 is approximately 0.095 acre. Access to Give Back Area 4 will be along approved project roads.
- **Biological Resources:** SCE submitted biological report from ICF International dated December 10, 2013 with the FEC request. The report documents the biological conditions for the proposed Segment 7 U.S. Army Corps of Engineers flood control give back areas (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 2009, 2010 and 2011 rare plant surveys (AMEC 2009o; ICF 2010at, 2011hc); 2010 and 2011 tree inventory surveys (ICF 2010av, 2011hd); 2009 and 2010 burrowing owl surveys (ICF 2010xx); 2008, 2009, 2010, 2011, and 2012 coastal California gnatcatcher surveys

(AMEC 2008d, 2009m; ICF 2010ww, 2011gq; FRED Survey Parent 000011); 2009 and 2010 two-striped garter snake and south coast garter snake surveys (AMEC 2009r; ICF and BonTerra 2010e); 2009, 2010, and 2011 southwestern pond turtle surveys (AMEC 2009q; ICF and Bon Terra 2010d, 2011b); and 2007, 2009, 2010, 2011, 2012, and 2013 riparian bird surveys (AMEC 2007c, 2009i; ICF 2010ss, 2011fx; FRED Survey Parent 000004, 000008, 000023). The biological resources within the BSA were also evaluated during Segment 7 general preconstruction surveys, burrowing owl preconstruction surveys, and bat habitat assessment preconstruction surveys. Also, a literature review was performed as part of the biological review for Segment 7 (ICF 2010ay). Additionally, a preconstruction (P30) level survey was conducted on December 13, 2012 for previously unsurveyed areas within the BSA. Clearance sweeps were performed on May 11 and 16, 2011; August 16, 23, and 25, 2011; September 9, 26, and 29, 2011; and October 3 and 9, 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).

Give Back Area 3

Vegetation communities within the Variance Project Component include disturbed/developed. Vegetation communities within the 500-foot buffer include coastal sage scrub, disturbed mule fat scrub, disturbed/developed, mule fat scrub, Riversidean alluvial fan sage scrub, ruderal grassland, ruderal wetland, southern willow scrub, sparsely vegetated streambed, water. No special-status plant species or regulated trees occur within the Variance Project Component or 500-foot buffer. No special-status wildlife species have been observed within the Variance Project Component or 500-foot buffer. Bat habitat occurs within the Variance Project Component and San Diego woodrat (*Neotoma lepida intermedia*) potential midden occurs within the 500-foot buffer. 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.

Potential jurisdictional resources within the Variance Project Component were evaluated during the 2010 jurisdictional delineation for Segments 7 and 8 (ICF 2010h). Potential jurisdictional resource, Santa Fe Dam, occurs within the Variance Project Component. Jurisdictional features 7-8-S-1, 7-8-S-2, and 7-8-S-3 occur within the 500-foot buffer and will be avoided.

Give Back Area 4

Vegetation communities within the Variance Project Component include disturbed/developed and Riversidean alluvial fan sage scrub. Vegetation communities within the 500-foot buffer include California annual grassland, coastal sage scrub, disturbed/developed, mule fat scrub, and Riversidean alluvial fan sage scrub. No special-status plant species or regulated trees occur within the Variance Project Component or 500-foot buffer. Special-status wildlife species observed within the 500-foot buffer includes Swainson's hawk (*Buteo swainsoni*). San Diego woodrat potential midden occurs within the 500-foot buffer. 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). No jurisdictional resources occur within the Variance Project Component. Jurisdictional features 7-10-S-1, 7-10-S-2, and potential jurisdictional feature (flood control channel), occur within the 500-foot buffer and will be avoided.

Impacts associated with this FEC include 0.061 acre of new temporary impacts: 0.026 acre of new temporary impacts for Give Back Area 3; and 0.035 acre of new temporary impacts for Give Back Area 4 (0.060 acre was already approved as temporary impact for an access road). 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 as a result of this FEC Request.

- **Cultural and Paleontological Resources:** SCE submitted a memorandum dated December 2, 2013 titled *SCE TRTP Cultural and Paleontological Resource Guidelines for Segment 7 T/L, Request for Final Engineering Concurrence – United States Army Corps of Engineers Give Back Areas*. The memorandum states that no cultural or paleontological resources will be impacted by the proposed U.S. Army Corps of Engineers Give Back Areas on Segment 7 T/L in support of the TRTP. All of Give Back Area 4 provided in this FEC request was included in previous surveys for the TRTP (Holm and Holson 2011; Panich and Holson 2010; Pacific Legacy 2007, 2010; Wetherbee 2010) which provided that no cultural resources were identified in Give Back Area 4. Give Back Area 3 with the associated access road lay outside of the previous surveys for TRTP and required an additional cultural resources survey - *Cultural Resources Survey for TRTP for Final Engineering Concurrence: Segments 7 and 8 Phase IV, Army Corps of Engineers Give Back Areas, Los Angeles County, California* – by Pacific Legacy 2013. No cultural resources were noted near Give Back Area 3.

Previous paleontological assessments conducted for the TRTP indicate that the proposed areas are located in Quaternary younger alluvium, recent alluvium, and artificial fill (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 Environmentally Sensitive Areas, 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,



John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen