

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



October 27, 2017

Ryan Stevenson  
Principal Advisor  
Regulatory Policy & Affairs  
Southern California Edison  
8631 Rush Street, General Office 4 - G100 (Ground Floor)  
Rosemead, CA 91770

RE: Tehachapi Renewable Transmission Project (TRTP), Segments 4-11: Final Engineering Concurrence to NTP #17

Dear Mr. Stevenson,

On October 24, 2017, Southern Californian Edison (SCE) submitted a Request for Final Engineering Concurrence (RFEC) for erosion repairs associated with 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. Additional information was provided October 26, 2017. **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 Structures 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, project site conditions have been further evaluated, resulting in the need for erosion repairs due to storm damage at Structure M27-T3. The specifics for the location are below:

- Implement Erosion Repairs at Structure M27-T3, Segment 7

For slope stability and repair purposes at the concrete wet crossing, the contractor shall establish a keyway at toe of erosion; a 3-foot minimum depth by 15-foot minimum width keyway to be keyed into native competent material as determined by the Soil Engineer. Benching shall be required when natural slopes are equal to or steeper than 5:1 or when recommended by the Soil Engineer. Typical height of benches is 4-feet or as recommended by Soil Engineer. All fill must be compacted to a minimum 90% relative compaction per ASTM D1557. Finished slope surface shall be armored with 18"-24" rip-rap. Filter fabric (Mirafi 180N or equivalent) shall be installed prior to rip-rap placement. Engineering changes consist of the following:

- Permanent Disturbance: total of 0.045 acre, including 0.028 acre of new disturbance area (i.e., beyond CPUC-approved area) and 0.004 acre of transition from temporary disturbance to permanent disturbance.
  - Temporary Disturbance: total of 0.273 acre, including 0.133 acre of new disturbance area (i.e., beyond CPUC-approved area).
- **Biological Resources:** SCE submitted a biological report from ICF International dated October 24, 2017 with the RFEC. The report documents the biological conditions for the proposed Segment 7 T/L erosion repairs associated with 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 2009, 2010 and 2011 special-status plant surveys (AMEC 2009o; ICF 2010at, 2011hc); and 2010 and 2011 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, 2010bi, 2011ay, 2010br). A literature review was performed as part of the biological reviews for Segment 7 (ICF 2010ay). Construction monitoring has been ongoing regularly since the sites became active, and species events and nest events are recorded in 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 coast live oak woodland, coastal sage scrub, disturbed/developed, and nonnative woodland. Special-status plant species, San Gabriel oak (*Quercus durata* var. *gabrielensis*), occur within the 500-foot buffer. Regulated tree species, blue elderberry (*Sambucus cerulea*), California scrub oak (*Quercus berberidifolia*), and coast live oak (*Quercus agrifolia*) occur within the 500-foot buffer. Special-status wildlife species observed within the Variance Project Component include merlin (*Falco columbarius*); and within the 500-foot buffer include bald eagle (*Haliaeetus leucocephalus*), Cooper's hawk (*Accipiter cooperii*), peregrine falcon (*Falco peregrinus*), sharp-shinned hawk (*Accipiter striatus*), southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*), Swainson's hawk (*Buteo swainsoni*), and coast range newt (*Taricha torosa torosa*). Sign of San Diego desert woodrat (*Neotoma lepida intermedia*) has been observed in the 500-foot buffer.

Jurisdictional resources within the Variance Project Component were evaluated during the 2010 jurisdictional delineation for Segments 7 and 8 (ICF 2010h). One mapped jurisdictional feature, 7-3A-S-5, occurs within the Variance Project Component and impacts are anticipated. To comply with the Clean Water Act, the Army Corps of Engineers are processing an emergency permit for the erosion repair work under RG63. In addition, the California Department of Fish and Wildlife are processing a 1602 Permit Amendment. Jurisdictional features identified within the 500-foot buffer will be avoided. Any additional potential jurisdictional features will be staked as Environmentally Sensitive Areas and flagged for avoidance.

The Variance Project Component is located outside special-status species occupied and critical habitat. The Variance Project Component does not affect designated critical habitat for coastal California gnatcatcher.

Impacts associated with this Final Engineering Concurrence include 0.028 acre of new permanent impacts to coastal sage scrub (i.e., beyond the CPUC-approved area) and 0.004 acre of transition from temporary disturbance to permanent disturbance; and 0.273 acre of temporary impacts to coastal sage scrub, including 0.133 acre of new disturbance area (i.e., beyond the CPUC-approved area). 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 August 25, 2017 regarding the SCE TRTP Cultural and Paleontological Resource Guidelines for Segment 7 T/L, Request for Final Engineering Concurrence – Erosion Repairs at Structure M27-T3. The memorandum states that it is anticipated that no cultural or paleontological resources will be impacted by the proposed RFEC for erosion repair activities at Structure M27-T3 on Segment 7 T/L in support of the TRTP. All proposed areas provided in this RFEC were included in previous surveys for the TRTP and no cultural resources were identified (Pacific Legacy 2007, 2010; PCR 2011). No further work for cultural resources is required.

Previous paleontological assessments for TRTP define the geology at Structure M27-T3 as quartz diorite, Quaternary older gravels, and gravels and sands of major streams and alluvial fans (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 (PFYC = 1).

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:**

- No work shall occur in the jurisdictional areas subject to United States Army Corps of Engineers and the California Department of Fish and Wildlife until the appropriate permit amendments have been issued. SCE shall submit the permit amendments/emergency permits to the CPUC prior to work in these subject areas.
- 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,



John Boccio

CPUC Environmental Project Manager

cc: V. Strong, Aspen