STATE OF CALIFORNIA Edmund G. Brown Jr., Governor

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

June 26, 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 #21

Dear Ms. Nelson,

On April 6, 2015, Southern Californian Edison (SCE) submitted a request for Final Engineering Concurrence to retain the Vincent North Material Yard improvements that supported Segments 6 and 11 of the Tehachapi Renewable Transmission Project (TRTP), in the unincorporated City of Vincent, Los Angeles County, California. Additional information was submitted by SCE on April 10, 2015 and June 10, 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 to retain the Vincent North Material Yard improvements that supported Segments 6 and 11 of the TRTP, in the unincorporated City of Vincent, Los Angeles County, California. Subsequent to approval of Vincent North Material Yard NTPR (NTP #21 dated December 9, 2010) by the CPUC, the property owner of the yard has requested that the improvements remain in place post construction. The landowner requests that the fence, rock/stabilization, utilities, and concrete pad be left in place. The improvements will provide property security and deter dumping and vandalism. The yard is in an area with mixed use (e.g., industrial, commercial, agricultural, utilities) and includes the State Route 14 corridor, Angeles Crest Highway, residential buildings, existing railroad right-of-way owned by Los Angeles County Metropolitan Transportation Authority and other construction yards. Future use will be determined by proposed development and subject to the approval of local authorities. SCE is requesting approval to allow improvements to be left in place at the Vincent North Material Yard per the owner's request.

- **Biological Resources**: SCE submitted biological information with the Final Engineering Concurrence Request. As described in the Vincent North Material Storage Yard Biological Review Report (November 2010), prior to the TRTP, much of the Vincent North Material Yard has been disturbed, and supported disturbed Mojavean juniper woodland and scrub, ruderal grassland, and a small area of Mojavean juniper woodland and scrub along the eastern boundary. Less disturbed Mojavean juniper woodland and scrub occurs near the Angeles Forest Highway. Habitats within the buffer area include Mojavean juniper woodland and scrub and mixed woody scrub, and a small strip of rabbit brush scrub along Carson Mesa Road.

  Results of the completed 2010 focused surveys for rare plants that included portions of the Vincent North Material Yard were reviewed, and results were negative. No special-status species were identified on the Vincent North Material Yard. Potential burrowing owl habitat was previously identified north of the Vincent Substation and within the southern portion of the Vincent North Material Yard, and potential burrowing owl burrows were detected. Additional potential burrows were scattered throughout the Vincent

North Material Yard and buffer. The 2010 focused surveys for burrowing owl included the Vincent North Material Yard and were negative, but confirmed the presence of potentially suitable habitat. Preconstruction burrowing owl surveys were performed at least 30 days prior to the start of yard construction to ensure impacts on the species were avoided.

The silvery legless lizard (*Anniella pulchra pulchra*) and coast horned lizard (*Phrynosoma blainvillii*) have potential to occur within the Biological Survey Area (Vincent North Material Yard plus a 500-foot buffer). The Vincent North Material Yard provides potential nesting habitat for bird species, including raptors. No hydrologic features or potential jurisdictional features occur in the Vincent North Material Yard.

Permanent impacts associates with keeping the improvements at the yard include 12.42 acres. SCE will mitigate for impacts per the Final Environmental Impact Report/Statement (FEIR/S) and Habitat Mitigation and Monitoring Plan (HMMP). Pre-existing vegetation at the yard was comprised of 2.81 acres of disturbed/developed and ruderal grassland and 9.63 acres of Mojavean juniper woodland and scrub. Much of the Mojavean juniper scrub was classified as disturbed and had a sparse coverage of junipers with patchy scrub habitat.

On June 10, 2015, SCE submitted a supplemental analysis of habitat impacts and off-site compensation to support the original Request for Final Engineering Concurrence. Below is a discussion of mitigation rational for permanent impacts at the Vincent North Yard.

Mitigation Measure (MM) B-1a requires SCE to provide restoration/compensation for permanent impacts to native vegetation communities through the acquisition of offsite lands. SCE is proposing to mitigate for the 9.63 acres of vegetation impacts with eight (8) acres of rubber rabbitbush scrub, five (5) acres of chamise Chaparral and two (2) acres of California buckwheat vegetation communities located on the acquired Petersen Ranch property.

Within the FEIR/S Impact B-1 analysis, it is stated that while "SCE intends to avoid special-status plant communities to the maximum extent possible and would flag resources for avoidance, construction of the proposed Project would still result in disturbance to a variety of plant communities." As analyzed, the Project would result in two types of impacts – permanent and temporary. Permanent impacts are defined as those that involve conversion of land to a new use, while temporary impacts are defined as those that restrict ground disturbance solely to the construction phase and where restoration is feasible.

The Mojavean juniper woodland and scrub community is listed by CDFW as uncommon, but not rare and it is amongst the communities determined to need compensatory mitigation. Within Table 3.4-17 of the FEIR/S, the mitigation ratio has been established at 1.5:1 for Mojavean juniper woodland and scrub. Within MM B-1a, the table is repeated but includes a footnote regarding ratio adjustments:

> "Ratios on non-NFS lands may be adjusted based on existing site conditions and disturbance levels with approval of the CPUC. Ratio could range from 0.5 to maximum noted in this Table based on site evaluation".

Furthermore, the mitigation measure states that permanent impacts:

> "...on non-federal lands shall be determined by the CPUC at the ratios stated below or at a comparable value".

Through these statements the FEIR/S allows a provision for the CPUC to adjust ratios based upon onsite conditions of the impacted habitats.

The FEIR/S analyzed Mojavean juniper woodland and scrub as supporting unique assemblages of flora and fauna. Within the Vincent North Project Component, the disturbed nature of the site and the low quality of

the habitat made it unusable by special status plants and most special status wildlife before construction. The species found onsite presently are common and ubiquitous throughout many habitat types in the Western Mojave with similar elevations.

The portions of the Petersen Ranch mitigation site that are proposed to offset the impact from the Vincent North Project Component, while not being a direct "like-for-like" replacement of Mojavean Juniper Woodlands and Scrub, represents a substantial upgrade in habitat quality, functions and values. The use of the Petersen Ranch mitigation site by special status species, the use of an increased ratio and the overall greater habitat value of the Petersen Ranch mitigation site, sufficiently meets the intent and requirements of MM B-1a for the protection of "comparable value" of the impacted habitat. Additionally, the habitats within Petersen Ranch are protected and managed in perpetuity and an endowment was established to fund management tasks such as invasive weed abatement, quantitative & qualitative surveys, trash removal and monitoring and reporting. The habitat management plan, habitat maintenance goals and objectives were all established to ensure the habitats are being managed to continue to provide a prolific and viable ecosystem.

No additional impacts to biological resources are anticipated.

- **Cultural and Paleontological Resources**: SCE submitted a memorandum titled *SCE TRTP 4011 Notice to Proceed Request for Vincent North Material Storage Yard (Vincent North Yard) (CPUC Notice to Proceed #21) Cultural and Paleontological Resources Assessment* dated March 27, 2015. The memorandum states that no cultural or paleontological resources will be impacted by retaining the improvements to the existing Vincent North Material Storage Yard. Previous surveys conducted in support of the TRTP identified a portion of a historic period cultural resource and an isolated historical glass insulator within the yard boundaries (Pacific Legacy 2007). The cultural resource was evaluated and recommended not eligible for the National Register of Historic Places (NRHP). In a letter dated December 13, 2010, the State Historic Preservation Officer (SHPO) indicated that the portion of the cultural resource within the yard has limited data potential and lacks historical significance. No additional efforts are required to mitigate the resource within the yard. All information related to the isolate (glass insulator) has been collected and no additional efforts are necessary to mitigate the resource. Allowing the current improvements to remain in place will not require ground disturbance and therefore additional monitoring efforts related to paleontological resources will not be necessary.

  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 to CPUC the final temporary and permanent impact acreages, by habitat type, for TRTP construction. These acreages shall be compared to the available TRTP off-site habitat compensation lands, and shall incorporate other SCE projects utilizing TRTP off-site compensation lands, including but not limited to, Antelope-Pardee, Antelope Transmission, and Downs Substation Expansion Project.

Sincerely,

John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen