STATE OF CALIFORNIA Edmund G. Brown Jr., Governor

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

December 3, 2012

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 #24

Dear Ms. Nelson,

On November 28, 2012, Southern Californian Edison (SCE) submitted a request for Final Engineering Concurrence for a new permanent access road to Structure M49-T2 on Segment 8 Transmission Line (T/L) West (Phase 4) of the Tehachapi Renewable Transmission Project (TRTP), in unincorporated 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 a new permanent access road and associated grading limits and contractor work limits on Segment 8 T/L West (Phase 4) of the TRTP, in unincorporated Los Angeles County, California. Subsequent to approval of NTPR (NTP #24 dated January 12, 2011) by the CPUC, final design was completed and a new permanent access road has been proposed to access and construct Structure M49-T2. Additionally, new proposed permanent grading limits and new proposed contractor work limits, associated with the new permanent access road, have been included. The structure work area has also been shifted south and reduced along the northeastern boundary to minimize disturbance area (approximately 0.997 acre). The new permanent access road is approximately 180 feet long, has a permanent grading limit that ranges between 15 feet and 80 feet wide, and has a total disturbance area of approximately 0.378 acres.

- **Biological Resources**: SCE submitted a biological survey report with the Request for Final Engineering Concurrence from ICF International dated November 20, 2012 titled *Proposed Access Road to M49-T2, Segment 8 West (Phase 4), Tehachapi Renewable Transmission Project, Los Angeles County*. The report documents the biological conditions at the proposed Segment 8 West (Phase 4) access road to Structure M49-T2 (Variance Project Component). The Variance Project Component plus a 500-foot buffer is 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); and 2008, 2009, 2010, 2011, 2012 coastal California gnatcatcher surveys (AMEC 2008d, 2009m; ICF 2010ww, 2011gq; FRED). The biological resources within the BSA were also evaluated during Segment 8 West general preconstruction surveys (ICF 2011gn, 2012f). Additionally, clearance sweeps were performed on January 19, 2012. 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). A literature review was also performed as part of the Biological Review for Segment 8 West (Phase 4) (ICF 2010dw).

Vegetation communities within the Variance Project Component include mixed chaparral, nonnative woodland, and disturbed/developed. Vegetation communities within the 500-foot buffer include coast live oak woodland, coastal sage scrub, mixed chaparral, nonnative woodland, and disturbed/developed. Special-status plant species, Intermediate mariposa lily (*Calochortus weedii* var. *intermedius*), occurs within the 500-foot buffer. Regulated tree species, blue elderberry (*Sambucus mexicanus*), occurs within the Variance Project Component and the 500-foot buffer. Regulated tree species, red gum (*Eucalyptus camaldulensis*), coast live oak (*Quercus agrifolia*), and toyon (*Heteromeles arbutifolia*), occur within the 500-foot buffer.

Special-status wildlife species observed within the 500-foot buffer include coastal cactus wren (*Campylorhynchus brunneicapillus*). San Diego desert woodrat (*Neotoma lepida intermedia*) potential middens, low potential solitary bat roost habitat, and coastal California gnatcatcher (*Polioptila californica*) occur within the Variance Project Component and the 500-foot buffer. Potential burrowing owl (*Athene cunicularia*) features and coastal California gnatcatcher occupied habitat occur within 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). Jurisdictional features 8-20-S-1 and 8-20-S-2 are within the 500-foot buffer and will be avoided. Any additional potential jurisdictional features will be staked as Environmentally Sensitive Areas (ESAs) and flagged for avoidance.

No additional impacts to biological resources are anticipated.

- **Cultural and Paleontological Resources**: SCE submitted a memorandum dated November 1, 2012 regarding the TRTP Request for Final Engineering Concurrence, Cultural and Paleontological Clearance for Proposed Access Road to M49-T2 on Segment 8 T/L Phase 4, Unincorporated Los Angeles County. The memorandum states that no cultural resources will be impacted by the use of the proposed access road to M49-T2 on Segment 8 Phase 4 as part of this Request for Final Engineering Concurrence in support of the TRTP. The proposed access road falls within the cultural records search and surveyed area for TRTP (Pacific Legacy 2007). In addition, the paleontological literature review (Gust and Scott 2009) shows this area to lie within landslide deposits that have a low paleontological sensitivity. The cultural records search did not yield any resources, but one historic transmission line, the Walnut-Mesa 220kV, runs through this area. The Walnut-Mesa 220kV was evaluated and determined ineligible for the NRHP and CRHR in 2010.

  No additional impacts to cultural or paleontological resources are anticipated.

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

- All conditions required by Notice to Proceed (NTP) #24 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #24, 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