

PUBLIC UTILITIES COMMISSION

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May 6, 2013

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 March 5, 2013, Southern Californian Edison (SCE) submitted a request for Final Engineering Concurrence to modify the new permanent access road to Structure M43-T3 and Structure M8-T1A, as well as the permanent grading limits, work limits, and drainage features associated with the access road 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 to modify the new permanent access road to Structure M43-T3 and Structure M8-T1A as well as the permanent grading limits, work limits, and drainage features associated with the access road 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 the proposed new permanent access road to access and construct Structure M43-T3 and Structure M8-T1A was modified. New proposed permanent grading limits and new proposed contractor work limits, associated with the new permanent access road, have also been included. Additionally, proposed permanent drainage features (i.e. v-ditch and riprap) have been included in the engineering design. The new permanent access road is approximately 946 feet long, has a permanent grading limit that ranges between 26 feet and 247 feet wide, and has a total disturbance area of approximately 3.57 acres (of this, approximately 0.014 acre is new disturbance not previously approved in NTP/Variance). The previously approved access road (NTP #24 and Mod #4 to NTP #24) will be replaced with the newly proposed access road.

- **Biological Resources:** SCE submitted a biological survey report with the Request for Final Engineering Concurrence from ICF International dated January 8, 2013 titled *Proposed Access Road to M43-T3 and M8-T1A, 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 M43-T3 (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); 2010 burrowing owl surveys (ICF 2010xx); 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 and bat habitat assessment preconstruction surveys (ICF

2011bw, 2011by, 2011dj, 2011dk). Additionally, combined preconstruction surveys and clearance sweeps were performed on September 26, 2011 and May 30, 2012 (ICF 2011gh, FRED). 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 coastal sage scrub, ruderal grassland, and disturbed/developed. Vegetation communities within the 500-foot buffer include coast live oak woodland, coastal sage scrub, non-native woodland, ruderal grassland, and disturbed/developed. Regulated tree species, coast live oak (*Quercus agrifolia*), occurs within the 500-foot buffer.

Special-status wildlife species observed within the Variance Project Component and 500-foot buffer include Cooper's hawk (*Accipiter cooperii*). Coastal California gnatcatcher (*Polioptila californica*) have been observed within the 500-foot buffer and designated critical habitat and occupied habitat occurs within the Variance Project Component and the 500-foot buffer (BSA). Due to increases in permanent coastal California gnatcatcher occupied habitat impacts at this location, an amendment to the Biological Opinion may be required. San Diego desert woodrat (*Neotoma lepida intermedia*) potential midden and low potential solitary bat roost habitat occur within the BSA. A potential burrowing owl feature was noted within the 500-foot buffer (2010xx).

Jurisdictional resources within the Variance Project Component were evaluated during the 2010 jurisdictional delineation for Segments 7 and 8 (ICF 2010h). Jurisdictional feature 8-10-S-1 is 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 14, 2012 regarding the TRTP Cultural and Paleontological Resources Guidelines for Segment 8 T/L, Request for Final Engineering Concurrence – Segment 8 T/L West Phase IV – Proposed Access Road to M43-T3 and M8-T1A. The memorandum states that no historical resources, historic properties or significant paleontological resources will be impacted by the proposed wire setup sites and access road additions. All proposed areas fall entirely within the cultural records search and field surveys for TRTP (Pacific Legacy 2007, 2010a, 2010b, 2010c, Wetherbee 2011). The previous cultural resources inventory efforts show that three historic-era transmission lines (Chino-Mesa 220kV, Walnut-Hilgen-Industry-Mesa-Reno 66kV, Mesa-Walnut 66kV) cross the area in this variance request. All of these lines were evaluated and determined ineligible for the NRHP and CRHR in 2010. Therefore, no further cultural resources assessment or monitoring is required to support this variance request.

Previous paleontological assessments for TRTP define the soil type at the proposed location as Fernando Formation (Gust and Scott 2009). The Fernando Formation is considered as having high sensitivity for yielding significant paleontological resources. Paleontological monitoring is required during ground disturbance associated with this variance request.

No additional impacts to cultural or paleontological resources are anticipated.

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

- SCE shall obtain an amendment to the Biological Opinion, if necessary, for increases in permanent coastal California gnatcatcher occupied habitat impacts at this location, prior to the start of construction.

- Due to the Fernando Formation having high sensitivity for yielding significant paleontological resources, paleontological monitoring shall be conducted during ground disturbance associated with this variance request.
- 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