

PUBLIC UTILITIES COMMISSION

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June 11, 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 May 16, 2013, Southern Californian Edison (SCE) submitted a request for Final Engineering Concurrence to modify the new permanent access road to Structure M44-T3 and Structure M7-T2B, as well as the permanent grading limits and work limits 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 M44-T3 and Structure M7-T2B as well as the permanent grading limits and work limits 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 M44-T3 and Structure M7-T2B was modified. New proposed permanent grading limits and new proposed contractor work limits, associated with the new permanent access road, have also been included. The new permanent access road is approximately 160 feet long and has a permanent grading limit that ranges between 30 feet and 115 feet wide. In addition, extending from the south end of the proposed new permanent road is a segment of proposed temporary road, and associated proposed temporary grading limit and contractor work limit. The proposed temporary road is approximately 42 feet long and has a temporary grading limit that ranges between 30 feet and 60 feet wide. The total disturbance area of the contractor work limit (which encompasses both the permanent and temporary grading limits) is approximately 0.721 acres. Access to the new permanent access road will be from the proposed existing access road, from the north, which is approximately 145 linear feet.

- **Biological Resources:** SCE submitted a biological survey report with the Request for Final Engineering Concurrence from ICF International dated February 19, 2013 titled *Proposed Access Road to M44-T3 and M7-T2B, 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 M44-T3 and M7-T2B (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 and bat habitat assessment preconstruction surveys (ICF 2011dj, 2011dk, 2011gi, 2011he). Preconstruction surveys were conducted and 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 disturbed/developed and ruderal grassland. Vegetation communities within the 500-foot buffer include coast live oak woodland, coastal sage scrub, disturbed/developed, and ruderal grassland. No special-status plant species or regulated tree species have been observed within the BSA.

Special-status wildlife species observed within the Variance Project Component and 500-foot buffer include coastal California gnatcatcher (*Poliopitila californica*) and both areas are designated critical habitat (occupied habitat occurs within 500-foot buffer). Impacts to coastal California gnatcatcher designated critical habitat include: 0.099 acre permanent impacts and 0.078 acre temporary impacts. Due to increases in permanent coastal California gnatcatcher designated critical habitat impacts at this location, an amendment to the Biological Opinion may be required. Cooper's hawk (*Accipiter cooperii*) has been observed within the 500-foot buffer. San Diego desert woodrat (*Neotoma lepida intermedia*) potential midden occurs within the 500-foot buffer.

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). Any 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.

Jurisdictional resources within the Variance Project Component were evaluated during the 2010 jurisdictional delineation for Segments 7 and 8 (ICF 2010h). Jurisdictional feature 8-11-S-5 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 January 31, 2013 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 M44-T3 and M7-T2B. The memorandum states that no previously recorded historical resources, historic properties or significant paleontological resources will be impacted by the proposed access road addition to M44-T3 and M7-T2B. The proposed new permanent access road is addressed within several previous cultural resources records searches and field surveys for TRTP (Pacific Legacy 2007, 2010a, 2010b, 2010c, Wetherbee 2010). The previous cultural resources inventory efforts show that no cultural resources intersect this area. Furthermore, the area is within a previously built environment. Therefore, there is no potential for impacts to cultural resources as a result of the described work.


Previous paleontological assessments for TRTP define the underlying soil type at the proposed location as Fernando Formation (Gust and Scott 2009). Fernando Formation is considered as having high sensitivity for yielding significant paleontological resources. Paleontological monitoring is required during initial ground disturbance to determine whether or not native soils will be impacted during the course of road development activities 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 designated critical 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 initial 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