

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 8, 2014

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 April 15, 2014, Southern Californian Edison (SCE) submitted a request for a Final Engineering Concurrence (FEC) for grading and work limit modifications associated with the access road to Structure M43-T3, on Segment 8 Transmission Line (T/L) West (Phase 4) of the Tehachapi Renewable Transmission Project (TRTP), in unincorporated Los Angeles County, California. SCE submitted a revised FEC request on May 1, 2014. **This Concurrence to Final Engineering is approved by CPUC based on the following factors:**

- SCE submitted the following information:

SCE requests a Final Engineering Concurrence for grading and work limit modifications associated with the access road to Structure M43-T3, 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, additional engineering design was conducted, which resulted in the need for revised permanent grading limits and an additional temporary contractor work area associated with the access road to Structure M43-T3. The proposed permanent and temporary disturbance area changes are described below.

- Revised Permanent Disturbance Areas. The revised permanent grading limits will remain within the CPUC-approved disturbance area limits. There are proposed disturbance area changes, including new permanent disturbance areas and previously approved permanent disturbance areas that will change to temporary disturbance areas (Figure 2 of FEC Request). The revised permanent grading area comprises a total of approximately 2.4 acres, resulting in an approximate 0.18-acre net increase to the permanent disturbance area associated with the Structure M43-T3 access road.
 - Additional Temporary Disturbance Area. An approximately 18-foot by 50-foot (0.01 acre) temporary contractor work limit extension is proposed along the northeast portion of the work area (Figure 1 of FEC Request).
- **Biological Resources:** SCE submitted biological resource information with the Request for Final Engineering Concurrence. The report documents the biological conditions at the proposed Segment 8 West (Phase 4) additional temporary contractor work area and associated access road work to Structure M43-T3. These areas fall within previously surveyed portions of Segment 8 T/L.

The Project Component is characterized as coastal sage scrub. Vegetation communities located within 500 feet of the Project Component include coastal sage scrub, ruderal grassland, non-native woodland,

disturbed/developed, and coast live oak woodland (ICF 2012). These surrounding vegetation communities will not be impacted by the Project Component.

The Project Component is not located within 500 feet of occupied or suitable habitat for least Bell's vireo (*Vireo bellii pusillus*). The Project Component is located within designated critical habitat and occupied habitat for coastal California gnatcatcher (*Polioptila californica*). The additional 0.01 acre of temporary impact to California gnatcatcher designated critical habitat and occupied habitat does not exceed the authorized take acreage in the U.S. Fish and Wildlife Biological Opinion (BO). Construction will occur in compliance with the conditions of the BO if active California gnatcatcher nests or territories are present.

As of April 10, 2014, no nests are located in or within 500 feet of the Project Component. Low-potential and medium-potential bat habitats are located within 500 feet of the Project Component.

Special-status species observed in or within 500 feet of the Project Component include California gnatcatcher, merlin (*Falco columbarius*), and Cooper's hawk (*Accipiter cooperii*). Regulated trees observed in or within 500 feet of the Project Component include blue elderberry (*Sambucus caerulea*) and coast live oak (*Quercus agrifolia*). No jurisdictional resources are located in or within 500 feet of the Project Component. Special-status biological resources are demarcated in the field by Environmentally Sensitive Area staking, where applicable. Construction began in this area in October 2011 and has been ongoing.

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.

No additional impacts to biological resources are anticipated.

- **Cultural and Paleontological Resources:** SCE submitted a memorandum dated April 9, 2014 regarding the TRTP Cultural and Paleontological Resource Guidelines for Segment 8 T/L Phase IV West, Request for Final Engineering Concurrence (RFEC) – Grading and Contractor Work Limit Modification at Structure M43-T3. The memorandum states that no cultural resources will be impacted. The proposed areas identified within the RFEC were included in previous surveys for the TRTP and no cultural resources were identified (Pacific Legacy 2007, 2010a, 2010b, 2010c).

Previous paleontological assessments conducted for TRTP indicate that the proposed grading and contractor work limit modifications identified in this RFEC are located within the Fernando Formation, which has a high sensitivity for yielding paleontological resources (Gust and Scott 2009; Aron 2010). Therefore, in accordance with the Paleontological Resource Management Plan (Gust and Scott 2009), paleontological resources monitoring is required during any ground disturbing activities for this RFEC.

No additional impacts to cultural or paleontological resources are anticipated.

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

- The boundaries of the temporary contractor work limit extension shall be staked and flagged, and verified by a CPUC EM prior to use.
- Due to the Fernando Formation having high sensitivity for yielding significant paleontological resources, paleontological monitoring shall be conducted during any ground disturbance activities associated with this RFEC.

- 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,

A handwritten signature in black ink, appearing to read 'J. Coontz', with a long horizontal flourish extending to the right.

Jason Coontz
CPUC Environmental Project Manager

cc: V. Strong, Aspen