

PUBLIC UTILITIES COMMISSION

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October 7, 2015

Ryan Stevenson
Principal Advisor
Regulatory Policy & Affairs
Southern California Edison
8631 Rush Street, General Office 4 - G100 (Ground Floor)
Rosemead, CA 91770

RE: Tehachapi Renewable Transmission Project (TRTP), Segments 4-11: Final Engineering Concurrence to NTP #24

Dear Mr. Stevenson,

On September 1, 2015, Southern Californian Edison (SCE) submitted a request for Final Engineering Concurrence for erosion repairs at Structures M43-T3 and M44-T2, permanent access roads at Structures M51-T3 and M54-T2, permanent grading limits at Structures M51-T4 and M51-T5, and slope design changes at Structure MA1-T2 on the Segment 8 Transmission Line (T/L) West (Phase IV) of the Tehachapi Renewable Transmission Project (TRTP), in the City of La Habra Heights, Los Angeles County and unincorporated Los Angeles County, California. Additional information was submitted October 2 and 7, 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 for erosion repairs at Structures M43-T3 and M44-T2, permanent access roads at Structures M51-T3 and M54-T2, permanent grading limits at Structures M51-T4 and M51-T5, and slope design changes at Structures MA1-T2 on Segment 8 T/L West (Phase IV) of the TRTP, in the City of La Habra Heights, Los Angeles County, and unincorporated Los Angeles County, California. Subsequent to approval of NTPR (NTP #24 dated January 12, 2011) by the CPUC, additional design activities have been conducted for Segment 8 T/L West (Phase IV). To address field conditions, SCE is modifying access roads to Structures M51-T3, M54-T2, M51-T4, and M51-T5. In addition, SCE is incorporating design changes at Structures MA1-T2, M44-T2, and M43-T3 to enhance slope stability. The specifics for each location are below:

- Implement Erosion Repairs at Structure M43-T3
For slope stability purposes, the revised site design includes the installation of additional V-ditches along the access road from the structure, an additional V-ditch on the western side of the permanent grading limit, and five splash walls. The proposed features are situated entirely in existing approved disturbance areas.
- Add Rip Rap at Structure M44-T2
For slope stability purposes, the revised site design includes the installation of additional rip rap. The proposed rip rap is situated entirely in an approved permanent disturbance area.
- Modify Access Road at Structure M51-T3
The proposed permanent access road is approximately 546 feet long and consists of approximately 0.177 acre. The proposed access road overlaps existing approved temporary disturbance areas and an existing permanent access road and, as such, the total new permanent disturbance area is approximately 0.027 acre.

- Modify Access Road at Structures M51-T4 and M51-T5
The proposed permanent disturbance area totals approximately 1.874 acres, including approximately 0.056 acre of new disturbance area (i.e., beyond the CPUC-approved area)
- Modify Slope Design at Structure MA1-T2
For slope stability purposes, the revised slope design incorporates changes to the temporary grading limit, permanent grading limit, and temporary contractor work limit associated with Structure MA1-T2. The proposed engineering changes consist of the following: permanent disturbance – approximately 0.491 acre, including 0.012 acre of new disturbance area (i.e., beyond the CPUC-approved area); temporary disturbance – approximately 0.423 acre, including approximately 0.159 acre of new disturbance area (i.e., beyond the CPUC-approved area).
- Modify Access Road at Structure M54-T2
The proposed permanent access road is approximately 368 feet long and consists of approximately 0.087 acre. The proposed access road overlaps existing approved temporary disturbance areas and an existing permanent access road and, as such, the total new permanent disturbance area is approximately 0.015 acre.
- **Biological Resources:** SCE submitted a biological report from ICF International dated August 12, 2015 with the Request for Final Engineering Concurrence (RFEC). The report documents the biological conditions for the proposed Segment 8 T/L erosion repairs at Structures M43-T3 and M44-T2, permanent access roads at Structures M51-T3 and M54-T2, permanent grading limits at Structures M51-T4 and M51-T5, and slope design changes at Structure MA1-T2 (Variance Project Component) and the 500-foot buffer referred to as the Biological Study Area (BSA). Biological resources within the BSA were evaluated during several focused surveys, including 2009, 2010 and 2011 special-status plant surveys (AMEC 2009o; ICF 2010at, 2011hc); 2010 and 2011 tree inventory surveys (ICF 2010av, 2011hd); 2009 and 2010 burrowing owl surveys (AMEC 2009j; ICF 2010xx); and 2008, 2009, 2010, 2011, and 2012 coastal California gnatcatcher surveys (AMEC 2008d, 2009m; ICF 2010ww, 2010gf, 2011gq; SCE 2014a Field Reporting Environmental Database (FRED) Survey Parent 000007). The biological resources within the BSA were also evaluated during Segment 8 West general preconstruction surveys, burrowing owl preconstruction surveys, and preconstruction bat habitat assessment surveys (ICF 2010cf, 2011bw, 2011by, 2011dk, 2011du, 2011dy, 2011ep, 2011fh, 2011fi, 2011gh, 2011gm, 2011gn, 2011go, and 2011gp). Also, a literature review was performed as part of the biological review for Segment 8 West (Phase 4; ICF 2010dw). Additionally, clearance sweeps were performed prior to the start of construction. Construction monitoring has been ongoing regularly since the sites became active, and species events and nest events are recorded in FRED (SCE 2014a). A clearance sweep will also be conducted prior to construction of the Variance Project Component.

Site 1: Implement Erosion Repairs at Structure M43-T3, Segment 8

Vegetation communities within the Variance Project Component include coastal sage scrub and ruderal grassland. Vegetation communities within the 500-foot buffer include coast live oak woodland, coastal sage scrub, disturbed/developed, nonnative woodland, and ruderal grassland. No special-status plant species occur within the BSA. Regulated tree species, blue elderberry (*Sambucus cerulea*), occurs within the Variance Project Component, and coast live oak (*Quercus agrifolia*) and blue elderberry occur within the 500-foot buffer. Special-status wildlife species observed within the 500-foot buffer include coastal California gnatcatcher (*Polioptila californica*), Cooper's hawk (*Accipiter cooperii*), merlin (*Falco columbarius*), peregrine falcon (*Falco peregrinus*), sharp-shinned hawk (*Accipiter striatus*), and willow flycatcher (*Empidonax traillii*). San Diego desert woodrat (*Neotoma lepida intermedia*) middens and bat habitat also occur within the 500-foot buffer. Coastal California gnatcatcher designated critical habitat and occupied habitat occur within the Variance Project Component and 500-foot buffer. Jurisdictional feature, 8-10-S-1 occurs within the 500-foot buffer.

Site 2: Add Rip Rap to Structure M44-T2, Segment 8

Vegetation communities within the Variance Project Component include disturbed/developed. Vegetation communities within the 500-foot buffer include coastal sage scrub, disturbed/developed, non-native woodland, and ruderal grassland. No special-status plant species or regulated tree species occur within the Variance Project Component or 500-foot buffer. Special-status wildlife species observed within the 500-foot buffer include coastal California gnatcatcher, Cooper's hawk, merlin (*Falco columbarius*), Northern harrier (*Circus cyaneus*), peregrine falcon, and sharp-shinned hawk. Designated coastal California gnatcatcher critical habitat and occupied habitat occurs within the 500-foot buffer. Jurisdictional feature 8-11-S-5 occurs within the 500-foot buffer.

Site 3: Modify Access Road at Structure M51-T3, Segment 8

Vegetation communities within the Variance Project Component include coast live oak woodland, coastal sage scrub, disturbed/developed, non-native woodland, and ruderal grassland. Vegetation communities within the 500-foot buffer include coast live oak woodland, coastal sage scrub, California walnut woodland, disturbed/developed, mixed chaparral, non-native woodland, and ruderal grassland. Special-status plant species, California walnut (*Juglans californica*), occurs within the 500-foot buffer. Regulated tree species, blue elderberry, laurel sumac (*Malosma laurina*), lemonade berry (*Rhus integrifolia*), and toyon (*Heteromeles arbutifolia*), occur within the 500-foot buffer. Special-status wildlife species, Northern harrier, have been observed within the 500-foot buffer. San Diego desert woodrat middens and bat habitat also occur within the 500-foot buffer. Coastal California gnatcatcher designated critical habitat occurs within the Variance Project Component and the 500-foot buffer. Jurisdictional features, 8-54-S-300 and 8-54-S-301, occur within the 500-foot buffer.

Site 4: Modify Access Road at Structures M51-T4 and M51-T5, Segment 8

Vegetation communities within the Variance Project Component include coastal sage scrub, disturbed/developed, and ruderal grassland. Vegetation communities within the 500-foot buffer include coast live oak woodland, coastal sage scrub, California walnut woodland, disturbed/developed, non-native woodland, and ruderal grassland. Special-status plant species, California walnut, occurs within the BSA. Regulated tree species, blue elderberry, occurs within the BSA, and canyon live oak (*Quercus chrysolepis*), coast live oak, and toyon occur within the 500-foot buffer. San Diego desert woodrat and middens, and bat habitat occur within the Variance Project Component. Special-status wildlife species observed within the 500-foot buffer include, Cooper's hawk, least Bell's vireo (*Vireo bellii pusillus*), merlin, Northern harrier, and Swainson's hawk (*Buteo swainsoni*). San Diego desert woodrat middens and bat habitat also occur within the 500-foot buffer. Coastal California gnatcatcher designated critical habitat occurs within the Variance Project Component and the 500-foot buffer. Jurisdictional feature, 8-54-S-300, occurs within the 500-foot buffer.

Site 5: Modify Slope Design at Structure MA1-T2, Segment 8

Vegetation communities within the Variance Project Component include California walnut woodland and disturbed/developed. Vegetation communities within the 500-foot buffer include coast live oak woodland, California walnut woodland, disturbed/developed, non-native woodland, and ruderal grassland. Special-status plant species, California walnut, occurs within the BSA. Regulated tree species, coast live oak, occurs within the 500-foot buffer. San Diego desert woodrat and middens, and bat habitat occur within the BSA. Coastal California gnatcatcher designated critical habitat occurs within the Variance Project Component and the 500-foot buffer. Jurisdictional feature, 8-25-S-10, occurs within the 500-foot buffer.

Site 6: Modify Access Road at Structure M54-T2, Segment 8

Vegetation communities within the Variance Project Component include disturbed/developed and mixed chaparral. Vegetation communities within the 500-foot buffer include coast live oak woodland, coastal sage scrub, California walnut woodland, disturbed/developed, and mixed chaparral. Special-status plant species, California walnut, occurs within the 500-foot buffer. Regulated tree species, coast live oak, occurs within

the BSA, and blue elderberry, California scrub oak (*Quercus berberidifolia*), laurel sumac, and toyon occur within the 500-foot buffer. San Diego desert woodrat occur within the 500-foot buffer, and bat habitat occurs within the BSA. No jurisdictional features occur within the BSA.

Jurisdictional resources within the Variance Project Component were evaluated during the 2010 jurisdictional delineation for Segments 7 and 8 (ICF 2010h). All jurisdictional features identified are located within the 500-foot buffer and will not be impacted by the proposed work.

The Variance Project Component overlaps coastal California gnatcatcher designated and occupied habitat, as included in the USFWS Biological Opinion (BO); however, an amendment to the BO will not be required based on consultation with USFWS.

Impacts associated with this Final Engineering Concurrence include 0.110 acre of new permanent impacts, and 0.159 acre of new temporary impacts. 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). 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 July 28, 2015 regarding the SCE TRTP Cultural and Paleontological Resource Guidelines for Segment 8 T/L Phase 4, Request for Final Engineering Concurrence – Erosion Repairs at Structures M43-T3 and M44-T2, and Permanent Access Roads at Structure M51-T3 and M54-T2, and Permanent Grading Limits at Structures M51-T4 and M51-T5. The memorandum states that no cultural resources will be impacted; however, there is a potential for impacting paleontological resources by the proposed Request for Final Engineering Concurrence (RFEC) on Segment 8 T/L Phase 4 in support of the TRTP. All proposed areas provided in this RFEC were included in previous surveys for the TRTP and no cultural resources were identified (Pacific Legacy 2007, 2010a-b). No further work for cultural resources is required.

Previous paleontological assessments for TRTP indicate that the proposed areas are located within the Fernando and Miocene Puente Formations (Gust and Scott 2009; Aron 2010). Based on the Potential Fossil Yield Classification (PFYC) system, Fernando and Puente Formations are considered high sensitivity for harboring significant paleontological resources (PFYC = 4 and 5). In accordance with the Paleontological Resource Management Plan (Gust and Scott 2009), paleontological resources monitoring is required during any ground disturbing activities in support of this RFEC.

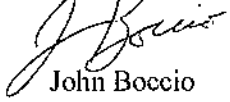
No cultural or paleontological resources impacts are anticipated as a result of this Request for Final Engineering Concurrence.

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

- Per the Paleontological Resource Management Plan, paleontological resources monitoring shall occur during any ground disturbing activities.
- The boundaries of the work area covered under this Concurrence of Final Engineering shall be staked and flagged, as well as any ESAs, and verified by a CPUC EM prior to use.
- 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