STATE OF CALIFORNIA Edmund G. Brown Jr., Governor

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

October 28, 2015

Ryan Stevenson
Principal Advisor
Regulatory Policy & Affairs
Southern California Edison
8631 Rush Street, General Office 4 - G10O (Ground Floor)
Rosemead, CA 91770

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

Dear Mr. Stevenson,

On October 2, 2015, Southern Californian Edison (SCE) submitted a request for Final Engineering Concurrence for permanent grading and excavation activities within Whittier Narrows Flood Control Basin on the Segment 8 Transmission Line (T/L) West (Phase IV) of the Tehachapi Renewable Transmission Project (TRTP), in unincorporated Los Angeles County, California. Additional information was provided by SCE on October 22, 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 permanent grading and excavation activities within Whittier Narrows Flood Control Basin on Segment 8 T/L West (Phase IV) of the TRTP, in 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). Construction of several new TRTP Segment 8 Phase IV T/L structure foundations has reduced flood control capacity within the Whittier Narrows Flood Control Basin managed by the U.S. Army Corps of Engineers (ACOE). For this reason, and at the direction of the ACOE, SCE has identified an area where soil will be removed from the flood control basin to replace or "give back" the flood control capacity lost through the construction of the new foundations. The excavated soil will be transported to an SCE-approved disposal facility.

  The approximately 0.385 acre give aback area is located south of Siphon Road in the Whittier Narrows area of Segment 8 T/L. An approximately 0.163 acre temporary work area adjacent to the give back area will be utilized to access the give back area from a Project-approved access road.

- **Biological Resources**: SCE submitted a biological report from ICF International dated August 18, 2015 with the Request for Final Engineering Concurrence (RFEC). The report documents the biological conditions for the proposed Segment 8 T/L West (Phase IV) U.S. Army Corps of Engineers Flood Control Give Back Area (Variance Project Component) and the associated 500-foot buffer. The Variance Project Component and the 500-foot buffer are referred to as the Biological Study Area (BSA). Biological resources within the BSA were evaluated during several focused surveys, including 2010 and 2011 special-status plant surveys (ICF 2010at, 2011hc); 2010 and 2011 tree inventory surveys (ICF 2010av, 2011hd); and riparian bird surveys in 2010, 2011, 2012, 2013, 2014, and 2015 (ICF 2010ss, 2011fx; Field Reporting Environmental Database (FRED) Survey Parent 000004, 000023, 000048, 000061). The biological resources within the BSA were also evaluated during Segment 8 West (Phase IV) general preconstruction surveys and preconstruction bat habitat assessment surveys (ICF 2011dk, 2011fu). 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 the start of construction.

Vegetation communities within the Variance Project Component include California walnut woodland, disturbed/developed, and ruderal grassland. Vegetation communities within the 500-foot buffer include sparsely vegetated streambed, California walnut woodland, disturbed/developed, ruderal wetland, exotic giant reed, mule fat scrub, open water, ruderal grassland, Southern cottonwood willow riparian forest, Southern willow scrub, and Southern willow scrub – disturbed. Special-status plant species, California walnut (*Juglans californica*), occurs within the 500-foot buffer.

Special-status wildlife species, yellow warbler (*Setophaga petechia*), has been observed within the Variance Project Component. Special-status wildlife species, Cooper's hawk (*Accipiter cooperii*), least Bell's vireo (*Vireo bellii pusillus*), merlin (*Falco columbarius*), white-faced ibis (*Plegadis chihi*), yellow warbler, and yellow-breasted chat (*Icteria virens*), have been observed within the 500-foot buffer. Coastal California gnatcatcher (*Polioptila californica californica*) designated critical habitat occurs within the Variance Project Component. Coastal California gnatcatcher designated critical habitat and least Bell's vireo occupied habitat occur within the 500-foot buffer.

A potential jurisdictional delineation feature occurs within the Variance Project Component. Jurisdictional feature 8-6-R-1, 8-7-W-1, and a potential jurisdictional feature occur within the 500-foot buffer. All potential and mapped jurisdictional features will be staked as Environmental Sensitive Areas (ESAs) and flagged for avoidance.

Impacts associated with this Final Engineering Concurrence include 0.385 acre of new permanent impacts, and 0.163 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 August 3, 2015 regarding the SCE TRTP Cultural and Paleontological Resource Guidelines for Segment 8 Phase 4 T/L, Request for Final Engineering Concurrence – United States Army Corps of Engineers Give Back Area. The memorandum states that no cultural or paleontological resources will be impacted by the proposed FEC in support of Segment 8 Phase IV of the TRTP. The proposed area provided in the RFEC was included in previous surveys for the TRTP and no cultural resources were identified (Pacific Legacy 2013). No further work for cultural resources is required.

  Previous paleontological assessments conducted for the TRTP indicate that the proposed area is located in Recent alluvium and gravels and sands of major streams and alluvial fans (Gust and Scott 2009; Aron 2010). Based on the Potential Fossil Yield Classification (PFYC) system, Recent alluvium and gravels and sands of major streams and alluvial fans are all considered low sensitivity for harboring significant paleontological resources (PFYC = 2).

  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:

- 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