

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



January 22, 2016

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 December 24, 2015, Southern Californian Edison (SCE) submitted a request for Final Engineering Concurrence for erosion repair work associated with Structure M43-T3 on the Segment 8 Transmission Line (T/L) West (Phase IV) of the Tehachapi Renewable Transmission Project (TRTP), in unincorporated Los Angeles County, California. A revised request was provided by SCE on January 15, 2016. **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 repair work associated with Structure M43-T3 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, erosion caused by stormwater runoff has resulted in the need for an additional work area associated with Structure M43-T3. This work area is needed to perform erosion repairs and install a concrete apron and rip-rap to protect against future erosion.

Temporary disturbance includes 0.203 acre, including 0.161 acre of new disturbance area (i.e., beyond CPUC-approved area). Permanent disturbance includes 0.128 acre, including 0.11 acre of new disturbance area (i.e., beyond CPUC-approved area).

- **Biological Resources:** SCE submitted a biological report from ICF International dated January 12, 2016 with the revised Request for Final Engineering Concurrence (RFEC). The report documents the biological conditions for the proposed Segment 8 T/L West (Phase IV) erosion control area associated with Structure M43-T3 (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 2008, 2009, 2010, 2011, and 2012 coastal California gnatcatcher surveys (AMEC 2008d, 2009m; ICF 2010ww, 2010gf, 2011gq, SCE 2014a (FRED Survey Parent 000007); 2009 and 2010 burrowing owl surveys (AMEC 2009j; ICF 2010xx); 2010 and 2011 special-status plant surveys (ICF 2010at, 2011hc); and 2010 and 2011 tree inventory surveys (ICF 2010av, 2011hd). 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, 2011by, 2011gh; SCE 2014a). 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 coast live oak woodland and coastal sage scrub. Vegetation communities within the 500-foot buffer include coast live oak woodland, coastal sage scrub, disturbed/developed, non-native woodland, and ruderal grassland. No special-status plant species occur within the BSA. Regulated tree species, coast live oak (*Quercus agrifolia*), occurs within the BSA, and blue elderberry (*Sambucus mexicanus*) occurs within the 500-foot buffer.

Special-status wildlife species, Cooper's hawk (*Accipiter cooperii*), merlin (*Falco columbarius*), peregrine falcon (*Falco peregrinus*), and sharp-shinned hawk (*Accipiter striatus*) have been observed within the 500-foot buffer. In addition, San Diego desert woodrat (*Neotoma lepida intermedia*) midden have been observed within the BSA and bat habitat also occurs within the BSA. Finally, coastal California gnatcatcher (*Poliottila californica*) designated critical and occupied habitat occurs within the BSA. Additional impacts from the Variance Project Component on coastal California gnatcatcher critical habitat total 0.271 acres, of which 0.055 acres is designated occupied habitat. Changes from temporary to permanent impacts on coastal California gnatcatcher occupied and critical habitat total 0.018 acre (coastal sage scrub). SCE is consulting with the U.S. Fish and Wildlife Service (USFWS) as to whether or not an Amendment to the project Biological Opinion (BO) is required.

Jurisdictional resources within the Variance Project Component were evaluated during the 2010 jurisdictional delineation for Segments 7 and 8 (ICF 2010h). No mapped jurisdictional features were located within the Variance Project Component. Jurisdictional feature 8-10-S-1 occurs within the 500-foot buffer and will be avoided. Any additional potential jurisdictional features will be staked as Environmental Sensitive Areas (ESAs) and flagged for avoidance.

Impacts associated with this Final Engineering Concurrence include 0.11 acre of new permanent impacts, and 0.161 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 December 16, 2015 regarding the SCE TRTP Cultural and Paleontological Resource Guidelines for Segment 8 West (Phase IV), Request for Final Engineering Concurrence – Erosion Repair at Structure M43-T3. The memorandum states that no cultural resources will be impacted by the proposed Request for Final Engineering Concurrence (RFEC) in support of Segment 8 Phase IV of the TRTP. Approximately 10 percent of the area to the south was included in previous surveys for the TRTP and no cultural resources were identified (Pacific Legacy 2007, 2010). The remaining portions of the area identified within this RFEC lies within the TRTP records search area, but outside of the TRTP survey areas. Therefore, a cultural resources survey was required and provided with the RFEC titled *Cultural and Paleontological Resources Assessment in Support of a Request for Final Engineering concurrence for TRTP Segment 8 T/L West (Phase IV) – Erosion Repair Associated with Structure M43-T3, unincorporated Los Angeles County, California* (RSP 2015). No cultural resources were identified during the current survey. No further work for cultural resources is required.

Previous paleontological assessments conducted for the TRTP indicate that the proposed area is located within the Fernando Formation, which has a high sensitivity for yielding paleontological resources (Gust and Scott 2009; Aron 2010). However, the current survey indicates the exposed soils consisted of ground

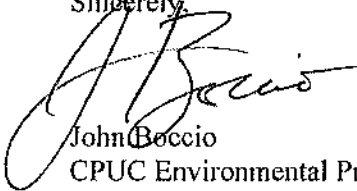
cover of rocks (both naturally occurring and artificial fill) and recent alluvium (RSP 2015). Construction activities that occur within artificial fill and alluvium do not require paleontological monitoring. However, if work exceeds into native soil, in accordance with the TRTP Paleontological Resources Management Plan (Gust and Scott 2009), paleontological monitoring is required.

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.
- If it is determined that SCE shall obtain a USFWS BO Amendment for impacts to coastal California gnatcatcher habitat, the BO Amendment shall be issued by USFWS prior to construction activities covered in this Final Engineering Concurrence. The approved BO Amendment shall be provided to the CPUC EM.
- Paleontological monitoring shall be conducted if work exceeds into native soil in accordance with the TRTP Paleontological Resources Management Plan.
- 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