

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 11, 2012

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

Dear Ms. Nelson,

On August 28, 2012, Southern Californian Edison (SCE) submitted a request for Final Engineering Concurrence for changes in disturbance areas due to changed grading limits for temporary crane pads and construction work areas on Segment 6A Transmission Line (T/L), outside of the Angeles National Forest (ANF), of the Tehachapi Renewable Transmission Project (TRTP), in unincorporated Los Angeles County, California. Additional information was submitted September 4, 2012. **This Final Engineering Concurrence is approved by CPUC for the proposed activities based on the following factors:**

- SCE submitted the following information:

SCE requests Final Engineering Concurrence for changes in disturbance areas due to changed grading limits for temporary crane pads and construction work areas on Segment 6A Transmission Line (T/L) of the TRTP, in unincorporated Los Angeles County, California. Subsequent to approval of the NTPR (NTP #32 dated November 8, 2011) by the CPUC, final design activities have been conducted for several locations within Segment 6A. The new disturbance areas are located at Construct 2, 3, 5, 6, 9, 10, 14, 24, 25, and 33. Below is a summary of the approximate additional temporary and permanent disturbance area requested for each site.

Construction Tower 2

Temporary Disturbance Area: 2,490 square feet (sf)
Permanent Disturbance Area: 290 sf

Construction Tower 3

Temporary Disturbance Area: 5,320 sf

Construction Tower 5

Temporary Disturbance Area: 9,280 sf
Permanent Disturbance Area: 1,395 sf

Construction Tower 6

Temporary Disturbance Area: 35 sf
Permanent Disturbance Area: 765 sf

Construction Tower 9

Temporary Disturbance Area: 120 sf
Permanent Disturbance Area: 410 sf

Construction Tower 10

Temporary Disturbance Area: 440 sf

Permanent Disturbance Area: 230 sf

Construction Tower 14

Temporary Disturbance Area: 95 sf

Permanent Disturbance Area: 1,550 sf

Construction Tower 24

Temporary Disturbance Area: 160 sf

Permanent Disturbance Area: 110 sf

Construction Tower 25

Temporary Disturbance Area: 2,790 sf

Permanent Disturbance Area: 140 sf

Construction Tower 33

Temporary Disturbance Area: 1,180 sf

Permanent Disturbance Area: 85 sf

- **Biological Resources:** SCE submitted a biological report by ICF International dated August 14, 2012, titled *Proposed Segment 6 Engineering Revision 4 Outside of the Angeles National Forest, Tehachapi Renewable Transmission Project, Los Angeles County*. The report documents the biological conditions at 10 sites throughout Segment 6A (Variance Project Component) outside of the ANF and a 500-foot buffer. The Variance Project Component and the 500-foot buffer are referred to as the Biological Study Area (BSA). Impacts associated with this Final Engineering Concurrence includes: 0.114 acres of additional permanent impacts and 0.503 acres of temporary impacts.

Biological resources within the Variance Project Component and 500-foot buffer were evaluated during several focused surveys, including 2007, 2009, 2010, and 2011 rare plant surveys (AMEC 2007a, AMEC 2009w, ICF 2010au, 2011hk); 2010 and 2011 tree inventory surveys (ICF 2010dj, 2011hj); 2009 and 2010 arroyo toad focused surveys (AMEC 2009y; ICF and BonTerra 2010k) and 2009 garter snake focused surveys (AMEC 2009s); and 2009 and 2010 burrowing owl focused surveys (AMEC 2009z; ICF 2010dk). Biological resources within the BSA were also evaluated during general preconstruction surveys and bat habitat assessment preconstruction surveys (ICF and Bon Terra 2011d, 2011i, 2011h, 2011j, 2011k). A literature review was also performed as part of the Biological Review for Segment 6A (ICF 2011gc). Preconstruction survey sweeps were performed on January 16, 2012, and March 15, 2012. 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).

Construct 2

Vegetation communities within the Variance Project Component include Mojavean juniper woodland and scrub, and disturbed/developed. Vegetation communities within the 500-foot buffer include big sagebrush scrub, Mojave desert wash scrub, Mojavean juniper woodland and scrub, and disturbed/developed. Special-status plant species, Lemmon's syntrichopappus (*Syntrichopappus lemmonii*), and short-joint beavertail (*Opuntia basilaris* var. *brachyclada*), occur within the 500-foot buffer. Regulated tree species, Tucker's oak (*Quercus john-tuckeri*), occurs within the 500-foot buffer. San Diego desert woodrat (*Neotoma lepida intermedia*), occurs within the Variance Project Component; and San Diego desert woodrat middens occur within the 500-foot buffer. Loggerhead shrike (*Lanius ludovicianus*), red-tailed hawk (*Buteo jamaicensis*) inactive nest occurs within the 500-foot buffer. Jurisdictional features 11-2-S-4, 11-2-S-5, 11-2-S-6, 11-2-S-7, and 11-2-S-8 occur within the 500-foot buffer.

Construct 3

Vegetation communities within the Variance Project Component include Mojavean juniper woodland and scrub, and disturbed/developed. Vegetation communities within the 500-foot buffer include big sagebrush scrub, Mojave creosote bush scrub, Mojavean juniper woodland and scrub, and disturbed/developed. Special-status plant species, short-joint beavertail, and regulated tree species, Tucker's oak, occur within the 500-foot buffer. San Diego desert woodrat potential middens occur within the 500-foot buffer. Jurisdictional features 11-2-S-8, 11-3-S-1, and 11-3-S-2 occur within the 500-foot buffer.

Construct 5

Vegetation communities within the Variance Project Component and the 500-foot buffer include Mojavean juniper woodland and scrub, tucker oak scrub, and disturbed/developed. Special-status plant species, short-joint beavertail, occurs within the 500-foot buffer. Regulated tree species, Tucker's oak, occurs within the Variance Project Component and 500-foot buffer, and lodgepole pine (*Pinus contort*) occurs within the 500-foot buffer. San Diego desert woodrat occur within the Variance Project Component. Prairie falcon (*Falco mexicanus*) and sharp-shinned hawk (*Accipiter striatus*) have been observed within the 500-foot buffer. Burrowing owl potential features, potential bat roosts, and San Diego desert woodrat potential middens, occur within the 500-foot buffer. Jurisdictional features 11-4-S-1, 11-4-S-2, 11-4-S-6, 11-4-S-7, 11-4-S-9, and 11-4-S-10 occur within the 500-foot buffer.

Construct 6

Vegetation communities within the Variance Project Component and the 500-foot buffer include Mojavean juniper woodland and scrub, and disturbed/developed. Prairie falcon and San Diego desert woodrat potential middens have been observed within the 500-foot buffer.

Construct 9

Vegetation communities within the Variance Project Component include mixed chaparral and disturbed/developed. Vegetation communities within the 500-foot buffer include mixed chaparral, Mojave mixed woody scrub, and disturbed/developed. Special-status plant species, short-joint beavertail, occur within the 500-foot buffer. Regulated tree species, California juniper (*Juniperus californica*), Tucker's oak, blue elderberry (*Sambucus mexicanus*), singleleaf pinyon pine (*Pinus monophylla*), California scrub oak (*Quercus berberidifolia*) occur within the 500-foot buffer. Medium potential bat roost habitat, San Diego desert woodrat potential middens, and red-tailed hawk inactive nest occur within the 500-foot buffer. Jurisdictional features 6-9-S-6, 6-9-S-7, 6-9-S-8, 6-9-S-9, 6-9-S-10, and 6-10-S-1 occur within the 500-foot buffer.

Construct 10

Vegetation communities within the Variance Project Component include mixed chaparral and disturbed/developed. Vegetation communities within the 500-foot buffer include desert almond saltbrush scrub, mixed chaparral, Riversidean alluvial fan sage scrub, and disturbed/developed. Regulated tree species, holly-leaved cherry (*Prunus ilicifolia*), Tucker's oak, blue elderberry, California juniper, singleleaf pinyon pine, and Fremont cottonwood (*Populus fremontii*) occur within the 500-foot buffer. Prairie falcon, medium potential bat roost habitat, and San Diego desert woodrat potential midden occur within the 500-foot buffer. No jurisdictional features occur within the Construct 10 BSA.

Construct 14

Vegetation communities within the Variance Project Component include mixed chaparral and disturbed/developed. Vegetation communities within the 500-foot buffer include big sagebrush scrub, mixed chaparral, Mojavean juniper woodland and scrub, Mojave mixed woody scrub, Riversidean alluvial fan sage scrub, and disturbed/developed. Special-status plant species, short-joint beavertail and Mojave Indian paintbrush (*Castilleja plagiotoma*) occur within the 500-foot buffer. Regulated tree species, Tucker's oak occur within the Variance Project Component and 500-foot buffer, and black walnut (*Juglans californica*) California juniper, and blue elderberry occur within the 500-foot buffer. Loggerhead shrike,

San Diego desert woodrat potential middens, and red-tailed hawk inactive nest occur within the 500-foot buffer. Jurisdictional feature 6-8-S-2 occurs within the 500-foot buffer.

Construct 24

Vegetation communities within the Variance Project Component and the 500-foot buffer include mixed chaparral and disturbed/developed. Regulated tree species, interior live oak (*Quercus wizliseni* var. *frutescens*) and Tucker's oak occur within the 500-foot buffer. An inactive raptor nest occurs within the 500-foot buffer. Jurisdictional features 6-20-S-1, 6-20-S-2, 6-20-S-3, 6-20-S-4, 6-20-S-5, 6-20-S-6 occur within the 500-foot buffer.

Construct 25

Vegetation communities within the Variance Project Component include mixed chaparral and disturbed/developed. Vegetation communities within the 500-foot buffer include canyon oak forest, mixed chaparral, and disturbed/developed. Regulated tree species, interior live oak occurs within the Variance Project Component and the 500-foot buffer, and Tucker's oak occurs within the 500-foot buffer. Jurisdictional features 6-20-S-7, 6-20-S-8, 6-20-S-9, 6-20-S-10, 6-20-S-11, 6-20-S-12, 6-20-S-13, 6-20-S-14, 6-20-S-16, 6-20-S-17, 6-20-S-18, and 6-20-S-19.

Construct 33

Vegetation communities within the Variance Project Component include mixed chaparral, Tucker oak scrub, and disturbed/developed. Vegetation communities within the 500-foot buffer include big sagebrush scrub, mixed chaparral, Tucker oak scrub, and disturbed/developed. Regulated tree species, interior live oak, Tucker's oak, blue elderberry, San Gabriel oak (*Quercus durata* var. *gabrielensis*), arroyo willow (*Salix lasiolepis*), and Gooding's willow (*Salix goodingii*) occur within the 500-foot buffer. Potential bat habitat and medium potential bat roost habitat occurs within the 500-foot buffer. Jurisdictional features 6-24-S-8 and 6-24-S-11 occur within the Variance Project Component, and 6-24-S-1, 6-24-S-2, 6-24-S-7, 6-24-S-8, 6-24-S-9, 6-24-S-10, 6-24-S-11, 6-25-S-2 occur within the 500-foot buffer.

Jurisdictional resources within the Variance Project Component were evaluated during the 2010 jurisdictional delineation for Segments 6 and 11 (ICF 2010aj). Jurisdictional features mapped within the BSA will be avoided by the Variance Project Component, with the exception of features 6-24-S-8 and 6-24-S-11, which have permits for impacts. Any additional potential jurisdictional features will be staked and flagged as Environmentally Sensitive Areas (ESAs) for avoidance. If avoidance is not feasible, wetland permits will be obtained as necessary.

The Variance Project Component does not overlap suitable habitat for special-status species as included in the CDFG Incidental Take Permit (ITP) or the USFWS Biological Opinion (BO).

Impacts associated with this Final Engineering Concurrence includes: 0.114 acres of additional permanent impacts and 0.503 acres of temporary impacts. Permanent impacts to special-status vegetation communities and special-status species habitat will be mitigated per off-site per agreements with CDFG and USFWS, and Applicant Proposed Mitigation (APM) BIO-7. 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).

No additional impacts to biological resources are anticipated.

- **Cultural and Paleontological Resources:** SCE submitted a memorandum titled SCE TRTP Cultural and Paleontological Resources Guidelines for Segment 6, Request for Final Engineering Concurrence – Rev 4 Engineering dated August 3, 2012. The memorandum states that no historical resources, historic properties or significant paleontological resources will be impacted by the Rev 4 engineering changes, in support of the TRTP. The proposed Rev 4 changes fall entirely within previous cultural resources records searches and survey areas for TRTP (Pacific Legacy 2007, 2010c). Three historic-era transmission lines are located in these areas: Antelope-Mesa 220kV, Rio Hondo-Vincent No. 1 220kV, and the Eagle Rock-Pardee 220kV.

One historic-era distribution line, the Bootlegger circuit, also crosses these areas. Historic infrastructure will not be affected by the proposed Rev 4 changes to the engineering data. One previously recorded archaeological site exists in the areas identified in the Rev 4 changes. This site was formally evaluated and determined ineligible for National Register of Historic Places or California Register of Historic Resources (Pacific Legacy 2010b). Pursuant to the requirements in the Construction Phase Management Plan for TRTP (Pacific Legacy 2010a), cultural resources monitoring is required during vegetation removal (grubbing) at this site. Also, an unanticipated cultural resources discovery (UAD) was made recently during construction activities along Segment 6A. Environmentally Sensitive Area (ESA) fencing was installed and the site and surrounding area was tested. A report will be forthcoming. No construction activities shall occur within the UAD ESA until the report has been submitted for review and approval by the CPUC.

Previous paleontological assessments for TRTP define the sediment types in these areas as “Quaternary Alluvium” and “Quaternary Older Alluvium” (Gust and Scott 2009). Quaternary Alluvium is considered low sensitivity for yielding significant paleontological resources and does not require monitoring. Quaternary Older Alluvium is considered moderately sensitive and requires spot-check monitoring by a qualified paleontologist during non-drilling excavations extending more than 2 feet below the surface.

No additional impacts to cultural or paleontological resources are anticipated.

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

- Per the Construction Phase Management Plan, cultural resources monitoring shall be conducted during vegetation removal (grubbing) at the previously recorded archaeological site identified in the Rev 4 changes.
- No construction activities shall occur within the UAD ESA until the site testing report has been submitted for review and approval by the CPUC. Cultural monitoring shall be conducted when any ground disturbing activities are occurring in this area.
- Paleontological monitoring shall be conducted on a spot-check basis during non-drilling excavations extending more than 2 feet below the surface in areas of Quaternary Older Alluvium.
- All conditions required by NTP #32 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #32, and this Final Engineering Concurrence to NTP #32 shall be available on site for the duration of construction activities where applicable.

Sincerely,

A handwritten signature in black ink, appearing to read "Lon Payne", written in a cursive style.

Lon Payne
CPUC Environmental Project Manager

cc: V. Strong, Aspen