

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 14, 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

Dear Ms. Nelson,

On May 6, 2014, Southern Californian Edison (SCE) submitted a request for Final Engineering Concurrence for the addition of a gate on the Reynolds property south of Construct 12 and Structure M79-T2 on the 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. **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 the addition of a gate on the Reynolds property south of Construct 12 and Structure M79-T2 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, additional design activities have been conducted south of Construct 12 and Structure M79-T2 on Segment 6A. SCE proposes to install a permanent gate on the Reynolds Property to restrict general and recreational vehicle access to the right-of-way, and to enhance public safety, at the request of the property owner.

An approximately 25-foot by 25-foot temporary disturbance area will be needed to accommodate installation activities. The total disturbance area associated with the gate is 625 square feet (or approximately 0.0143 acre). Because the gate location occurs along a CPUC-approved project road, the total new temporary disturbance is approximately 0.009 acre. The permanent disturbance areas are limited to the gate posts and, therefore, the acreage is negligible.

- **Biological Resources:** SCE submitted a biological report by ICF International dated April 25, 2014, titled *Proposed Gate on Reynolds Property South of Construct 12, Segment 6A, Tehachapi Renewable Transmission Project, Los Angeles County*. The report documents the biological conditions at the proposed gate location on the Reynolds property south of Construct 12 and Structure M79-T2 on Segment 6A (Variance Project Component) 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 0.009 acre of temporary impacts.

Biological resources within the Variance Project Component and 500-foot buffer were evaluated during several focused surveys, including a 2011 vegetation mapping effort (ICF 2011bv); 2011, 2012, and 2013 rare plant surveys (ICF 2011hk; SCE FRED Survey Parent 000006 and 000024); 2011 tree inventory surveys (ICF 2011hj; SCE 2014a); 2014 Segment 6A conifer tree stump surveys (FRED Survey Parent 000042); 2009, 2010, 2011, 2013, and 2014 arroyo toad focused surveys (AMEC 2009y; ICF and BonTerra

2010k, 2011c; FRED Survey Parent 000018, 000043); 2013 and 2014 California red-legged frog focused survey (FRED Survey Parent 000019 and 000044); and 2009 and 2010 burrowing owl surveys (AMEC 2009z; ICF 2010dk). Biological resources within the BSA were also evaluated during the general preconstruction surveys for Segments 6 and 11 and the bat habitat assessment surveys (ICF 2011ax, 2011bl; ICF and Bon Terra 2011d, 2011h, 2011i, 2011j, 2011k; FRED Survey Parent 000031, 000035). A literature review was also performed as part of the Biological Review for Segment 6A (ICF 2011gb, 2011gc). Preconstruction survey sweeps were performed as part of the biological review. 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).

Vegetation communities within the Variance Project Component include mixed chaparral and disturbed/developed. Vegetation communities within the 500-foot buffer include big sagebrush scrub, disturbed/developed, mixed chaparral, Mojave mixed woody scrub, and Riversidean alluvial fan sage scrub. Special-status plant species, short-joint beavertail (*Opuntia basilaris* var. *brachyclada*) and Mojave Indian paintbrush (*Castilleja plagiotoma*), occur within the 500-foot buffer. Regulated tree species, Tucker's oak (*Quercus john-tuckeri*), blue elderberry (*Sambucus caeruleus*), California juniper (*Juniperus californica*), California walnut (*Juglans californica*), interior live oak (*Quercus wizliseni* var. *wizliseni*), and an unidentified pine species (*Pinus sp.*) occur within the 500-foot buffer. San Diego desert woodrat (*Neotoma lepida intermedia*) occur within the 500-foot buffer. A common raven (*Corvus corax*) active nest occurs within the 500-foot buffer.

Jurisdictional resources within the Variance Project Component were evaluated during the 2010 jurisdictional delineation for Segments 6 (ICF 2010aj). Jurisdictional features 6-8-S-2 and 6-118-S-4 occur within the 500-foot buffer. Jurisdictional features mapped within the 500-foot buffer will be avoided (ICF 2010aj). Any additional potential jurisdictional features will be staked and flagged as Environmentally Sensitive Areas (ESAs) and flagged for avoidance.

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

Impacts associated with this Final Engineering Concurrence includes 0.009 acres 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).

No additional impacts to biological resources are anticipated.

- **Cultural and Paleontological Resources:** SCE submitted a memorandum titled SCE TRTP Cultural and Paleontological Resource Guidelines for Segment 6A, Request for Final Engineering Concurrence – Addition of Gate on Reynolds Property South of Construct 12 and Tower M79-T2, dated May 5, 2014. The memorandum states that no cultural or paleontological resources will be impacted by the installation of a permanent gate on the Reynolds property south of Construct 12 and Tower M79-T2 in support of the TRTP. The temporary disturbance area for the proposed gate installation for this Request for Final Engineering Concurrence falls within previous surveys in support of the TRTP and no cultural resources were identified (Pacific Legacy 2007; 2010).

Previous paleontological assessments for TRTP define the geology at the proposed location as Quaternary older alluvium (Gust and Scott 2009). Based on the Potential Fossil Yield Classification (PFYC) system, Quaternary older alluvium is considered moderate sensitivity for harboring significant paleontological resources (PFYC = 3). 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 Request for Final Engineering Concurrence.

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 disturbance area shall be staked and flagged, and verified by a CPUC EM prior to use.
- Per the Paleontological Resource Management Plan (Gust and Scott 2009), paleontological resources monitoring shall be conducted during any ground disturbing activities for this Request for Final Engineering Concurrence.
- 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 'Jason Coontz', with a long horizontal flourish extending to the right.

Jason Coontz
CPUC Environmental Project Manager

cc: V. Strong, Aspen