

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
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August 10, 2018

Ryan Stevenson
Principal Advisor
Regulatory Affairs
Southern California Edison
8631 Rush St, General Office 4 – 235E (2nd Floor)
Rosemead, CA, 91770

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

Dear Mr. Stevenson,

On July 25, 2018, Southern Californian Edison (SCE) submitted a request for Final Engineering Concurrence for erosion control repairs near Structure M29-T3 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. **This Final Engineering Concurrence is approved by CPUC for the proposed activities based on the following factors:**

- SCE submitted the following information:

Subsequent to the approval of the NTPR (NTP #32 dated November 11, 2011) by the California Public Utilities Commission (CPUC), project site conditions have been further evaluated, resulting in the need for repairs near Structure M29-T3.

The specifics for the location are below:

Implement Repairs at Structure M29-T3, Segment 6

For erosion repairs, contractor to grade and pave the existing access roads and to road edges. Engineering changes consist of the following:

- Permanent Disturbance: total of 0.12224 acre, including 0.039072 acre of new disturbance area (i.e. beyond CPUC-approved area) and 0.083167 acre of transition of temporary disturbance to permanent disturbance.
 - Temporary Disturbance: total of 0.136218 acre, including 0.061445 acre of new disturbance area (i.e. beyond CPUC-approved area).
- **Biological Resources:** SCE previously submitted a biological report by ICF International dated January 18, 2018, titled *Proposed Erosion Repairs at Segment 6 Construct M29-T3, Tehachapi Renewable Transmission Project, County of Los Angeles*. The report documents the biological conditions at the proposed erosion control repair location at Structure M29-T3 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). Biological resources within the BSA were evaluated during several focused surveys, including a

2011 vegetation mapping effort (ICF 2011bv); 2009, 2010, 2011, 2012, and 2013 rare plant surveys (AMEC 2009w; ICF 2010au, 2011hk; SCE Field Reporting Environmental Database [FRED] Survey Parent 000006 and 000024); 2010 and 2011 tree inventory surveys (ICF 2010dj, 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 California red-legged frog focused survey (FRED Parent Survey 000019); 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 preconstruction bat habitat assessment surveys (ICF 2011ax, 2011bl; ICF and BonTerra 2011d, 2011h, 2011i, 2011j, 2011k; FRED Survey Parent 000031, 000035). All surveys were conducted with use of the appropriate survey protocols. A clearance sweep will be conducted prior to construction of the Variance Project Component. Construction monitoring has been ongoing regularly since the site became active, and species events and nest events have been recorded in the Field Reporting Environmental Database (SCE 2014a). Jurisdictional resources within the Variance Project Component were evaluated during the 2010 jurisdictional delineation for Segment 6 (ICF 2010aj).

A literature review was performed as part of the biological review for Segment 6A (ICF 2011gb, 2011gc). The review included the TRTP Final Environmental Impact Report (FEIR) (Aspen 2009a) and Final Environmental Impact Statement (FEIS) (Aspen 2010), California Natural Diversity Database (CNDDDB) Rarefind 3 application (CDFG 2009a), and previous special-status species surveys conducted on the site.

No sensitive vegetation communities occur within the Project Component. Vegetation communities within the 500-foot buffer include big sagebrush scrub, disturbed/developed, mixed chaparral, Mojave mixed woody scrub, Mojavean Juniper Woodland and Scrub, and Riversidean alluvial fan sage scrub. One special-status plant species, short-joint beavertail (*Opuntia basilaris* var. *brachyclada*), occurs within the 500-foot buffer. Regulated tree species, Blue elderberry (*Sambucus mexicanus*), Tucker's oak (*Quercus john-tuckeri*), California juniper (*Juniperus californica*), interior live oak (*Quercus wizliseni* var. *wizliseni*), and Tucker's oak (*Quercus john-tuckeri*) occur within the 500-foot buffer. San Diego desert woodrat (*Neotoma lepida intermedia*) occur within the 500-foot buffer.

All jurisdictional features within the Variance Project Component and 500-foot buffer will be avoided. Any additional potential jurisdictional features will be staked as Environmentally Sensitive Areas 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).

- **Cultural and Paleontological Resources:** SCE previously submitted a memorandum titled *SCE TRTP Cultural and Paleontological Resource Guidelines for Segment 6A, Request for Final Engineering Concurrence – Erosion Repairs Near Structure M29-T3* dated January 10, 2018. The memorandum states that no cultural or paleontological resources will be impacted by the subject erosion repair work. The disturbance area for the proposed erosion repair work 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 near Structure M29-T3 as Holocene gravel wash (low sensitivity). Therefore, in accordance with the Paleontological Resource Management Plan (Gust and Scott 2009), paleontological resources monitoring is not 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:

- 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,



John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen