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

August 5, 2013

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 July 15, 2013, Southern Californian Edison (SCE) submitted a request for Final Engineering Concurrence for changes in disturbance areas due to changed grading limits, road boundaries, temporary crane pads and construction work areas associated with Construct 113 on Segment 6C Transmission Line (T/L) of the Tehachapi Renewable Transmission Project (TRTP), in the City of Duarte, Los Angeles County, California. Additional information was submitted July 25 and August 2, 2013. **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, road boundaries, temporary crane pads and construction work areas on Segment 6C Transmission Line (T/L) of the TRTP, in the City of Duarte, Los Angeles County, California. Subsequent to approval of the NTPR (NTP #35 dated May 16, 2012) by the CPUC, additional design activities have been conducted for several locations near Construct 113. The grading impacts within the tower disturbance area were maximized as a permanent slope repair/benching to accommodate construction and remove the existing wall, which proved to be a pinch point for larger equipment. Based on recent conversations with the ANF, the wall was preventing fire access, and causing the roadway to erode downhill, and the ANF requested that SCE eliminate it. The Final Engineering Concurrence would result in 0.08 acres of new disturbance including:
    - 0.02 acres of new permanent disturbance (excludes former temporary disturbance)
    - 0.06 acres of new temporary disturbance

  Note that this request for Final Engineering Change also includes changing approximately 0.50 acres of previously approved temporary disturbance area into areas of permanent disturbance.

- **Biological Resources**: SCE submitted a biological report by ICF International dated July 9, 2013, titled *Proposed Construct 113 Modification, Segment 6C, Tehachapi Renewable Transmission Project, Los Angeles County.* The report documents the biological conditions at the proposed Construct 113 modification areas on Segment 6C (Variance Project Component). The Variance Project Component and the 500-foot buffer are referred to as the Biological Study Area (BSA).

  Biological resources within the Variance Project Component and 500-foot buffer were evaluated during several focused surveys, including 2009, 2010, 2011, 2012, and 2013 rare plant surveys (AMEC 2009o, 2009w, ICF 2010at, 2010au, 2011hc, 2011hk; FRED Survey Parent 000006, 000024) and the 2010, 2011, 2012, 2013 tree inventory surveys (ICF 2010av, 2010dj, 2011hd, 2011hj; 2012 and 2013 FRED Tree

Events). Biological resources within the BSA were also evaluated during Segment 7 general preconstruction surveys and preconstruction bat habitat assessment surveys (ICF 2010bg, 2010df, 2011br). Additionally, a Segment 7 clearance sweep was performed on August 9, 2011. A literature review was also performed as part of the Biological Review for Segment 6C (ICF 2012b). Construction Monitoring has been ongoing 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 coast live oak woodland, coastal sage scrub, mixed chaparral, and disturbed/developed. Vegetation communities within the 500-foot buffer include coast live oak woodland, coastal sage scrub, scrub oak chaparral, southern willow scrub, and disturbed/developed. Special-status plant species, San Gabriel oak (*Quercus durata* var. *gabrielensis*), occurs within the BSA. Regulated tree species within the Variance Project Component include blue elderberry (*Sambucus cerulea*), California scrub oak (*Quercus berberidifolia*), coast live oak (*Quercus agrifolia*), and toyon (*Heteromeles arbutifolia*). Regulated tree species within the 500-foot buffer include big leaf maple (*Acer macrophyllum*), blue elderberry, California bay laurel (*Umbellularia californica*), coast live oak, Coulter pine (*Pinus coulteri*), interior live oak (*Quercus wislizeni* var. *wislizeni*), toyon, and unknown willow species (*Salix* sp.).

Special-status wildlife observed within the 500-foot buffer include Swainson's hawk (*Buteo swainsonii*), southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*), and merlin (*Falco columbarius*). San Diego desert woodrat (*Neotoma lepida intermedia*) potential midden and potential ringtail (*Bassariscus astutus*) were observed within the BSA.

Jurisdictional resources within the Variance Project Component were evaluated during the 2010 jurisdictional delineation for Segments 6 and 11 (ICF 2010aj). Jurisdictional features within the Variance Project Component include 7-1-S-1, 7-1-S-9, 7-2-S-4 and 7-2-S-6. Jurisdictional features within the Variance Project Component that are outside of previously permitted areas will be avoided. In addition, jurisdictional features identified within the 500-foot buffer will be avoided. Any additional potential jurisdictional features will be staked and flagged as Environmentally Sensitive Areas (ESAs) 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 0.06 acres of new temporary impacts and 0.02 acres of new permanent impacts. Also, 0.50 acres already approved for temporary impacts is being changed to permanent 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 titled SCE TRTP Cultural and Paleontological Resources Guidelines for Segment 6C, Request for Final Engineering Concurrence – Construct 113 Engineering Changes. The memorandum states that no cultural or paleontological resources will be impacted by the proposed engineering changes at Construct 113 on Segment 6C in support of the TRTP. The bulk of the proposed changes fall within previous surveys in support of the TRTP and one cultural resource was identified (Pacific Legacy 2007; Schmidt and Romani 2010; PCF 2011). This resource, Van Tassel Motorway (P-19-186917; Vance 2011) has been determined ineligible for listing on the National Register of Historic Places (NRHP) and the California Register of Historical Resources

(CRHR) (Schmidt and Romani 2010). In addition, two areas that extend beyond the previously surveyed areas were spot-checked on June 26, 2013. These areas are characterized by steep slopes and the leveled portions have been previously disturbed; therefore, the potential for cultural resources is low. No cultural resources were identified during the spot-check.

Previous paleontological assessments for TRTP define the geology at the proposed locations as Granitic (Gust and Scott 2009). Based on the Potential Fossil Yield Classification (PFYC) system, Granitic is considered very low sensitivity for harboring significant paleontological resources (PFYC = 1).

No additional impacts to cultural or paleontological resources are anticipated.

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

- SCE shall provide a copy of the City of Duarte grading permit to the CPUC prior to the start of construction.

- All conditions required by NTP #35 shall apply to the subject area and activities.

- Copies of all relevant permits, compliance plans, NTP #35, and this Final Engineering Concurrence to NTP #35 shall be available on site for the duration of construction activities where applicable.

Sincerely,

Ken Lewis
CPUC Environmental Project Manager

cc: V. Strong, Aspen