

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 11, 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 April 8, 2014, Southern Californian Edison (SCE) submitted a request for a Final Engineering Concurrence for the addition of a McCarthy drain near 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. **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 McCarthy drain near Construct 113 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 near Construct 113. SCE is adding a McCarthy drain to reduce the potential for erosion to occur along a section of roadway.

SCE is requesting final engineering concurrence for the modified engineering data, which has resulted in changes in disturbance areas due to the addition of the McCarthy drain, a permanent feature. The engineering changes consist of a total disturbance area of approximately 0.021 acre including:

- 0.001 acre of new permanent disturbance (outside of previously approved features)
- 0.020 acre of new permanent disturbance (within existing, approved temporary work areas)

- **Biological Resources:** SCE submitted a biological report by ICF International dated March 19, 2014, titled *Proposed Additional McCarthy Drain near Construct 113, Segment 6C, Tehachapi Renewable Transmission Project, Los Angeles County*. The report documents the biological conditions at the proposed Segment 6C additional McCarthy drain near Construct 113 (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, 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 (Constr 113 at very southern end of Segment 6C) general preconstruction surveys and preconstruction bat habitat assessment surveys (ICF 2010bg, 2010df, 2011br; ICF and BonTerra 2011d). 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) and Segment 7 (ICF 2010ay). 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 disturbed/developed and mixed chaparral. Vegetation communities within the 500-foot buffer include coast live oak woodland, coastal sage scrub, mixed chaparral, southern willow scrub, and disturbed/developed. Regulated tree species within the Variance Project Component include San Gabriel oak (*Quercus durata* var. *gabrielensis*). Regulated tree species within the 500-foot buffer include bigleaf maple (*Acer macrophyllum*), blue elderberry (*Sambucus cerulea*), California bay laurel (*Umbellularia californica*), California scrub oak (*Quercus berberidifolia*), coast live oak (*Quercus agrifolia*), interior live oak (*Quercus wizliseni* var. *wizliseni*), San Gabriel oak, toyon (*Heteromeles arbutifolia*), and unknown willow (*Salix* spp.).

Special-status wildlife signs observed within the 500-foot buffer include San Diego desert woodrat (*Neotoma lepida intermedia*) midden.

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 500-foot buffer include 7-1-S-2, 7-1-S-3, 7-1-S-4, 7-1-S-10, 7-1-S-11, 7-1-S-12, 7-1-S-13, 7-1-S-14, 7-1-S-15, 7-1-S-16, 7-1-S-17, and 7-1-S-18. No mapped jurisdictional features are located within the Variance Project Component. 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 0.001 acre of new permanent impacts. Also, 0.020 acres already approved for temporary impacts is being changed to permanent impacts. 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 Resource Guidelines for Segment 6C, Request for Final Engineering Concurrence – McCarthy Drain at Construct 113 – Off ANF*. The memorandum states that no cultural or paleontological resources will be impacted by the proposed request for engineering changes for a proposed McCarthy drain at Construct 113 on Segment 6C in support of the TRTP. The proposed area falls within previous surveys in support of the TRTP and one cultural resource was identified (Pacific Legacy 2007; Schmidt and Romani 2010; PCR 2011). This resource, Van Tassel Motorway (P-19-186917; Vance 2001) 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).

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:

- 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,

A handwritten signature in black ink, appearing to read 'Jason Coontz', with a long horizontal stroke extending to the right.

Jason Coontz
CPUC Environmental Project Manager

cc: V. Strong, Aspen