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

March 21, 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 January 7, 2014, Southern Californian Edison (SCE) submitted a request for Final Engineering Concurrence for changes in disturbance areas due to changed grading limits, a temporary crane pad, and construction work areas associated with Structure M0-T1 and Constructs 2 and 5 on Segment 11C Transmission Line (T/L) of the Tehachapi Renewable Transmission Project (TRTP), in unincorporated Los Angeles County, California. Additional information was submitted February 11 and March 14, 2014. **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, a temporary crane pad, and construction work areas associated with Structure M0-T1 and Constructs 2 and 5 on Segment 11C Transmission Line (T/L) of the TRTP, in unincorporated Los Angeles County, California. Subsequent to approval of the NTPR (NTP #39 dated October 10, 2013) by the CPUC, additional design activities have been conducted for several locations on Segment 11C. SCE is requesting final engineering concurrence for the modified engineering data, which resulted in changes in disturbance areas due to changes to grading limits, a temporary crane pad, and construction work areas. The engineering changes consist of the following:

  - Changes to grading limits for the construction of a permanent slope for an access road at Structure M0-T1, situated south of Vincent Substation. This change consists of changing approximately 0.106 acre of previously-approved temporary disturbance to permanent disturbance.

  - Addition of a temporary work area along the access road to Construct 2 to facilitate grading. This change consists of approximately 0.028 acre of new temporary disturbance.

  - Adjustments to temporary and permanent disturbance areas associated with a crane pad at Construct 5. This change results in approximately 0.011 acre of new permanent disturbance and 0.105 acre of new temporary disturbance. In addition, approximately 0.093 acre of previously-approved temporary disturbance is changing to permanent disturbance.

- **Biological Resources**: SCE submitted a biological report by ICF International dated January 6, 2014, titled *Proposed Segment 11C Construct M0-T1, CT 2 and 5 Rev 0 Changes, Tehachapi Renewable Transmission Project, Los Angeles County.* Additional disturbance area impact information was submitted March 14, 2014. The report documents the biological conditions at the proposed Segment 11C Construct M0-T1,

Construct 2, and Construct 5 modification areas on Segment 11C (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 2007, 2009, 2010, 2011, 2012, and 2013 rare plant surveys (AMEC 2007a, 2009w, ICF 2010au, 2011bv, 2011hk; FRED Survey Parent 000024); 2010 and 2011 tree inventory surveys (ICF 2010dj, 2011hj), and 2009 and 2010 burrowing owl surveys (AMEC 2009z; ICF 2010dk). Biological resources within the BSA were also evaluated during Segment 6A and Segment 11C general preconstruction surveys, burrowing owls preconstruction surveys, and preconstruction bat habitat assessment surveys (ICF 2011ax, 2011bl; ICF and BonTerra 2011d, 2011h, 2011i, 2011j, 2011k; FRED Survey Parent 000031, 000035). Jurisdictional resources within the Variance Project Component were evaluated during the 2010 jurisdictional delineation for Segments 6 and 11 (ICF 2010aj) and reevaluated during the 2013 Segment 11C supplemental jurisdictional delineation (ICF 2013b). 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 as Environmentally Sensitive Areas (ESAs) and flagged for avoidance. A literature review was also performed as part of the Biological Review for Segment 11C (ICF 2013f). 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).

Site 1 (M0-T1)

Vegetation communities within the Variance Project Component include disturbed/developed, Mojave mixed woody scrub, and ruderal grassland. Vegetation communities within the 500-foot buffer include big sagebrush scrub, disturbed/developed, Mojave desert wash scrub, Mojave mixed woody scrub, Mojave mixed woody scrub – disturbed, Mojave juniper woodland and scrub, Mojave juniper woodland and scrub – disturbed, and ruderal grassland. Special-status plant species, short-joint beavertail (*Opuntia basilaris* var. *brachyclada*), occurs within the 500-foot buffer. Special-status wildlife observed within the 500-foot buffer include Cooper's hawk (*Accipiter cooperii*), loggerhead shrike (*Lanius ludovicianus*), and San Diego desert woodrat (*Neotoma lepida intermedia*) and potential midden, as well as potential burrowing owl feature. Jurisdictional features within the 500-foot buffer include 11-2-S-2, 11-2-S-3, and 11-2-S-4.

Site 2 (Construct 2)

Vegetation communities within the Variance Project Component and the 500-foot buffer include disturbed developed, Mojave creosote bush scrub, and Mojavean juniper woodland and scrub. Special-status plant species, short-joint beavertail, occurs within the 500-foot buffer. Regulated tree species, Tucker's oak (*Quercus john-tuckeri*), occurs within the 500-foot buffer. Special-status wildlife species, San Diego desert woodrat and midden, occur within the 500-foot buffer. Jurisdictional features within the 500-foot buffer include 11-3-S-1 and 11-3-S-2.

Site 3 (Construct 5)

Vegetation communities within the Variance Project Component and the 500-foot buffer include disturbed/developed and Mojavean juniper woodland and scrub. Regulated tree species, Tucker's oak, occurs within the 500-foot buffer. Special-status species, San Diego desert woodrat midden have been observed within the BSA. Jurisdictional feature 11-4-S-8 occurs within the 500-foot buffer.

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 0.132 acres of new temporary impacts, 0.011 acres of new permanent impacts, as well as 0.199 acres of permanent impacts that were previously temporary impacts (total of 0.210 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 11C, Request for Final Engineering Concurrence – Rev 0 Engineering Changes at M0-T1, CT2 and CT5 – Off Angeles National Forest. The memorandum states that no cultural or paleontological resources will be impacted by the proposed Request for Final Engineering Concurrence (RFEC) in support of the TRTP Segment 11C. All of the above proposed changes provided in this RFEC were included in the previous surveys for the TRTP and no cultural resources were identified (Pacific Legacy 2007).

  Previous paleontological assessments for TRTP indicate that the bulk of the geology of the areas identified in this RFEC is characterized by hornblend diorite with one area located just south of the Vincent Substation for an access road for Construct M0-T1 characterized by Quaternary older alluvium. Based on the Potential Fossil Yield Classification (PFYC) system, hornblend diorite is considered very low sensitivity (PFYC = 1) and Quaternary older alluvium is considered moderate sensitivity for harboring significant paleontological resources (PFYC = 3). However, previous paleontological monitoring efforts from April 2010 through March 2011 in support of the Vincent Substation expansion did not yield any significant paleontological resources. As a result, it was recommended that based on the lack of significant finds during construction monitoring and the paleontological potential of this unit in the Mojave Desert, that the PFYC Class for this area be reduced to less than significant impact, and be changed from Class 3 to Class 2 (Aron 2011). It was further recommended that no paleontological monitoring be undertaken during the remaining construction activities at Vincent Substation during trenching and mass-grading activities effective on March 1, 2011 (Aron 2011). Therefore, no paleontological monitoring is required during work associated with the new disturbance activities proposed in this RFEC.

  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 #39 shall apply to the subject area and activities.

- Copies of all relevant permits, compliance plans, NTP #39, and this Final Engineering Concurrence to NTP #39 shall be available on site for the duration of construction activities where applicable.

Sincerely,

Jason Coontz
CPUC Environmental Project Manager

cc: V. Strong, Aspen