

Southern California Edison
WODUP A.13-10-020

DATA REQUEST SET A.13-10-020 WODUP ED-SCE-05

To: ENERGY DIVISION
Prepared by: Paul Yamazaki
Title: Senior Biologist
Dated: 05/23/2014

Question BIO-21-Supplemental:

BIO-21 Please provide a draft Integrated Weed Management Plan (IWMP) that describes SCE's proposed methods of preventing or controlling project-related spread of weeds or new weed infestations. The IWMP also must meet BLM's requirements for NEPA disclosure and analysis if herbicide use is proposed for the project.

For the purpose of the IWMP, "weeds" should include designated noxious weeds, as well as any other non-native weeds or pest plants identified on the weed lists of the California Department of Food and Agriculture, the California Invasive Plant Council, or identified by BLM as special concern. The IWMP should include the contents listed below. The IWMP should be implemented throughout project construction, operations and maintenance, and through the close of any soils, water, or vegetation-related post-construction rehabilitation, revegetation, restoration, and related monitoring. The IWMP should include the information defined in the following paragraphs.

Background . An assessment of the project's potential to cause spread of invasive nonnative weeds into new areas, or to introduce new nonnative invasive weeds into the project ROW. This section should list known and potential nonnative and invasive weeds occurring on the ROW and in the project region prior to construction activities, and identify threat rankings and potential consequences of project-related occurrence or spread for each species. Please include a map showing locations of all weeds detected in the ROW to date. The map should be updated at least once a year. It also should identify project sites where weed introduction or spread may be particularly likely or important. This section should identify control goals for each species (e.g., eradication, suppression, or containment).

Prevention . Specify methods to minimize potential transport of weed seeds onto the ROW, or from one section of the ROW to another. For example, the ROW may be divided into "weed zones," based on known or likely invasive weeds in any portion of the ROW. Vehicles may be inspected and cleaned at entry points to any portion of the ROW. Portable vehicle wash stations or commercial wash stations should be used to minimize likelihood of introducing weed seeds onto the ROW. Erosion control materials (e.g., hay bales) should be certified free of weed seed before they are brought onto the site. The IWMP should prohibit on-site storage or disposal of mulch or green waste that may contain weed material.

Monitoring . Please include the proposed methods to survey for weeds during construction and operation. This section should include a monitoring schedule to ensure timely detection and immediate control of weed infestations, to prevent further spread. Surveying and monitoring for

weed infestations will occur at least two times per year, to coincide with the early detection period for early season and late season weeds. It also should include methods for marking invasive weeds on the ROW, and recording and communicating these locations to weed control staff. The map of weed locations (above) should be updated at least once a year. The monitoring section should also describe methods for post-eradication monitoring to evaluate success of control efforts and any need for follow-up control.

Control . Please describe the proposed manual and chemical weed control methods to be employed during construction and operation. The IWMP should only include weed control measures with a demonstrated record of success for target weeds, based on the best available information. The plan should describe proposed methods for promptly scheduling and implementing control activity when any weed infestation is located, to ensure effective and timely weed control. Weed infestations must be controlled or eradicated as soon as possible upon discovery, and before they go to seed, to prevent further expansion of weed occurrences. All proposed weed control methods should minimize the extent of any native vegetation or ground disturbance, limit ingress and egress to defined routes, and avoid damage from herbicide use or other control methods to any environmentally sensitive areas identified within or adjacent to the ROW.

Manual control should specify well-timed removal of weeds or their seed heads with hand tools; seed heads and plants must be disposed of in accordance with guidelines from the Riverside or San Bernardino County Agricultural Commissioners, if such guidelines are available.

The chemical control section must include specific and detailed plans for any herbicide use. It should indicate where herbicides will be used, which herbicides will be used, and specify techniques to be used to avoid drift or residual toxicity to native vegetation or special-status plants, consistent with BLM's Vegetation Treatments Using Herbicides on BLM Lands in 17 Western States (2007) and National Invasive Species Management Plan (NISC 2008). Herbicides having residual toxicity, such as pre-emergents, should not be used in natural areas or within channels (engineered or not) where they could run off into downstream areas. Only state and BLM-approved herbicides may be used, and all herbicide applicators will be required to possess a qualified herbicide applicator license from the state. All herbicide applications will follow U.S. Environmental Protection Agency label instructions and be performed in accordance with federal, state, and local laws and regulations.

Reporting schedule and contents. This section of the IWMP should describe SCE's proposed reporting to the CPUC and BLM, including reporting schedule, and contents of each report.

Response to Question BIO-21-Supplemental:

Please see the attached memo and figure that provides the information requested in Data Request No. BIO-21. The memo summarizes the more detailed information that would be included in the Integrated Weed Management Plan (that would be prepared for construction of the Project) and should be sufficient for CEQA/NEPA purposes. Please note that in my earlier email I mistakenly referred to a supplemental response to BIO-18. It is for BIO-21 and no supplemental

response for BIO-18 is needed.

Summary of the Weed Management Plan for the West of Devers Upgrade Project

PREPARED FOR: Southern California Edison
PREPARED BY: CH2M HILL
DATE: August 28, 2014

Introduction

This memorandum summarizes the draft Weed Management Plan (Plan) for Southern California Edison's (SCE) West of Devers Upgrade Project (WOD Upgrade Project or Project). SCE and its contractors will be responsible for carrying out the methods and procedures to prevent and control the spread of weeds during and following construction of the Project as described in the Plan and in this summary. Weed management areas are geographically limited to the area within the Project's temporary disturbance areas.

Goals and Objectives

Weeds are generally defined as plants that are undesirable in a given location. Noxious or invasive weeds can be detrimental or destructive to biological values and natural biological diversity and may be difficult to control or eradicate. The State of California and the federal government maintain lists of weed species. The goal of the Plan is to minimize the spread of weeds during construction as well as to provide an appropriate level of control of weed populations during the operations and maintenance of the proposed SCE facilities. Monitoring and maintenance during the construction and operational phases will include identifying areas of localized infestation within construction work areas that may pose a substantial risk for contributing to the spread of weeds. Implementation will reduce and/or eliminate the propagation and spread of weeds into the Project right-of-way (ROW) and surrounding areas, thereby minimizing potential impacts to wildlife habitat and vegetation communities.

Botanical surveys conducted in 2012 and 2013 (LSA, 2013) identified 40 noxious weed species within the Project area that are on the State of California CDFG and/or Cal-IPC 2012 noxious weeds lists (Table 1). Ubiquitous species, such as red brome (*Bromus madritensis* spp. *rubens*), redstem filaree (*Erodium cicutarium*), and wild oat (*Avena* spp.); have such a widespread distribution that general control of these species is not considered feasible, and meaningful control of such ubiquitous species is beyond the scope of the Weed Management Plan. SCE's objective is to prevent or control the further spread of noxious weeds as it relates to project activities. Control measures on the Project ROW and any ancillary project areas are generally not considered feasible where weed species are already established and abundant in the adjacent undisturbed areas. New and discreet populations of weed species found within the Project disturbance areas will be treated. The map of weeds in the WOD Upgrade Project is found on Figure 5 (Sheets 1 thru 11) in Appendix D (Botanical Resources of the West of Devers Upgrade Project) to the Biological Resources

Technical Report which is Appendix F in the PEA. Table 1 below provides a list of weed species identified within the West of Devers Project Area, weed rating and proposed treatment method.

Table 1
Noxious Weeds Identified within West of Devers Project Area
West of Devers Upgrade Project Noxious Weed Control Plan

Scientific Name	Common Name	Cal-IPC Weed Rating	CDFA Weed Rating	Preliminary BLM Risk Rating Factor 1/ Factor 2		*Treatment Methods
<i>Ailanthus altissima</i>	tree-of-heaven	Moderate	C	Moderate	Moderate	C
<i>Arundo donax</i>	giant reed	High	B	Moderate	Moderate	C
<i>Avena barbata</i>	slender oat	Moderate	Not rated	High	Moderate	NT
<i>Brassica tournefortii</i>	Saharan mustard	High	Not rated	High	Moderate	C
<i>Bromus diandrus</i>	ripgut grass	Moderate	Not rated	High	Low	NT
<i>Bromus hordeaceus</i>	Soft chess	Limited	Not rated	Low	Moderate	NT
<i>Bromus madritensis ssp. rubens</i>	red brome	High	Not rated	High	Moderate	NT
<i>Bromus tectorum</i>	cheatgrass	High	Not rated	High	High	NT
<i>Cardaria draba</i>	whitetop	Moderate	B	Moderate	Moderate	C
<i>Carduus pycnocephalus</i>	Italian thistle	Moderate	C	High	Moderate	C
<i>Carpobrotus chilensis</i>	Iceplant	Moderate	Not rated	High	Low	C
<i>Centaurea melitensis</i>	tocalote	Moderate	C	Moderate	Moderate	C
<i>Cirsium vulgare</i>	bull thistle	Moderate	C	Moderate	Low	C
<i>Conium maculatum</i>	poison hemlock	Moderate	Not rated	Moderate	Moderate	C
<i>Cynodon dactylon</i>	Bermuda grass	Moderate	C	High	Low	C
<i>Erodium cicutarium</i>	redstem filaree	Limited	Not rated	Moderate	High	NT
<i>Eucalyptus camaldulensis</i>	river red gum	Limited	Not rated	Moderate	Moderate	C
<i>Foeniculum vulgare</i>	sweet fennel	High	Not rated	Moderate	Moderate	C
<i>Gazania linearis</i>	gazania	Moderate	Not rated	High	Moderate	C

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Scientific Name	Common Name	Cal-IPC Weed Rating	CDFA Weed Rating	Preliminary BLM Risk Rating		*Treatment Methods
				Factor 1/	Factor 2	
<i>Hirschfeldia incana</i>	Mediterranean mustard	Moderate	Not rated	High	Moderate	NT
<i>Hordeum murinum</i>	Mediterranean barley	Moderate	Not rated	Moderate	Low	NT
<i>Hypochaeris glabra</i>	smooth cat's-ear	Limited	Not rated	Moderate	Low	A
<i>Marrubium vulgare</i>	white horehound	Limited	Not rated	Moderate	Moderate	A
<i>Medicago polymorpha</i>	California burclover	Limited	Not rated	Moderate	High	C
<i>Nicotiana glauca</i>	tree tobacco	Moderate	Not rated	Moderate	Moderate	C
<i>Pennisetum setaceum</i>	crimson fountain grass	Moderate	Not rated	Moderate	Moderate	C
<i>Polypogon monspeliensis</i>	annual beardgrass	Limited	Not rated	Moderate	Moderate	C
<i>Raphanus sativus</i>	wild radish	Limited	Not rated	Moderate	Moderate	A
<i>Ricinus communis</i>	castor bean	Limited	Not rated	Moderate	Moderate	C
<i>Rubus armeniacus</i>	Himalayan blackberry	High	Not rated	High	Moderate	C
<i>Salsola tragus</i>	Russian thistle	Limited	C	Moderate	Moderate	C
<i>Schinus molle</i>	Peruvian pepper tree	Limited	Not rated	Moderate	Moderate	C
<i>Schinus terbinthifolius</i>	Brazilian pepper tree	Limited	Not rated	High	High	C
<i>Sisymbrium irio</i>	London rocket	Moderate	Not rated	Moderate	High	A
<i>Spartium junceum</i>	Spanish broom	High	C	Moderate	Moderate	C
<i>Tamarix ramosissima</i>	saltcedar	High	B	Moderate	Low	C
<i>Trifolium hirtum</i>	rose clover	Moderate	Not rated	Moderate	Moderate	A
<i>Verbascum thapsus</i>	common mullein	Limited	Not rated	High	Moderate	A
<i>Vulpia myuros</i>	rat-tail fescue	Moderate	Not rated	Moderate	Low	NT

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West of Devers Upgrade Project Noxious Weed Control Plan

Scientific Name	Common Name	Cal-IPC Weed Rating	CDFA Weed Rating	Preliminary BLM Risk Rating Factor 1/ Factor 2		*Treatment Methods
<i>Washingtonia robusta</i>	Mexican fan palm	Moderate	Not rated	Moderate	Low	C

* Control Method:

C: Control (as new infestations detected in project disturbance areas)

A: Allow at low density (e.g., < 10% cover), species considered innocuous

NT: No Treatment (infeasible to control – species is naturalized and ubiquitous)

Prevention

Two important goals of the Plan are to prevent spreading weeds into areas that are not already infested, and to prevent material from area containing weeds to be spread to non-infested sites both on a Project site and elsewhere. To accomplish the goals, weed control efforts will be implemented during all three project phases: (1) pre-construction, (2) during construction, and (3) post construction restoration. The scope of weed treatment activities associated with the three phases is described in the following subsections.

Pre-construction

Prior to construction all project disturbance areas and a 200-foot buffer will be surveyed for weeds in April and October to ensure early detection for early season and late season weeds. Prior to beginning construction (within 2 weeks of initial ground-disturbance), Project impact areas will be resurveyed for target weed species and used to augment the baseline inventory. During these pre-construction clearance surveys, discreet weed infestations will be flagged for avoidance or control within the project disturbance areas. For weeds that are uncommon to the Project area and could be controlled, control should be implemented before construction so as to minimize the risk of spreading these weeds during construction. The focus of the pre-construction clearance surveys will be limited to a 200-foot buffer around temporary disturbance areas.

Areas with target weeds species present will be identified for management purposes. Each discrete infestation will be identified to species, documented, and mapped. All data will be collected using Trimble GeoXT GPS units with sub-meter accuracy. The GPS units were equipped with data files for navigation and data dictionaries for data collection.

During Construction

A list of preventive measures to be implemented during construction is provided in the following paragraphs. In general, such measures are intended to control the spread of weeds during Project construction when soil-disturbing activities can introduce new weed seed and result in proliferation of new infestations. SCE will provide information and training to all Project personnel regarding weed management, identification, and potential impacts during the worker environmental awareness training. If weeds are observed in new

areas after construction commences, appropriate control measures will be implemented to reduce the spread or proliferation of noxious weeds.

During construction, the following measures will be implemented as applicable and feasible, to prevent the spread of target weed species:

- Ground disturbing construction equipment will be cleaned prior to arrival at the work site and when traveling between weed zones. Monitoring personnel, with construction inspector oversight, will ensure that equipment is free of soil and debris capable of transporting weed seeds, roots, or rhizomes before the equipment is allowed use of access roads. Construction monitors shall maintain inspection logs to document contractor compliance and shall refuse entry to equipment that are not in compliance.
- Personal vehicles that are not used for land-disturbing activities [that is, clearing and grading] and delivery vehicles will be exempt from this requirement.
- Tools associated with ground-disturbing activities and/or vegetation trimming/removal activities will be cleaned prior to use in areas containing natural vegetation. Chainsaws and other tools and equipment will be cleaned with compressed air, water, cloth, and/or wire brush as appropriate.
- Likewise, after conducting work with tools involving ground-disturbing activities and/or vegetation trimming/removal activities in areas infested with weeds, tools must be cleaned before they are removed from the infested area.
- “Flag and Avoid.” If new target weed infestations are identified after construction commences, they will be flagged in the field by biological monitors and reported to construction supervisor(s). The flagging will alert construction personnel and is intended to prevent access into areas slated for disturbance until noxious weed control measures have been implemented.
- In areas where weed infestations are identified and mapped, cleared vegetation and salvaged topsoil from such areas will be stockpiled immediately adjacent or as close as possible to the area from which they are stripped to prevent transport of soil containing noxious weed seeds, roots, or rhizomes. During restoration, topsoil and vegetative material from infested sites will be returned to the areas from which they were stripped and post-project mapping or notes refined as appropriate based on weed content.
- Straw or hay bales used for sediment-barrier installations or mulch distribution will be certified “weed free” by the supplier and/or obtained from state-approved sources.
- To prevent contamination of construction supplies such as “weed-free” sediment barriers, construction yards will be regularly weeded allowing no noxious weeds to set seed within the yards.
- Ground disturbance to vegetation will be limited to the minimum necessary to perform the activity safely and as designed.

Post Construction Restoration

Noxious weed control measures will be implemented during post construction restoration where necessary in accordance with BLM's *Final Vegetation Treatments Using Herbicides on BLM Lands in 17 Western States Programmatic Environmental Impact Statement* (2007) and the *National Invasive Species Management Plan* (National Invasive Species Council [NISC] 2008) regulations. Control measures may include various treatment methods. Physical removal and chemical control of weedy species will be employed as required and are described in the following subsections. Biological control methods are not prescribed under this plan but may be considered and implemented if determined to be safe and approved. Treatment methods will be based on species-specific and area-specific conditions.

Control Methods

Physical Removal

Physical removal of noxious weeds is employed for localized, discrete weed control. Typically, physical control methods will uproot, girdle, or cut plants through manual hand-pulling or use of power tools. Several types of physical removal techniques may be implemented, including the following: hand-pulling, lever arms, weed whipping, hoeing, and mowing.

Hand-pulling should be focused on discrete populations of weed species that have a single-root mass. Hand-pulling is particularly effective to remove annual species after germination and prior to seed set, when the stems are not as easily broken, so that root mass is left behind. Broken root pieces and other fragments of weedy species are able to resprout and recolonize cleared areas. Hand-pulling is less effective in large areas and with weed species that spread through an underground root system (for example, tamarisk).

Hoeing and weed whipping may be used to control herbaceous weeds in limited discrete areas before seed has set. Care must be taken not to damage adjacent native plants. Hoeing and weed whipping are most effective on small weeds with single root masses. Larger weeds are more likely to regenerate from cut roots. Cut plant material should be bagged and removed to prevent resprout and seed maturation.

- Cover all loads while removing vegetation using a tarpaulin. Caution must be taken to contain all plant stem and root fragments because they may recolonize cleared areas and can invade new areas if not disposed of properly.
- Avoid contact with established native shrub and grass species.
- Temporarily discontinue weed abatement work in the event of rainfall.
- Soil and spoils may not be transported offsite from any project work site infested with noxious weeds not considered ubiquitous in the region.

Chemical Control

Herbicide applications are widely used to control or eradicate infestations of noxious weed species. Herbicides may be used selectively to control discrete but significant infestations

where manual and mechanical control methods are deemed ineffective. Herbicide application will be conducted per the BLM Standard Operating Procedures (SOP) within the Final Environmental Impact Statement on Vegetation Treatment on BLM Lands in Seventeen Western States (BLM, 2007). Section 3.3.1 provides specific standard operating procedures dictated by the BLM Standard Operating Procedures (SOP) within the Final Environmental Impact Statement on Vegetation Treatment on BLM Lands in Seventeen Western States (BLM, 2007).

Where herbicides are applied, all treated areas must be identified and mapped to record treatment type and extent and to allow future monitors to compare or verify treatment effectiveness.

Prior to application of herbicide, contractors must demonstrate that they possess required permits from state and local authorities. All herbicides will be applied in accordance with applicable laws, regulations, and permit stipulations. Only herbicides and adjuvants approved by the State of California and BLM for use on public lands will be used within or adjacent to the Project site.

Herbicide Use and Regulations

Control of some weeds may require herbicide application. The application of these general use herbicides will be in compliance with all state and federal laws. The BLM's Vegetation Treatments Using Herbicides on BLM Lands in 17 Western States (2007) and the National Invasive Species Management Plan (NISC 2008) documents will be used as guidance for herbicide use methods.

Herbicide Use Guidelines

Herbicides will only be used on weed infestations that have been approved for herbicide treatment. SCE will implement the following environmental protection measures to minimize the adverse impacts to biological resources:

- The Project Area will be divided into weed zones taking into consideration geography, existing ubiquitous weed populations, and location of construction yards.
- Herbicide treatments would be conducted under the direction of a professional pesticide applicator with State Pesticide Applicator License to minimize both environmental and personal risk. The applicator should be familiar with all safety and environmental regulations, as well as be able to identify target plant species.
- A biological monitor would be used to minimize impact to sensitive resources such as special-status plant species and jurisdictional waters, when working in these areas. The biological monitor will flag avoidance areas ahead of personnel applying herbicide.
- Only drift reduction agents, as appropriate, to reduce the drift hazard to non-target species will be used.
- The proponent would obtain all necessary Clean Water Act (CWA) approvals prior to applying herbicides in dry jurisdictional desert washes.

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- Use appropriate herbicide-free buffer zones for herbicides not labeled for aquatic use based on risk assessment guidance with minimum widths of 100-feet for aerial, 25 feet for vehicle and 10 feet for hand spray applications.
 - Maintain buffers between treatment areas and water bodies. Buffer widths should be developed based on herbicide- and site-specific criteria to minimize impacts to water bodies.
 - Use spot applications or low-boom broadcast operations where possible to limit the probability of contaminating non-target food and water sources, especially non-target vegetation over areas larger than the treatment area.
 - Use timing restrictions (for example, do not treat during critical wildlife breeding or staging periods) to minimize impacts to wildlife.
 - In desert tortoise habitat, conduct herbicide treatments during the period when desert tortoises are less active.
 - To the greatest extent possible, avoid desert tortoise burrows during herbicide treatments.
 - Conduct pre-treatment surveys for sensitive habitat and special status species within or adjacent to proposed treatment areas.
 - Crews that conduct invasive plant treatment will have experience working on sensitive habitats and species. Crews would be trained in the identification of non-native and native species. Methods of chemical treatment utilize spot application of herbicide on individual plants. This approach avoids broad chemical application to avoid any non-target species.
 - High winds or precipitation events occurring during application of herbicide could result in drift or runoff and chemical contact with non-target vegetation. Herbicide applications would be suspended if any of the following conditions occur:
 - Wind in excess of 10 miles per hour
 - Precipitation is occurring or imminent (within 24 hours)
 - Any other weather requirements as stated on the label.
 - Crews would use spray bottles with water to immediately douse non-target vegetation in the case of drift or mistaken chemical application. Systemic absorption of herbicide typically takes a few hours depending on the properties of the chemical and the plants being treated, thus an application of water only would dilute the herbicide and minimize the damage from accidental non-target application.
 - Dust control would not be performed on roads immediately following herbicide application to reduce the risk of herbicide runoff and leaching.

Herbicides Proposed for Use

Chemical treatment will be limited to the following herbicides:

Chorsulfuron
Clopyralid (Transline)
Dicamba

Glyphosate (Accord, Rodeo, Roundup, Roundup Pro, Aquamaster)
Imazapyr
Triclopyr (Garlon 3A, Garlon 4, Pathfinder II)

Applicator Licenses and Other Regulatory or Agency Policy Requirements

All herbicides which will be used for this project have been registered with the U.S. Environmental Protection Agency (EPA) and the California Department of Pesticide Regulation (CDPR). None of the herbicides proposed for use are considered to be federally or state restricted.

California State regulations (www.cdpr.ca.gov/docs/legbills/calcode/030302.htm#a6724) require that; 1) a Qualified Applicator must instruct all employees handling herbicides of the correct uses, handling, and safety precautions for each of the herbicides to be utilized prior to the start of the project; 2) a Pesticide Handler Training Program must be written for all of the herbicides utilized and then signed by the Applicator and prospective employee; 3) a Pesticide Training Record must be filled out and signed by each employee prior to herbicide application.

Training requirements for herbicide use will be consistent with the requirements found at can be found at: www.cdpr.ca.gov/docs/legbills/calcode/030302.htm#a6724.

Herbicide Use Documentation

SCE or their Contractor would submit Pesticide Application Records (PARs) to the District Weed Management Specialist or Authorized Officer following each application of herbicide on BLM-managed lands within 14 days of application. The occurrence of invasive plants within the Project Area, or where the invasive plants occur, will also be reported to the BLM District Office. The PARs will be completed by the certified herbicide applicator. The PARs would also be used to track the amount and efficacy of herbicide applied in each treatment area.

Monitoring

SCE will conduct biannual monitoring of non- ubiquitous weed infestations and effectiveness of controls in conjunction with biological monitoring of construction and post-construction monitoring of restoration areas. Areas containing or being treated for weed infestations will be identified, mapped and referenced in annual reports. Each annual report will include specific maps identifying treatment areas and will provide a qualitative analysis and photo documentation for treatment areas. Annual reports describing weed infestations and control efforts implemented and their effectiveness will be submitted annually to the BLM and CPUC with the annual progress report for the Habitat Restoration effort. Restoration areas that are anticipated to require remediation activities to control new or repeated infestations of weeds will be identified. General recommendations and lessons learned will be provided.

Monitoring Schedule

Monitoring will begin one year after initial construction treatment of noxious weeds has been conducted, and will continue for a period of five years following completion of project construction or until success criteria are met, whichever occurs first. The following section provides a description of monitoring methods, schedule, and success criteria, and reporting requirements.

Monitoring Methods

Monitoring will be conducted at all sites impacted by construction (tower pads, staging areas, pull sites, etc.), including access/spur roads disturbed during project construction. All monitoring activities will be conducted by qualified biologists or ecologists.

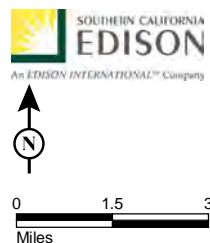
Monitoring will consist of a qualitative evaluation of treatment success and will focus on identifying the location, extent, and species composition of any new or repeated infestations. Visual surveys will be performed by walking over the entire acreage of disturbance areas including towers, landing zones, assembly yards, pull sites, and spur roads. Visual surveys will be performed while driving and by stopping at intervals to view all affected or treated areas and access roads (excluding all state highways a) utilized by the project. All areas that were treated during pre-construction weed control efforts will be monitored by walking each site. Occurrences of new discreet infestations of target noxious weed species will be documented, mapped by GPS, and identified on an aerial photograph or other base map. Photographs will be taken when appropriate. Annual monitoring reports will be prepared by the biological monitoring firm or Contractor or Restoration Contractor and submitted to SCE, CPUC and BLM, as described below.

Reporting

Annual monitoring reports will be prepared to document progress toward meeting the weed control success criterion. Monitoring reports will be prepared and submitted to SCE, BLM and the CPUC by the biological monitor or Contractor (during project construction) or the Restoration Contractor (after completion of project construction). The annual monitoring reports will include the following information:

- Monitoring methods;
- Success criteria;
- Occurrence, extent, and species composition of noxious weed populations;
- Changes from previous years monitoring data;
- Treatment methods, timing, and results;
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- Recommended changes in treatment methods and/or monitoring methods;
- Progress toward meeting success criterion, including impacts to treatment sites that are outside the control of SCE such as illegal OHV trespass;
- Photographs of selected treatment areas;
- Updated mapping of non-ubiquitous weeds along the project.

Draft annual monitoring reports will be submitted to SCE and the agencies on January 31 of each year for the prior year and revised and re-submitted as needed.



LEGEND

Weed Zone	■ C	■ Substation
■ A	■ C2	■ Material Storage Yard (MSY)
■ B	■ D	

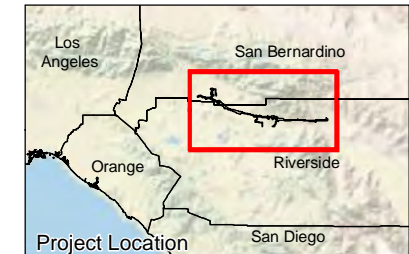


FIGURE 1

Southern California Edison
West of Devers Upgrade Project
Weed Zone Delineation

Dats Source: SCE, ESRI World Street Map, Riverside TLMA, Bing Imagery
H:\GIS_WoDMapFiles\Plans\Weeds\WeedPlan_Figures_2014-07-30\WeedZones_Overview_2014-08-18.mxd (2014-08-18)

