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PROJECT MEMORANDUM

TEHACHAPI RENEWABLE TRANSMISSION PROJECT

To: John Boccio, CPUC Project Manager
From: Vida Strong, Aspen Project Manager
Date: February 24, 2017
Subject: TRTP Post-Construction Monthly Report #1, January 2017

Construction of SCE's Tehachapi Renewable Transmission Project (TRTP) has been completed and the last segment of the transmission line was energized on December 15, 2016. Restoration and Storm Water Pollution and Prevention Plan (SWPPP) compliance activities are ongoing on Segments 6/11 and 7/8. Temporary and permanent impacts to Segments 4, 5, and 10 are being mitigated off-site due to limited success restoring native vegetation communities in arid environments.

Restoration activities and SWPPP Inspections and BMP maintenance will continue until each site has met final success criteria.

CPUC EM, Jenny Slaughter, conducted a site visit on January 16 and 17, 2017.

Summary of Restoration Activities

Restoration activities conducted during January 2017 included the following:

Antelope-Pardee and Antelope Transmission Project, Segments 1, 2, and 3

1. On November 23, 2016, SCE submitted a request to allow for offsite mitigation for underperforming restoration sites on Segments 1, 2, and 3. This request was approved by the CPUC on January 31 2017.
2. On November 23, 2016, SCE submitted an Addendum to the Habitat Restoration and Revegetation Plan for the Antelope Transmission Project for Segment 3B. The Addendum documents the offsite mitigation ratios proposed for both temporarily disturbed areas. Aspen has reviewed the Addendum and comments were sent to SCE on February 9.

TRTP, Segments 6 and 11

3. Hydroseeding occurred at 3 sites on Segment 11.
4. Weed abatement (hand pulling and herbicide use) occurred at 12 sites on Segment 11.
5. Grading crews completed restoration grading at Segment 6 Tower 59 "give-back" area (see Figure 1).
6. No container planting occurred on Segments 6 and 11 during the month of January. Container plant installation on the Angeles National Forest (ANF) is on hold pending the U.S. Forest Service (USFS) decision on whether to allow SCE to install container plants given the risk of *Phytophthora sp.* introduction (see below).

Background: In March of 2016, the ANF brought to SCE's attention their concern regarding an outbreak of exotic pathogens of the *Phytophthora* genus, transmitted through the future restoration plantings. Plant diseases associated with this pathogen genus include the well documented and detrimental "Sudden Oak Death". In June, the ANF notified SCE that testing for the *Phytophthora* pathogens would be required. The Orange County Agriculture Department (Orange County AG) collected samples on September 15. Additional testing was conducted on December 13. Results of the additional testing indicated the presence of *Phytophthora sp* in 4 of 13 species of plants tested. The USFS Supervisor is reviewing the information and will provide a decision on if planting will be allowed to occur.

TRTP, Segments 7 and 8

1. Hydroseeding occurred at 12 restoration sites on Segment 8 Overhead (see Figure 2).
2. Weed abatement (hand pulling and herbicide use) occurred at 21 sites on Segment 8 Overhead.
3. No container planting occurred on Segment 8 Overhead during the month of January; Segment 7 container plantings have been completed with the exception of replacement plantings within Whittier Narrows (see Item #6 below). Container planting off ANF lands is on hold temporarily while contracts with SCE's restoration contractor are renegotiated.
4. Restoration activities along the Segment 8 500 kV Underground right-of-way have not yet been initiated.
5. On February 9, 2017, SCE resubmitted a request to exclude disturbance areas (or portions of) in Segments 7 and 8 Overhead from restoration requirements. The request would exclude 10 sites on Segment 7 and 37 sites on Segment 8 Overhead. In many cases, the sites overlapped other rights-of-way and were subject to routine mowing or spraying. A site visit between Aspen and SCE was conducted in July 2016. This request is currently under review.
6. In January 2016, SCE received a Cease and Desist letter from USACE for any further restoration activities on federal lands (Whittier Narrows Flood Control Basin and Santa Fe Dam) on Segments 7 and 8 Overhead. Some of the sites had restoration activities completed or were in progress, but under the Cease and Desist, SCE was unable to maintain or monitor these sites. SCE received written confirmation from the USACE on November 29, 2016 that the order has been lifted and restoration activities in Whittier Narrows can resume. The USACE specified that if additional restoration activities are necessary at the Santa Fe Dam location, that those activities would be approved under a separate request.
7. On January 30, SCE notified the CPUC that re-contouring work needed to be conducted within the right-of-way of the Segment 8 500 kV Underground near Vault Cluster #12 to address water flow. In addition, SCE needed to remove and replace approximately 700-ft of chain link fence to meet San Bernardino County Flood Control Specification. Both the grading location and the chain link fence is within previously approved and disturbed areas.
8. A Final Engineering Concurrence Request for temporary right-of-way fencing along portions of the Segment 8 500 kV Underground is expected to be submitted to the CPUC for review in February.

SCE Monitoring of Restoration Sites (TRTP, Segments 6/11, and 7/8)

Monitoring was conducted at 30 total sites in January, including ANF lands, during the Plant Establishment Period (PEP) (see Figure 3). Due to inclement weather and poor road conditions, monthly site visits for four hydroseed sites and one bi-weekly site visit for nine container plants and or mitigation tree sites were not completed in January. SCE reported the following results and observations of the sites surveyed during the month of January:

1. Across all segments, 0% of the hydroseed sites are in attainment of the native species cover PEP success standard (at or above 10% native species cover) prescribed in the Habitat Mitigation and Monitoring Plan (HMMP).
2. Across all segments, 92% of the hydroseed sites are in attainment of the non-native annual species cover PEP success standard (less than 20% non-native annual species cover) prescribed in the HMMP. In addition, 100% of the hydroseed sites are in attainment of the non-native perennial species cover PEP success standard (less than 5% non-native perennial species cover). Sites continue to demonstrate a positive trend.

3. Across all segments, 100% of the sites with container plants have an average container plant Health & Vigor rating of Fair, Good or Excellent.
4. Across all segments, 56% of the sites with container plant have a Survivorship average of 91-100%.
5. Across all segments, 100% of the sites with mitigation tree have an average tree Health & Vigor rating of Fair, Good or Excellent.
6. Across all segments, 88% of the sites with mitigation tree have an average tree Survivorship of 91-100%.

Summary of SWPPP Compliance

TRTP, Segments 6 and 11

1. On February 14, 2017, SCE provided a progress report detailing SWPPP installation and site stabilization progress throughout Segments 6 and 11. Sites on Segments 6 and 11 are being reported as not being under any active construction and stabilized (hydroseed/planting/hydromulch). For Segment 6, 87 Change of Information (COIs) have been submitted for which Notices of Terminations (NOTs) were issued by the State Water Resources Control Board for removal from General Permit coverage due to stabilization criteria having been met, and for Segment 11, NOTs for the 34 sites have been issued (see Table 1). Open sites under caretaker status (sites that have yet to achieve stabilization specifications) are monitored monthly and COIs will be submitted once stabilization criteria have been met. Sites listed as pending COI are those for which COIs have been submitted to the Water Board for release of coverage under the SWPPP, but NOTs haven't yet been issued.

Table 1 – SWPPP Close Out Progress for Segments 6 and 11

	Segment 6A	Segment 6B	Segment 6C	Segment 6 Totals	Segment 11C*
Total Number of Sites	44	47	68	159	87
Total COI/NOT approved sites	8	30	49	87	34
Total caretaker sites	36	17	19	72	53
Total COI pending sites	6	0	0	6	0

*Sites located in Segments 11A and 11B have been released from SWPPP coverage.

2. Rainfall totals for the month of January were as follows: Segment 6A – 4.66", Segment 6B – 6.98", Segment 6C – 12.69", and Segment 11C – 8.75".
3. Pre- and post-storm SWPPP inspections took place in accessible areas (approximately 14% of the Segment 6 towers were inaccessible). BMP maintenance and repairs are being conducted by crews on a daily basis as weather conditions allow (see Figures 4–6).
4. Due to mudslides on Van Tassel Parkway, access to Segment 6C between Towers 85 and 113 is not possible. SCE is requesting a Variance to the USFS to allow use of alternate access roads and is investigating if SCE Operations and Maintenance can assist in clearing Van Tassel Parkway.

TRTP, Segments 7 and 8

1. On February 14, 2017, SCE provided a progress report detailing SWPPP installation and site stabilization progress throughout Segments 7 and 8 Phase 1 and 4. Sites on Segments 7 and 8 are being reported as not being under any active construction and stabilized (hydroseed/planting/hydromulch). For Seg-

ment 7, 78 COIs have been submitted for which NOTs were issued by the State Water Resources Control Board for removal from General Permit coverage due to stabilization criteria having been met, and for Segment 8 Phases 1 and 4, NOTs for the 144 sites have been issued (see Table 2). For Segment 7 there are 3 sites under caretaker status and for Segment 8 Overhead there are 25 (see Table 2); once these sites are stabilized, COI's will be submitted. Sites listed as pending COI are those for which COIs have been submitted to the Water Board for release of coverage under the SWPPP, but NOTs haven't yet been issued.

Table 2 – SWPPP Close Out Progress for Segments 7 and 8 Phases 1 and 4

	Segment 7	Segment 8 Phase 1*	Segment 8 Phase 4	Segment 8 Total
Total Number of Sites	81	68	101	169
Total COI/NOT approved sites	78	60	84	144
Total caretaker sites	3	8	17	25
Total COI pending sites	0	2	8	10

*Sites located in Segment 8 Phases 2 and 3 have been released from SWPPP coverage.

2. Rainfall totals for the month of January were as follows: Segment 7 – 12.69", Segment 8 Phase 4 – 8.75", and Segment 8 Phase 1 (includes Underground) – 9".
3. Pre and post-storm SWPPP inspections took place for the majority of the Segment 7 and 8 towers (approximately 2% of the Segment 7 towers were inaccessible). BMP maintenance and repairs are being conducted by crews on a daily basis as weather conditions allow (see Figures 7 and 8).

PROJECT PHOTOGRAPHS



Figure 1: Grading crews restoring access road near Tower 59 “give back area,” Segment 6.



Figure 2: Hydroseeding at Segment 8 Restoration Site 023. Photo courtesy of SCE.



Figure 3: Container plants installed and monitored at Aliso Helicopter Assembly Yard, Segment 11.



Figure 4: Off-site sedimentation and BMP failure observed at Tower 16, Segment 11.



Figure 5: Rilling, gully, and sediment buildup at Tower 6 before maintenance, Segment 6. Photo courtesy of SCE.



Figure 6: Tower 6 after BMP maintenance, Segment 6. Photo courtesy of SCE.



Figure 7: Erosion at Tower 45-T5, Segment 8 Overhead. Photo courtesy of SCE.



Figure 8: Erosion of access road at Tower 49-T2, Segment 8 Overhead. Photo courtesy of SCE.