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PROJECT MEMORANDUM

TEHACHAPI RENEWABLE TRANSMISSION PROJECT

To: John Boccio, CPUC Project Manager
From: Vida Strong, Aspen Project Manager
Date: March 28, 2017
Subject: TRTP Post-Construction Monthly Report #2, February 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 February 13 and 14, 2017.

Summary of Restoration Activities

Restoration activities conducted during February 2017 included the following:

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

1. 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.
2. A site visit was conducted on March 2, 2017, to review two parcels proposed by SCE to be used for mitigation for project impacts to Joshua tree and juniper woodland habitat on Segments 2 and 3a, and compensation for underperforming restoration sites on Segments 1, 2, and 3a. A formal proposal for the subject sites was submitted by SCE on March 15.

TRTP, Segments 6 and 11

3. Hydroseeding occurred at one site on Segment 6 and at 3 sites on Segment 11 (see Figures 1 and 2).
4. Weed abatement (hand pulling and herbicide use) occurred at 11 sites on Segment 6 and at 5 sites on Segment 11 (see Figure 3).
5. No container planting occurred on Segments 6 and 11 during the month of February. Container plant installation on the Angeles National Forest (ANF) was 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 10 species of plants tested. The USFS Supervisor issued a letter to SCE on March 9 stating that outplanting of container plants from one of SCE's contract nurseries would not be allowed because they present an unacceptable risk on environmental degradation to National Forest System lands due to the high likelihood of *Phytophthora* pathogen introductions. Container plants from two other nurseries will be allowed to be outplanted based on negative test results for the pathogen. For areas where container plants from the nursery of concern have already been outplanted, SCE will work with the USFS to implement a testing and monitoring protocol to detect and remediate any occurrence of the *Phytophthora* pathogens.

6. On February 24, SCE submitted the 2016 Annual Mitigation Monitoring Report for Restoration of TRTP Segments 6 and 11 Angeles National Forest.
7. On March 23, SCE notified CPUC that frequent rains and associated restriction days have pushed out installation planting outside the November–February planting window specified in the TRTP HMMP for Segments 6 and 11 Private Lands.

TRTP, Segments 7 and 8

1. Hydroseeding occurred at 13 restoration sites on Segment 8 Overhead (see Figure 4).
2. Weed abatement (hand pulling and herbicide use) occurred at 21 sites on Segment 8 Overhead (see Figure 5).
3. No container planting occurred on Segment 8 Overhead during the month of February; 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 was on hold temporarily while contracts with SCE's restoration contractor were renegotiated.
4. No restoration activities along the Segment 8 500 kV Underground right-of-way took place in February.
8. 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 request for additional information was submitted to SCE on March 21.
5. On March 10, SCE sent an email request to Aspen to substitute excess container plants that cannot be used on the Angeles National Forest (ANF) for shortages in required species on Segment 8. This request is currently under review.
6. On March 23, SCE notified CPUC that frequent rains and associated restriction days have pushed out installation planting outside the November–February planting window specified in the TRTP HMMP for Segments 7 and 8.
7. 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 April.

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

Monitoring was conducted at 23 total sites in February, including ANF lands, during the Plant Establishment Period (PEP). Due to inclement weather and poor road conditions, the monthly site visit for one hydroseed site was not completed in February. SCE reported the following results and observations of the sites surveyed during the month of February:

1. Across Segments 7 and 8, 7% 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). For Segments 6 and 11, 0% of sites monitored that were hydroseeded are in attainment of the native species cover success standard prescribed in the HRRP at this time.
2. Across Segments 7 and 8, 64% 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. For Segments 6 and 11, 0% of sites monitored that were hydroseeded are in attainment of the non-native annual species cover success standard prescribed in the HRRP.
3. Across Segments 7 and 8, 100% of the sites with container plants have an average container plant Health & Vigor rating of Fair, Good or Excellent.
4. Across Segments 7 and 8, 57% of the sites with container plant have a Survivorship average of 91–100%.
5. Across Segments 7 and 8, 100% of the sites with mitigation tree have an average tree Health & Vigor rating of Fair, Good or Excellent.
6. Across Segments 7 and 8, 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 March 24, 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 February were as follows: Segment 6A – 3.56", Segment 6B – 3.29", Segment 6C – 3.29", and Segment 11C – 3.95".

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.
4. Due to mudslides on Van Tassel Parkway, access to Segment 6C between Towers 85 and 113 is not possible. SCE has indicated that they will be 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 March 24, 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 Segment 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 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 February were as follows: Segment 7 – 3.79", Segment 8 Phase 4 – 4.02", and Segment 8 Phase 1 (includes Underground) – 3.5".
3. Pre- and post-storm SWPPP inspections took place for the Segment 7 and 8 disturbance areas still open under the SWPPP (see Figure 6). BMP maintenance and repairs are being conducted by crews on a daily basis as weather conditions allow.

PROJECT PHOTOGRAPHS



Figure 1: Rabbit Peak Helicopter Assembly Yard (HAY) entrance before hydroseeding. Photo courtesy of SCE.



Figure 2: Rabbit Peak HAY entrance after hydroseeding. Photo courtesy of SCE.



Figure 3: Weed abatement activities at Cheney Trail restoration site, Segment 11b.
Photo courtesy of SCE.



Figure 4: Hydroseeding at Restoration Site R035, Segment 8 Phase 4. Photo courtesy of SCE.



Figure 5: Herbicide application at Tower M58-T3, Segment 8 Phase 1.



Figure 6: Erosion of access road at Tower 49-T12, Segment 8 Overhead. Photo courtesy of SCE.