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PROJECT MEMORANDUM

TEHACHAPI RENEWABLE TRANSMISSION PROJECT

To: John Boccio, CPUC Project Manager
From: Vida Strong, Aspen Project Manager
Date: April 19, 2017
Subject: TRTP Post-Construction Monthly Report #3, March 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 site visits on March 14-15 and 27, 2017.

Summary of Restoration Activities

Restoration activities conducted during March 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 and approved by CPUC on March 29.

TRTP, Segments 6 and 11

3. Hydroseeding occurred at 2 sites on Segment 11.
4. Weed abatement (hand pulling and herbicide use) occurred at 22 sites on Segment 6 and at 15 sites on Segment 11 (see Figure 1).
5. Container planting during the month of March was limited to conifers and rare plants. Conifers were planted at Camp 16 on Segment 11 and rare plants were planted at three locations on Segments 6 and 11 (see Figure 2). Container plant installation on the Angeles National Forest (ANF) is limited to those allowed by the U.S. Forest Service (USFS) due to 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 14 restoration sites on Segment 8 Overhead (see Figures 3 and 4).
2. Weed abatement (hand pulling and herbicide use) occurred at 13 sites on Segment 8 Overhead and at one site on Segment 8 Underground.
3. Container planting occurred on Segment 8 Overhead at 3 locations during the month of March; all located within Whittier Narrows natural area (see Figure 5).
4. Restoration activities along the Segment 8 500 kV Underground right-of-way took place at Vault Cluster #2 (see Figure 6). SCE's restoration crews did not have time to install the irrigation system at this location due to the seasonal restriction of nesting least Bell's vireo. SCE has indicated that they will coordinate with USFWS and CDFG to determine if supplemental watering of the restoration area can occur during the nesting season.
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 of required plant species on Segment 8. Many of the requested substitute species were never tested for the *Phytophthora* pathogen; however, were grown at the same nursery where the problem was detected. One substitute plant species was tested and tested positive for a species of the pathogen. The CPUC issued a letter to SCE on April 7 outlining the concern of planting container plants grown for the Project possibly infecting surrounding restoration areas with *Phytophthora* pathogens. The CPUC directed SCE to prepare a notification disclosing the risk of container plant infection to the property owners of the restoration sites where container plants have been installed (or will be installed) along with a *Phytophthora* Monitoring and Mitigation Plan for approval by the CPUC and the property-owning entities.
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 was submitted to the CPUC on April 7.
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. SCE is currently conducting Annual Performance Monitoring of restoration sites and has indicated that some of the proposed sites may be recovered. SCE has proposed collecting more data to determine if some of the sites can be withdrawn from the exclusion request.

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

Monitoring was conducted at 32 total sites in March, including ANF lands, during the Plant Establishment Period (PEP). SCE reported the following results and observations of the sites surveyed during the month of March:

1. Across segments on private lands, 18% 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 the ANF portions of 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 on private lands, 54% 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 the ANF portions of Segments 6 and 11,, 50% of sites monitored that were hydroseeded are in attainment of the non-native annual species cover success standard prescribed in the HRRP. In addition, 100% of sites that were hydroseeded are supporting less than 5% non-native perennial species cover. Weed abatement is ongoing and will be prescribed accordingly for sites not meeting the success standards.
3. Across segments on private lands, 100% of the sites with container plants have an average container plant Health & Vigor rating of Fair, Good or Excellent.
4. Across segments on private lands, 29% of the sites with container plant have a Survivorship average of 91-100%.
5. Across segments on private lands, 100% of the sites with mitigation tree have an average tree Health & Vigor rating of Fair, Good or Excellent.
6. Across segments on private lands, 75% 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 April 17, 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	88
Total COI/NOT approved sites	8	30	49	87	34
Total caretaker sites	36	17	19	72	54
Total COI pending sites	7	0	0	7	3

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

- Rainfall totals for the month of March were as follows: Segment 6 – 0.18” and Segment 11C – 0.20”.
- 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.
- Due to mudslides on Van Tassel Parkway, access to Segment 6C between Towers 85 and 113 is not possible using project approved access roads. SCE has received approval to access these areas using the Monrovia Truck Trail. SCE has installed a wash station at White Saddle to help prevent the spread of noxious weeds.

TRTP, Segments 7 and 8

- 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	72	101	173
Total COI/NOT approved sites	78	66	84	150
Total caretaker sites	6	6	8	14
Total COI pending sites	0	0	0	0

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

- Rainfall totals for the month of March were as follows: Segment 7 – 0.22”, Segment 8 Phase 4 – 0.29”, and Segment 8 Phase 1 (includes Underground) – 0.32”.
- Pre- and post-storm SWPPP inspections took place for the Segment 7 and 8 disturbance areas still open under the SWPPP. BMP maintenance and repairs are being conducted by crews on a daily basis as weather conditions allow (see Figure 7).

PROJECT PHOTOGRAPHS



Figure 1: Pull Site 28/29 after BMP maintenance, Segment 6.



Figure 2: Special-status species planting at Restoration Site R015, Segment 6. Photo courtesy of SCE.



Figure 3: Restoration Site R003 before weed abatement activities, Segment 8. Photo courtesy of SCE.



Figure 4: Restoration Site R003 after weed abatement and hydroseed activities, Segment 8. Photo courtesy of SCE.



Figure 5: Container plant installation at Restoration Site R0006, Whittier Narrows, Segment 8.



Figure 6: Restoration crews install container plants and cuttings at Restoration Site RUG 04, Segment 8 Underground.



Figure 7: BMP maintenance and repair near Vault Cluster #3, Segment 8 Underground.