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PROJECT MEMORANDUM

TEHACHAPI RENEWABLE TRANSMISSION PROJECT

To: John Boccio, CPUC Project Manager
From: Vida Strong, Aspen Project Manager
Date: June 16, 2017
Subject: TRTP Post-Construction Monthly Report #4, April 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.

Summary of Restoration Activities

Restoration activities conducted during April 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. On May 16, a meeting was held by CPUC/Aspen with SCE to discuss final permanent impact acreages by habitat type and required off site mitigation land acquisition, and the status of acquisition.

TRTP, Segments 6 and 11

3. Hydroseeding occurred at one site on Segment 11.
4. Weed abatement (hand pulling and herbicide use) continued on Segments 6 and 11.
5. Container planting during the month of April, conifers and rare plants, was completed at Camp 16 and Segment 11, Tower 63 (see Figures 1-2). 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.

TRTP, Segments 7 and 8

1. Hydroseeding occurred at 3 restoration sites on Segment 8 Overhead (see Figure 3).
2. Weed abatement (hand pulling and herbicide use) continued at sites on Segment 8.
3. Container planting occurred on Segment 8 Overhead during the month of April (see Figure 4).
4. SCE received clarification from USFWS and USFS that supplemental watering would be allowed during the covered species nesting season under existing TRTP Biological Opinion on May 22, 2017.
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. 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 and was approved on April 18.
7. 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 24 total sites in April, including ANF lands, during the Plant Establishment Period (PEP). SCE reported the following results and observations of the sites surveyed during the month of April:

1. Across segments on private lands, 22% 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, 41% 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, 0% 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, 17% 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, 67% 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 June 12, 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, 84 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 37 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	43	46	65	154	88
Total COI/NOT approved sites	8	29	47	84	37
Total caretaker sites	36	13	0	49	51
Total COI pending sites	24	4	18	46	14

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

2. Rainfall totals for the month of April were as follows: Segment 6 – 0.0” and Segment 11C – 0.0”.
3. Pre- and post-storm SWPPP inspections took place. BMP maintenance and repairs are being conducted by crews on a daily basis as weather conditions allow.

TRTP, Segments 7 and 8

1. On June 12, 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 159 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	100	173
Total COI/NOT approved sites	78	66	93	159
Total caretaker sites	0	2	0	2
Total COI pending sites	3	4	7	14

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

2. Rainfall totals for the month of April were as follows: Segment 7 – 0.08”, Segment 8 Phase 4 – 0.03”, and Segment 8 Phase 1 (includes Underground) – 0.12”.
3. 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.

PROJECT PHOTOGRAPHS



Figure 1: Segment 11 restoration site R47 before container plants were installed. Photo courtesy of SCE.



Figure 2: Segment 11 restoration site R47 after container plants were installed. Photo courtesy of SCE.



Figure 3: Segment 8 restoration Site R27 during hydroseeding activities. Photo courtesy of SCE.



Figure 4: Container planting at restoration site R21, Segment 8. Photo courtesy of SCE.