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PROJECT MEMORANDUM

TEHACHAPI RENEWABLE TRANSMISSION PROJECT

To: John Boccio, CPUC Project Manager **From:** Vida Strong, Aspen Project Manager

Date: September 20, 2017

Subject: TRTP Post-Construction Monthly Report #7, August 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, SWPPP Inspections, and BMP maintenance will continue until each site has met final success criteria.

Summary of Restoration Activities

Restoration activities conducted during August 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, 2017.
- 2. On May 16, 2017, 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. No hydroseeding or container planting took place in August.
- 4. Removal of BMPs at sites that have met SWPPP requirements, BMP maintenance, and weed abatement (hand pulling and herbicide use) continued on Segments 6 and 11 (see Figure 1).
- 5. Watering and irrigation system maintenance was performed according to the HMMP schedule and adjusted based upon weather events as needed.
- 6. 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 *Phytopthora 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 *Phytopthora* 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 *Phytopthora* 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 *Phytopthora 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

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degradation to National Forest System lands due to the high likelihood of *Pytophthora* 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 *Phytopthora* pathogens.

TRTP, Segments 7 and 8

- 1. No hydroseeding or container planting took place in August.
- 2. Weed abatement (hand pulling and herbicide use) continued at sites on Segment 7 and 8 (see Figures 2 and 3).
- 3. On March 10, 2017, 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, 2017, 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.
- 4. 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, 2017. 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)

As conditioned in the Habitat Mitigation and Monitoring Plans Segments 6 and 11 Private Lands, and the Segments 7 and 8, SCE submitted the Annual Mitigation and Monitoring Report (AMMR) for 2017 on August 25, 2017. This report describes overall restoration activities conducted during the 2016/2017 Monitoring Year, and presents the performance of Habitat Restoration Sites in both Year 1 and Year 2. This report is under review.

Monitoring was conducted at 27 total sites in August, including ANF lands, during the Plant Establishment Period (PEP). SCE reported the following results and observations of the sites surveyed during the month of June:

- 1. Across segments on private lands, 50% 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, 100% 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, 50% 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. On ANF 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, 63% of the sites with container plants have a Survivorship average of 91-100%. On ANF lands, 100% of the sites with container plants have a Survivorship average above 91%.
- 5. Across segments on private lands, 64% of the sites with mitigation trees have an average tree Health & Vigor rating of Fair, Good or Excellent.
- 6. Across segments on private lands, 45% of the sites with mitigation trees have an average tree Survivorship of 91-100%. On ANF lands, 100% of the sites with mitigation trees have an average tree Survivorship of 91-100%.

Summary of SWPPP Compliance

TRTP, Segments 6/11 and Segments 7/8

1. On September 14, 2017, SCE provided the SWPPP summary detailed in Table 1 below.

Table 1 - TRTP 2017 SWPPP Close Out Progress

| Table 1 - TNTF 2017 SWPFF Close Out Flogress | | | | |
|--|---|---|---|---|
| Segment | Total Size of Construction Area (acres) | Area Remaining under Permit Coverage (acres) (Current) | Phase 2: Area Remaining under Permit Coverage (acres) (Upon approval of COIs) | Number of Work Areas to Remain under Permit Coverage |
| Work Package 2 | | | | |
| 6A (within ANF) | 133 | 9.6 | 2.1 (In Development) | 4 |
| Vincent South | 38 | 0 | | |
| 6B (within ANF) | 112 | 52.4 | 40.2 (In Development) | 7 |
| 6C (within ANF) | 116 | 0 | 0 (NOT was Submitted) | |
| 11C (within ANF) | 355 | 83.1 | 30.4 (COI drafted for 52.7 acres) | 13 |
| Work Package 3 | | | | |
| 7 | 165 | 0 | 0 | |
| 8 Phase 1 (Chino Hills Underground) | 175 | 1.75 | 0 Notice of Termination prepared and under review by SCE (not submitted yet) | |
| 8 Phase IV | 211 | 0 | 0 (NOT was Submitted) | |
| Total | 1,305 | 146.8 | 72.7 (Reduction of 74.1 acres) | 24 |

- 2. Rainfall totals for the months of August were as follows: Segment 6-0.23", Segment 11C-0.23", Segment 7-0.00", Segment 8-0.04".
- 3. Pre- and post-storm SWPPP inspections took place. BMP maintenance and repairs are being conducted by crews on an as needed basis as weather conditions allow.

PROJECT PHOTOGRAPHS



Figure 1: Weed abatement at Restoration Site R 136, Segment 6. Photo courtesy of SCE.



Figure 2: Weed abatement at Restoration Site 03, Segment 7. Photo courtesy of SCE.



Figure 3: Overview after weed abatement at Restoration Site 03, Segment 7. Photo courtesy of SCE.