PUBLIC UTILITIES COMMISSION
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January 4, 2021

Alex Gutierrez
Regulatory Affairs
Southern California Edison
8631 Rush St, General Office 4 – 235E (2nd Floor)
Rosemead, CA, 91770

RE: West of Devers Upgrade Project: Minor Project Refinement #43

Dear Mr. Gutierrez,

On December 17, 2020, Southern California Edison (SCE) submitted a request for Minor Project Refinement (MPR) #43 for the replacement of several McCarthy drains, the installation of a retaining wall, and for two permanent nest platforms. The additional work areas are located in Segments 2, 3, and 4, and are located on private lands in the cities of Grand Terrace, Loma Linda, Calimesa, and Banning, in Riverside and San Bernardino Counties. The additional work areas would support transmission line activities approved under the California Public Utilities Commission (CPUC) Notice to Proceed (NTP) #4, September 5, 2017, for the West of Devers Upgrade Project in the County of Riverside, California.

The CPUC voted on August 18, 2016 to approve SCE's West of Devers Upgrade Project (Decision D.16-08-017) and a Notice of Determination was submitted to the State Clearinghouse (SCH# 2014051041). The CPUC also adopted a Mitigation, Monitoring, Compliance and Reporting Plan (MMCRP) to ensure compliance with all mitigation measures imposed on the West of Devers Upgrade Project during implementation. The MMCRP also acknowledges that temporary changes to the project, such as final project design and engineering or need for addition workspace, are anticipated and common practice for construction efforts of this scale and that an MPR request would be required for these activities. This letter documents the CPUC's thorough evaluation of all activities covered in this MPR, and that no new impacts or increase in impact severity would result from the requested MPR activities.

MPRs are reviewed for consistency with CEQA requirements and are located within the geographic boundary of the project study area. MPRs do not create new or substantially more severe significant impacts, or conflict with any mitigation measure or applicable law or policy. Also, they do not trigger other permit requirements unless the appropriate agency has approved the change, and clearly and strictly comply with the intent of the mitigation measure or applicable law or policy.

MPR #43 for additional work areas for the replacement of several McCarthy drains, the installation of a retaining wall, and for two permanent nest platforms to support construction activities (approved under NTP #4) is granted by CPUC based on the factors described below.

SCE MPR Request. Excerpts from the SCE MPR request are presented below (indented):

> **WA-2-2N28-NestPlatform-MPR-43**
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> WA-2-2N28-NestPlatform-MPR-43 will permanently leave in place the artificial nest stand previously approved in MPR #33 (WA-2-2N28-NestStand-MPR-33) to provide a temporary alternate nesting substrate for Red-tailed Hawk (Buteo jamaicensis) FRED Nest Event 000499, located approximately 100 feet southeast of 2N28, in an existing SCE tower structure. The existing tower structure, on which the nest platform is located, is

associated with the existing SCE 115-kV Moreno-Moval-Vista circuit and associated O&M work area. The nest stand platform was approved on 1/9/20 as a suitable alternative nesting location, which will not be adversely affected by active construction or operational activities associated with the SCE right-of-way.

The nest platform was constructed of materials and methods consistent with those described in the West of Devers (WOD) Nesting Bird Management Plan (NBMP), in accordance with the WOD Mitigation Monitoring Compliance and Reporting Program. The nest platform is located within the existing SCE 115-kV ROW, approximately 25 feet southwest of the existing WOD 500-kV SCE ROW. The nest platform will be left in place for future nesting upon project completion and be maintained by SCE O&M crews.

The nest stand location and access road are located on property owned by the City of Grand Terrace within SCE's existing right-of-way. No additional work space or construction impacts will be required at the location.

MAC-2X17-1-MPR-43, MAC-2-2X17-2-MPR-43, and MAC-2-2X17-3-MPR-43

The proposed work within and around existing SWA-2-2N17 in Supersite 2X17 includes the removal of three existing nonProject related McCarthy Drains and replacement of two of the McCarthy Drains to better capture and divert surface flow from the access roads. The southernmost drain (MAC-2-2X17-2-MPR-43) will be removed and replaced in the same location. The existing drain located within SWA-2-2N17 will be removed, restored, and relocated to the northeast (MAC-2-2X17-3-MPR-43) along the access road in SWA-2-2N17. The existing northernmost drain will be removed, restored, and require a 0.006 acre expansion of Supersite 2X17 complete the work at MAC-2-2X17-1-MPR-43.

The removal and replacement of McCarthy Drains will consist of a combined net increase in temporary impacts of approximately 0.036 acre consisting of 0.023 acre of coastal sage scrub and 0.013 acre of developed/disturbed land. The new work areas are located on private property within the WOD 500-kV SCE ROW utility corridor.

SWA-2-2N12-2-MPR-43, RW-2-2N12-1-MPR-43, GL-2-2N12-1-MPR-43, MAC-2-2X12-2-MPR-43; MAC-2-2X11- 1-MPR-43

A new 0.40 acre temporary work area (SWA-2-2N12-2-MPR-43) is required to construct a 0.0006 acre retaining wall (RW2-2N12-1-MPR-43), associated 0.11 acre access road expansion (GL-2-2N12-1-MPR-43), and mac drain relocation (MAC2-2X12-2-MPR-43). MAC-2-2X12-2-MPR-43 was originally designed in the location where the retaining wall construction is required, and will therefore be relocated to the west to provide additional surface flow relief on the access road outside of the retaining wall construction. Approximately 0.11 acre surrounding the access road will be graded to complete the construction and better divert surface flows to the McCarthy Drains.

A new McCarthy Drain is proposed within Supersite 2X11 to provide surface flow relief from the tower pad. The proposed McCarthy Drain will be installed on the northeastern side of the tower pad. No new work area is required for the installation.

The proposed work area within SWA-2-2N12-2-MPR-43 will result in a combined net increase in disturbance impacts of approximately 0.52 acre on private property located within the WOD 500-kV SCE ROW utility corridor, consisting of 0.082 acre coastal sage scrub, .116 acre grassland/forbland, and 0.322 acre of developed/disturbed land.

MAC-2-2X04-1-MPR-43 and MAC-2-2X04-2-MPR-43

Two new McCarthy Drains are required in Supersite 2X04 to capture and divert surface flows from the 2N04 tower pad to the west and from the access road to the immediate north. MAC-2-2X04-1-MPR-43 will be installed approximately 30 feet north of 2N04 and will run from the tower pad in a northwesterly direction.

MAC-2-2X04-2-MPR-43 will be installed on the north side of the access road approximately 150 feet northeast of 2N04 and will run in a northerly direction to an area of lower elevation. The two new McCarthy Drain will discharge to uplands.

Both work areas are located entirely within existing Supersite 2X04 and will not result in an increase in temporary impacts. The features will result in a net increase in permanent impacts of approximately 0.006 acre of public property in the previously approved work area owned by the City of Loma Linda consisting of grassland forbland.

WSS-3-3X06-1-NestStand-MPR-43

WSS-3-3X06-1-NestStand-MPR-43 will permanently leave in place the existing artificial nest stand previously built in the approved work area to provide a temporary alternate nesting substrate for Red-tailed Hawk (Buteo jamaicensis) FRED Nest Event 000507, located on the western perimeter of wire site WSS-3-3X06-1 in existing Supersite 3X06-07. The previously constructed wooden nest stand does not support electrical equipment or components. The nest stand structure site is a suitable alternative nesting location, which will not be adversely affected by active construction or operational activities associated with the right-of-way.

The nest platform was constructed of materials and methods consistent with those described in the West of Devers (WOD) Nesting Bird Management Plan (NBMP) and in accordance with the WOD Mitigation Monitoring Compliance and Reporting Program. The nest platform will be left in place for future nesting upon project completion and maintained by SCE O&M crews.

The existing nest stand location is located entirely within the WOD 500-kV SCE ROW, within the Norton Younglove Reserve, and on property owned by the Riverside County Regional Park & Open Space District. The feature consists of a permanent impact of approximately 0.0001 acre. No additional workspace or construction will be required at the existing nest stand.

MAC-4-N-4X12-3-MPR-43, MAC-4-N-4X12-4-MPR-43

Two planned McCarthy Drains along the utility access roads approximately 1,000 feet northwest of 4N12 (MAC-4X12-2- N) and 620 feet northeast of 4N12 (MAC-4X12-2-E) will be eliminated from the final design and replaced with the two proposed McCarthy Drains shown adjacent to MAC-4X12-2-N, positioned to better capture and divert flows off the access road to adjacent uplands.

The relocated drains are located along the existing SCE utility access road. As redesigned, the proposed features are of equal vegetation impact to the originally designed locations, and therefore offset each other, resulting in no additional temporary or permanent project impacts.

MAC-4-S-4X05-2-MPR-43

McCarthy Drain MAC-4X05-2-S will be eliminated from the final project design and relocated with McCarthy Drain MAC4-S-4X05-2-MPR-43, located approximately 140 feet to the southwest, along the southeastern edge of the existing access road, to better capture and divert surface flows from the access road.

The relocated drain is located along the existing SCE utility access road. As redesigned, the proposed feature is of equal vegetation impact to the originally designed location, and therefore offset by the original drain, resulting in no additional temporary or permanent project impacts.

SWA-4-PP123353-2-MPR-43, SWA-4-PP-123353-3-MPR-43

A new temporary 0.24 acre work area adjacent to the northwest side of Supersite PP123353 is required to safely stage material and equipment during wire wreck-out activities associated with PP#123353.

A new temporary 0.1 acre work area adjacent to the east side of Supersite PP123353 is required to safely stage material and equipment during wire wreck-out activities associated with PP#123353.

The new temporary work areas will result in approximately 0.34 acres of temporarily impacted public property owned by the City of Banning and consisting of 0.237 acre of desert scrub, 0.082 acre of grassland/forbland, and 0.021 acre developed disturbed land.

MAC-4X03-2-NE

McCarthy drain MAC-4X03-1-NE has been eliminated from the final design. In addition, the design of MAC-4X03-2-NE (located approximately 660 feet northeast of 4N03) will be shifted approximately 2 feet northwest and tied into the existing roadside berm.

The elimination of MAC-4X03-1-NE and design shift for MAC-4X03-2-NE will result in a reduction of temporary impacts by approximately 0.03 acre and reduction of permanent impacts by approximately 0.003 acres. Impacts to jurisdictional waters associated with MAC-4X03-2-NE were previously permitted as described in the jurisdictional waters section below. The previously permitted drainage impact is located along the existing SCE utility access road.

CPUC Evaluation of MPR Request

In accordance with the MMCRP, the subject MPR request was reviewed by CPUC to confirm that no new impacts or increase in impact severity would result from the requested MPR activities and that the subject request was within the geographic boundary of the Project study area. Additionally, the CPUC Environmental Monitor (EM) conducted a site visit of the requested work area on December 21, 2020. The following discussion summarizes this analysis for agriculture, air quality, biological resources, cultural resources, geology and soils, hazards and hazardous materials, land use, noise, paleontological resources, traffic and transportation, visual resources, water resources, and wildland fire. A list of bulleted conditions is presented to define additional information and clarifications regarding mitigation requirements. In some cases, these items exceed the requirements of the Mitigation Measures (MMs) and Applicant Proposed Measures (APMs) and are based on specific site conditions and/or are proposed conditions by SCE.

Agriculture: No Important Farmland is located within the proposed MPR work areas.

Air Quality: During proposed construction, SCE shall implement the Fugitive Dust Control Plan approved by the CPUC on May 22, 2017, as well as the Exhaust Emissions Control Plan approved by CPUC on June 8, 2017. In addition, in compliance with MM AQ-1b, off-road equipment with engines larger than 50 horsepower shall have engines that meet or exceed U.S. EPA/CARB Tier 3 Emissions Standards. No additional impacts to air quality will occur with the implementation of this MPR.

Biological Resources: SCE submitted biological resource survey information with the MPR request. SCE conducted a desktop analysis using aerial imagery, publicly available data, and project biological data. The proposed work areas were covered during previous surveys.

Desert Tortoise (DETO): The new work areas are not located within the range of desert tortoise; therefore, no impacts to DETO are anticipated.

Special-Status Terrestrial Herpetofauna: No special-status terrestrial herpetofauna have been observed within the new work areas during project related surveys. However, a red diamond rattlesnake was observed approximately 300 feet northwest of SWA-2-2X12-2-MPR-43 (FRED Species Event 000586) and approximately 300 feet southwest of MAC-4X03-2-NE (FRED Species Event 000520). With biological monitoring and implementation of project mitigation measures, no impacts are anticipated.

Burrowing Owl (BUOW): Burrowing owl habitat is widespread in the Project area. Burrowing owls only have a moderate potential to occur within 500 feet of the work areas associated with the locations surveyed. No owl buffers intersect the new work areas. Active owl burrows observed during preconstruction surveys and during construction will be mitigated in accordance with the Burrowing Owl Management and Passive Relocation Plan. With implementation of mitigation measures, including appropriate avoidance buffers and biological monitoring during construction, no impacts to burrowing owls are anticipated.

Nesting Birds: Suitable substrates for nesting birds protected by the Migratory Bird Treaty Act and California Fish and Game Code, including transmission structures, trees, shrubs, and the ground surface, are located throughout the Project right-of-way. Observations of special-status bird species (red-tailed Hawk, Cooper's hawk, and loggerhead shrike) have been made in the vicinity of the new work areas. However, the observations were ephemeral and are not associated with active nests.

Preconstruction surveys, including surveys for nesting birds will be conducted during the avian breeding season (Jan 1 – Aug 31) prior to the initiation of construction in the new work areas. If active nests are identified, avoidance buffers will be established in accordance with the Nesting Bird Management Plan. With implementation of mitigation measures, including appropriate avoidance buffers and biological monitoring during construction, no impacts to nesting birds are anticipated.

WA-2-2N28-NestPlatform-MPR-43: A red-tailed hawk (RTHA) (Buteo jamaicensis) nest was relocated to the nest stand on January 9, 2020. The nest height provides a visual and acoustic buffer to ground sites below the nest. FRED Nest Event 000499 is currently inactive.

WSS-3-3X06-1-NestStand-MPR-43: An RTHA nest was observed on February 4, 2020, utilizing the nest stand. The nest height provides a visual and acoustic buffer to ground sites below the nest. FRED Nest Event 000507 successfully fledged on May 15, 2020 and is currently inactive. With implementation of nesting bird surveys during nesting season and project mitigation measures, no impacts are anticipated.

Listed Riparian Birds: Suitable habitat for riparian birds (least Bell's vireo [LBVI]/Southwestern willow flycatcher [SWFL]) is mapped approximately 335 feet northeast of MAC-4-S-4X05-2-MPR-43. No LBVI or territorial SWFL were detected in this habitat stand during 2020 protocol surveys. If active LBVI or SWFL nests are identified later within 500 feet of construction activities, avoidance buffers will be established and the nest monitored according to the Wildlife Noise Monitoring Plan.

The remaining MPR 43 components are not located within 500-feet of listed riparian birds. With implementation of nesting bird surveys during nesting season and project mitigation measures, no impacts are anticipated.

Coastal California Gnatcatcher (CAGN): The following work areas are located within mapped USFWS-designated Critical Habitat Unit 10 for coastal California gnatcatcher (CAGN): WA-2-2N28-NestPlatform-MPR-43; MAC-2-2X17-1-MPR-43, MAC-2-2X17-2-MPR43, and MAC-2-2X17-3-MPR-43; SWA-2-2N12-2-MPR-43, GL-2-2N12-1-MPR-43, RW-2-2N12-1-MPR-43, and MAC-2-2X12-2-MPR-43; MAC-2-2X11-1-MPR-43. No additional work is required at the existing nest stand in WA-2-2N28-NestPlatform-MPR-43; therefore, no impacts to CAGN are expected in this location. Mapped suitable habitat for CAGN is located approximately 300 feet north of MAC-2-2X11-1-MPR-43 and approximately 160 feet east of MAC-2-2X04-1-MPR-43 and MAC-2-2X04-2-MPR-43. Focused surveys for CAGN were conducted in March and April 2018. No CAGN were detected in Segment 2. Due to a history of subsequently negative CAGN survey results in the area, no impacts to CAGN are anticipated and the Project area in San Bernardino County is considered unoccupied by CAGN at this time. To offset additional impacts to Critical Habitat subject to mitigation, the area north of 2N16 (also located in critical CAGN habitat), will not be used for construction. The offset areas will be removed from the Project data upon approval of this MPR.

Mapped suitable habitat for CAGN overlaps a small portion of MAC-4-S-4X05-2-MPR-43 and approximately 375 feet southeast of SWA-4-PP-123353-3-MPR-43; however, CAGN is a covered species in the WR-MSHCP. Protocol surveys in this area occurred in March, April, and May of 2018. No CAGN were observed within these areas during 2018 protocol surveys. Furthermore, no CAGN were detected within CAGN habitat during the July 2019 survey. If active CAGN nests or breeding territories are identified later within 500 feet of construction activities, avoidance buffers will be established, and the nest monitored according to the Wildlife Noise Monitoring Plan.

No suitable habitat for CAGN occurs within 500 feet of the other proposed MPR work areas. Therefore, no impacts are anticipated with implementation of preconstruction surveys and mitigation measures.

Golden Eagle (GOEA): Based on aerial habitat assessments and protocol surveys conducted for the Project, no suitable nesting habitat for golden eagles is located within 2 miles of the new work areas. Protocol aerial surveys conducted for the project in 2019 also showed no golden eagle nests within 2 miles of the new work areas. Therefore, no impacts are anticipated.

Stephen's Kangaroo Rat (SKR): WSS-3-3X06-1-NestStand-MPR-43: Areas of suitable habitat for Stephens' kangaroo rat (SKR) are mapped within supersite 3X06-07. A habitat assessment, pedestrian surveys, and trapping surveys were conducted in Segment 3 as recent as last trapping season in 2018. No SKR were captured. Based on a lack of historic data, habitat conditions, and negative results over several years of surveys, SKR are not expected. Furthermore, the existing nest stand will not require construction and maintenance will be performed on an as-needed basis. Therefore, no impacts to SKR are anticipated.

The remaining MPR 43 components are not located within the range of the species, therefore no impact to SKR are anticipated.

Special-Status Bats: No suitable bat roosting habitat or buffers occur within the proposed work areas; therefore, no impacts to special-status bats are anticipated.

Special-Status Small Mammals: SWA-4-PP-123353-3-MPR-43: Los Angeles Pocket Mouse (LAPM) Suitable Habitat is located approximately 40 feet east of SWA-4-PP-123353-3-MPR-43, across Bluff Street. However, the new work areas do not intersect LAPM habitat. A habitat assessment, pedestrian surveys, and several consecutive years of trapping surveys have been conducted within the LAPM suitable habitat areas of the Project. No LAPM were captured during trapping. Based on a lack of historic data, habitat conditions, and negative results over several years of surveys, LAPM are not expected in the project area. With implementation of mitigation measures and biological monitoring during construction, no impacts to LAPM are anticipated. If the species is found, potential impacts will be addressed in accordance with the Small Mammals Avoidance and Minimization Plan.

Special-Status Plants: Mac-4-4X12-3-MPR-43, Mac-4-4X12-4-MPR-43: Plummer's mariposa lily (Calochortus plummerae; CRPR 4.2) plants have been identified in several locations along the access roads between supersites 4X12 and 4X14. During the July 2019 surveys, no special-status plants were observed within the survey area. If special-status plants are later identified during clearance sweeps/monitoring, they will be avoided to the extent feasible. Unavoidable impacts to special-status plants will be addressed in accordance with the Special-status Plant Salvage and Relocation Plan.

SWA-4-PP123353-2-MPR-43, SWA-4-PP-123353-3-MPR-43: Plummer's mariposa lily (Calochortus plummerae; CRPR 4.2) plants have been previously identified approximately 600-feet south west of the new work areas, across an access road, on the opposite side of the cemetery (FRED Habitat Events: 000049, 000050 and 000051) Because Plummer's mariposa lily is a CRPR 4 ranked species no soil salvage

or transplantation is required. Yucaipa onion (Allium marvinii; CRPR 1B.2) occupied habitat overlaps the PP123352 supersite areas as well. Seed collection for Yucaipa onion was conducted in 2018 in accordance with the Special-status Plant Salvage and Relocation Plan to address impacts to these populations of Yucaipa onion. The proximity of this area from the new work areas poses no threat to the plants.

MAC-4-NE-4X03-2: Historical occurrences of Yucaipa onion (Allium marvinii; CRPR 1B.2) are mapped southwest of the work area. Occupied habitat for Yucaipa onion is located approximately 110 feet southwest of MAC-4- NE-4X03-2. Seed collection for Yucaipa onion was conducted in 2018 in accordance with the Special-status Plant Salvage and Relocation Plan to address impacts to these populations of Yucaipa onion. The work area does not intersect the area; therefore, the plants will be avoided.

The remaining MPR 43 components are not anticipated to impact special-status plants.

Regulated Trees: No tree trimming or removal is required for construction activities within the proposed work areas. Therefore, no impacts are anticipated.

Jurisdictional Waters: SWA-2-2N12-2-MPR-43: Non-wetland feature 2057.1 intersects the easternmost McCarthy drain shown within SWA-2-2N12-2-MPR-43. Figure 2 illustrates that 168 square feet of temporary impacts and 12 square feet of permanent impacts are permitted for this water feature. No non-permitted impacts to jurisdictional features are anticipated.

MAC-4-NE-4X03-2: Non-wetland feature 4106.4 intersects MAC-4X03-2-NE. Figure 3 illustrates that 157 square feet of temporary impacts and 2 square feet of permanent impacts are permitted for this water feature. No nonpermitted impacts to jurisdictional features are anticipated. The remaining MPR 43 components do not intersect jurisdictional waters.

Cultural Resources: The proposed work areas are located within the WOD APE and were covered within the record search data that was conducted during previous WOD surveys and studies West of Devers: Cultural Resources Assessment and Class III Inventory (LSA, 2013) and Area of Potential Effects for the Engineering Refinements Survey and Recommendation of Eligibility for Cultural Resources with Southern California Edison Company's West of Devers Project (ASM, 2015). The record search and survey results for the area were negative for cultural resources.

Geology and Soils: SCE conducted geotechnical studies to evaluate faults, landslides and unstable slopes, and soil characteristics as outlined in MMs G-1a, G-2a, and G-5a. The geotechnical survey reports were reviewed and approved by the CPUC on August 17, 2017. No additional impacts to geology and soils will occur with the implementation of this MPR.

Hazards and Hazardous Materials: As required by MM HH-1a, SCE prepared and submitted a Hazardous Materials and Waste Management Plan to the CPUC on September 27, 2017. Hazardous materials used and stored on site for the duration of construction activities will be managed according to the Plan. A Soil Management Plan has been developed consistent with MMs HH-2a and HH-3a to provide guidance for the proper handling, onsite management, and disposal of impacted soil that might be encountered during construction activities, including soil samples to be collected in construction areas where the land has historically or is currently being used for agriculture and would be subject to ground disturbance by the Project. SCE's Soil Management Plan was combined with the Hazardous Materials and Waste Management Plan described above. Also, SCE's contractor submitted information including written procedures for fueling and maintenance of construction equipment and an Emergency Response Plan. No additional impacts from hazards or hazardous materials will occur with the implementation of this MPR.

Land Use: As required by MM LU-1a, a Construction Notification Plan was prepared by SCE and approved by CPUC on May 22, 2017. The Plan identified the procedures to ensure that SCE will inform property and

business owners of the location and duration of construction. The Plan includes provisions for public noticing including mailers, newspaper advertisements, public venue notices, and includes the establishment of a public liaison and toll-free information hotline. No additional impacts to land use will occur with the implementation of this MPR.

Noise: BMPs for construction noise management will be implemented as outlined in MM N-1a to reduce construction noise exposure at noise-sensitive receptors and to avoid possible violations of local rules, standards, and ordinances during construction. Construction noise shall be confined to daytime, weekday hours (7:00 a.m. to 6:00 p.m.) or an alternative schedule developed by SCE based on its coordination with the local jurisdiction(s). Construction traffic and helicopter flights shall be routed away from residences and schools, where feasible. No additional impacts to noise will occur with the implementation of this MPR.

Paleontological Resources: The WOD Paleontological Resources Mitigation and Monitoring Plan (PRMMP) requires full-time, qualified paleontological construction monitoring in areas determined to have moderate (PFYC 3) to very high (PFYC 5) sensitivity. Sediments of unknown (PFYC U) sensitivity shall be monitored by a qualified paleontological monitor on a part-time basis and geologic units with very low (PFYC 1) or low (PFYC 2) sensitivity may be spot checked to confirm paleontological sensitivity.

Proposed work areas WSS-3-3X06-1-NestStand-MPR-43, SWA-4-PP123353-2-MPR-43, and SWA-4-PP-123353-3- MPR-43 are located in areas of low paleontological sensitivity; therefore, the sites will be spot checked on a regular basis to confirm paleontological sensitivity.

Proposed work areas Mac-4-4X12-4-MPR-43 and MAC-4-S-4X05-2-MPR-43 are located within an area of moderate PFYC 3 paleontological sensitivity; therefore, the site requires full-time, qualified paleontological construction monitoring if holes larger than 2-feet in diameter are drilled or if grading is required:

Proposed work areas WA-2-2N28-NestPlatform-MPR-43, MAC-2-2X17-1-MPR-43, MAC-2-2X17-2-MPR-43, MAC-2-2x17-3-MPR-43, SWA-2-2N12-2-MPR-43, GL-2-2N12-1-MPR-43, RW-2- 2N12-1-MPR-43, MAC-2-2X12-2-MPR-43; MAC-2-2X11-1-MPR-43, MAC-2-2X04-1-MPR-43, MAC-2-2X04-2-MPR-43, Mac-4-4X12-3-MPR-43, and MAC-4-NE-4X03-2-NE are located within areas of very high PFYC 5 paleontological sensitivity; therefore, the site requires full-time, qualified paleontological construction monitoring if holes larger than 2-feet in diameter are drilled or if grading is required.

Traffic and Transportation: Consistent with MM T-1a and MM T-1b, Construction Transportation and Traffic Control Plans have been developed and approved. The Construction Transportation Plan describes timing of commutes, methods of reducing crew-related traffic, and other methods for reducing construction-generated additional traffic on regional and local roadways. No additional impacts to traffic and transportation will occur with the implementation of this MPR.

Visual Resources: The proposed additional work areas described in this MPR are no different than what was described in NTP #4. No additional impacts to visual resources will occur with the implementation of this MPR.

Water Resources: As required by MM WR-2a, SCE developed and submitted an Erosion Control Plan to the CPUC and BLM. The Erosion Control Plan was incorporated into the SWPPP, which is kept onsite and readily available on request. SCE submitted the SWPPP to the CPUC on May 25, 2017. Any changes necessitated by this MPR will be incorporated into the SWPPP document. No additional impacts to water resources will occur with the implementation of this MPR.

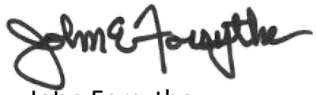
Wildland Fire: SCE submitted a Fire Management Plan on February 10, 2017 to satisfy the conditions of MM WF-1a and the Plan was approved by the CPUC on July 18, 2017. A revised Fire Management Plan

was submitted by SCE on October 29, 2018, which was approved by the CPUC on October 30, 2018. The revised Plan was also approved by BLM and State and local fire agencies. No additional impacts to wildland fire will occur with the implementation of this MPR.

The conditions noted below shall be met by SCE and its contractors:

- SCE shall notify the CPUC and provide Collector data for the proposed work areas covered in this MPR prior to the start of construction activities. Additionally, habitat give back areas will be removed from Project GIS data upon approval of this MPR.
- All applicable Project MMs, APMs, compliance plans, and permit conditions shall be implemented. Some measures have on-going/time-sensitive requirements and shall be implemented prior to and during construction where applicable.
- Copies of all relevant permits, compliance plans, and this MPR shall be available on site for the duration of construction activities. All permits and plans shall be made available to the CPUC EM upon request.
- All crew members shall be WEAP trained prior to working on the Project. A log shall be maintained on-site with the names of all crew personnel trained. The WEAP training brochure can be provided in Spanish or other languages if appropriate. All participants will receive a hard-hat sticker for ease of compliance verification.
- No movement or staging of construction vehicles or equipment shall be allowed outside of the approved areas. If additional temporary workspace areas or access routes, or changes in technique and mitigation implementation to a lesser level are required, an MPR request shall be submitted for CPUC review.
- A preconstruction biological survey shall be conducted prior to initiating work in each proposed work area if those sites are no longer active.
- In accordance with the PRMMP, a paleontological monitor shall be on site to monitor ground-disturbing construction activities.

Sincerely,



John Forsythe
CPUC Environmental Project Manager

cc: V. Strong, Aspen