PUBLIC UTILITIES COMMISSION
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March 12, 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 #45

Dear Mr. Gutierrez,

On March 4, 2021, Southern California Edison (SCE) submitted a request for Minor Project Refinement (MPR) #45 for new wire site, guard structure, and McCarthy drain work areas. The additional work areas are located in Segments 3, 4, and 6, and are located on private lands in the cities of Loma Linda, Beaumont, Banning, and 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 #45 for additional new wire site, guard structure, and McCarthy drain work areas 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):

> **MWL-3-S-3X64-1-MPR-45: Proposed McCarthy Drain Relocation**
>
> The originally planned location of MWL-3-S-3X64 has been redesigned to shift the installation approximately 50-feet southeast to better capture and divert stormwater flows off the utility access road into upland areas north of the roadside. No new impacts will occur as a result of the design shift because the removal of the McCarthy drain design from the original location will offset the impacts in the redesigned location.

The new work area consists of 0.03-acre of developed/disturbed, grassland/forbland located in the City of Loma Linda in San Bernardino County, along the SCE utility access road.

MWL-3-3X21-1-MPR-45: Proposed McCarthy Drain Relocation/Installation

The originally planned location of MAC-3-3X21 has been redesigned to shift the discharge point from the north side of the access road to the south side of the access road, to better capture and divert stormwater flows off the utility access road into upland areas south of the roadside. No new impacts will occur as a result of the design shift because the removal of the McCarthy drain design from the original location to MWL-3-3X21-1-MPR-45 will offset the impacts in the redesigned location. In addition, a new McCarthy Drain will be installed at MWL-3-3X21-3-MPR-45 to capture and divert stormwater flows off the utility access road into upland areas west of the roadside.

The new work area consists of 0.03-acres consisting of 0.01-acre developed/disturbed land and 0.02-acre chaparral vegetation, located in the City of Redlands in Riverside County, along the SCE utility access road.

MWL-4-E-4X56-1-MPR-45: Proposed McCarthy Drain Relocation

The originally planned location of MWL-4-E-4X56 has been redesigned to shift the installation approximately 50-feet southeast to better capture and divert stormwater flows off the utility access road into upland areas south of the roadside. No new impacts will occur as a result of the design shift because the removal of the McCarthy drain design from the original location will offset the impacts in the redesigned location.

The new work area consists of 0.03-acre of chaparral and developed/disturbed land located in the City of Beaumont in Riverside County, along the SCE utility access road.

WSS-4X55-1-MPR-45: Wire Wreck-out

A new 0.32-acre temporary work area south of the access road west of 4N55 is required to safely provide adequate work space for material and equipment staging during wire wreck-out activities.

The new work area consists of approximately 0.32-acre chaparral. The land is privately owned and located within the SCE transmission line right-of-way, in the City of Beaumont in Riverside County.

MWL-4-W-4X54-1-MPR-45: Proposed McCarthy Drain

A new 0.01-acre work space is required to install a new McCarthy drain along the access road northeast of 4N54 to capture and divert stormwater flow off the utility access road and into upland areas north of the roadside.

The new work area consists of 0.01-acre of chaparral, located in the City of Beaumont in Riverside County, along the SCE utility access road.

GS-4-4X31-1-MPR-45 and GS-4-4X31-2-MPR-45: GS-4-4X31-1-MPR-45: Proposed Guard Structures

Two new temporary work areas are required along the east side of Beaumont Avenue and west of PP#123314 to safely provide adequate work space for material and equipment staging during wire wreck-out activities. The new work areas may be lightly graded to level the existing terrain.

The total temporary disturbance area (0.44-acre) associated with the new work areas consists of approximately 0.07 acre of developed/disturbed land and 0.37 acre grassland/forbland. The land is publicly and privately owned and located within the SCE transmission line right-of-way, in the City of Beaumont in Riverside County.

WSS-4-4X16-1-MPR-45: Proposed Wire Site

A new 0.05-acre temporary work area north of 4N16 is required to expand approved WSS-4-4X15-4X16-MPR-34 to safely provide adequate work space for material and equipment staging during construction activities.

The new work area consists of approximately 0.05-acre of grassland/forbland. The land is privately owned and located within the SCE transmission line right-of-way, in the City of Beaumont in Riverside County.

GS-4-4X14-1-MPR-45: Proposed Guard Structure

A new 0.18-acre temporary work area is required along the east side of the access road east of PP#123337 to safely provide adequate work space for material and equipment staging during wire wreck-out activities.

The new work area may be lightly graded to level the existing terrain. The total temporary disturbance area associated with the new work area consists of approximately 0.17 grassland/forbland and 0.01 acre developed/disturbed land. The land is privately owned and located within the SCE transmission line right-of-way, in the City of Beaumont in Riverside County.

SWA-6-6N26-1-MPR-45: Proposed Expansion of SWA-6-6N26 for Wire Wreck-out Activities

A new 0.9-acre temporary work area is required on the north side of SWA-6-6N26 to safely facilitate wire wreck-out activities associated with M2-T4(1) and M3-T1(1). The new work area will be lightly graded to level the existing terrain.

The total temporary disturbance area associated with the new work area consists of approximately 0.9-acre of desert scrub. The land is privately owned and located within the SCE transmission line right-of-way in Riverside County.

SWA-6-M61-T1-1-MPR-45: Proposed Expansion of SWA-6-6N26 for Wire Wreck-out Activities

A new 0.77-acre temporary work area is required on the north side of 16th Avenue to safely facilitate wire wreck-out activities associated with M0-T5(1) and M0-T4(1). The new work area will be lightly graded to level the existing terrain.

The total temporary disturbance area associated with the new work area consists of approximately 0.77-acre of desert scrub. The land is privately owned and located within the SCE transmission line right-of-way in Riverside County.

WA-3-3X55-3X53-MPR-45: Guard Structure Wreck-out

A new 0.32-acre temporary work area is required on the east side of Refuse Road to safely facilitate wire and guard structure wreck-out activities associated with M97-T3. The new work area will be lightly graded to level the existing terrain.

The total temporary disturbance area associated with the new work area consists of approximately 0.32-acre of Coastal Sage Scrub. The land is publicly owned and located within the SCE transmission line right-of-way in Riverside County.

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 March 8, 2021. 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 in Segment 6 (SWA-6-6N26-1-MPR-45 and SWA-6-M61-T1-1-MPR-45) are located within desert tortoise modeled habitat. These new work areas are located within the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) area. DETO are a covered species within the CVMSHCP, in which SCE is a participating agency for the WOD Project.

No definitive signs of DETO were observed during protocol desert tortoise surveys, preconstruction surveys, or during daily sweeps and monitoring of the areas, although desert tortoises are present in other portions of the Project area. With implementation of the desert tortoise mitigation measures and permit conditions, including new preconstruction surveys of the new work areas, continued clearance sweeps, tailboard awareness trainings, and monitoring during construction, no direct impacts to DETO are anticipated.

The other new work areas are not located within the current known range of the DETO; therefore, no impacts to DETO are anticipated at those locations.

Special-Status Terrestrial Herpetofauna: No special-status terrestrial herpetofauna have been observed within the new work areas during prior Project-related surveys. However, many species have the potential to occur throughout the Project area. For instance, red diamond rattlesnakes (FRED Species Events 000131 and 000408) were observed approximately 480 feet northeast of MWL-3-S-3X64-1-MPR-45 and approximately 560 feet southeast of MWL-4-E-4X56-1-MPR-45. An orange-throated whiptail (FRED Species Event 000040) was also observed approximately 280 feet southwest of MWL-4-W-4X54-1-MPR-45. A preconstruction survey for each work area will be conducted prior to use. With implementation of the mitigation measures and biological monitoring during construction, no significant impacts to special-status terrestrial herpetofauna are anticipated.

Burrowing Owl (BUOW): BUOW habitat in the form of annual and perennial grasslands and scrublands characterized by low-growing vegetation is present throughout the Project area. One adult BUOW (Athene cunicularia) was observed approximately 330 feet east of SWA-6-6N26-1-MPR-45 on August 14, 2020 (FRED Species Event 000580); however, no burrows were observed in the area or in the other new work areas. If active BUOW burrows are observed during preconstruction surveys or during construction in the new work areas, impacts will be mitigated in accordance with the Burrowing Owl Management and

Passive Relocation Plan. With implementation of the mitigation measures, including appropriate avoidance buffers and biological monitoring during construction, no impacts to BUOW are anticipated.

Nesting Birds: Suitable substrates for nesting birds protected by the California Fish and Game Code and Migratory Bird Treaty Act, including trees, shrubs, man-made structures, and the ground surface, can be found throughout the Project area. No active nest buffers intersect the new work areas at this time.

Observations of special-status bird species (e.g., white-tailed kite, Cooper's hawk, prairie falcon, Ferruginous hawk, northern harrier, 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. Therefore, no impacts area anticipated. If active nests are discovered in the future, impacts will be mitigated in accordance with the Nesting Bird Management Plan (NBMP).

Preconstruction surveys, including surveys for nesting birds during the avian breeding season (Jan 1 – Aug 31), will be conducted prior to the initiation of construction use in each area. If active nests are identified, avoidance buffers will be established in accordance with the NBMP. With implementation of the NBMP, no impacts are anticipated.

Listed Riparian Birds: No suitable or occupied habitat for least Bell's vireo (LBVI) or southwestern willow flycatcher (SWFL) is mapped within 500 feet of the new work areas.

If active LBVI or SWFL nests are identified during future preconstruction surveys or within 500 feet of construction activities, avoidance buffers will be established, and the nest will be monitored according to MM WIL-1c. With implementation of these avoidance and minimization measures and biological monitoring during construction, no impacts to listed riparian birds are anticipated.

Coastal California Gnatcatcher (CAGN): The proposed MWL-3-S-3X64-1-MPR-45, MWL-4-W-4X54-1-MPR-45, and WSS-4-4X16- 1-MPR-45 work areas are located more than 500 feet west of coastal CAGN suitable habitat. McCarthy drains MAC-3-3X21-1-MPR-45 and MAC-3-3X21-2-MPR-452 are located within 500-feet of coastal CAGN suitable habitat; however, the work areas do not intersect suitable habitat. In addition, CAGN are a covered species in Western Riverside Multiple Species Habitat Conservation Plan (WRMSHCP), for which SCE is a participating agency for the WOD Project.

Guard structure wreck-out work area GS-4-4X14-1-MPR-45 intersects coastal CAGN suitable habitat. In the history (2014-2018) of protocol surveys conducted for the Project in this area, there have been no detection of CAGN. Results were also negative during subsequent preconstruction surveys. However, to offset temporary impacts to the mapped suitable habitat, an equal area of coastal CAGN suitable habitat will not be used by construction and will be removed from the Project data upon approval of this MPR.

Preconstruction surveys, including surveys for nesting birds, will be conducted in the new work areas during the avian breeding season (Jan 1 – Aug 31). With monitoring and implementation of mitigation measures, no impacts to CAGN are anticipated.

Golden Eagle (GOEA): Based on habitat assessments and protocol surveys conducted for the Project, no suitable nesting habitat for golden eagles is located within 2 miles of the new Segment 3 and 4 work areas. However, a juvenile GOEA was observed flying approximately 500 ft above the Project alignment, approximately 400 feet northwest of GS-4-4X14-1- MPR-45 on 10/18/2019 (FRED Species Event 000333); however, the observation was ephemeral and not associated with an active nest. Based on habitat assessments, limited suitable nesting habitat for GOEA was identified within 2 miles of the new Segment 6 work areas. Protocol aerial surveys conducted for the Project in 2019 showed no GOEA nests within 2 miles of the Project right-of-way. With monitoring and implementation of mitigation measures, no impacts are anticipated.

Stephen's Kangaroo Rat (SKR): Areas of suitable habitat for SKR are mapped approximately 520 feet west of proposed McCarthy drain relocation MWL-4-E-4X56-1-MPR-45. Proposed work areas GS-4X31-1- MPR-45 and GS-4-4X31-1-MPR-45, WSS-4-4X16-1-MPR-45, and GS-4-4X14-1-MPR-45 are located within mapped suitable SKR habitat.

These new work areas are located within the WRMSHCP. SKR is a covered species within the WRMSHCP, in which SCE is a participating agency for the WOD Project. Habitat assessments, pedestrian surveys, and several consecutive years of trapping surveys have been conducted within suitable habitat areas in the project area. Based on a lack of historic data, habitat conditions, and negative results over several years of surveys, SKR are not expected to occur. Therefore, no impacts to SKR are anticipated.

The other new work areas outside of Segment 4 are not located within suitable habitat for the species; therefore, no impacts 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: Special-status small mammals such as the pallid San Diego pocket mouse, northwestern San Diego pocket mouse, American badger, desert kit fox, San Diego desert woodrat, and/or San Diego black-tailed jackrabbit can occur in many parts of the Project area. Ringtail and Palm Springs round-tailed ground squirrel are not expected. However, if any of these species are found, potential impacts will be addressed according to the Small Mammals Avoidance and Minimization Plan.

No proposed work areas intersect occupied Los Angeles pocket mouse (LAPM) habitats in the WRMSHCP.

Little pocket mouse subspecies (i.e., Palm Springs pocket mouse [PSPM] and LAPM) occupied habitat is widespread throughout Segment 6. No occurrences of San Diego pocket mice have been documented within the new work areas.

Desert woodrat midden was previously observed within SWA-6-M61-T1-1-MPR-45 (FRED Habitat Event 000660). Desert woodrat middens have also been observed throughout the vicinity (FRED Habitat Events 000676-000678) as well as in the vicinity of SWA-6-6N26-1-MPR-45. A 10-foot no-entry buffer was established around each midden using Environmentally Sensitive Area (ESA) signs. If construction determines avoidance of a buffer is not possible, a qualified biologist will relocate the midden in accordance with the Special Status Small Mammal Avoidance and Minimization Plan.

Potential impacts will be addressed according to the Small Mammals Avoidance and Minimization Plan. With implementation of the plan, no significant impacts to special-status small mammals are anticipated.

Special-Status Plants: Plummer's mariposa lilies were observed in the vicinity of proposed MWL-4-W-4X54-1-MPR-45. However, no special-status plants were observed within the new work area itself, and due to the high levels of disturbance and compaction along the roadside, no impacts to these plant species are anticipated. Should they occur in the future, the Plummer's mariposa lily, which is a CRPR 4 plant and adequately conserved in the WRMSHCP, will be avoided to the extent feasible.

Chaparral sand verbena (Abronia villosa var. aurita; CRPR 1B.1) occupied habitat has been observed approximately 300 feet southeast of SWA-6-6N26-1-MPR-45 across the associated access road. The boundaries of the occupied habitat were staked with ESA signs along the access road. If additional special-status plants are later identified during clearance sweeps/monitoring, ESA buffers will be established, and special-status plants will be avoided to the extent feasible. With implementation of these avoidance strategies and based on current levels of disturbance, the project is not expected to impact greater than

10 percent of the local occurrences. In addition to avoidance, drive and crush methods will be used to the extent possible for temporary work areas. If grading of temporary work areas is required, topsoil salvage will occur. Seed was also collected from these populations in 2019 and will be planted during the restoration phase of the project. Unavoidable impacts to special-status plants will be addressed in accordance with the Special-status Plant Salvage and Relocation Plan.

Coachella Valley milk-vetch (Astragalus lentiginosus var. coachellae; FE, CRPR 1B.2) modeled habitat overlaps SWA-6- 6N26-1-MPR-45 and the associated access roads. However, no milk-vetch plants have been detected after many years of focused surveys. Therefore, no impacts are anticipated. If milk-vetch plants are discovered in the future, they will be addressed in accordance with the Biological Opinion and/or via the CVMSHCP, in coordination with the CVCC and USFWS.

Regulated Trees: No tree trimming or removal is required for construction activities within the proposed work areas.

Jurisdictional Waters: No jurisdictional features intersect the new work areas; therefore, no impacts to jurisdictional features are expected to result from use of the new work areas.

Cultural Resources: The new work areas are located within the WOD Area of Potential Effect (APE) and were covered within the record search data that was conducted during previous WOD surveys and studies. The record search and survey results for the new work areas were negative for cultural resources. *Williams, Audry. 2016. Cultural Resources Management Plan for Southern California Edison Company's West of Devers Transmission Line Upgrade Project, Riverside and San Bernardino Counties, California. Prepared by Southern California Edison.*

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 area SWA-6-6N26-1-MPR-45 is located in an area of unknown paleontological sensitivity and will be monitored by a qualified paleontological monitor on a part-time basis, if ground disturbance occurs.

Proposed work areas GS-4-4X31-1-MPR-45, GS-4-4X31-2-MPR-45, and WSS-4-4X16-1-MPR-45 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 MWL-4-E-4X56-1-MPR-45, WSS-4X55-1-MPR-45, MWL-4-W-4X54-1-MPR-45, GS-4-4X14-1-MPR-45, and SWA-6-M61-T1-1-MPR-45 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 MWL-3-S-3X64-1-MPR-45 and MWL-3-3X21-1-MPR-45 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.

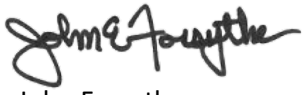
Water Resources: As required by MM WR-2a, SCE developed and submitted an Erosion Control Plan to the CPUC and BLM. The Erosion Control Plan was incorporated into the SWPPP, which is kept onsite and readily available on request. SCE submitted the SWPPP to the CPUC on May 25, 2017. Any changes necessitated 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, if habitat give back areas are described, they 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