

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 20, 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 #51

Dear Mr. Gutierrez,

On August 3, 2021, Southern California Edison (SCE) submitted a request for Minor Project Refinement (MPR) #51 to exclude 102 Project construction areas across all Segments from the 5-year restoration success criteria in the approved Habitat Restoration and Revegetation Plan (HRRP). Additional information was provided by SCE on October 6, 2021, which reduced the number of requested sites to 95 Project work areas. The requested sites are located in Segments 2-6 in San Bernardino and Riverside Counties; Segment 1 sites were eliminated from the original request.

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 #51 for the exclusion of 95 Project construction areas from the 5-year restoration success criteria in the HRRP is granted by CPUC based on the factors described below.

SCE MPR Request. Excerpts from the SCE MPR request are presented below (indented), including a timeline of events:

The Project Supersites were proposed for exclusion for one or more of the following reasons: dumping, Off-Highway Vehicle (OHV) damage, disking/mowing activities, donkey/cow damage, and agriculture usages. In the August 3, 2021 MPR Request, SCE stated: "The sites proposed for this mitigation sign-off, as authorized by the HRRP, have been subjected to one or more disturbances outside of SCE's control, which may severely hinder restoration efforts at the sites. These sites may not achieve the success criteria established in the HRRP, in spite of good faith restoration efforts. SCE therefore requests that the sites listed below be exempt from meeting the 5-year restoration success criteria and that the mitigation efforts at each site be considered complete following restoration installation."

The CPUC/Aspen memo dated August 4, 2021 requested additional information including: property owner information, site designation per Mitigation Measure VEG-1d, preconstruction site conditions, and actions SCE Plans to meet HRRP and Storm Water Pollution and Prevention Plan (SWPPP) stabilization requirements.

On October 6, 2021, SCE submitted an updated table (see Attachment A) with the information requested on the original request. As part of the resubmittal, SCE eliminated all Segment 1 requested sites and added 3 sites to Segment 3.

SCE included proposed actions for continued maintenance activities on restoration sites with one-time or ongoing anthropogenic activities. The proposed actions are presented below (also see Attachment A, Appendix B:

- **Dumping:** Unauthorized dumping of non-project related trash has been observed at several restoration sites. In this instance, trash is often piled up in one location or scattered throughout one general area. Dumping may either be a one-time occurrence or may occur repeatedly in areas that may be easily accessed. Where unauthorized dumping occurs, the contractor shall notify the property owner of the occurrence and SCE will remove that portion of the site from the restoration program. However, any incidental trash blowing into the restoration site will be removed during routine maintenance activities. If recurring dumping occurs, and depending on the severity of dumping activities, the property owner will again be notified, and SCE will request the restoration site be removed of the restoration program. **The requirements of the Project's Integrated Weed Management Plan (IWMP) would be implemented in all areas remaining in the restoration program, as designed.**
- **OHV:** Off Highway Vehicle Activity is a common occurrence within restoration sites and usually consists of one or multiple tire trails through a site. OHV activity may have occurred prior to construction and may persist throughout the maintenance period. OHV activity compacts soil, crushes vegetation, and results in bare areas difficult to revegetate. OHV trails can also lead to erosion and the formation of rills and gullies. In these instances, SCE will remove the footprint of areas impacted by OHV activity from the restoration program while the remainder of the site will remain in the revegetation program. **The requirements of the Project's Integrated Weed Management Plan (IWMP) would be implemented in all areas remaining in the restoration program, as designed.**
- **Disking/Mowing:** Private property owners may routinely mow and/or disk their properties for multiple reasons including weed abatement, fire fuel management, or visual aesthetics. When a restoration site is mowed or disked, SCE will remove that portion mowed or disked from the restoration program. **The requirements of the Project's Integrated Weed Management Plan (IWMP) would be implemented in all areas remaining in the restoration program, as designed.**
- **Donkeys/Cows:** Private property owners may routinely open their property for grazing animals including cows, donkeys, goats, etc. Grazing may occur for multiple reasons including feeding their livestock, weed abatement, fire fuel management, or visual aesthetics. When a restoration site is grazed, SCE will remove **that portion which is grazed from the restoration program. The requirements of the Project's Integrated Weed Management Plan (IWMP) would be implemented in all areas remaining in the restoration program, as designed.**
- **Agricultural Lands:** Private property owners may conduct agricultural farming activities within their property. When a restoration site is converted to agricultural farmland, SCE will remove that portion of the restoration site from the restoration program.
- **Multiple Anthropogenic Activities:** Several restoration sites have more than one disturbance activity occurring within the same area or within the same site. In these instances, SCE will remove both areas which have been disturbed from the revegetation program. As an example, a restoration site may have dumping and OHV activity occurrences in which case both areas impacted would be removed from the restoration program while unaffected areas would remain in the program.

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. The following discussion summarizes this analysis.

Restoration or compensation for lands impacted by the Project is conditioned in the Final Environmental Impact Report (FEIR) under Mitigation Measure (MM) VEG-1e (CPUC, 2015):

“SCE shall compensate for permanent or long-term habitat loss through off-site habitat acquisition and management or through participation in an approved in-lieu fee compensatory mitigation bank. This compensation may be accomplished through participation in the WR-MSHCP, CV-MSHCP (within the respective MSHCP areas) if SCE obtains PSE status. This mitigation measure will be applicable to all permanent project disturbance areas and to areas designated as temporary disturbance, but that cannot be effectively revegetated or restored to replace habitat values within a five-year timeframe....

Compensation will be provided for impacts to the following resources, based on final engineering calculations, at the ratios specified below:

- Previously disturbed lands (agriculture, developed/disturbed) and open water: n/a (no habitat compensation required)
- Chaparral, desert scrub, and grassland/forbland: 1:1
- Alluvial scrub, coast live oak woodland, riparian woodland, and aeolian sand: 3:1
- Coastal sage scrub within USFWS designated coastal California gnatcatcher critical habitat and coastal sage scrub outside of designated critical habitat that is occupied by California gnatcatcher: 3:1
- Coastal sage scrub outside of USFWS designated coastal California gnatcatcher critical habitat that is not occupied by California gnatcatcher: 1:1....

Compensation lands will provide habitat value that is equal to or better than the quality and function of the habitat impacted by the project, taking into consideration soils, vegetation, topography, human-related disturbance, wildlife movement opportunity, proximity to other protected lands, management feasibility, and other habitat values, subject to review and approval by CPUC and BLM.”

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.

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

- In accordance with MM VEG-1c, SCE shall provide the CPUC with GIS shapefiles of all requested sites under MPR #51, including accurate aerial imagery of the sites, and summary data of all discrepancies between final engineering and “as-built” conditions for each vegetation or habitat type, within each jurisdictional area (San Bernardino County, WR-MSHCP, CV-MSHCP). This data shall also include the preconstruction habitat types, including acreages, and any areas removed from the restoration program.
- SCE shall compensate for any temporary habitat that is removed from the restoration program according to the mitigation ratios presented in MM VEG-1e via participation in an approved in-lieu fee compensatory mitigation bank, WR-MSHCP, or CV-MSHCP, as applicable.

- SCE shall provide updated acreage calculations, compensation mechanism, and GIS data for any areas removed from the restoration program in the FEIR/FEIS Annual Restoration Reports.
- 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 restoration 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 restoration 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.

Sincerely,

A handwritten signature in black ink, appearing to read "John Forsythe", written in a cursive style.

John Forsythe
CPUC Environmental Project Manager

cc: V. Strong, Aspen

ATTACHMENT A

Excerpts from SCE MPR #51 Request

| Proposed MPR Area (Supersite) | Property Owner | Assessor's Parcel Number | Site A or Site B? (as defined by MM VEG- 1d) | Preconstruction Site Conditions (i.e., Agriculture, Develop/Disturbed, etc. as defined by MM VEG-1d) | Actions to meet HRRP and SWPPP stabilization Requirements ("the overall goals of the HRRP will be to minimize weed invasion, dust generation, and soil erosion") | Problematic Activity | | | | |
|----------------------------------|---|--------------------------------|---|---|--|----------------------|-----|--------------------|------------------|-------------|
| | | | | | | Dumping | OHV | Disking/ Mowing | Donkeys/ Cows | Ag Lands |
| WS-2-PradoLn-MPR-27 | City of Colton Leo R Beus | 0284-161-49 0284-161-50 | A | Developed/Disturbed Grassland/Forbland | See Appendix B for proposed actions | | | X | | |
| 2X25 | AMG-RECHE LLC | 0164-471-01 0164-231-36 | A | Developed/Disturbed Grassland/Forbland | See Appendix B for proposed actions | | X | | | |
| | | | B | Coastal Sage Scrub | | | | | | |
| WSS-2-2N26-2-MPR-28 | AMG-RECHE LLC | 0164-231-36 0276-372-09 | A | Developed/Disturbed Grassland/Forbland | See Appendix B for proposed actions | | X | X | | |
| 2X26 | AMG-RECHE LLC | 0276-372-09 | A | Developed/Disturbed Grassland/Forbland | See Appendix B for proposed actions | | X | X | | |
| | | | B | Coastal Sage Scrub | | | | | | |
| WSS-2-2N26-1-MPR-28 | AMG-RECHE LLC | 0276-372-09 | A | Developed/Disturbed Grassland/Forbland | See Appendix B for proposed actions | | X | X | | |
| 2X28-29 | Southern California Edison | 0276-361-14 | A | Developed/Disturbed Grassland/Forbland | See Appendix B for proposed actions | X | | X | | |
| | | | B | Coastal Sage Scrub | | | | | | |
| 2N30 | Riverside Highland Water Co | 0276-361-55 | A | Developed/Disturbed Grassland/Forbland | See Appendix B for proposed actions | | | X | | |
| | | | B | Coastal Sage Scrub | | | | | | |
| 2X31 | AP-Colton LLC | 0276-361-79 | A | Developed/Disturbed | See Appendix B for proposed actions | X | | | | |
| 2X32 | AP-Colton LLC Greater Faith Ministries | 0276-361-79 0276-382-14 | A | Developed/Disturbed Grassland/Forbland | See Appendix B for proposed actions | X | X | | | |
| | | | B | Coastal Sage Scrub | | | | | | |
| 3X14 | Davinder Singh Dept, Of Parks | 413-140-026 413-140-004 | A | Developed/Disturbed | See Appendix B for proposed actions | X | | | | |
| | | | B | Grassland/Forbland (SKR Habitat) | | | | | | |

| Proposed MPR Area (Supersite) | Property Owner | Assessor's Parcel Number | Site A or Site B? (as defined by MM VEG- 1d) | Preconstruction Site Conditions (i.e., Agriculture, Develop/Disturbed, etc. as defined by MM VEG-1d) | Actions to meet HRRP and SWPPP stabilization Requirements ("the overall goals of the HRRP will be to minimize weed invasion, dust generation, and soil erosion") | Problematic Activity | | | | |
|----------------------------------|---|---|---|---|--|----------------------|-----|--------------------|------------------|-------------|
| | | | | | | Dumping | OHV | Disking/ Mowing | Donkeys/ Cows | Ag Lands |
| 3X23 | Donald A Giardini Richard Wimsett Dennis Scott Gibson | 413-390-011 413-400-017 417-400-015 | A | Developed/Disturbed Grassland/Forbland | See Appendix B for proposed actions | X | | | | |
| | | | B | Coastal Sage Scrub | | | | | | |
| 3X24 | SCK, Poultry Ranches | 413-390-010 | A | Agriculture | See Appendix B for proposed actions | X | | X | | |
| 3X28 | Larry S Min Michael G Rizzo | 473-070-033 473-070-032 | A | Developed/Disturbed | See Appendix B for proposed actions | X | | | | |
| | | | B | Coastal Sage Scrub | | | | | | |
| 3X29 | Vinh T Nguyen | 473-070-019 | A | Developed/Disturbed | See Appendix B for proposed actions | X | | | | |
| | | | B | Grassland/Forbland (SKR Habitat) | | | | | | |
| 3X29-WSS-MPR-23 | Vinh T Nguyen West, Coast League | 473-070-019 473-070-029 | A | Grassland/Forbland | See Appendix B for proposed actions | X | | | | |
| | | | B | Grassland/Forbland (SKR Habitat) | | | | | | |
| M36T1 | Daniel K Kido | 471-150-002 | A | Developed/Disturbed Grassland/Forbland | See Appendix B for proposed actions | | | | X | |
| | | | B | Coastal Sage Scrub | | | | | | |
| 3X44 | Edric Willes MD INC DEF BENE PEN PLA | 0294-101-031 | A | Developed/Disturbed Grassland/Forbland | See Appendix B for proposed actions | | | | X | |
| | | | B | Coastal Sage Scrub | | | | | | |
| 3X50 | MJM Ventures Inc MJM Ventures Inc | 0294-081-59 0294-081-58 | A | Developed/Disturbed Grassland/Forbland | See Appendix B for proposed actions | | | | X | |
| 3X51 | Curti Family Trust 11-26-02 | 0294-071-01 | A | Developed/Disturbed | See Appendix B for proposed actions | | | | X | |
| | | | B | Grassland/Forbland (SKR Habitat) Coastal Sage Scrub | | | | | | |
| GS-3-3X50-MPR-37 | Curti Family Trust 11-26-02 | 0294-071-01 | B | Grassland/Forbland (SKR Habitat) | See Appendix B for proposed actions | | | | X | |
| WSS-3-3X50-MPR-34 | Curti Family Trust 11-26-02 | 0294-071-01 | A | Developed/Disturbed | See Appendix B for proposed actions | | | | X | |

| Proposed MPR Area (Supersite) | Property Owner | Assessor's Parcel Number | Site A or Site B? (as defined by MM VEG- 1d) | Preconstruction Site Conditions (i.e., Agriculture, Develop/Disturbed, etc. as defined by MM VEG-1d) | Actions to meet HRRP and SWPPP stabilization Requirements ("the overall goals of the HRRP will be to minimize weed invasion, dust generation, and soil erosion") | Problematic Activity | | | | | | | |
|----------------------------------|-----------------------------|--------------------------------|---|---|--|----------------------|--|--|---------|-----|--------------------|------------------|-------------|
| | | | | | | | | | Dumping | OHV | Disking/ Mowing | Donkeys/ Cows | Ag Lands |
| | | | B | Grassland/Forbland (SKR Habitat) Coastal Sage Scrub | | | | | | | | | |
| SWA-3-3X51-1-MPR-44 | Curti Family Trust 11-26-02 | 0294-071-01 | B | Grassland/Forbland (SKR Habitat) Coastal Sage Scrub | See Appendix B for proposed actions | | | | X | | | | |
| 3X53 | Curti Family Trust 11-26-02 | 0294-071-01 | A | Developed/Disturbed Grassland/Forbland | See Appendix B for proposed actions | | | | X | | | | |
| M37-T3 | County of San Bernardino | 0294-061-01 | A | Developed/Disturbed Grassland/Forbland | See Appendix B for proposed actions | | | | X | | | | |
| | Curti Family Trust 11-26-03 | 0294-071-02 | B | Coastal Sage Scrub | | | | | | | | | |
| 3X55 | County of San Bernardino | 0294-061-01 | A | Developed/Disturbed | See Appendix B for proposed actions | | | | X | | | | |
| | | | B | Grassland/Forbland (SKR Habitat) Coastal Sage Scrub | | | | | | | | | |
| GS-3-3X55-3X53 | County of San Bernardino | 0294-061-01 | A | Developed/Disturbed Grassland/Forbland | See Appendix B for proposed actions | | | | X | | | | |
| | | | B | Coastal Sage Scrub | | | | | | | | | |
| GS-3-3X55-3X53-MPR-23 | County of San Bernardino | 0294-061-01 | A | Developed/Disturbed Grassland/Forbland | See Appendix B for proposed actions | | | | X | | | | |
| | | | B | Coastal Sage Scrub | | | | | | | | | |
| WA-3-3X55-3X53-MPR-45 | County of San Bernardino | 0294-061-01 | B | Coastal Sage Scrub | See Appendix B for proposed actions | | | | X | | | | |
| SWA-3-3X55-MPR-25 | County of San Bernardino | 0294-061-01 | A | Developed/Disturbed | See Appendix B for proposed actions | | | | X | | | | |
| | | | B | Grassland/Forbland (SKR Habitat) Coastal Sage Scrub | | | | | | | | | |
| WSS-3-3X55-3X56 | County of San Bernardino | 0294-061-01 | A | Developed/Disturbed | See Appendix B for proposed actions | | | | X | | | | |

| Proposed MPR Area (Supersite) | Property Owner | Assessor's Parcel Number | Site A or Site B? (as defined by MM VEG- 1d) | Preconstruction Site Conditions (i.e., Agriculture, Develop/Disturbed, etc. as defined by MM VEG-1d) | Actions to meet HRRP and SWPPP stabilization Requirements ("the overall goals of the HRRP will be to minimize weed invasion, dust generation, and soil erosion") | Problematic Activity | | | | |
|----------------------------------|-----------------------------|--------------------------------|---|---|--|----------------------|-----|--------------------|------------------|-------------|
| | | | | | | Dumping | OHV | Disking/ Mowing | Donkeys/ Cows | Ag Lands |
| 3X63 | City of Loma Linda | 0294-021-20 | A | Developed/Disturbed Grassland/Forbland | See Appendix B for proposed actions | | | | X | |
| | | 0294-021-21 | B | Coastal Sage Scrub | | | | | | |
| PP123354 | Banning Sportsmens Club Inc | 009-601-530 | A | Developed/Disturbed | See Appendix B for proposed actions | X | | | | |
| | | | B | Desert Scrub | | | | | | |
| PP123355 | Banning Sportsmens Club Inc | 009-601-530 | A | Developed/Disturbed | See Appendix B for proposed actions | X | | | | |
| | | | B | Alluvial Scrub Desert Scrub Coastal Sage Scrub | | | | | | |
| PP123356 | Banning Sportsmens Club Inc | 009-601-530 | A | Developed/Disturbed | See Appendix B for proposed actions | X | | | | |
| | | | B | Coastal Sage Scrub | | | | | | |
| 4X14 | Bilberry Banning | 535-020-029 | A | Developed/Disturbed | See Appendix B for proposed actions | | | | | X |
| | USA Morongo Indian Res 535 | 535-020-018 | B | Grassland/Forbland (SKR Habitat) | | | | | | |
| GS-4-4X14-1-MPR-45 | Barbara L Brinton | 531-080-007 | A | Developed/Disturbed | See Appendix B for proposed actions | | | | | X |
| | | | B | Grassland/Forbland (SKR Habitat) | | | | | | |
| 4X15 | Bilberry Banning | 535-020-029 | A | Developed/Disturbed | See Appendix B for proposed actions | | | | | X |
| | Pardee Homes | 531-080-014 | B | Grassland/Forbland (SKR Habitat) | | | | | | |
| 4X16 | Bilberry Banning | 535-020-004 | A | Developed/Disturbed | See Appendix B for proposed actions | | | | | X |
| | Pardee Homes | 531-080-014 | B | Grassland/Forbland (SKR Habitat) | | | | | | |
| WSS-4-4X15-4X16-MPR-34 | Bilberry Banning | 535-020-029 | A | Developed/Disturbed | See Appendix B for proposed actions | | | | | X |
| | Pardee Homes | 531-080-014 | B | Grassland/Forbland (SKR Habitat) | | | | | | |
| WSS-4-4X16-1-MPR-45 | Pardee Homes | 531-080-014 | B | Grassland/Forbland (SKR Habitat) | See Appendix B for proposed actions | | | | | X |

| Proposed MPR Area (Supersite) | Property Owner | Assessor's Parcel Number | Site A or Site B? (as defined by MM VEG- 1d) | Preconstruction Site Conditions (i.e., Agriculture, Develop/Disturbed, etc. as defined by MM VEG-1d) | Actions to meet HRRP and SWPPP stabilization Requirements ("the overall goals of the HRRP will be to minimize weed invasion, dust generation, and soil erosion") | Problematic Activity | | | | |
|----------------------------------|----------------|--------------------------------|---|---|--|----------------------|-----|--------------------|------------------|-------------|
| | | | | | | Dumping | OHV | Disking/ Mowing | Donkeys/ Cows | Ag Lands |
| 4X17 | Pardee Homes | 408-120-018 | A | Developed/Disturbed | See Appendix B for proposed actions | | | | | X |
| | | | B | Grassland/Forbland (SKR Habitat) | | | | | | |
| WA-4-4X17-AccessRoad-MPR-31 | Pardee Homes | 408-120-018 | A | Developed/Disturbed | See Appendix B for proposed actions | | | | | X |
| 4X18 | Pardee Homes | 408-120-018 | A | Developed/Disturbed | See Appendix B for proposed actions | | | | | X |
| | | | B | Grassland/Forbland (SKR Habitat) | | | | | | |
| M20-T3 | Pardee Homes | 408-120-018 | A | Developed/Disturbed | See Appendix B for proposed actions | | | | | X |
| | | | B | Grassland/Forbland (SKR Habitat) | | | | | | |
| 4X19 | Pardee Homes | 408-120-018 | A | Developed/Disturbed | See Appendix B for proposed actions | | | | | X |
| | | | B | Grassland/Forbland (SKR Habitat) | | | | | | |
| 4X20 | Pardee Homes | 408-120-020 | A | Developed/Disturbed | See Appendix B for proposed actions | | | | | X |
| | | | B | Grassland/Forbland (SKR Habitat) | | | | | | |
| PP123328 | Pardee Homes | 408-120-020 | A | Developed/Disturbed | See Appendix B for proposed actions | | | | | X |
| | | | B | Grassland/Forbland (SKR Habitat) | | | | | | |
| 4X21 | Pardee Homes | 408-120-020 | A | Developed/Disturbed | See Appendix B for proposed actions | | | | | X |
| | | | B | Grassland/Forbland (SKR Habitat) | | | | | | |
| 4X22 | Pardee Homes | 408-120-020 | A | Developed/Disturbed | See Appendix B for proposed actions | | | | | X |
| | | | B | Grassland/Forbland (SKR Habitat) | | | | | | |
| GS-4X22-4X23 | Pardee Homes | 408-120-020 | A | Developed/Disturbed | See Appendix B for proposed actions | | | | | X |

| Proposed MPR Area (Supersite) | Property Owner | Assessor's Parcel Number | Site A or Site B? (as defined by MM VEG- 1d) | Preconstruction Site Conditions (i.e., Agriculture, Develop/Disturbed, etc. as defined by MM VEG-1d) | Actions to meet HRRP and SWPPP stabilization Requirements ("the overall goals of the HRRP will be to minimize weed invasion, dust generation, and soil erosion") | Problematic Activity | | | | |
|----------------------------------|---|--------------------------------|---|---|--|----------------------|-----|--------------------|------------------|-------------|
| | | | | | | Dumping | OHV | Disking/ Mowing | Donkeys/ Cows | Ag Lands |
| 4X30 | City of Beaumont First Southern Baptist Church of Beaumon | 404-230-001 | A | Developed/Disturbed | See Appendix B for proposed actions | | | X | | |
| | | 404-190-005 | B | Grassland/Forbland (SKR Habitat) | | | | | | |
| PP123314 | City of Beaumont | 404-140-006 | A | Developed/Disturbed | See Appendix B for proposed actions | | | X | | |
| | | | B | Grassland/Forbland (SKR Habitat) | | | | | | |
| GS-4-4X31-2-MPR-45 | City of Beaumont | 404-140-006 | B | Grassland/Forbland (SKR Habitat) | See Appendix B for proposed actions | | | X | | |
| GS-4-4X31-1-MPR-45 | City of Beaumont | 404-140-006 | A | Developed/Disturbed | See Appendix B for proposed actions | | | X | | |
| 4X31 | Beaumont CA Leased Housing, Assoc | 404-190-006 | A | Developed/Disturbed | See Appendix B for proposed actions | | | X | | |
| | | | B | Grassland/Forbland (SKR Habitat) | | | | | | |
| M23-T2 | Bianchi Prop Ltd | 404-140-001 | A | Developed/Disturbed | See Appendix B for proposed actions | | | X | | |
| | Helou Saab | 404-190-007 | B | Grassland/Forbland (SKR Habitat) Alluvial Scrub | | | | | | |
| 4X32 | Bianchi Prop Ltd | 404-140-001 | A | Developed/Disturbed | See Appendix B for proposed actions | | | X | | |
| | Helou Saab | 404-190-007 | B | Grassland/Forbland (SKR Habitat) | | | | | | |
| WA-4-4X34-MPR-34 | Bianchi Prop Ltd | 404-140-001 | A | Developed/Disturbed | See Appendix B for proposed actions | | | X | | |
| | | | B | Grassland/Forbland (SKR Habitat) | | | | | | |
| PP123311 | Creek, Nobel Meadows | 400-250-008 | A | Developed/Disturbed | See Appendix B for proposed actions | | | X | | |
| | | | B | Grassland/Forbland (SKR Habitat) | | | | | | |
| 4X34 | Creek, Nobel Meadows | 400-250-008 | A | Developed/Disturbed | See Appendix B for proposed actions | | | X | | |

| Proposed MPR Area (Supersite) | Property Owner | Assessor's Parcel Number | Site A or Site B? | Preconstruction Site Conditions | Actions to meet HRRP and SWPPP stabilization Requirements ("the overall goals of the HRRP will be to minimize weed invasion, dust generation, and soil erosion") | Problematic Activity | | | | |
|----------------------------------|--|--|--|---|--|----------------------|-----|--------------------|------------------|-------------|
| | | | (as defined by MM VEG- 1d) | (i.e., Agriculture, Develop/Disturbed, etc. as defined by MM VEG-1d) | | Dumping | OHV | Disking/ Mowing | Donkeys/ Cows | Ag Lands |
| | | | B | Grassland/Forbland (SKR Habitat) Coastal Sage Scrub | | | | | | |
| PP123310 | Creek, Nobel Meadows | 400-250-008 | A | Developed/Disturbed | See Appendix B for proposed actions | | | X | | |
| | | | B | Grassland/Forbland (SKR Habitat) | | | | | | |
| 5X10 | USA 523 Parcel 9 Partners LLC | 523-020-005 523-140-004 | A | Developed/Disturbed | See Appendix B for proposed actions | | | | X | |
| | | | B | Desert Scrub | | | | | | |
| 5X09 | USA 523 Parcel 9 Partners LLC | 523-020-005 523-140-004 | A | Developed/Disturbed Grassland/Forbland | See Appendix B for proposed actions | | | | X | |
| | | | B | Desert Scrub | | | | | | |
| WSS-5-5X09-5X10 | USA 523 Parcel 9 Partners LLC | 523-020-005 523-140-004 | A | Developed/Disturbed Grassland/Forbland | See Appendix B for proposed actions | | | | X | |
| | | | B | Desert Scrub | | | | | | |
| 5X03 | Eira P Molton | 523-050-003 | A | Developed/Disturbed | See Appendix B for proposed actions | | | X | | |
| | | | B | Desert Scrub | | | | | | |
| 6X48 | Virginia V Drasnin | 520-050-005 520-050-004 | A | Developed/Disturbed | See Appendix B for proposed actions | X | X | | | |
| | | | B | Desert Scrub | | | | | | |
| 6N40 | Billie A Colclasure K C Chen Joel Mendoza Lorena Jeannette Moran Jan Gilbert Michael Siaw | 517-190-071 517-190-065 517-190-066 517-190-052 517-190-064 517-190-069 | A | Developed/Disturbed | See Appendix B for proposed actions | | | X | | |
| | | | B | Desert Scrub | | | | | | |
| 6N39 | Conrad E Langner Geogory C Wiehe | 517-211-004 517-211-005 | A | Developed/Disturbed | See Appendix B for proposed actions | | | X | | |

| Proposed MPR Area (Supersite) | Property Owner | Assessor's Parcel Number | Site A or Site B? | Preconstruction Site Conditions | Actions to meet HRRP and SWPPP stabilization Requirements ("the overall goals of the HRRP will be to minimize weed invasion, dust generation, and soil erosion") | Problematic Activity | | | | |
|----------------------------------|----------------------------|--------------------------------|--|---|--|----------------------|-----|--------------------|------------------|-------------|
| | | | (as defined by MM VEG- 1d) | (i.e., Agriculture, Develop/Disturbed, etc. as defined by MM VEG-1d) | | Dumping | OHV | Disking/ Mowing | Donkeys/ Cows | Ag Lands |
| | | | | | | | | | | |
| 6X14 | Southern California Edison | 668-100-005 | A | Developed/Disturbed | See Appendix B for proposed actions | X | | | | |
| | | 668-212-024 | B | Desert Scrub | | | | | | |
| M61-T1 | Southern California Edison | 668-100-005 | A | Developed/Disturbed | See Appendix B for proposed actions | X | | | | |
| | | | B | Desert Scrub | | | | | | |

Appendix A Example Photographs



Photo 1. Non-project trash located at 5X03.



Photo 2. Non-project trash located at 6X48.



Photo 3. Non-project disking/mowing conducted at 4X27.



Photo 4. Large group of donkeys grazing and moving through 3X59.

Appendix B

Proposed Actions

As the long-term restoration team for SCE's West of Devers project, we would like to provide the following input on the attached CPUC MPR 51 table, and specifically provide a course of action for continued maintenance activities on restoration sites with one-time or ongoing anthropogenic activities which have hindered the success of the West of Devers restoration program. Proposed actions for each problematic activity are presented below.

Dumping: Unauthorized dumping of non-project related trash has been observed at several restoration sites. In this instance, trash is often piled up in one location or scattered throughout one general area. Dumping may either be a one-time occurrence or may occur repeatedly in areas that may be easily accessed. Where unauthorized dumping occurs, the contractor shall notify the property owner of the occurrence and SCE will remove that portion of the site from the restoration program. However, any incidental trash blowing into the restoration site will be removed during routine maintenance activities. If recurring dumping occurs, and depending on the severity of dumping activities, the property owner will again be notified, and SCE will request the restoration site be removed of the restoration program. The requirements of the Project's Integrated Weed Management Plan (IWMP) would be implemented in all areas remaining in the restoration program, as designed.

OHV: Off Highway Vehicle Activity is a common occurrence within restoration sites and usually consists of one or multiple tire trails through a site. OHV activity may have occurred prior to construction and may persist throughout the maintenance period. OHV activity compacts soil, crushes vegetation, and results in bare areas difficult to revegetate. OHV trails can also lead to erosion and the formation of rills and gullies. In these instances, SCE will remove the footprint of areas impacted by OHV activity from the restoration program while the remainder of the site will remain in the revegetation program. The requirements of the Project's Integrated Weed Management Plan (IWMP) would be implemented in all areas remaining in the restoration program, as designed.

Disking/Mowing: Private property owners may routinely mow and/or disk their properties for multiple reasons including weed abatement, fire fuel management, or visual aesthetics. When a restoration site is mowed or disked, SCE will remove that portion mowed or disked from the restoration program. The requirements of the Project's Integrated Weed Management Plan (IWMP) would be implemented in all areas remaining in the restoration program, as designed.

Donkeys/Cows: Private property owners may routinely open their property for grazing animals including cows, donkeys, goats, etc. Grazing may occur for multiple reasons including feeding their livestock, weed abatement, fire fuel management, or visual aesthetics. When a restoration site is grazed, SCE will remove that portion which is grazed from the restoration program. The requirements of the Project's Integrated Weed Management Plan (IWMP) would be implemented in all areas remaining in the restoration program, as designed.

Agricultural Lands: Private property owners may conduct agricultural farming activities within their property. When a restoration site is converted to agricultural farmland, SCE will remove that portion of the restoration site from the restoration program.

Multiple Anthropogenic Activities: Several restoration sites have more than one disturbance activity occurring within the same area or within the same site. In these instances, SCE will remove both areas which have been disturbed from the revegetation program. As an example, a restoration site may have dumping and OHV activity occurrences in which case both areas impacted would be removed from the restoration program while unaffected areas would remain in the program.