PUBLIC UTILITIES COMMISSION
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August 4, 2025

Tom Diaz
Project Manager
Major Environmental Projects
Southern California Edison
2244 Walnut Grove Avenue
Rosemead, CA, 91770

RE: Eldorado-Lugo-Mohave Upgrade Project: Notice to Proceed (NTP) #5

Dear Mr. Diaz,

On July 15, 2025, Southern California Edison (SCE) submitted Notice to Proceed (NTP) Request #5 to the California Public Utilities Commission (CPUC) for the installation of an alternating current mitigation system on the non-federal portions of the Eldorado-Lugo-Mohave Upgrade Project (ELM Project). The Project would increase the amount of power delivered on the existing Eldorado-Lugo and Lugo-Mohave 500-kV transmission lines, address line clearance discrepancies, facilitate communication between substations, and modify substations to accommodate the Proposed Project. SCE's Eldorado-Lugo-Mohave Upgrade Project was evaluated in accordance with the California Environmental Quality Act (CEQA). The mitigation measures described in the Final Mitigated Negative Declaration (MND) were adopted by the CPUC as conditions of project approvals. The CPUC voted on August 27, 2020 to approve SCE's Eldorado-Lugo-Mohave Upgrade Project (Decision D.20-08-032) and a Notice of Determination was submitted to the State Clearinghouse (SCH# 2019089033). The CPUC also adopted a Mitigation Monitoring, Compliance and Reporting Program (MMCRP) to ensure compliance with all mitigation measures imposed on the ELM Project during implementation.

NTP Request #5 includes the installation of an alternating current (AC) mitigation system that is required to maintain the integrity and safety of SoCal Gas's natural gas high-pressure pipelines, Line 235 (L235) and Line 3000 (L3000), which parallel portions of SCE's Lugo-Mohave 500 kV Transmission Line. The AC mitigation system installation will be located entirely within unincorporated San Bernardino County, California. The existing pipeline corridors for L235 and L3000 traverse federal lands administered by the National Park Service (NPS) within the Mojave National Preserve (MNP) and the Bureau of Land Management (BLM), state lands managed by the California State Lands Commission (CSLC), and privately owned lands in unincorporated San Bernardino County. NTP #5 addresses the portions of the AC mitigation system on non-federal lands.

SCE requested four previous NTP authorizations in a phased approach. Given that the ELM Project had been approved by the CPUC, as described above, this phased construction review process allowed SCE to proceed with individual project components where compliance with all applicable mitigation measures and conditions was documented.

This letter documents the CPUC's thorough evaluation of all activities covered in NTP #5, including the mitigation measure requirements applicable to the subject NTP Request. The evaluation process ensures that all mitigation measures applicable to the location and activities covered in the NTP are implemented, as required in the CPUC's Decision.

NTP #5 for the installation of an AC mitigation system is granted by the CPUC based on the factors described below.

Notice to Proceed Request Summary

SCE requests an NTP from the CPUC to install AC mitigation along certain segments of the existing natural gas pipelines that parallel the 500 kV transmission line, located in California on non-federal lands. The components are described below and the locations are shown in the Project Overview Map in Figure 1:

- Installation of 2/0 copper grounding cable parallel to and within 10 feet of L235 and L3000.
- Installation of coupon test stations (CTS) to monitor the level of AC interference over time and to alert SoCalGas of any issues that may develop.
- Installation of solid-state decoupler (SSD) devices to allow AC to pass to ground while retaining direct current (DC) on L235 and L3000.
- Other ancillary improvements necessary to facilitate the installation of AC mitigation components, such as access improvements and laydown yards.

Copper Ground Cable

Copper grounding cable will be installed along the existing L235 and L3000 natural gas pipelines. Cable will be installed at a minimum depth of 3 ft., parallel to and within 10 ft. of the pipeline (i.e., L235 or L3000). Trenching for the copper grounding cable installation will be achieved using a "V-ditch" track type tractor, where feasible. The V-ditch tractor will install the copper wire and warning tape concurrently and will not result in an open trench. Where site conditions preclude the use of the V-ditch tractor, excavation and installation will be completed manually.

The grounding cable will be connected to L235 and L3000 through SSD devices. In addition to each ground cable connection to the SSD, a separate cable will be pin-brazed to the associated SoCalGas high-pressure pipeline within the AC mitigation section workspaces. A SSD is designed to allow AC to pass to ground while retaining direct current from a cathodic protection system to mitigate the AC interference without disrupting the cathodic protection on a pipeline. Each SSD device will be placed in below grade structures (approximately 2 ft. by 2 ft. by 1 ft.) and have a specialized Remote Monitoring Unit that will transmit information to SoCalGas for monitoring. An excavation measuring approximately 5 ft. by 5 ft. by 6 to 7 ft. deep will be utilized at each of the SSD locations to expose the top of the pipeline so that both the copper ground cable connection and the separate cable pin-brazed to the pipeline can be attached to the SSD. SSD excavations will be located entirely within the AC mitigation section workspaces. AC mitigation section workspaces will be located entirely within SoCalGas's existing right-of-way for L235 and L3000.

Coupon Test Stations

Three CTSs will be installed to monitor the level of AC interference over time and to alert SoCalGas of any issues that may develop. For each CTS, a 5 ft. by 5 ft. by 3 to 4 ft. deep excavation located approximately 3 ft. from the pipeline will be required. The test coupon will be installed in the excavation with wire extending to grade and terminating inside an enclosure measuring approximately 3 inches (in.) in diameter and 7 ft. tall. Approximately 4 ft. of the enclosure will be above grade. CTS workspaces will be located entirely within SoCalGas's existing right-of-way for L235 and L3000.

AC Mitigation of Natural Gas High-Pressure Pipelines

Construction Location, Description of Work Areas and Existing Conditions, and Approximate Acreage of Distribution by Work Area, Vegetation Type and Land Use

The following table and referenced NTPR maps contain information on the location of construction activities by the existing natural gas pipeline number and associated coupon test station number or workspace number, a description of the construction activity within those work areas, and a reference to the map page where those are shown. In addition, existing site conditions are described for each work area. Lastly, an approximate acreage of disturbance by work area and by vegetation type or land use is shown.

Associated Work Areas, Description of Work	Site Condition	Approximate Acreage of Disturbance Per Work Area	Vegetation Type (If Vegetated) or Land Use	Disturbance (Previously Disturbed or Undisturbed)	Approximate Acreage of Disturbance Per Vegetation Type or Land Use
L235 Section 1 (Figure 1, Pages 9 and 10)					
Copper grounding cable will be installed on both sides of the pipeline with 2 SSD devices approximately 1,800 ft. from each other.	Gently rolling to flat with shallowly incised washes, Creosote bush – white bursage scrub	2.29	*Larrea tridentata-Ambrosia dumosa Shrubland*	Previously disturbed	2.29
L235 Section 2 (Figure 1, Pages 9 and 10)					
Copper grounding cable will be installed on one side of the pipeline with 2 SSD devices approximately 3,400 ft. from each other.	Gently rolling to flat with shallowly incised washes, Creosote bush – white bursage scrub	3.32	*Larrea tridentata-Ambrosia dumosa Shrubland*	Previously disturbed	3.32
L235 Section 4 (Figure 1, Pages 7 and 8)					
Copper grounding cable will be installed on one side of the pipeline with 4 SSD devices approximately 5,900ft. from each other.	Mountainous with rolling hills to flat, Disturbed variant of Mojave yucca scrub (*Yucca schidigera - Larrea tridentata - Ambrosia dumosa* Shrubland) dominated by desert senna that becomes very dense in places and some cheesebush (*Ambrosia salsola*).	4.42	*Yucca schidigera – Larrea tridentata – Ambrosia dumosa Shrubland Association (Disturbed)*	Previously disturbed	4.42

Associated Work Areas, Description of Work	Site Condition	Approximate Acreage of Disturbance Per Work Area	Vegetation Type (If Vegetated) or Land Use	Disturbance (Previously Disturbed or Undisturbed)	Approximate Acreage of Disturbance Per Vegetation Type or Land Use
L235 Section 17a (Figure 1, Page 4)					
Copper grounding cable will be installed on one side of the pipeline with 2 SSD devices approximately 695 ft from each other	Gently rolling to flat with and gently sloping to the east, Creosote bush – white bursage scrub	1.02	*Larrea tridentata-Ambrosia dumosa Shrubland*	Previously disturbed	1.02
L235 Section 19 (Figure 1, Pages 2 and 3)					
Copper grounding cable will be installed on one side of the pipeline with 3 SSD devices approximately 4,000 ft. from each other.	Flat, creosote bush – white bursage scrub, undisturbed.	4.7	*Larrea tridentata-Ambrosia dumosa Shrubland*	Previously disturbed	4.7
L235 Section 20 (Figure 1, Pages 2 and 3)					
Copper grounding cable will be installed on both sides of the pipeline with 2 SSD devices approximately 2,400 ft. from each other.	Flat, creosote bush – white bursage scrub, undisturbed.	2.65	*Larrea tridentata-Ambrosia dumosa Shrubland*	Previously disturbed	2.65
L235 CTS 4 (Figure 1, Page 6)					
Workspace for CTS installation.	Flat with braided washes merging within the work area. Creosote bush - white bursage scrub with scattered catsclaw shrubs throughout the wash bottom.	0.23	*Larrea tridentata-Ambrosia dumosa Shrubland*	Previously disturbed	0.23
L235 CTS 6 (Figure 1, Pages 2 and 3)					
Workspace for CTS installation.	Flat, creosote bush – white bursage scrub, undisturbed.	0.23	*Larrea tridentata-Ambrosia dumosa Shrubland*	Previously disturbed	0.23
L235 CTS 7 (Figure 1, Page 1)					
Workspace for CTS installation.	Flat, creosote bush – white bursage scrub, undisturbed.	0.21	*Larrea tridentata-Ambrosia dumosa Shrubland*	Previously disturbed	0.21

Associated Work Areas, Description of Work	Site Condition	Approximate Acreage of Disturbance Per Work Area	Vegetation Type (If Vegetated) or Land Use	Disturbance (Previously Disturbed or Undisturbed)	Approximate Acreage of Disturbance Per Vegetation Type or Land Use
L3000 Section 1 (Figure 1, Pages 5 and 6)					
Copper grounding cable will be installed on both sides of the pipeline with 2 SSD devices approximately 1,600 ft. from each other.	Flat, disturbed Creosote bush - white bursage scrub	2.29	*Larrea tridentata-Ambrosia dumosa Shrubland (Disturbed)*	Previously Disturbed	2.29
L3000 Section 2 (Figure 1, Pages 5 and 6)					
Copper grounding cable will be installed on one side of the pipeline with 2 SSD devices approximately 3,400 ft. from each other.	Flat, disturbed Creosote bush - white bursage scrub	4.01	*Larrea tridentata-Ambrosia dumosa Shrubland (Disturbed)*	Previously Disturbed	4.01
NOTES: Disturbance is temporary for all locations					

Project Activity Schedule

Construction of the AC mitigation system is anticipated to start August 2025, or once applicable environmental permits/clearances are received. Construction duration is anticipated to be approximately 7-9 months dependent on field conditions. Construction is to commence on both L235 and L3000 concurrently, starting at the westerly edge of the project boundary and working towards the east. Due to the remoteness of each mitigation section, vehicles and equipment will remain within the right-of-way during off hours, weekends and holidays. The schedule for the work being completed on non-federal lands is identified below.

Project Component	Anticipated Construction Start Date
Laydown Yard (Newberry Springs, Crucero Road, Ludlow Station North Easement)	August 2025
L3000 Sections 1 and 2	August 2025
L235 Sections 1, 2, 4, 17a, 19, and 20 and CTS 4, 6, and 7	August 2025

Description of Project Activities Requested

<u>Access Roads</u>

The ELM Project components described in this NTP will be accessed by existing public roadways and existing unpaved access/pipeline patrol roads that intersect paved roadways adjacent to the route. Improvements to the existing access/pipeline patrol roads may be required due to wash outs that occur regularly to these dirt roadways. Access/pipeline patrol road improvement is likely to require a motor grader, water truck, backhoe, motor grader and/or cat-loader. The surface area affected will depend on the nature of the needed repairs. Access road repairs are anticipated to involve two workers.

AC mitigation system construction work is not anticipated to occur at night. If right-of-way access is required at night, reduced vehicle speeds and biological escorts will be implemented to ensure monitors may perform their duties according to the mitigation measures and plans established for the ELM Project.

Preconstruction Activities

AC mitigation system installation will be contained within the boundaries of SoCalGas's existing right-of-way; therefore, minimal site preparation will be required for this ELM Project component. Clearing and or drive/crush of vegetation will be conducted at work sites of the AC mitigation system work areas to provide sufficient workspace. A few sites may need minor grading to provide a flat, level workspace. Stormwater Pollution Prevention Plan (SWPPP) requirements will be implemented (i.e., best management practices [BMP]) prior to clearing or minor grading. Existing dirt access roads will be improved to allow for safe passage of equipment and vehicles.

Construction Activities

Typical daily construction activities will include use of construction trailers and portable restrooms, personal parking for construction personnel, and installation of AC mitigation system-related components. Other daily construction activities may include refueling and equipment maintenance and repair, containment of waste disposal, and component assembly. Equipment and vehicles that may be used during construction include the following:

- D4 LGP Tract Type Tractor with "V-ditch" digging rig or D6T Track Type Tractor with V-ditch digging rig
- Backhoe 410
- Vacuum excavator
- Forklift
- Water truck
- Motor grader
- Cat-loader
- 4x4 crew trucks
- Portable restrooms

The workforce size will depend on the contractor and how many crews are assigned during construction at any given time. It is expected that approximately 10 to 15 construction personnel per section will work weekly. The landscape contractor is responsible for implementing mitigation plans during construction such as the Special Status Plant Salvage and Relocation Plan, Cacti and Yucca Salvage and Relocation Plan, and Habitat Restoration and Revegetation Plan (HRRP).

The AC mitigation work will consist of trenching and installing 2/0 copper wire within 10 feet of the edge of pipeline for each of the sections described in Appendix A. For L235, Section 1 and Section 20 will require the installation of 2/0 copper wire on each side of the pipeline. For L3000 Section 1 will require the installation of 2/0 copper wire on each side the pipeline.

Trenching for the 2/0 copper wire will be achieved using a "V-ditch" track type tractor (D4 or D6T model), where feasible. The V-ditch tractor will install the copper wire and warning tape concurrently and will not result in an open trench. Where site conditions preclude the use of the V-ditch tractor, excavation and installation will be completed manually. For each section, a SSD will be required to effectively mitigate the induced AC without disrupting the cathodic protection on the pipelines. For each of the SSD locations, an excavation measuring approximately 5 ft. by 5 ft. by 6 to 7 ft. deep will be performed to expose the top of the pipeline so that a #6 copper wire can be attached (pin-brazed) to the pipe and attaching the other end to the SSD. A separate #6 copper cable will extend from the SSD to the 2/0 copper cable (See Exhibit 1 for typical SSD installation).

In addition, 3 locations along L235 within non-federal lands will also require CTS to be installed for interference monitoring. For each CTS, a 5 ft. by 5 ft. by 3 ft. to 4 ft. deep excavation located approximately 3 ft. from the pipeline is required. The test coupon will be installed in the excavation with wire extending to grade and terminating inside an enclosure measuring approximately 3 inches in diameter and 7-ft. tall. Approximately 4 ft. of the enclosure will be above grade (See Exhibit 2 for typical CTS installation).

Upon completion of the work, all areas will be restored to as near to their original condition as reasonably practicable.

Staging Yards

SCE's NTP Request included three laydown yards. The laydown yards will serve as a reporting location for workers, vehicle and equipment parking, and material storage during construction. The yards may be fenced and have construction trailers for supervisory and clerical personnel and may be lit for staging and security. Normal maintenance and refueling of construction equipment will be conducted at the yard; refueling and storage of fuels will be in accordance with the SWPPPs.

The need for temporary power will be determined based on the type of equipment and facilities to be used for construction. If existing distribution lines are available, a temporary service and meter may be used to provide electrical power at the yard. If it is determined that temporary power is not available, then a portable generator may be used intermittently for electrical power.

Materials commonly stored will include, but not be limited to, construction trailers; construction equipment; portable sanitation facilities; signage; consumables (e.g., fuel); waste materials for salvaging, recycling, or disposal; and BMP materials (e.g., straw wattles, gravel, and silt fences).

The laydown yards may also serve as assembly points for crews from where they will be transported to work sites. The majority of materials associated with the construction will be delivered by truck to the laydown yard for subsequent distribution to work areas. Some materials may be delivered directly to construction work areas.

Security personnel will be provided for each laydown yard during off hours, weekends and holidays.

The site conditions and affected areas for each site are noted in the following.

Laydown Yards					
Construction Location	Latitude/ Longitude	Site Conditions	*Approximate Disturbed Acres	Vegetation Impacts	
				Vegetation Type (If Vegetated) or Land Use	Acres
Temporary Disturbance					
Laydown Yard 1 – Newberry Springs	34.784723, -116.608186	The parcel of land where this laydown yard is located is characterized by disturbed land that has previously been used as a laydown yard. Fort Cady Road is adjacent to the laydown yard on the north side.	3.32	Disturbed	3.32
Laydown Yard – Crucero Road	34.731826, -116.162021	The parcel of land where this laydown yard is located is characterized by undeveloped disturbed desert scrub land.	5.06	Disturbed desert scrub	5.06
Laydown Yard – Ludlow Station North Easement	34.780951°, -116.359556°	The parcel of land where this laydown yard is located is characterized by desert scrub habitat adjacent to a developed SCE Ludlow Series Capacitor yard.	3.22	Desert scrub	3.22
NOTE: *Acreage is a total estimate for the staging area whether disturbance is a result of previous activity or as a result of construction activity for the staging yard.					

Dust Control

Several of the construction activities associated with the ELM Project have the potential to result in the release of fugitive dust under certain circumstances, including grading, trenching, excavation, backfilling, cleanup and the use of unpaved access roads. During construction, water trucks will be used to apply water to work areas, trench spoil, and other exposed soil with the potential to create dust to a level that complies with applicable regulations.

CPUC Evaluation of Preconstruction Mitigation Implementation

All applicable project mitigation measures (MMs), Applicant Proposed Measures (APMs), compliance plans, and permit conditions shall be implemented. Some measures have on-going/time-sensitive requirements and are required to be implemented prior to and during construction where applicable. Section 5.1 in SCE's NTP request provides the required environmental submittals for the issue areas addressed by the Eldorado Lugo Mohave Upgrade Project Final MND. The following contains a status of applicable MM and APM required submittals and requirements. Any outstanding requirements are also included:

Aesthetics: In compliance with MM AES-2, SCE shall screen construction activities from view. To reduce significant impacts associated with construction yards, staging areas, and material and equipment storage

areas shall be visually screened using temporary screening fencing, with the exception of construction yards, staging areas, and material and equipment storage areas on existing substation properties.

As required by MM AES-3, only the minimum amount of vegetation necessary for cathodic protection mitigation implementation shall be removed during construction.

Air Quality: As required by MM AQ-1, SCE prepared a Dust Control Plan that describes all measures that will be implemented for the project. The plan includes restrictions for vehicle traffic speeds on unpaved roads, watering frequencies for disturbed areas, covering loaded haul vehicles or provide adequate freeboard, and the reduction of non-essential earth-moving activity under high wind conditions. In addition, in compliance with APM AIR-03, off-road diesel construction equipment with a rating between 100 and 750 horsepower would be required to use engines compliant with the U.S. Environmental Protection Agency's final Tier 4 non-road engine standards. Additionally, as required by APMs AIR-03, AIR-04, and AIR-05, limitations on equipment idling would be implemented, ridesharing would be encouraged, and construction diesel engines would be maintained in good working order. The Dust Control Plan was approved by the CPUC on November 17, 2020. A Dust Control Plan pursuant to MDAQMD Rule 403 will be prepared for work described in this NTP.

Biological Resources: The following biological resource protection measures have been prepared for the Project and shall be implemented under this NTP.

- A Worker Environmental Awareness Program (WEAP) was prepared to educate on-site workers about the proposed Project's sensitive environmental issues in accordance with MM BR-2. Throughout the duration of construction, SCE shall be responsible for ensuring that all on-site project personnel receive this training prior to beginning work. SCE shall maintain a list of all personnel who have completed the WEAP training. The WEAP was approved by the CPUC on September 10, 2020.
- SCE prepared a Habitat Restoration and Revegetation Plan (HRRP) in accordance with MM BR-4 to outline the restoration or revegetation of all temporary disturbance areas. The HRRP was approved by the CPUC on December 11, 2020.
- An Integrated Weed Management Plan (IWMP) was developed in compliance with MM BR-5 to propose methods of preventing or controlling project-related spread or introduction of weeds. The IWMP was approved by the CPUC on September 10, 2020.
- As required by MM BR-6, a Cacti and Yucca Salvage Plan was developed and approved by the CPUC on December 11, 2020. Also a requirement of MM BR-6, a Special-Status Plant Salvage and Relocation Plan was developed. This plan was approved by CPUC on January 27, 2021.
- As required by MM BR-8, SCE is required to compensate for all desert tortoise habitat loss. SCE prepared a Habitat Conservation Plan documenting the mitigation strategy for impacts to desert tortoise habitat. The HCP was approved by the CPUC on October 30, 2020.
- Consistent with the requirements of MM BR-9, a Raven Management Plan was developed and approved by the CPUC on November 24, 2020.
- SCE prepared a Nesting Bird Management Plan (NBMP) consistent with MM BR-10. This plan was developed to describe methods to minimize potential project effects to nesting birds, and to avoid any potential for unauthorized take. The NBMP was developed in coordination with CDFW and USFWS and was approved by the CPUC on December 11, 2020.
- As required by Mitigation Measure BR-11, a Burrowing Owl Passive Relocation Plan was developed and approved by the CPUC on November 24, 2020.

- Preconstruction surveys for special-status plants and wildlife will be conducted consistent with MMs BR-6, BR-9, BR-11, and BR-13. SCE will ensure wildlife impact avoidance and minimization through measures outlined in MM BR-7 during project construction.

Cultural Resources: As required by MM CR-3, a Cultural Resources Management Plan (CRMP) was prepared by SCE. The CRMP was approved by the CPUC on December 9, 2020. A Tribal Engagement Plan was prepared and included in the CRMP and the CRMP was provided to the tribes for review, consistent with APM-TCR-2.

Hazards and Hazardous Materials. SCE prepared and will implement a Project-specific Hazardous Materials and Waste Management Plan pursuant to Title 24, Part 9 of the California Code of Regulations (CCR) that identifies hazardous materials to be transported, used, and stored on site for the proposed construction activities as well as hazardous wastes generated onsite as a result of the proposed construction activities and appropriate management procedures**.** The Hazardous Materials and Waste Management Plan was approved by the CPUC on October 30, 2020.

Hydrology and Water Quality. SCE submitted Erosion Control Plans included in the Storm Water Pollution Prevention Plans developed for the project.

Noise. Best Management Practices for construction noise management will be implemented as outlined in MM N-1 to reduce construction noise levels to the extent feasible. Construction noise shall be confined to days and hours consistent with local jurisdiction regulations. Construction traffic shall be routed away from residences, recreational facilities, and schools to the maximum extent feasible.

Paleontological Resources: A Paleontological Resource Mitigation and Monitoring Plan (PRMMP) was prepared for the Eldorado-Lugo-Mohave Upgrade Project. The PRRMP was approved by the CPUC on November 17, 2020.

Traffic and Transportation. Impacts to roadways are not anticipated for the components subject to NTP #5; therefore, coordination with emergency service providers is not required.

Utilities and Service Systems. Consistent with UT-1 an alternating current interference study has been provided to the CPUC for review. According to UT-3, An Induced Current Touch Study was submitted to the CPUC for review. Approval of both studies is still pending.

Wildfire. SCE prepared a Fire Management Plan as required by MM WF-1. The Plan requires that a qualified Fire Marshal be established to implement and enforce all provisions of the Fire Management Plan. The Fire Management Plan was approved by the CPUC on November 17, 2020.

Conditions of NTP Approval

The conditions noted below shall be met by SCE and its contractors prior to the start of construction:

- All applicable project mitigation measures, 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 NTP shall be available on site for the duration of construction activities. All permits and plans shall be made available to the CPUC Environmental Monitors (EMs) upon request.
- To capture ongoing project and resource changes during construction, updated construction and resource maps, and digital spatial data (KML/KMZ or GIS data viewable from mobile device) shall be made available to SCE/contractor field monitoring staff and the CPUC EMs as changes occur.

- **BR-1:** SCE shall submit resumes of biological monitors to the CPUC for approval at least 10 working days prior to the monitor commencing field duties. Preconstruction surveys will be completed before activities start for the ELM Project components of NTP #5.
- **BR-2:** Prior to workers arriving onsite, all new ELM Project personnel will receive ELM Project-approved WEAP training.
- **BR-3:** Prior to any ground-disturbing activities, SCE shall provide CPUC and BLM with final engineering GIS shapefiles depicting all temporary and permanent disturbance areas, as well as summary data on temporary and permanent disturbance for each vegetation or habitat type. CPUC EM to verify site staking.
- **BR-7:** Minimization measures including but not limited to adhering to the 15 mile per hour speed limit, covering pipes, tanks and excavations will be implemented throughout construction.
- **MM BR-9 and BR-10:** SCE shall conduct pre-construction nesting bird surveys no more than seven days prior to construction activities during nesting bird season for the ELM Project components of this NTP #5. Appropriate precautions will be taken to avoid disturbance.
- **MM BR-13:** SCE shall conduct pre-construction surveys for desert kit fox, ringtail, and American badger no more than 30 days prior to initiation of construction activities and submit to CPUC and BLM for review and approval.
- **MMs BR-6, BR-9, BR-11, and BR-13**: Conduct reconstruction surveys for special-status plants and wildlife. Results of preconstruction surveys shall be provided to the CPUC for review and approval.
- **APM-CUL-02:** SCE shall perform surveys and submit Class III Cultural Resources Inventory reports for AC mitigation areas.
- **MM HWQ-1:** The previously approved Erosion Control Plan will be incorporated into the SWPPP specific to work described in this NTP.
- **MM T-2:** Prior to construction, SCE shall establish the pre-construction conditions of the roads within 500 feet in each direction of project access points and confer with State and local agencies.
- **APM-TCR-1:** Provide monitoring reports to the CPUC on a monthly basis.
- **MMCRP:** Once preconstruction survey reports are submitted, the CPUC EMs shall conduct site reviews to verify that the required site boundary and resource staking has been installed in work areas. Typically, each work site shall be delineated by markers (usually wooden stakes) which define the approved work area boundaries. Any Environmentally Sensitive Area (ESA) identified during preconstruction surveys shall also be delineated for avoidance. Only after the preconstruction survey reports and staking verification reviews occur, is construction permitted to begin.
- **MMCRP:** SCE will prepare and distribute a weekly environmental compliance status report for distribution to the CPUC consistent with project permits, mitigation measures, and the Mitigation Monitoring, Compliance and Reporting Plan (MMCRP). Prior to the start of monitoring activities, SCE shall provide a proposed format describing content and organization of Weekly Compliance Reports for CPUC review and approval.
- **MMCRP:** 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, a Temporary Extra Work Space (TEWS) or Minor Project Change (MPC) request shall be submitted for CPUC review (MMCRP Section 4.6). In addition, all water sources and disposal sites not previously identified shall require a TEWS or an MPR.
- As clarified in a May 6, 2021 email to SCE from CDFW, biological sweeps are to occur after sunrise and biologist shall not have limited visibility due to darkness.

- Any variances from local jurisdictions on allowable workdays/hours shall be provided to the CPUC prior to their implementation.
- The protocols of the Contractor Fatigue Management Plan shall be implemented during extended workdays.

Sincerely,

Eric Chiang

Eric Chiang
CPUC Environmental Project Manager

cc: V. Strong, Aspen