

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 2, 2011

Ms. Suzan Benz
Environmental Project Manager
Devers-Palo Verde No. 2 Transmission Project
6 Point Drive, 1st Floor
Brea, CA 92821-6320

RE: SCE Devers-Palo Verde No. 2 (DPV2) Transmission Line Project - Notice to Proceed (NTP #9)

Dear Ms. Benz:

On October 8, 2011, Southern California Edison (SCE) requested authorization from the California Public Utilities Commission (CPUC) for a construction of the 81-mile overhead 500 kV transmission line from Devers Substation to Red Bluff Substation as part of the Devers-Palo Verde No. 2 Transmission Line Project. The construction activities for under this NTP will occur mainly within SCE right-of-way (ROW) from the existing Devers Substation north of the City of Palm Springs to the new Red Bluff Substation located approximately 5 miles east of Desert Center, immediately south of Interstate 10. NTP #9 is for all areas along private lands. All areas within federal lands are addressed in the Bureau of Land Management (BLM) Devers-Palo Verde No. 2 Transmission Line Project NTP, which was issued on September 19, 2011.

The CPUC voted on January 25, 2007 to approve the SCE DPV2 Transmission Line Project (Decision D.07-01-040). On May 14, 2008, SCE filed a Petition for Modification (PFM) of the existing Certificate for Public Convenience and Necessity (CPCN) approved per Decision D.07-01-040. SCE requested that the CPUC authorize SCE to construct DPV2 facilities in only the California portion of DPV2 and the Midpoint Substation (now called the Colorado River Substation) near Blythe, California. The CPUC approved SCE's PFM on November 20, 2009 in Decision D.09-11-007.

After the CPUC's 2009 Decision regarding the PFM, several large solar power projects were proposed in the Blythe and Desert Center areas. SCE filed Permit to Construct applications addressing expansion of the Colorado River Substation and construction of a new Red Bluff Substation. These components were not covered in the original DPV2 Final EIR/EIS, because the solar power projects had not yet been proposed, and supplemental environmental review has been conducted. The Colorado River Substation Expansion and the Red Bluff Substation were both approved by the CPUC on July 14, 2011 in Decisions D.11-07-011 and D.11-07-020, respectively.

The BLM issued a Record of Decision approving the Project on July 19, 2011. The BLM issued NTPs for construction of the Red Bluff and Colorado River Substations and the overhead transmission line on its lands in September 2011. The Project also crosses lands under jurisdiction of the U.S. Department of Agriculture Forest Service on the San Bernardino National Forest within an existing Forest Service-issued easement. The Forest Service will issue a revised easement signed by the Forest Supervisor. The area requested under this Notice to Proceed (NTP) does not fall under Forest Service or BLM jurisdiction.

The Devers-Palo Verde No. 2 Transmission Project will be constructed in eight work packages, as defined on the CPUC's project website (<http://www.cpuc.ca.gov/Environment/info/aspen/dpv2/dpv2.htm>). It is

anticipated that, even within the eight work packages, SCE will submit multiple separate requests for NTPs during the construction process. This is a typical process for transmission line projects. Given that the DPV2 Project has been approved by the CPUC and BLM, as described above, this segmented construction review process allows SCE to proceed with individual project components where compliance with all applicable mitigation measures and conditions can be documented.

This letter documents the CPUC's thorough evaluation of all activities covered in this NTP, including the mitigation compliance table provided with the subject NTPR. The evaluation process ensures that all mitigation measures and Biological Opinion Conditions applicable to the location and activities covered in the NTP are implemented, as required in the CPUC's Decision and in BLM's Record of Decision (where applicable).

NTP #9 for the Devers-Red Bluff 500 kV overhead transmission line is granted by CPUC based on the factors described below.

SCE NTP Request

The CPUC has carefully reviewed the NTP request (NTPR) submitted by SCE, and verified that it incorporates compliance with all applicable mitigation measures. Excerpts from the SCE NTPR dated October 8, 2011 are presented as follows (indented).

The Devers-Red Bluff Transmission Line portion of the Project starts from lattice steel tower construction RB2-1W, located on the existing transmission right-of-way (ROW) south of the new Red Bluff Substation, to new tower 2000A to be constructed in the existing Devers Substation. The scope of work to be performed under this NTPR consists of construction of stub roads, foundations, steel assembly, erection of 278 lattice steel towers (LSTs), and the installation of associated hardware assemblies and interconnecting wires...

3.1 Project Elements/Construction Activities

Following is a list of elements and activities that will possibly be present or active throughout the construction of the Devers-Red Bluff Transmission Line:

Project Elements

- New stub roads and maintenance of existing access roads
- Wire setup sites (that is, pull sites, wire splice sites, tensioning sites)
- Transmission tower foundations, structures, and wires
- Temporary guard structures

Construction Activities

- Grading and excavation; blasting as required
- Installation of foundations, tower/pole structures, and wires
- Operation of construction equipment and vehicles
- Operation of helicopters
- Installation, maintenance, and removal of guard structures
- Implementation, installation, maintenance, and removal of permit requirements (for example, Stormwater Pollution Prevention Plan [SWPPP])
- Operation of water trucks

- Material salvage and disposal

3.2 Site Work and Activities

Site work for the installation of the transmission line will include (1) grading for stub roads and site preparation; and (2) installation of new transmission structures/foundations, wires, and hardware assemblies. Specific information on these activities is provided in the following section.

3.2.1 Access Roads

Constructing the Devers-Red Bluff Transmission Line stub roads will involve clearing, grubbing, and grading. All new stub roads have been designed to be a 14-foot-wide roadway. Berms or swales that are approximately 2 to 3 feet wide will be created on each side of the stub road where necessary. Additionally, stub road widths will accommodate vehicle turning, vehicle turnouts, sidecasting, and backslope. Drainage improvements may be implemented in certain stub road locations to divert water away from stub roads to control erosion according to approved engineering designs. During construction, periodic maintenance of existing access roads may also be required.

3.2.2 Site Preparation

Construction activities associated with the Devers-Red Bluff Transmission Line will require grading and other site preparation activities at most tower locations and other areas in the ROW. Some of these activities would be temporary (for example, construction roads, land disturbance for pull sites, helicopter landing and staging areas, construction staging areas, and crane pads associated with tower assembly and erection). Other construction activities would be permanent, and the land would remain in use after construction (for example, tower footings and stub roads). Typically, the work area for construction activities would require an area of approximately 200 feet by 200 feet at each tower. Typically, in locations of relatively level terrain, only vegetation removal would occur to prepare the site for construction. In more rugged terrain with sloping site conditions, both vegetation removal and temporary or permanent elevation modifications may be necessary to prepare site access and the staging area for construction and to provide access of facilities during future maintenance. To support the equipment and vehicle traffic, the graded area may be compacted. Site preparation will be necessary to accommodate installation of new tower sites, and to perform crane operation during the assembly and erection of tower structures.

Prior to stringing activities, temporary protective netting systems, guard structures, or temporary guard arms mounted on boom trucks will be used at crossings for roads, streets, railroads, highways, or other transmission, distribution, or communication facilities, as required. On roads where traffic is light, guard structures may not be necessary; however, the use of barriers, flagmen, and/or temporary stopping of traffic will be required.

Approximately 110 pull sites, 36 splicing sites, 138 temporary guard structure setup sites, and 3 helicopter landing zones (HLZs) will be required for construction of the Devers-Red Bluff Transmission Line. The HLZs are located on BLM land and have been approved under a separate NTP granted by the BLM. Each pull/tension site, wire splice site, and wire setup will typically occupy a work area measuring approximately 300 feet by 150 feet.

All site preparations will be conducted in compliance with applicable permit and easement requirements and will include installation of SWPPP best management practices.

3.2.3 Underground, Belowground, and Abovegrade Activities

3.2.3.1 Major Underground Activities

Not applicable to this NTPR.

3.2.3.2 Major Belowgrade Activities

It is anticipated that belowgrade activities such as excavation, drilling, foundation installation will be performed for construction of the Devers-Red Bluff Transmission Line. Construction of the new LSTs will require construction of drilled concrete pier foundations. Planned belowgrade activities for construction of the Devers-Red Bluff Transmission Line are summarized as follows:

Construction of Foundations for 278 Lattice Steel Towers

Each LST will require four excavated holes of approximately 3 to 7 feet in diameter and 20 to 40 feet deep.

3.2.3.3 Major Abovegrade Activities

The Devers-Red Bluff Transmission Line requires assembly and erection of 278 LSTs and associated wire and hardware installation. Planned abovegrade activities are summarized as follows:

Construction of 278 Lattice Steel Towers

This scope is scheduled to be completed before April 1, 2013, to support the planned substation in-service schedule. All tower structures will be assembled and erected by cranes or helicopter for those identified as requiring this assembly method. Helicopters will also be utilized for installing sock line during wire-pulling operations. Conductor and wire will be installed along the entire route using conventional and helicopter installation methods.

Nine tower structures within the Devers-Red Bluff Transmission Line are planned to be constructed using helicopters. Those structures are 2307, 2308, 2309X, 2310X, 2412, 2422, 2423, 2424, and 2425ALTA. These structure locations are identified in Appendix A: Project Site and Access Maps, pages 2-92, 2-93, 2-125, 2-129, 2-130, and 2-131.

3.2.4 Parking/Staging

In order to support construction activities along the transmission ROW, where terrain and/or soil conditions within the 200-by-200-foot work area will not support parking of vehicles, parking and temporary staging are proposed along the existing Devers-Palo Verde No. 1 Transmission Line (DPV1) access route, along established disturbed routes. All parking and staging will occur outside of any Environmentally Sensitive Area (ESA).

3.2.5 Other Activities

Water trucks will be used for dust control during the construction for compliance with South Coast Air Quality Management District requirements and Project mitigation requirements.

4.0 ACTIVITY SCHEDULE

The activity [start date] schedule for DV2 construction activities is shown below:

- Road Construction and Maintenance: December 2011
- Foundation Installation: December 2011
- Structure Assembly: December 2011

- Structure Erection: December 2011
- Conductor Installation: September 2012
- GW and OPGW Installation: September 2012

CPUC Evaluation of Pre-Construction Mitigation Implementation

All applicable project mitigation 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. For biological resources, those additional conditions are discussed and defined in this section. The Compliance Status Table in SCE's NTPR provides pre-construction compliance information for the other issue areas addressed by the DPV2 EIR/EIS.

Following the discussion of biological, cultural, paleontological land use/sensitive receptors, geologic and water resources, a list of numbered conditions is presented to define additional information and clarifications regarding outstanding requirements. In some cases, these items exceed the requirements of the Mitigation Measures and Applicant Proposed Measures, and are based on specific site conditions. In these cases, the conditions will not also appear in the Compliance Status Table.

Biological Resources

This section presents a background for biological resources that occur, or could occur, along non-federal lands of the approximately 81-miles long Devers – Red Bluff Substation (Devers-Red Bluff) segment of new transmission line associated with the DPV2 Project. This summary of biological issues is based on information summarized in SCE's *Notice to Proceed Request for the Devers-Red Bluff Substation Transmission Line* (NTPR) (October, 2011) and a field verification study conducted on October 18 and 19, 2011 by Aspen Environmental Group (Aspen).

Construction activities associated with the DPV2 components included in this NTP would primarily occur within SCE's existing right-of-way (ROW) from the existing Devers Substation in North Palm Springs to the new Red Bluff Substation, approximately five miles east of Desert Center and immediately south of Interstate 10. According to SCE's NTPR, these activities would occur in, or adjacent to, 32 native vegetation communities, seven of which are considered sensitive habitats by CDFG. Sensitive habitats occurring in this NTP project area include blue palo verde wash woodland, creosote bush-white bursage-big galleta, creosote bush-white bursage-indigo bush, ocotillo open-tall scrub, smoke tree woodland, sweetbush riparian scrub, and wand holdback unique stands. Permanent and/or temporary impacts are anticipated in each of these, as well as a variety of other native and non-native, habitats as a result of activities associated with new transmission line construction, development of new spur roads, set-up of wiring/pull sites and guard structures, and temporary work limits.

The USFWS Biological Opinion (BO), which includes all activities associated with the components of this NTP, was issued on January 11, 2011 for the DPV2 Project. Subsequently, the CDFG issued a 2080.1 Consistency Determination for the DPV2 Project on April 27, 2011. In accordance with the USFWS BO, the CDFG Consistency Determination, Mitigation Measures presented in the DPV2 Final EIR/EIS, and APMs included as part of project development, a Qualified Biologist(s) shall conduct the appropriate pre-construction clearance surveys for special-status species prior to any ground disturbing activities and shall be present throughout the duration of all construction activities associated with the components of the NTP. Additionally, SCE shall implement all other applicable conditions of the USFWS BO, CDFG Consistency Determination, Final EIR/EIS Mitigation Measures, and APMs for biological resources that occur, or could occur, in all areas subject to disturbance.

Special-status plants. To date, SCE has indicated that three special-status plant species, including the federally endangered Coachella Valley milk-vetch, have been identified along the Devers-Red Bluff project area. According to SCE's NTPR, construction activities associated with the components addressed in this NTP would result in impacts totaling 2.46 acres and 12.28 acres of occupied and modeled habitat for Coachella Valley milk-vetch, respectively. Add more here regarding mitigation. As such, SCE shall implement a series of measures and conditions prior to construction that specifically address potential impacts to this species, including focused pre-construction surveys, the assurance of compensation funding for impacts to modeled habitat, and the submittal and implementation of a USFWS and CPUC approved Coachella Valley Milk-Vetch Salvage Plan.

The two remaining special-status plants that have been detected in the project area during surveys include California barrel cactus (*Ferocactus cylindraceus*) and foxtail cactus (*Coryphantha alversonii*). Each of these species is afforded protection under the California Desert Native Plant Act (CDNPA). To ensure that impacts to these species are minimized and/or avoided, SCE shall implement the conditions of the CPUC approved Transplant Plan.

In the event that additional special-status plant species are detected in the project area prior to and/or during construction activities, SCE shall implement the applicable Final EIR/EIS Mitigation Measures and APMs to minimize and/or avoid impacts to individual plants and populations. These include pre-construction surveys for special-status plants, biological monitoring during construction, and the implementation of transplanting or salvage methods as outlined in the applicable agency approved plans prepared for the DPV2 Project.

Special-status wildlife. SCE has reported a total of eight special-status wildlife species that have been observed and/or detected within the Devers-Red Bluff segment project area during surveys. These include desert tortoise (*Gopherus agassizii*), common chuckwalla (*Sauromalus ater*), red diamond rattlesnake (*Crotalus ruber*), black-tailed gnatcatcher (*Poliophtila melanura*), gray vireo (*Vireo vicinior*), loggerhead shrike (*Lanius ludovicianus*), prairie falcon (*Falco mexicanus*), and horned lark (*Eremophila alpestris*).

Desert tortoise is listed as a threatened species under the federal and California Endangered Species Acts (ESA and CESA, respectively). As reported in SCE's NTPR, implementation of construction activities associated with the Devers-Red Bluff segment are expected to result in a total of 14.45 acres of permanent impacts and 178.98 acres of temporary impacts to desert tortoise occupied, modeled, and critical habitat. Anticipated impacts to this species have been incorporated within formal Section 7 consultation between SCE and the USFWS and will be offset/mitigated through implementation of conditions of the USFWS BO, CDFG Consistency Determination, and Mitigation Measures presented in the Final EIR/EIS developed specifically for desert tortoise.

Although not identified during surveys, the federally threatened and State endangered Coachella Valley fringe-toed lizard (*Uma inornata*) is known to occur in the project area and the project area supports modeled habitat for this species. As a preliminary condition required under the USFWS BO, SCE has completed installation of exclusionary fencing at 41 tower locations within Coachella Valley fringe-toed lizard habitat. In order to ensure that impacts to this species, along with flat-tailed horned lizard which also occurs in the project area, are minimized and/or avoided, SCE shall implement additional conditions, such as pre-construction surveys, clearance surveys, biological monitoring, and post-project compensation funding.

Of the remaining wildlife species that have been identified during surveys, red diamond rattlesnake, gray vireo, and loggerhead shrike are considered Species of Special Concern (SSC) by CDFG and prairie

falcon and horned lark are CDFG Watch List (WL) species. Black-tailed gnatcatcher, along with most other bird species in the region, is afforded protection under the Migratory Bird Treaty Act (MBTA). In order to avoid and/or minimize impacts to special-status and other wildlife species occurring in the project area, SCE will implement broadly based Mitigation Measures provided in the Final EIR/EIS, such as pre-construction clearance surveys and biological monitoring, along with more specific Mitigation Measures for reptiles and nesting birds throughout the duration of all construction activities associated with this NTP.

Jurisdictional drainages. The SCE NTPR states that the Devers-Red Bluff segment of the DPV2 transmission line supports United States Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and CDFG jurisdictional wetland and non-wetland waters. Impacts associated with construction of the components of this NTP are anticipated within jurisdictional features that include braided ephemeral channels, ditches and culverts, and narrow ephemeral channels. SCE has indicated that impacts to jurisdictional non-wetland waters would total approximately 0.32 acres of permanent conversion and 5.51 acres of temporary disturbance from construction activities associated with the Devers-Red Bluff segment. SCE shall obtain the appropriate agency permits prior to any construction activities that result in impacts to federal or State jurisdictional waters. Additionally, SCE shall implement all applicable Final EIR/EIS Mitigation Measures, conditions of the USFWS BO and CDFG Consistency Determination, and APMs to avoid and/or minimize impacts to these areas. Any areas that would meet the criteria for federal and/or State jurisdiction that are disturbed during construction activities shall be mapped and the disturbance acreages shall be reported to the USFWS, CDFG, and CPUC to include in final mitigation/compensation requirements. Impacts to any area considered as federal wetlands shall be avoided throughout the duration of all construction activities.

Vegetation management. According to SCE's NTPR, construction activities associated with the Devers-Red Bluff segment are expected to result in a total of 29.84 acres and 304.92 acres of permanent and temporary impacts, respectively. The majority of these impacts would occur in native vegetation communities and habitats and would primarily be associated with temporary work limits, including wire pulling and splicing sites, access roads, and other temporary work spaces.

In order to ensure that ground disturbance is limited to overall acreages provided in the NTPR, SCE shall clearly flag, stake, or mark all permanent and temporary impact boundaries prior to any ground-disturbing activities associated with the components of this NTP. All work shall be strictly limited to defined boundaries. Vegetation clearing in defined temporary disturbance areas shall only occur where necessary to allow for equipment access and storm water management. Drive and crush methods shall be used in these temporary disturbance areas to minimize impacts and ensure root systems remain intact. All material and equipment to be used in connection with activities covered under this NTP will be stored and maintained at CPUC approved construction yards or an existing utility storage yard. Storage at any other location would likely require a Variance or Temporary Extra Work Space (TEWS) request and CPUC approval. Similarly, any water supply locations not previously approved by CPUC, would require CPUC approval.

SCE is currently developing a Habitat Compensation/Restoration Plan (HCRP) to address restoration and compensation of all areas disturbed by construction with the overall DPV2 Project. The restoration component of this plan is intended to target areas where onsite restoration is planned for temporary impacts to vegetation communities and jurisdictional waters whereas the compensation component relates to the purchasing and managing of offsite lands targeted for conservation in perpetuity. In compliance with Mitigation Measure B-1a, a Final HCRP shall be approved by the CPUC and BLM prior to any ground disturbing activities. A formal acquisition proposal for compensatory mitigation lands is

currently being developed by Wildlands, Inc. (Wildlands) on behalf of SCE to meet mitigation requirements for permanent impacts to native vegetation communities and jurisdictional waters and coordination between SCE, Wildlands, and the regulatory agencies is ongoing. As such, SCE may commence construction activities associated with the components of this NTP prior to final agency approval of compensatory acquisition lands provided the Final HCRP has been approved by the CPUC and BLM. Prior to CPUC and BLM approval of the Final HCRP, construction activities shall be limited to developed areas or previously disturbed areas as identified on Project vegetation maps.

A Noxious Weed Control Plan has been approved by the CPUC for the overall DPV2 Project. The purpose of this plan is to control the introduction and spread of non-native and invasive plant species in the project area or into adjacent undisturbed habitats during the project activity period. SCE shall implement all the conditions of this plan during project construction.

Cultural Resources

The Final Historic Properties Management Plan (HPMP) for the Devers-Palo Verde No. 2 Project was accepted on October 20, 2011. Nineteen cultural resources sites were identified on non-federal lands within the Area of Potential Effects (APE) for the Devers Substation to Red Bluff Substation Transmission Line. Therefore, in accordance with the Final HPMP, cultural resources management measures at the following nineteen (19) sites, is required during construction activities for the Devers Substation to Valley Substation Transmission Line:

Cultural Resources Sites within the Area of Potential Effects (APE) to be Monitored (n=19)		
Site Number	NRHP¹ Eligibility Determinations	Proposed Mitigation
CA-RIV-250T	Recommended ineligible; site was evaluated during testing for DPV2	Tower 2309X identified as Helicopter construction; no construction roadway access, monitor avoidance
CA-RIV-1117	Not Evaluated	No Grading signs and monitor avoidance
CA-RIV-1119	Not Evaluated	No Grading signs and monitor avoidance
CA-RIV-1809	Not Evaluated	No Grading signs and monitor avoidance
CA-RIV-1814	Listed	Data Recovery excavations of tower footings prior to construction with other mitigation following construction
CA-RIV-7947	Not Evaluated	ESA ² fencing and monitor avoidance
CA-RIV-9311	Not Evaluated	No Grading signs and monitor avoidance
P-33-013574	Not Evaluated	ESA fencing and monitor avoidance
P-33-013576	Recommended ineligible; site was evaluated during testing for DPV2	None
P-33-013577	Not Evaluated	ESA fencing and monitor avoidance
P-33-013579	Not Evaluated	ESA fencing and monitor avoidance. It should be noted that the southeastern portion of Distribution Pull Site CRD-REEL40 will be truncated by the resource's ESA fencing.
P-33-013600	Not Evaluated	No Grading signs and monitor avoidance
P-33-013601	Not Evaluated	ESA fencing and monitor avoidance. It should be noted that the northeastern portion of the Tower work limit will be truncated by the resource's ESA fencing.
P-33-014142	Not Evaluated	No Grading signs and monitor avoidance

Cultural Resources Sites within the Area of Potential Effects (APE) to be Monitored (n=19)		
Site Number	NRHP¹ Eligibility Determinations	Proposed Mitigation
P-33-017763	Recommended ineligible; site was evaluated during testing for DPV2	Monitor construction
P-33-017764	Not Evaluated	ESA fencing and monitor avoidance. It should be noted that the eastern portion of the Tower work limit will be truncated by the resource's ESA fencing.
P-33-018145	Not Evaluated	ESA fencing and monitor avoidance
P-33-018183	Not Evaluated	ESA fencing and monitor avoidance
P-33-018186	Not Evaluated	ESA fencing and monitor avoidance

¹ NRHP = National Register of Historic Places, ² ESA = Environmentally Sensitive Area

The Final HPMP states that areas identified as sensitive will be monitored during construction activities. In accordance with Mitigation Measure C-1e: Monitor construction, full-time monitoring shall occur when ground-disturbing activities take place at all archaeological High-Sensitivity Areas. Therefore, construction disturbance associated with the following tower structures within the Devers Substation to Red Bluff Substation Transmission Line, located in areas determined to be of high sensitivity for buried sites, shall be monitored as follows:

- Tower 2407 to Tower 2416 (archaeological monitor only)
- Tower 2505 to Tower 2529 (archaeological and Native American monitor).

In the event that an unanticipated discovery of cultural materials is made during construction of the Devers Substation to Red Bluff Substation Transmission Line, the find shall be managed in compliance with the following procedures provided in Section 4.4 - Plan of Discovery of Cultural Resources of the approved HPMP as itemized below:

- All work within 200 feet of the discovery will be halted and the onsite Archaeological Field Monitor will evaluate the discovery.
- The Environmental Monitor will notify the Lead Archaeological Monitor, Consultant Project Manager (CPM), Work Package Archaeologist(s) (WPA), or SCE Archaeologist (in that order) immediately.
- Activities within 200 feet of the discovery will not resume until the discovery has been assessed by a member of the Cultural Resources Team.

Paleontological Resources

Based on the Paleontological Monitoring and Treatment Plan, submitted to the California Public Utilities Commission on April 20, 2011, the potential to encounter paleontological resources along the Devers Substation to Red Bluff Substation Transmission Line varies from low to high. Therefore, in accordance with the Plan, high sensitivity units must be monitored full-time during excavations in sediment of high paleontological sensitivity. In addition, low sensitivity units must be monitored intermittently, to verify the low sensitivity classification, as determined by the Paleontological Resource Specialist. Excavation for the lattice steel tower foundations must be monitored at the following tower locations:

Paleontological Construction Monitoring						
Full-time Monitoring		Part-time Monitoring				
2229	2236	2001	2116	2220	2304	2349

Paleontological Construction Monitoring						
Full-time Monitoring		Part-time Monitoring				
2230	2237	2002	2117	2221	2305	2353
2230AX	2238	2003	2118	2222	2306	2354
2231	2239	2004	2119	2223	2307	2355
2232	2356	2005	2120	2224	2308	2404
2234	2403	2006	2121	2240	2309	2405
2235		2007	2122	2241	2312	2406
		2008	2123	2242	2315	2407
		2009	2124	2243	2316	2408
		2010	2125	2244	2317	2409
		2011	2126	2245	2318	2420
		2012	2127	2246	2322	2421
		2013	2128	2247	2323	2422
		2015	2129	2248	2324	2423
		2016	2130	2249	2325	2428
		2017	2131	2250	2326	2429
		2018	2132	2251	2327	2430
		2019	2133	2252	2328	2452
		2020	2134	2253	2329	2455
		2100	2135	2254	2330	2456
		2101	2136	2255	2331	2457
		2102	2137	2256	2332	2458
		2013	2200	2257	2333	2501
		2104	2209	2258	2334	2502
		2105	2210	2259	2335	2503
		2106	2211	2260	2340	2504
		2107	2212	2261	2341	2505
		2108	2213	2262	2342	2519
		2109	2214	2263	2343	2520
		2110	2215	2265	2344	2521
		2112	2216	2266	2345	
		2113	2217	2267	2346	
		2114	2218	2302	2347	
		2115	2219	2303	2348	

In the event that a paleontological resource discovery is made during site development, all construction activities in the area of the discovery must cease, and the Discovery of Fossils protocol, as specified in the Plan must be followed (1-Notification, 2-Avoidance and Continued Construction Activities, and 3-Determining Significance of a Discovered Paleontological Resource).

Geologic Resources

The CPUC reviewed the NTPR and the Draft Geotechnical Investigation Report¹ related to compliance with the following approved Geology and Soils mitigation measures that apply to the CRS-Red Bluff segment of the DPV2 Transmission Line Project: G-2a (Conduct geotechnical studies for soils to assess characteristics and aid in appropriate foundation design), G-3a (Conduct geotechnical surveys for landslides), G-5a (Design project facilities to avoid impact from ground failure), and G-7a (Minimize project structures within active fault zones). The geotechnical investigation conducted by Kleinfelder consisted of literature review, aerial photo and field reconnaissance geologic mapping, drilling of 147 rock and soil borings, and laboratory testing of samples obtained from the borings. Based on the information collected from their investigation Kleinfelder provides seismic design parameters and recommendations for use by SCE and Powers Engineers for foundation design.

Kleinfelder review and reconnaissance did not identify any existing landslides along the Red Bluff-Devers alignment that could impact project structures. However, towers located within the Granite quarry area (Towers 2221-2224) are located within an area where previous and ongoing aggregate mining has resulted in excavation of the soil materials on several sides of the existing and proposed towers. A report by URS analyzing the stability of these slopes was reviewed by Kleinfelder, Kleinfelder indicates that if URS recommendations regarding stabilization of these slopes by stockpiling soil against and adjacent to them are followed, the stability of the area should meet or exceed required factors of safety.

The field reconnaissance revealed that 5 towers located on or adjacent to steep slopes may be subject to damage by rock fall. Kleinfelder provides suggested mitigation measures for protection against rock fall in their conclusions and recommendations section.

Additionally, the Red Bluff-Devers alignment crosses traces of the active San Andreas fault zone (the Banning and Mission Creek faults) and unnamed mapped Quaternary faults north of the Mecca Hills. The Kleinfelder report indicates that the Banning fault is mapped as crossing between Towers 2013 and 2015, and the Garnet Hill fault is mapped as crossing between Towers 2228 and 2229; Kleinfelder has concluded that based available mapping and aerial photo review that the mapped surface traces of these faults do not cross within the foot print of any planned tower and that the risk of surface fault rupture within the footprint of the proposed towers is low.

Based on CPUC review of the Geologic and Borehole Location Maps provided in the report and the project mapbooks, Towers 2015, 2226X, and 2228 range from less than 10 feet to approximately 185 feet from mapped traces of the San Andreas Fault. Tower 2226X appears to be less than 10 feet from the fault. Therefore, a condition has been added requiring a fault study for these three tower locations. Towers 2013, 2224, 2225X, 2227, 2229, and 2230AX are also in the San Andreas Fault Alquist-Priolo zone, but are all approximately 400 feet or more from the mapped traces and are not likely to have surface rupture issues.

Additionally, several towers (Towers 2242 to 2252) are located within and near the mapped traces and associated Alquist-Priolo zone for the unnamed fault traces north of the Mecca Hills Fault. Information Kleinfelder obtained regarding previous trenches along these strands from Petra Geotechnical indicates that no active faults were identified in this area by Petra. Kleinfelder concluded that there is little to no potential for rupture from these unnamed fault strands.

¹ "Draft Geotechnical Investigation Report, Colorado River Substation to Devers No. 2 500 kV Transmission Project, Riverside County, California" prepared for Southern California Edison by Kleinfelder West, Inc., dated January 28, 2011.

In accordance with APM G-7, helicopter-assisted construction will occur in areas that exhibit both (1) high erosion potential and/or slope instability; and (2) a lack of existing stub roads within a reasonable distance of the tower site, or existing access that is not suitable for upgrading to accommodate conventional tower construction or line stringing equipment, and where it is determined that, after field review, the issues of erosion and/or slope instability cannot be successfully mitigated through implementation of accepted engineering practices. Along this segment, helicopter construction will be used in the steep areas adjacent to SBNF and SCE has provided a list of nine towers where helicopter construction is planned.

Land Use and Sensitive Receptors

The construction activities for under this NTP will occur mainly within the existing SCE ROW from the existing Devers Substation north of the city of Palm Springs to a new Red Bluff Substation to be located approximately 5 miles east of Desert Center, immediately south of Interstate 10.

This segment of transmission line is located in predominantly open space, with pockets of existing residential and industrial development. Residential development continues to grow in this region, specifically in the communities north of the Cities of Indio and Rancho Mirage. The community of Desert Center is located approximately 0.8 miles north of the transmission line.

According to the NTPR, in general, construction equipment operating hours for the work on the ROW associated with the installation of the transmission line are planned to be from approximately 7:00 a.m. to 6:00 p.m. on weekdays or in accordance with an alternative schedule in compliance with the local jurisdiction. Towers 2221-2224 are located within an open pit granite quarry area and SCE will coordinate with the owner/operator to avoid critical mining periods (per APM L-8).

Construction activities, including noise associated with helicopter usage, was addressed in the DPV2 Final EIR/EIS. Helicopter usage will be limited to the extent feasible in accordance with Mitigation Measure AQ-1g (Reduce helicopter use during construction) and all residences will be notified of construction per the approved Construction Notification Plan as required in Mitigation Measure L-1a. The following nine tower structures are planned to be constructed using helicopters: 2307, 2308, 2309X, 2310X, 2412, 2422, 2423, 2424, and 2425ALTA.

In accordance with Mitigation Measure L-1c, SCE must provide proof of resolution of land acquisition issues for crossing Agua Caliente Band of Cahuilla Indians tribal lands. To date, proof of this resolution has not been received by the CPUC, so a condition requiring such has been added to this NTP.

Water Resources

This segment of the line crosses natural watercourses, including several crossings of the San Geronio River in locations where the river is in a braided condition with potential for flow to follow several channel paths. Groundwater in the area is deep. The NTPR indicates that Mitigation Measure H-6a and Applicant Proposed Measures W-1 through W-9 are applicable to this segment of the project. With regards to APM W-1, which requires "potential erosion sites" to be inspected after each major rainstorm during the first year following construction, maintenance workers shall inspect and repair any erosion observed near tower foundations located within FEMA-designated Flood Hazard Areas for the lifetime of the project. With regards to APM W-3, the NTPR notes that the project would not contain enough hazardous materials to warrant a Hazardous Materials Business Plan (HMBP). APM W-3 does not specifically require a HMBP or identify a quantity of hazardous materials that would be necessary in order to justify such a plan; rather, APM W-3 requires that "hazardous material plans" are incorporated into the construction bidding specifications. The Hazardous Substance Control and Emergency Response

Plan required per Mitigation Measure P-1a would meet the purpose of APM W-3, and would be implemented for this portion of the project, also as noted in the NTPR.

Transportation and Traffic

Section D.9.4 (Applicable Regulations, Plans, and Standards) of the DPV2 Final EIR/EIS discusses the Federal Aviation Administration (FAA) regulations, including submittal of Form 7460-1 as required under Subpart B, Section 77.13 of the guidelines of the FAA. Furthermore, the DPV2 Final EIR/EIS addresses DPV2 aviation impacts and FAA regulations under Section D.9.6.6 (Midpoint Substation to Cactus City Rest Area) and Section D.9.6.7 (Cactus City Rest Area to Devers) with respect to the Desert Center, Chiriaco Summit and Palm Spring Airports.

As part of the MMCRP process and to ensure that SCE is in accordance with all federal, State and local regulations, the CPUC sent SCE a data request on November 9, 2011 requesting information on FAA determinations of No Hazard to Navigable Airspace and requirements for lighting and marking of transmission facilities. SCE responded on November 30, 2011 that it filed Forms 7460-1 for 77 locations (66 towers & 11 catenaries) along the entire CRS-Devers line; however, the forms/determinations have not yet been received. Therefore, in order to ensure that the CPUC and its environmental monitors are informed about towers, spans, and other project components that may fall under FAA jurisdiction and have the potential for lighting or marker requirements, the following conditions have been included in this NTP:

- Prior to construction of any tower or span for which a Form 7460-1 is required to be submitted to the FAA, SCE shall provide the CPUC with a copy of the FAA's obstruction evaluation determination.
- For any tower or span where lights or markers are required per the FAA, SCE shall submit to the CPUC a copy of FAA Form 7460-2 at the time when it is filed at (1) the start of construction and (2) within five days of when the structure is constructed to its maximum height.

Conditions of NTP Approval

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

1. 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. Please see the table of pre-construction requirements in SCE's NTPR. Bulleted items can be found below which provide additional information and clarifications to outstanding requirements.
2. Copies of all relevant permits, compliance plans, and this Notice to Proceed shall be available on site for the duration of construction activities.
3. Verification of noticing mailings including address lists, postings and newspaper postings, as required under Mitigation Measures L-1a, WR-1a, and WR-1b shall be submitted to the CPUC prior to construction.
4. Prior to construction, SCE shall provide proof of resolution of land acquisition issues for crossing Agua Caliente Band of Cahuilla Indians tribal lands (in accordance with Mitigation Measure L-1c).
5. All crew members shall be trained through a Worker Environmental Awareness Program (WEAP) prior to working on the project. A log shall be maintained onsite with the names of all crew personnel trained. For any crew members with limited English, a translator shall be onsite to ensure understanding of the training program. In place of a translator, the WEAP training brochure can be

provided in Spanish or other languages as appropriate. All participants will receive a hard hat sticker for ease of compliance verification.

6. Prior to the initiation of any ground-disturbing activities, all work area boundaries associated with temporary and permanent disturbance shall be clearly staked, flagged, or marked. All workers shall strictly limit access and vehicles to the designated work limits. Removal of any perennial, native vegetation in work areas shall be avoided to the maximum extent practicable. Access to work areas in undisturbed habitat shall be achieved by crushing, instead of removal, to the maximum extent practicable.
7. In compliance with conditions of the USFWS BO, a field contact representative (FCR) shall be designated and will be onsite for all ground-disturbing activities in desert tortoise habitat. The FCR will have the authority to halt all work activities that are not in compliance with the Project's conservation measures and Incidental Take Statement requirements.
8. SCE shall maintain ongoing coordination with the CPUC, BLM, USFWS, and CDFG related to the acquisition of offsite compensatory lands to mitigate for permanent impacts to native vegetation communities and federal and State jurisdictional waters.
9. Prior to CPUC and BLM approval of the Final HCRP, construction activities shall be limited to developed areas or previously disturbed areas as identified on Project vegetation maps.
10. SCE shall implement the conditions of the approved Final HCRP to compensate for temporary disturbance to native vegetation communities.
11. SCE shall implement all conditions of the Final Noxious Weed Control Plan which specifies the locations of existing weed populations and provides appropriate measures to control the introduction and spread of noxious weeds into the Project area, worker training, specifications, and inspection procedures for construction materials and equipment used in the Project area.
12. Prior to entering the work area for the first time, all ground-disturbing equipment shall be thoroughly cleaned at an approved wash station, or other location with CPUC approval.
13. All seeds, straw wattles, gravel and fill material used during construction shall be certified weed free by the local County Agricultural Commissioner's Office.
14. SCE shall conduct pre-construction surveys for special-status plants, cacti, and plant species covered under the California Desert Native Plant Act within fourteen (14) days prior to construction activities within 100 feet of ground disturbing activities. If listed and/or sensitive plants are identified and cannot be avoided, SCE shall be responsible for the translocation of plants and/or collection of seeds from existing populations that would be impacted and the planting/reseeding of these plants in adjacent suitable habitat that would not be affected by construction activities. Prior to any ground-disturbing activities, the CPUC EM shall review and approve the survey results, and avoidance and disturbance flagging.
15. To the extent possible, all construction activities in Coachella Valley milk-vetch modeled habitat will be conducted outside of the seed germination and growing season, generally January to May. If construction activities are required during that period, a qualified biologist/botanist shall conduct pre-construction focused winter (generally January and February) surveys for Coachella Valley milk-vetch in areas of the project that support modeled habitat for this species prior to ground disturbance. Any milk-vetch locations identified during surveys shall be delineated on aerial photographs, incorporated into the project construction management plans, and avoided to the

maximum extent possible. Where avoidance is not possible, SCE shall implement measures outlined in the USFWS approved Coachella Valley Milk-Vetch Salvage Plan.

16. Prior to ground-disturbing activities, SCE shall provide documentation that ensures funding applicable to the requirements outlined for impacts to modeled habitat for Coachella Valley milk-vetch under Condition #26 of the USFWS BO.
17. SCE shall implement all conditions of the BLM and CPUC approved Transplanting Plan that provides details on the plants being transplanted, including which species and how many of each individuals of each species; where the plants will be transplanted; how the plants will be transplanted; how the plants will be maintained during the transplanting efforts; and, if the plants will be used to re-vegetated disturbed areas of construction sites.
18. All plants that are subject to transplanting shall be clearly marked for avoidance (using bright colored flagging) prior to construction activities. For listed plants, SCE shall identify if the plants can be avoided. If avoidance is not possible, SCE shall purchase offsite mitigation in coordination with the USFWS and CDFG. If avoidance is not feasible for non-listed special-status plants, SCE shall implement measures outlined in the CPUC approved Final Special-Status Plant Impact Avoidance and Minimization Plan.
19. SCE shall prepare and submit a Sensitive Plant Salvage Plan to the CPUC. This plan shall require CPUC approval prior to any ground disturbing activities that result in impacts to special-status plants, including those designated as CNPS List 1B species. The plan shall include methods to reduce impacts to these species, should they occur, including, but not limited to, seed collection and topsoil salvage techniques. SCE shall conduct pre-construction surveys for sensitive wildlife in accordance with specific conditions provided in Final EIS/EIR Mitigation Measures and conditions of the USFWS BO. The location of sensitive species identified during the pre-construction surveys shall be provided to the BLM and CPUC on updated project maps.
20. SCE shall conduct pre-construction surveys for sensitive wildlife in accordance with specific conditions provided in Final EIS/EIR Mitigation Measures and conditions of the USFWS BO. The location of sensitive species identified during the pre-construction surveys shall be provided to the BLM and CPUC on updated project maps.
21. SCE shall conduct pre-construction surveys for special-status reptiles within 48 hours prior to initiation of construction activities. If special-status reptiles are identified in the Project area during construction, all activities adjacent to the identified location shall be halted and the animal will be allowed to move away from the construction site. If the individual is not moving, a qualified biologist will relocate it to nearby suitable habitat (in the shade of a shrub) outside of the construction area.
22. Pre-construction surveys for breeding birds shall be conducted within 500 feet of disturbance limits by a CPUC-approved biologist at least fourteen (14) days prior to construction during the appropriate season. If federally or State listed birds with active nests are identified, a qualified biological monitor shall establish a 500-foot buffer around the nest and no activities will be allowed within the buffer until the young have fledged from the nest or the nest fails. A 300-foot buffer shall be implemented in the event that raptors or other species protected under the Migratory Bird Treaty Act (MBTA) are located. The biological monitor shall conduct regular monitoring of any identified nest to determine success/failure and to ensure that construction activities do not occur within established buffers until the nesting cycle is complete or the nest fails. There may be a reduction of these buffer zones depending on site-specific conditions or the existing ambient level of activity. SCE shall coordinate with CDFG and USFWS to determine the appropriate buffer zone.

23. Prior to ground-disturbing activities, SCE shall conduct pre-construction surveys for burrowing owl within all potential impact areas. Any burrowing owls occupying the Project area shall be evicted by passive relocation techniques as identified in Mitigation Measure B-9e.
24. SCE shall conduct pre-construction surveys for American badger in suitable habitat prior to ground-disturbing activities. Badger dens located outside the project area shall be flagged for avoidance. Unoccupied dens located in the project area shall be covered to prevent the animal from re-occupying the den prior to construction. If occupied dens are identified in any disturbance areas, SCE shall consult with CDFG for further action.
25. SCE shall conduct pre-construction surveys for Palm Springs round-tailed ground squirrel. If occupied nesting colonies are identified during these surveys, construction activities would not be permitted during the active season (March 1 through July 31).
26. Pre-construction desert tortoise clearance surveys shall be conducted by a CPUC, CDFG, and USFWS approved Authorized Biologist immediately prior to construction activities within a 100 percent coverage area of all desert tortoise habitat (modeled, critical, and/or occupied) that be subject to project disturbance. Surveys, tortoise handling protocols, burrow excavations, and relocation procedures shall follow conditions specified in the Final EIR/EIS Mitigation Measures and conditions of the USFWS BO.
27. The Authorized Biologist shall be present during all construction activities in tortoise habitat (modeled, critical habitat, and/or occupied habitat) during the tortoise's more active season (April thru May and September thru October).
28. As part of the Project WEAP training defined under Condition #4 above, a qualified tortoise biologist shall present a class or briefing to construction workers that addresses, at a minimum, desert tortoise sensitivity to human disturbance, daily and seasonal activity patterns, and proper handling protocols.
29. A Qualified Biologist shall conduct pre-construction clearance surveys within modeled/blow sand habitat for Coachella Valley fringe-toed lizard and flat-tailed horned lizard immediately prior to the initiation of ground-disturbing activities during the active season (between April and May, and inclusive of both months). The Qualified Biologist shall be present during all construction activities in these areas. If fringe-toed or flat-tailed horned lizards are identified, the Qualified Biologist will capture and relocate any individuals to the nearest suitable modeled/blowsand habitat outside of the project ROW.
30. Prior to any ground-disturbing activities within modeled/critical/occupied habitat for desert tortoise and/or CVFTL, SCE shall provide documentation that ensures funding to complete required mitigation, including acquisition of lands, monitoring, and reporting activities for impacts to CVMV, desert tortoise, CVFTL, and/or FTHL habitat. SCE shall provide to the CPUC, CDFG, USFWS, and BLM no later than thirty (30) days prior to commencing ground-disturbing activities at applicable tower locations, an irrevocable letter of credit or other form of security approved by CDFG's Office of the General Counsel.
31. SCE shall conduct biological monitoring in all areas of disturbance during construction activities, including access roads. The biological monitor shall look for special-status wildlife that may be located within or immediately adjacent to construction areas. If special-status species are found, the biological monitor shall avoid or relocate in accordance to the appropriate Final EIR/EIS Mitigation Measures, APMs, and conditions of the USFWS BO.

32. SCE shall install all overhead components utilizing the most current APLIC standards for collision-reducing techniques.
33. SCE shall implement all conditions of the USFWS approved Raven Control Plan that includes procedures for conducting depredation surveys and outlines contributions to a range-wide management program. The approved Raven Control Plan provided by SCE to all transmission line companies that conduct operations within the ROW.
34. Sand compaction at all sites in the Coachella Valley shall be avoided.
35. SCE shall avoid construction activities that would tend to create wind barriers that might result in sand stabilization in Coachella Valley fringe-toed lizard habitat.
36. No activities, whatsoever, shall be permitted within areas designated as federal wetlands.
37. All federal and State jurisdictional waters shall be avoided to the maximum extent feasible. In the event that jurisdictional waters cannot be avoided by project activities, SCE shall obtain the appropriate USACE, CDFG, and State Water Quality Control Board permits. Documentation of these permits must be provided to the CPUC prior to conducting any activities in these areas which may result in permanent or temporary impacts.
38. Project speed limits shall be posted and strictly adhered to in compliance with Mitigation Measures and APMs provided in the Final EIR/EIS and conditions of the USFWS BO.
39. For any construction activities that occur within the Coachella Valley Preserve boundaries, SCE will cooperate with the Preserve in closing (gating) existing access roads.
40. During construction, parked vehicles will be inspected prior to being moved. If a tortoise is found beneath a vehicle, the Authorized Biologist will be contacted to move the animal out of harm's way, or the vehicle will not be moved until the tortoise leaves on its own accord. The Authorized Biologist will be responsible for taking appropriate measures to ensure that any tortoises moved in this manner is not exposed to temperature extremes which could be harmful to the animal.
41. Removal of perennial, native vegetation in work areas will be avoided to the maximum extent practicable, particularly while accessing pulling and splicing stations and during pulling and splicing activities.
42. Scalping of topsoil and removal of low growing vegetation shall not be allowed unless otherwise authorized by the CPUC for areas that support special-status plant species that are not suitable for transplanting.
43. Road construction shall avoid blading to the extent possible and shall be implemented through vegetation crushing. Within desert tortoise habitat, spur roads shall not be bladed except where necessary to allow access for construction vehicles. Required vehicles shall enter on one pathway which is flagged and developed only by the passage of vehicles crushing vegetation.
44. Constructed road berms in modeled, critical, and occupied desert tortoise habitat shall be less than 30.48 cm (12 in) in height and have slopes less than 30 degrees.
45. All auger holes, trenches, pits, or other steep-sided excavations that pose a hazard to wildlife will be securely fenced or covered when unattended to prevent accidental death or injury. At the start and end of each workday, and just before backfilling, all excavations will be inspected for trapped animals. If found, trapped animals will be removed by the Authorized or Qualified Biologist.
46. Project personnel will not be allowed to bring pets into any work areas.

47. Road-killed animals or other carcasses detected within the Project area will be picked up and disposed of immediately (e.g. removal to a landfill or disposal at SCE facility). For any special-status species road-kill, the Qualified Biologist or FCR will contact CDFG and USFWS within 1 working day of receipt of the carcass for guidance on disposal or storage.
48. A trash collection system will be established to ensure that all food and other trash that could attract desert tortoise predators is properly disposed of in self-closing, sealable containers with lids that latch to prevent wind, common ravens, and mammals from opening containers. All trash containers will be regularly inspected and emptied to prevent spillage and maintain sanitary conditions, and removed from the Project footprint when construction activities are complete.
49. Immediately after completion of construction activities, the FCR or designated representative will record the perimeter of the post-construction project footprint, including all tower pads, spur roads, pulling and splicing stations and access routes, and other project-related infrastructure in a GIS-compatible format to verify the extent of project disturbance. The GIS coverage layer will be provided to the BLM, Service, and CDFG within 90 days of completing construction; the coverage will be compared to impact acreages estimated in this biological/conference opinion to determine final ground-disturbance associated with project construction.
50. Following completion of construction, SCE will remove all exclusionary fencing approved under NTP #2 for the DPV2 Project and recontour soils to pre-construction conditions.
51. In addition to APM W-1, which requires "potential erosion sites" to be inspected after each major rainstorm during the first year following construction, for the lifetime of the project maintenance personnel shall watch for and repair any areas where infrastructure is located within FEMA-designated Flood Hazard Areas and active erosion is observed near tower foundations.
52. Engineering and Conclusions Recommendations included in the Geotechnical Investigations Report (2011) shall be followed.
53. A qualified archaeologist and Native American monitor shall monitor construction disturbance associated with Towers 2407 to Tower 2416 (archaeological monitor only) and Tower 2505 to Tower 2529 (archaeological and Native American monitor), which are located in areas determined to be of high sensitivity for buried sites along the Devers-Red Bluff transmission line.
54. In the event that an unanticipated discovery of cultural materials is made during construction of the Devers Substation to Valley Substation Transmission Line, the find shall be managed in compliance with the following procedures provided in Section 4.4 - Plan of Discovery of Cultural Resources of the approved HPMP as itemized below:
 - All work within 200 feet of the discovery shall be halted and the onsite Archaeological Field Monitor shall evaluate the discovery.
 - The Environmental Monitor shall notify the Lead Archaeological Monitor, Consultant Project Manager (CPM), Work Package Archaeologist(s) (WPA), or SCE Archaeologist (in that order) immediately.
 - Activities within 200 feet of the discovery shall not resume until the discovery has been assessed by a member of the Cultural Resources Team.
55. As noted in the table above, excavation for the lattice steel tower foundations shall be monitored on a full or part-time basis by a qualified paleontological monitor.

56. In the event that a paleontological resource discovery is made during site development, all construction activities in the area of the discovery must cease, and the Discovery of Fossils protocol, as specified in the Paleontological Monitoring and Treatment Plan will be followed (1-Notification, 2-Avoidance and Continued Construction Activities, and 3-Determining Significance of a Discovered Paleontological Resource).
57. The CPUC Environmental Monitor (EM) shall be notified immediately of any unanticipated cultural, paleontological, or biological resource discoveries.
58. If buried metal components are used for project facilities, the Corrosion Control Recommendations outlined by Schiff Associates in Appendix E of the Geotechnical Investigations Report (2011) shall be followed.
59. A detailed fault study shall be provided to the CPUC prior to construction at Towers 2015, 2226X, and 2228.
60. If the application of water is needed to abate dust in construction areas and on dirt roads, SCE shall use the least amount needed to meet safety and air quality standards and prevent the formation of puddles, which could attract wildlife to construction sites.
61. SCE shall obtain required haul and ingress/egress and permits for any temporary lane closures from the County of Riverside or other jurisdictions as necessary. Copies of permits shall be submitted to the CPUC. If temporary lane closures are needed, SCE shall coordinate in advance with emergency service providers and shall provide documentation to the CPUC.
62. Prior to construction of any tower or span for which a Form 7460-1 is required to be submitted to the Federal Aviation Administration (FAA), SCE shall provide the CPUC with a copy of the FAA's obstruction evaluation determination.
63. For any tower or span where lights or markers are required per the FAA, SCE shall submit to the CPUC a copy of FAA Form 7460-2 at the time when it is filed at (1) the start of construction and (2) within five days of when the structure is constructed to its maximum height.
64. In regard to the Hazardous Substance Control and Emergency Response Plan, to fully satisfy the intent of Mitigation Measure P-1b, documentation of training for personnel who would be working near or handling hazardous materials shall be submitted to the CPUC for review after completion of these training activities. Only trained personnel shall be allowed to work near or to handle hazardous materials.
65. In accordance with Mitigation Measure P-1a, prior to project construction, documents prepared by the construction contractors should be submitted to the CPUC along with an acknowledgment that the SCE Certified Industrial Hygienist has reviewed and approved the documents to complete the submittals required for these measures. Documents that the construction contractor would be responsible for would include a hazardous materials inventory that will be used to prepare and/or modify the Hazardous Material Business Plan, documents providing SCE with the names and telephone numbers of persons responsible for the hazardous waste management, an Emergency Response Procedures document that follows SCE's emergency response procedures for the Project.
66. 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 Variance Request, as defined in the Mitigation Monitoring, Compliance and Reporting Plan for this project shall be submitted for CPUC review.

67. No clearing or disturbance to vegetation shall occur outside of approved work areas.

68. If construction debris or spills enter into environmentally sensitive areas, appropriate jurisdictional agencies and the CPUC EM shall be notified immediately.

Please contact me if you have any questions or concerns.

Sincerely,

Billie Blanchard

Billie Blanchard

CPUC Environmental Project Manager

Devers-Palo Verde No. 2 Transmission Project

cc: Mary Jo Borak, CPUC Supervisor
Allison Shaffer, BLM Palm Spring South Coast Field Office
Holly Roberts, BLM Palm Springs South Coast Field Office
Ysmael Wariner, BLM Palm Springs South Coast Field Office
Vida Strong, Aspen Environmental Group
Jamie Miner, Aspen Environmental Group
Rosina Gallego, Aspen Environmental Group
Jenny Slaughter, Aspen Environmental Group
Hedy Koczwarra, Aspen Environmental Group
Ryana Parker, Southern California Edison Company
Sheree James, Southern California Edison Company