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 #10)

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 overhead 500 kV transmission line from Devers Substation to Valley Substation, excluding the portion of the line within San Bernardino National Forest (SBNF), as part of the Devers-Palo Verde No. 2 Transmission Line Project. The construction activities for under this NTP #10 will occur mainly within SCE right-of-way (ROW) from the existing Devers Substation north of the City of Palm Springs to the existing Valley Substation located in the City of Menifee, excluding the portion of the transmission line in the SBNF which requires separate U.S. Forest Service authorization.

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 #10 for the Devers-Valley 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 and revised on November 28, 2011 are presented as follows (indented).

> This portion of the project starts from a new dead-end rack inside Devers Substation (submitted as separate NTPR) and then proceeds to existing lattice steel tower (shown as MO-T1 on map book), immediately outside the Devers Substation in the existing transmission right-of-way (ROW), to the new tower east of the SBNF (Construction Number 1036) and continues from the new tower west of SBNF (Construction Number 1049) to the new tubular steel pole (TSP) to be installed inside the existing Valley Substation, terminating on an existing deadend rack at Valley Substation. The scope of work to be performed under this NTPR consists of construction of stub roads, foundations, steel assembly, erection of 141 lattice steel towers (LSTs), erection of 1 TSP, and the installation of associated hardware assemblies and interconnecting wires.
>
> Because of the environmental, constructability, and safety concerns in the steep areas adjacent to SBNF, no access roads can be constructed to these tower locations. Hence, helicopters will be used for the majority of construction activities for these towers. In order to support the helicopter construction activities, temporary helicopter landing areas may be utilized within the ROW in the steep areas where no access roads can be constructed. These landing areas will require clearing of vegetation and minor leveling.
>
> There will also be four temporary Helicopter Landing Zones (HLZs): H1A-DV, H1X-DV, H2-DV, and H7-DV, located within and adjacent to the ROW to support the use of helicopter construction for towers. The HLZs are shown in Appendix A: Project Site and Access Maps, on Figures 2-16 (H1A-DV), 2-17 (H1X-DV), 2-27 (H2-DV), and 2-33 (H7-DV)…
>
> **3.0 PROJECT COMPONENTS**
>
> This section describes the Project components, including site facilities, operations, and site work associated with DV2 Transmission Line (excluding SBNF) 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. SCE has dedicated a DPV2 toll-free information line ([866] 602-3782) and website (wwwsce.com/dpv2) for this Project. The information line is the designated public notification contact for DPV2, as described in the Project Wide Construction Notification Plan.

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 DV2 Transmission Line (excluding SBNF):

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
- Helicopter Construction and Maintenance Platforms
- Temporary Helicopter Landing Zones

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])
- Installation of exclusionary fencing
- Operation of water trucks
- Material salvage and disposal

4.0 Site Work

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.

4.1 Access Roads

Constructing the DV2 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 width must 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.

4.2 Site Preparation

Construction activities associated with the DV2 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 staging area for construction activities would require approximately a 200□] by 200□]foot area 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, including blasting, may be necessary to prepare site access and the staging area for construction and also to provide access to facilities for 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 operate the crane(s) during the assembly and erection of tower structures.

Approximately 25 wire setup sites, 138 temporary guard structure setup sites, and 4 HLZs will be required for construction of the DV2 Transmission Line included in this NTPR. Each pull/tension site, wire splice site, and wire setup will typically occupy a work area measuring approximately 300 by 150 feet.

All site preparation will be conducted in compliance with all permit requirements and will include installation of SWPPP best management practices.

4.3 Underground and Belowground Activities

4.3.1 Major Underground Activities

Not applicable to this NTPR.

4.3.2 Major Belowgrade Activities

It is anticipated that belowgrade activities such as excavation, drilling, and foundation installation, will be performed for construction of the DV2 Transmission Line. Construction of the new LSTs and TSP will require construction of drilled concrete pier foundations.

Planned belowgrade activities for construction of the DV2 Transmission Line (excluding SBNF) are summarized as follows:

- ***Construction of Foundations for 141 LSTs and One TSP***. Each LST will require four excavated holes that will be approximately 3 to 7 feet in diameter and 20 to 40 feet deep. The foundation for the TSP to be located inside the Valley Substation will require a hole that will be approximately 8 feet in diameter and 40 to 60 feet deep.

4.3.3 Major Abovegrade Activities

The DV2 Transmission Line requires assembly and erection of 141 LSTs, 1 TSP, and associated wire and hardware installation. Planned abovegrade activities are summarized as follows:

- ***Construction of 141 LSTs and One TSP***. 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 used for installing sock line during wire pulling operations. Conductor and wire will be installed along the entire route using conventional and helicopter installation methods. Temporary guard structures will be installed at roadway and utility crossings as needed.

4.4 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 is proposed along the existing Devers-Valley No. 1 access route, along

established disturbed routes. All parking and staging will occur outside of any Environmentally Sensitive Area.

4.5 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: December 2011
- GW and OPGW Installation: September 2012
- Fiber Optic Splice and Test: October 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 air quality, 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 NTPR mitigation compliance table.

Air Quality

The Fugitive Dust Emission Control Plan was reviewed by the CPUC and approved on April 18, 2011 in accordance with Mitigation Measure AQ-1a. Under Mitigation Measure AQ-1i, SCE is required to obtain NOx emission reduction credits or offsets to offset construction emissions of NOx in the South Coast Air Basin. While a portion of the DV2 transmission line is located within the South Coast Air Basin, construction activities within the basin during the 2011 calendar year will not exceed the applicable de minimus thresholds. SCE is currently performing the general conformity analysis to determine necessary emissions credits. A condition has been added to this NTP stating that emissions offsets shall be obtained by SCE prior to construction in the South Coast Air Basin in 2012 in accordance with Mitigation Measure AQ-1i.

Biological Resources

This section presents a background for biological resources that occur, or could occur, along non-federal lands associated with construction of the Devers – Valley No. 2 (Devers-Red Bluff) segment of new transmission line included within the DPV2 Project. This summary of biological issues is based on information summarized in SCE's Notice to Proceed Request for the Devers-Valley No. 2 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 north of the City of Palm Springs to the existing Valley Substation located in the City of Menifee, excluding the portion of the transmission line that traverses the SBNF. According to SCE's NTPR, these activities would occur in, or adjacent to, 19 native vegetation communities, seven of which are considered sensitive habitats by CDFG or occur within jurisdictional waters. Sensitive or jurisdictional habitats occurring in this NTP project area include California sycamore woodlands, creosote bush wash scrub, desert willow woodland, southern willow scrub, scale broom scrub, catclaw acacia thorn scrub, and mulefat thickets. 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 four special-status plant species, including Jaeger's milk-vetch (*Astragalus pachypus* var. *jaegeri*), Plummer's mariposa lily (*Calochortus plummerae*), Parry's spineflower (*Chorizanthe parryi* var. *parryi*), and white-bracted spineflower (*C. xanti* var. *leucotheca*) have been identified along the Devers-Valley project area. Each of these species is designated as CNPS List 1B plants which are considered rare across their range in California and elsewhere. In order to minimize and/or avoid impacts to special-status plant species, SCE shall implement the Final CPUC approved Sensitive Plant Salvage Plan, which will include methods for seed collection and other alternatives, such as topsoil salvage, where direct seed collection is not feasible.

Although no federally or State listed plants have been detected in the project area during focused surveys, the project area is located within modeled habitat for the federally endangered (CNPS List 1B.2) Coachella Valley milk-vetch (*Astragalus lentiginosus* var. *coachellae*), and there remains a moderate potential for this species to occur. According to SCE's NTPR, construction activities associated with the components addressed in this NTP would result in permanent and temporary impacts to modeled habitat for Coachella Valley milk-vetch. 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 Coachella Valley Milk-Vetch Salvage 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 five special-status wildlife species that have been observed and/or detected within the Devers-Valley segment project area during surveys. These include Stephen's kangaroo rat (*Dipodomys stephensi*), coastal California gnatcatcher (*Polioptila californica californica*), burrowing owl (*Athene cunicularia*), prairie falcon (*Falco mexicanus*), and loggerhead shrike (*Lanius ludovicianus*). Although not identified during surveys, the Devers-Valley segment project area supports modeled habitat for desert tortoise (*Gopherus agassizii*) and Coachella Valley fringe-toed lizard (*Uma inornata*).

Stephen's kangaroo rat is listed as federally and State endangered and desert tortoise is listed as federally and State threatened. According to SCE's NTPR, construction activities associated with the Devers-Valley segment are expected to result in a total of 0.36 acre of permanent impacts and 2.27 acres of temporary impacts to Stephen's kangaroo rat occupied habitat. For desert tortoise, SCE has also indicated that 4.04 acres and 62.25 acres of permanent and temporary impacts, respectively, would occur as a result of these activities. The federally threatened and State endangered Coachella Valley fringe-toed lizard is known to occur in the project area and the project area supports modeled habitat for this species. As reported by SCE, project activities would result in permanent impacts of 0.20 acre and temporary impacts of 2.73 acres to Coachella Valley fringe-toed lizard modeled habitat. Anticipated impacts to these 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 Stephen's kangaroo rat, desert tortoise, and Coachella Valley fringe-toed lizard.

Coastal California gnatcatcher is listed as federally threatened by the USFWS and considered a Species of Special Concern by CDFG. As such, the USFWS BO and CDFG Consistency Determination do not directly address impacts and appropriate mitigation/compensation, should impacts occur. However, in order to avoid impacts to this species, SCE has indicated that all construction activities would occur outside of the breeding season (March 15 through July 31). In the event that construction activities occur within the breeding season, impacts to Coastal California gnatcatcher and/or gnatcatcher habitat shall only be permitted through the context of additional Section 7 consultation with USFWS and CDFG.

Of the remaining special-status wildlife species identified in the project area during surveys, burrowing owl and loggerhead shrike are also designated as Species of Special Concern by CDFG and prairie falcon, 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 mammals, reptiles and nesting birds throughout the duration of all construction activities associated with this NTP.

Jurisdictional drainages. The SCE NTPR states that the Devers-Valley segment of the DPV2 transmission line supports United States Army Corps of Engineers (USACE) and Regional Water Quality Control Board (RWQCB) non-wetland waters 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, low-flow channels, ditches and culverts, narrow ephemeral channels, and wetlands. SCE has indicated that impacts to jurisdictional non-wetland and wetland waters would total approximately 0.55 acres of permanent conversion and 7.73 acres of temporary disturbance from construction activities associated with the Devers-Valley 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-Valley segment are expected to result in a total of 26.08 acres and 203.63 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. Twelve cultural resources sites were identified on non-federal lands within the Area of Potential Effects (APE) for the Devers Substation to Valley Substation Transmission Line. Therefore, in accordance with the Final HPMP, cultural resources management measures at the following twelve (12) 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=12)		
Site Number	**NRHP[1] Eligibility Determinations**	**Proposed Mitigation**
CA-RIV-373	Not Evaluated; site was not relocated during surveys for DPV2	None
CA-RIV-5066T	Not Evaluated	ESA[2] fencing and monitor avoidance
CA-RIV-1395	Not Evaluated	ESA fencing and monitor avoidance
P-33-012278	Not Evaluated	No Grading signs and monitor avoidance
P-33-015102	Not Evaluated	ESA fencing and monitor avoidance
P-33-015105	Not Evaluated	ESA fencing and monitor avoidance
P-33-017582	Not Evaluated	ESA fencing and monitor avoidance
P-33-017584	Not Evaluated	ESA fencing and monitor avoidance
P-33-017587	Not Evaluated	ESA fencing and monitor avoidance. It should be noted that the southeast corner of Distribution Pull Site DV-REEL7 will be truncated by the resource's ESA fencing.
P-33-017588	Not Evaluated	ESA fencing and monitor avoidance
P-33-017595	Not Evaluated	ESA Flagging/Fencing
P-33-018123	Recommend ineligible; site was evaluated during testing for DPV2	Monitor construction

[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 Valley Substation Transmission Line, located in areas determined to be of high sensitivity for buried sites, shall be monitored by both a qualified archaeologist and Native American monitor:

- Tower 1131 to Tower 1121
- Tower 1156 to Tower 1051.

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

Paleontological Construction Monitoring						
Full-time Monitoring (Tower Locations)			**Part-time Monitoring (Tower Locations)**			
1092	1093	1094	1001	1002	1003	1004
1095	1096	1097	1005	1006	1007	1008
1098	1099	1100	1009	1010	1011	1012
1101	1102	1103	1013	1014	1015	1016
1104	1105	1106	1017	1018	1019	1020
1107	1108	1109	1021	1022	1023	1024
1110	1111	1112	1025	1026	1027	1028
1113	1114	1115	1029	1030	1031	1032
1116			1033	1034	1035	1036
			1049	1050	1051	1052
			1053	1054	1055	1056
			1057	1058	1059	1060
			1061	1062	1063	1064
			1065	1066	1067	1068
			1069	1070	1071	1072
			1073	1074	1075	1076
			1077	1078	1079	1080
			1081	1082	1083	1084
			1085	1086	1087	1088
			1089	1090	1091	1117
			1118	1119	1120	1121
			1122	1123	1124	1125
			1126	1127	1128	1129
			1130	1131	1132	1133
			1134	1135	1136	1137

Paleontological Construction Monitoring						
Full-time Monitoring (Tower Locations)			Part-time Monitoring (Tower Locations)			
			1138	1139	1140	1141
			1142	1143	1144	1145
			1146	1147	1148	1149
			1150	1151	1152	1153
			1154	1155		

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 will 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 Report[1] related to compliance with the approved Geology and Soils mitigation measures that apply to the Devers-Valley segment of the DPV2 Transmission Line Project, including: 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 aerial photo and field reconnaissance geologic mapping, drilling of 63 rock and soil borings, conducting 8 cone penetration tests (CPTs) in area of potential liquefaction, 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. No expansion testing was conducted as part of this study; however, Kleinfelder concludes that due to the granular nature of the materials encountered in the borings that on-site sediments/soils have “very low” expansion potential (Mitigation Measure G-2a).

In accordance with Mitigation Measure G-3a, Kleinfelder identified one small landslide along the DV2 alignment that could impact project structures at Tower 1107. A geotechnical boring indicated that the landslide had a shallow failure plane with a shear zone at an approximate depth of 5 feet overlying in-place bedrock of the San Timoteo Formation. Kleinfelder did not perform any stability calculations for this shallow landslide, but the report concluded that it appears to be buttressed by the existing topography and provided recommendations for tower and foundation design to mitigate the potential for landslide reactivation. The field reconnaissance revealed that 34 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 the conclusions and recommendations section of the report.

Kleinfelder evaluated the potential for liquefaction along the project alignment using data from the borings and CPTs conducted for the investigation and results of groundwater research. Potentially liquefiable soils were identified in the San Jacinto Valley where the San Jacinto River crosses the project alignment (Towers 1116 to 1121). For this area Kleinfelder further analyzed the potential for liquefaction and seismically induced settlement using procedures developed by Seed, et al. Analyses

[1] “Draft Geotechnical Investigation Report, Devers – Valley 500 kV Transmission Project, Riverside County, California” prepared for Southern California Edison by Kleinfelder West, Inc., dated March 2, 2011.

results are presented in the report and design recommendations to reduce the potential impacts from liquefaction and seismically induced settlement are presented in the conclusions and recommendations section.

The DV2 alignment crosses traces of the active San Andreas fault zone (the Banning and Garnet Hill faults) and the active San Jacinto fault zone (the Claremont and Casa Loma faults). The Kleinfelder report indicates that the Banning fault is located between Towers 1002 and 1003 and the Garnet Hill fault is located between Towers 1116 and 1117. Kleinfelder has concluded based on aerial photos and available fault mapping (USGS and CGS) that the footprints of these towers are not located over a fault trace. Similarly, Towers between 1114 and 1117 are identified as being located between and on either side of the strands of the Claremont fault and Towers 1121 and 1122 are identified as being on either side of the Casa Loma fault. The investigation report discusses these faults; however, it does not indicate if any field investigation was conducted to verify the location of the active fault traces relative to the tower locations. Kleinfelder indicates that based on this 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.

Although no detailed fault study appears to have been conducted for this investigation, based on CPUC geotechnical review of the Geologic and Borehole Location Maps provided in the report and the project mapbooks, several of the towers discussed in the report appear to be within Alquist-Priolo fault rupture hazard zones (Towers 1002 - 1004, 1016, and 1121). Specifically, Towers 1003 and 1016 are less than 30 and 190 feet from traces of the San Andreas Fault, respectively. Therefore, a condition has been added requiring a fault study for these two tower locations. Towers 1002 and 1004 are within the San Andreas Alquist-Priolo zones, but they appear to be more than 500 feet from the mapped traces of the fault and would likely not have surface rupture issues. In the San Jacinto Valley area, none of the towers mapped within the Alquist-Priolo zones are closer than 390 feet from the mapped traces of the Claremont and Casa Lomas strands of the San Jacinto Fault zone (Tower 1121 is the closest to a fault at about 395 feet from the Casa Loma strand).

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 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 the existing Valley Substation located in the City of Menifee, excluding the portion of the transmission line in the SBNF. There are portions of the route with concentrations of residential, agriculture, and industrial uses. Residential development is primarily located in the unincorporated Riverside County communities of Cabazon, Juniper Flats, and Romoland, and within the southern boundaries of the Cities of Banning and Beaumont. South of Gilman Springs Road and north of the Ramona Expressway are concentrations of agricultural land uses. Agricultural uses are also found along the southern end of the route, including the ranchettes and horse farms that are traversed by and are adjacent to the line. Commercial and industrial uses are located near Devers Substation (i.e., wind farms) and in the vicinity of Valley Substation.

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.

Because of the environmental, constructability, and safety concerns in the steep areas adjacent to SBNF, no access roads can be constructed to these tower locations. Hence, helicopters will be used for the majority of construction activities for these towers and four temporary Helicopter Landing Zones will be constructed. Construction activities, including noise associated with helicopter usage, was addressed it 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.

Water Resources

This segment of the line crosses natural watercourses, including several crossings of the San Gorgonio 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, generally more than 50 feet below the ground surface (bgs), except in San Jacinto Valley where groundwater has been encountered between 12 and 49 feet bgs, and in Perris Valley where groundwater has been encountered between 30 and 49 feet bgs, as described in the Draft Geotechnical Investigation Report. 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, while Mitigation Measure H-5a (Construction site dewatering management) is required for the CRS Expansion and does not apply to DPV2. Due to the depth to groundwater along this portion of the project, particularly in the San Jacinto Valley and Perris Valley, Mitigation Measure H-5a shall be implemented during construction to ensure that any groundwater resources which are unexpectedly encountered would be managed through implementation of appropriate BMPs for dewatering activities.

In addition, as described in the Draft Geotechnical Investigation Report (Table 6-2), the following towers are located within a FEMA-designated Flood Hazard Area and are subject to flood and erosion hazards: Tower 1017, 1018, 1026 through 1029, 1051 through 1065, 1077, 1079, 1083, 1084, 1117 through 1121, and 1056. The Draft Geotechnical Investigation Report identifies the depth to ignore for these towers as ranging between 3 and 5 feet (depth to ignore is the portion of soils that should be completely neglected from the foundation analysis due to loose material, organic material, erosion or construction activities). The depth to ignore for towers located within FEMA-designated Flood Hazard Areas, as identified in Table 6-2 of the Draft Geotechnical Investigation Report, is considered appropriate. In addition to APM W-1, which requires “potential erosion sites” to be inspected after each major rainstorm during the first year following construction, maintenance workers should inspect and repair any erosion observed near tower foundations located within FEMA-designated Flood Hazard Areas for the lifetime of the project.

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. 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 72 locations along the Devers-Valley line (33 towers & 39 catenaries); 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. 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.
4. 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.
5. Verification of noticing mailings including address lists, postings and newspaper postings, as required under Mitigation Measures L-1a, L-1e, WR-1a, and WR-1b shall be submitted to the CPUC prior to construction.
6. 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.
7. 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.
8. 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.

9. SCE shall implement the conditions of the approved Final HCRP to compensate for temporary disturbance to native vegetation communities.
10. 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.
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.

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. 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 within Coachella Valley milk-vetch, Stephen's kangaroo rat, desert tortoise, Coachella Valley fringe-toed lizard, and flat-tailed horned lizard 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. Should any individuals of these species be crushed, injured, or killed during construction activities, all activities in the immediate area shall be halted and the FCR and/or Authorized or Qualified Biologist will be immediately contacted. The FCR and/or Authorized or Qualified Biologist will be responsible for reporting the incident (via fax or email) to the USFWS and CDFG within 24 hours of the incident.

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. 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.

30. 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.

31. SCE shall conduct focused pre-construction surveys to determine presence/absence of Coastal California gnatcatcher and least Bell's vireo in the project area. All construction activities within suitable habitat for these species shall be conducted to avoid the breeding season (March 15 through July 31). Any anticipated impacts to Coastal California gnatcatcher and/or least Bell's vireo individuals or occupied habitat would only be permitted through the context of a Biological Opinion obtained through re-consultation with the USFWS. Appropriate mitigation/compensation for impacts to Coastal California gnatcatcher and/or least Bell's vireo occupied habitat shall only be defined within the context of a Biological Opinion.

32. Prior to the implementation of construction in areas that support suitable habitat for Stephen's kangaroo rat and San Bernardino kangaroo rat, SCE shall install exclusionary fencing around all work sites where impacts will occur. SCE shall conduct the appropriate clearance surveys for Stephen's kangaroo rat and San Bernardino kangaroo rat prior to ground disturbance in fenced areas. A qualified biological monitor shall be present during all construction activities in suitable habitat for these species to ensure that individuals are not harmed and are relocated in suitable habitat outside of exclusionary fencing until construction is completed. Upon completion of construction, SCE shall remove all exclusionary fencing and recontour soils to pre-construction conditions.

33. During construction in suitable habitat for Stephen's kangaroo rat, work will only be permitted during daylight hours and no night lighting will be used.

34. During construction in suitable habitat for Stephen's kangaroo rat, a load spreading device (e.g., plywood) will be installed to reduce impacts to burrow systems. Load spreading devices must be removed each night.
35. Prior to any construction activities in suitable Stephen's kangaroo habitat, SCE shall provide documentation that ensures funding to complete required mitigation/compensation, including payment to the Metropolitan Water District of Southern California for acquisition of kangaroo rat habitat to offset permanent impacts and payment to the California Department of Parks and Recreation to offset temporary impacts.
36. 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.
37. SCE shall install all overhead components utilizing the most current APLIC standards for collision-reducing techniques.
38. SCE shall implement all conditions of the USFWS approved Raven Control Plan that includes procedures for conducting depradation 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.
39. Sand compaction at all sites in the Coachella Valley shall be avoided.
40. 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.
41. No activities, whatsoever, shall be permitted within areas designated as federal wetlands.
42. 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.
43. 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.
44. 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.
45. 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.
46. 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.

47. 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.
48. Constructed road berms in modeled desert tortoise habitat shall be less than 30.48 cm (12 in) in height and have slopes less than 30 degrees. Similarly, constructed road berms in suitable Stephen's kangaroo habitat will not exceed 13 cm (5 in).
49. No fuel modifications shall be conducted in suitable habitat for Stephen's kangaroo rat.
50. 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.
51. Project personnel will not be allowed to bring pets into any work areas.
52. 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.
53. 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.
54. 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.
55. Construction site dewatering management in accordance with Mitigation Measure H-5a shall be implemented during construction to ensure that any groundwater resources which are unexpectedly encountered would be managed through implementation of appropriate BMPs for dewatering activities.
56. 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.
57. A detailed fault study shall be provided to the CPUC prior to construction at Towers 1003 and 1016.
58. Engineering and Conclusions Recommendations included in the Geotechnical Investigations Report (2011) shall be followed.

59. A qualified archaeologist and Native American monitor shall monitor construction disturbance associated with Towers 1131 to 1121 and Towers 1156 to 1051, which are located in areas determined to be of high sensitivity for buried sites along the Devers-Valley transmission line.

60. 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.

61. 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.

62. 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).

63. The CPUC Environmental Monitor (EM) shall be notified immediately of any unanticipated cultural, paleontological, or biological resource discoveries.

64. Emissions offsets shall be obtained by SCE prior to construction in the South Coast Air Basin in 2012 in accordance with Mitigation Measure AQ-1i.

65. 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.

66. 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.

67. 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.

68. 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.

69. 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.

70. 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.
71. No clearing or disturbance to vegetation shall occur outside of approved work areas.
72. 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 Koczwara, Aspen Environmental Group
Ryana Parker, Southern California Edison Company
Sheree James, Southern California Edison Company