#### **Southern California Edison**

### **Notice to Proceed Request**

for the

# Red Bluff Substation Project Distribution Line

Analyzed in the

Desert Sunlight Solar Farm Final Environmental Impact Statement and to be

Constructed in conjunction with the

**Devers-Palo Verde No. 2 Transmission Line Project** 

September 2011

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### **Acronyms**

AM Applicant Measure

BLM Bureau of Land Management

BO Biological Opinion

CDFG California Department of Fish and Game

CPUC California Public Utilities Commission

DPV2 Devers-Palo Verde No. 2 Transmission Line Project

DSSF Desert Sunlight Solar Farm Project

FEIS Final Environmental Impact Statement

kV Kilovolt

MM Mitigation Measure

NECO Northern and Eastern Colorado Desert Coordinated Management Plan

NTPR Notice to Proceed Request

Project Red Bluff Substation Project

SCE Southern California Edison

#### 1.0 INTRODUCTION

The Red Bluff Substation Project (Project) was analyzed in the Desert Sunlight Solar Farm Project (DSSF) Final Environmental Impact Statement (FEIS) and will be constructed in conjunction with the approved Devers-Palo Verde No. 2 Transmission Line Project (DPV2).

This Notice to Proceed Request (NTPR) describes the improvements associated with the Project, which will cross property that is not owned by the Bureau of Land Management (BLM), and is hence subject to California Public Utilities Commission (CPUC) approval. These improvements are limited to the upgrade of a segment of the existing Southern California Edison (SCE) 12 kilovolt (kV) circuit overhead distribution line from single-phase to three-phase power, to supply light and power to the Red Bluff Substation. Material and equipment associated with this work will be stored at the existing DPV2 Desert Center 1 and Desert Center 2 Construction Yards, the distribution line Contractor's existing material storage yard located in Blythe, California or the SCE Blythe Service Center Yard.

Red Bluff Substation will be located adjacent to and on the south side of Interstate 10 (I-10), east of Desert Center/Rice Road and west of Corn Springs Road, in unincorporated Riverside County, California, on BLM property, as shown in Figure 1, Project Location Map. The existing SCE 12 kV circuit overhead distribution line is located on the south side of the substation site and continues west towards Desert Center along Aztec Road, as shown in Figure 2, Distribution Line Overview Map. The portion of the distribution line, which is not located on BLM land, is located adjacent to the paved section of Aztec Road.

The Notice to Proceed will be applicable to all activities associated with the upgrade of the distribution line, including the use of the existing Contractor material storage yards located in Desert Center and/or Blythe, California.

This NTPR provides an overview of the planned construction activities to be conducted during the distribution line upgrade. The DSSF FEIS describes the distribution line construction activities associated with the Project. Descriptions of the proposed Red Bluff Substation construction activities are included in the DSSF FEIS Section 2.2.4 (Alternative 1,

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describing the BLM preferred Red Bluff Substation A components) and Section 2.3.2 (Construction Plan for Red Bluff Substation Project). The FEIS was based on preliminary engineering. Refinements of the Project components have been made based upon final engineering design. Such changes are noted in this document and the corresponding updated disturbance area of less than 0.36 acre is illustrated in Figure 3, Non-BLM Distribution Line Disturbance Area.

All applicable Applicant Measures (AMs), Mitigation Measures (MMs), Biological Opinion (BO) Conservation Measures, and permits have been identified in Checklist Tables 2 and 3, and will be implemented and complied with prior to commencement of the construction associated with this NTPR, where applicable. Monitoring and reporting on implementation of AMs, MMs, BO measures, and permit conditions will be conducted in accordance with the Red Bluff Mitigation Monitoring Compliance and Reporting Plan. Additionally, required preconstruction surveys for biological resources will be conducted prior to the start of construction, as applicable.

#### 2.0 SITE LOCATION AND CONDITIONS

The Red Bluff Substation is located within the Corn Springs United States Geological Survey 7.5' topographic quadrangle. The coordinates for the approximate center of the substation are latitude 33° 41′ 57″ north, longitude 115° 18′46″ west.

The Red Bluff project site consists of primarily undisturbed BLM land. The exception is approximately 2,600 linear feet of non-BLM property associated with the upgrade of the existing SCE 12 kVA distribution line, located on disturbed land, adjacent to a paved roadway, on existing distribution line poles. The non-BLM portion of the distribution line is located in the NE 1/4 of Section 26, T5S, R21E, San Bernardino Base and Meridian. No sensitive receptors are located within 300 feet of this non-BLM construction segment.

During construction, workers will travel in construction vehicles from the existing construction material storage yards located in Desert Center or Blythe. The distribution line will be accessed from the I-10 Desert Center/Rice Road exit south, to Aztec Road. Workers will travel east on Aztec Road, within the paved boundaries of the low use road, at a speed

of 25 mph or less. They will park on the south side of the paved road to remove and replace eight (8) existing wood poles and install four (4) new wood poles on the non-BLM segment.

The existing DPV2, CPUC approved, construction yards to be utilized for distribution line material and equipment storage are located as follows:

- a. **Desert Center 1 Yard.** The Desert Center 1 Construction Yard is located northwest of the intersection of Ragsdale Road and State Highway 177 /Desert Center/ Rice Road in the Desert Center area of unincorporated Riverside County, California. The Assessor Parcel Number is 808061001.
- b. Desert Center 2 Yard. The Desert Center 2 Construction Yard is located about 1,900 feet east of State Highway 177 /Desert Center/ Rice Road along Ragsdale Road, south of Ragsdale Road and north of the I-10, in the Desert Center area of unincorporated Riverside County, California. The Assessor Parcel Number is 808113001.
- c. **Blythe Service Center Yard.** The Blythe Service Center Yard is currently owned and operated by SCE and is located at 505 West 14th Street, in Blythe, CA 92225.

The water source to be used for the distribution line construction is the Riverside County Water District hydrant located at 26251 Parkview Drive, in Desert Center, CA, or another nearby appurtenance identified by the District for the Contractor's use. The Contractor will enter into an agreement with the Water District prior to construction.

#### 2.1.1 Biological Resources

A complete description of the surveys conducted for the proposed Project is contained in the Final EIS and the Biological Resources Technical Report, Desert Sunlight Solar Farm Project, BLM Case File Number CACA-48649, Riverside County, California, prepared by Ironwood Consulting, Inc., dated July 2010 (provided to CPUC previously under separate cover and accessible on the DPV2 hyperoffice). All surveys were conducted by Ironwood Consulting, Inc., unless otherwise specified.

#### 2.1.1.1 Vegetation Communities

The majority of the Project area supports creosote bush scrub with non-vegetated dry washes. Dominant plant species associated with this community include creosote bush (*Larrea tridentata*), burro bush (*Ambrosia dumosa*), boxthorn (*Lycium sp.*), brittlebush (*Encelia farinosa*), indigo bush (*Psorothamnus spp.*), and cheesebush (*Hymenoclea salsola*).

Anticipated permanent impacts to creosote bush scrub as a result of the non-BLM owned segment of the distribution line total 500 square feet, as shown in Figure 4, Non-BLM Distribution Line Vegetation Communities. These permanent impacts account for the eight existing wood poles to be removed and replaced and the four additional new wood poles to be installed on the non-BLM segment of the distribution line.

Temporary impacts to vegetation communities as a result of the non-BLM segment of the distribution line include those areas where construction vehicles would access two temporary pull site locations (approximate locations shown in Figure 4). Anticipated temporary impacts to creosote bush scrub total 9,946 square feet.

#### 2.1.1.2 Cactus

General distribution data was collected during botanical surveys for the purpose of estimating the level of effort that might be required for salvaging cactus prior to ground disturbance. A count of each species occurrence within the Project components will be performed during pre-construction surveys to quantify the number of individual cactus requiring salvage.

To date, no cacti have been recorded within the distribution line portion of the Project; therefore, it is not likely that any cacti occur within the non-BLM portion of the distribution line. Species that occur within the general vicinity include foxtail cactus (*Coryphantha vivipara*), fish-hook cactus (*Mammalaria* spp.), golden cholla (*Opuntia echinocarpa*), and pencil cholla (*Opuntia ramosissima*) (Ironwood Consulting, 2010); however, these are not expected to be impacted by the distribution line construction.

#### 2.1.1.3 Special-status Habitats

Special-status habitat types include plant communities listed as sensitive by BLM, California Department of Fish and Game (CDFG) and other resources agencies, or listed in the Northern and Eastern Colorado Desert Coordinated Management Plan (NECO), as well as potential wildlife movement corridors. The NECO/EIS designates desert dry wash woodland as a sensitive habitat. This vegetation community is not present within the non-BLM portion of the distribution line; however, is located in the general vicinity.

The Red Bluff Project area is not considered a wildlife movement corridor because it does not link areas of suitable habitat that are otherwise separated by human disturbance, changes in habitat, or rugged terrain (it is adjacent to I-10). Pinto Wash, which is located north of the Project area, may provide a movement corridor for numerous large mammal species including several special-status species including mountain lion, bighorn sheep, and burro deer (Ironwood Consulting, 2010). However, none have been observed in the non-BLM portion of the distribution line area.

#### 2.1.1.4 Special-status Plant Species

No federal- or State-listed (threatened or endangered) plant species were found within the Project area. One special-status plant species foxtail cactus (*Coryptantha alversonii*) (California Native Plant Society 4.3 and NECO-covered) was found in close vicinity to the Red Bluff Project area. Four individuals of these species were detected just west of the substation boundary; however, no special-status-species have been detected within the distribution line portion of the Project (Ironwood Consulting, 2010).

#### 2.1.1.5 Special-status Wildlife Species

#### **Desert Tortoise**

No desert tortoise were found on or immediately adjacent to the distribution line area during formal focused surveys; however, one active burrow was located 200 feet north of the distribution line component of the Project during focused surveys. A desert tortoise was observed just west of the current substation footprint in the fall of 2010 during a field visit conducted by an Ironwood Consulting subcontractor. In addition, a desert tortoise was

observed within a wash in the eastern portion of the substation footprint (not within the distribution line area) to the east of the substation footprint. It appears that this animal is using a burrow located in the large wash east of the substation footprint.

Focused surveys confirmed the presence of a low density desert tortoise population within the Project area (Ironwood Consulting, 2010); however, no desert tortoises and no desert tortoise sign have been found in the non-BLM portion of the distribution line area.

#### **Burrowing Owl**

The Phase 1 assessment determined that suitable habitat for burrowing owls exists throughout the Project area. Signs of the burrowing owl were detected east of the loop-in line component of the Project. Phase 3 surveys will be performed prior to ground disturbing activities to determine the number of resident owls potentially affected by construction (Ironwood Consulting, 2010). None have been observed in the non-BLM portion of the distribution line area.

#### **Other Special-status Wildlife Species**

Additional special-status wildlife species detected within or in the vicinity of the Red Bluff Project area include the following:

- Loggerhead shrike (*Lanius Iudovicianus*) is a State Species of Special Concern and a
  year-round resident in parts of the Southern California desert. This species was
  observed in the vicinity of the Project area; however, none have been observed in
  the non-BLM portion of the distribution line area.
- Golden eagle is a State Species of Special Concern and addressed in the NECO/EIS.

  No golden eagle nests were found on or adjacent to the Project area. Phase I occupancy surveys conducted in April 2010 detected 13 potentially active nests within a 10-mile radius of the Project area (in Joshua Tree National Park or the close vicinity and in the Chuckwalla Mountains). Phase II productivity surveys determined that all but one of these nests were inactive. The one active nest was located in the Joshua Tree Wilderness Area approximately 10 miles from the telecom site

- boundary and approximately 13 miles from the distribution line portion of the Project; however, this nest was not reproductive (Ironwood Consulting, 2010).
- Chuckwalla (Sauromalus obesus) is addressed in the NECO/EIS. Three chuckwallas were observed basking in the rocky slopes south of the western access road to Red Bluff Substation A. One observation was approximately 1,000 feet south of the access road and the other two were approximately 2,200 feet south of the access road. Chuckwalla scat was observed in the rocky outcrop in the southeastern portion of the Red Bluff Substation A Project area. No chuckwallas were observed within the distribution line component of the Project.
- Burrow deer (Odocoileus hemionus eremicus) is addressed in the NECO/EIS and holds no additional special status. Two individuals and numerous tracks of this species were observed in and around the Red Bluff Substation Project area, near the base of the Chuckwalla Mountains. No burrow deer were observed within the distribution line component of the Project.

Although surveys for bat species were not conducted within the Red Bluff Project area, the following special-status bat species have the potential to occur within the Project area:

- State Species of Special Concern including California leaf-nosed bat (*Macrotus californicus*), western mastiff (*Eumops perotis californicus*), pocketed free-tailed bat (*Nyctinomops femorosaccus*), pallid bat (*Antrozous pallidus*), and Townsend's bigeared bat (*Plecotus townsendii*). However, none have been observed in the non-BLM portion of the distribution line area.
- Southern yellow bat (*Lasiurus xanthinus*) is a proposed State Species of Special
   Concern and potentially occurs within the Project area. However, none have been observed in the non-BLM portion of the distribution line area.

#### 2.1.1.6 Jurisdictional Drainages

The Project area is located in an arid region with numerous dry washes that may support flows during and after rainfall events. CDFG jurisdiction (desert dry wash) is present within the distribution line component of the Red Bluff Project area. There are no impacts to CDFG

jurisdiction as a result of the non-BLM segment of the distribution line portion of the Project since poles will be located outside of the desert dry wash (CDFG jurisdictional streambed).

No U.S. Army Corps of Engineers (USACE) or Regional Water Quality Control Board jurisdictional drainages or wetlands are present within the Project area (USACE, 2010). Additional details regarding jurisdictional drainages can be found in the *Investigation of the Presence of Wetlands and Other Waters of the United States, Desert Sunlight Solar Farm Project* (Ironwood and Huffman, 2010).

#### 2.1.2 Cultural Resources

Please see the Cultural Resources Assessment provided in Appendix B.

#### 3.0 PROJECT COMPONENT AND DISTURBANCE AREAS

This section of the NTPR describes the main construction activities and site work associated with the Red Bluff Substation distribution line upgrade. Construction activities are planned between the hours of 6:00 a.m. and 7:00 p.m. and will occur primarily Monday through Saturday, although construction may occasionally occur on Sundays or after hours. SCE has established a toll-free information line (866) 602-DPV2 or (866) 602-3782, and website (sce.com/dpv2) to make project information accessible to the public on a 24-hour basis. The toll-free line is the designated public notification contact for DPV2 and Red Bluff Substation construction activities.

### 3.1 Distribution Line Upgrade

An upgrade of the existing, SCE-owned, Desert Center 12 kV circuit distribution line is required to provide power to the Red Bluff Substation. Approximately 2,600 linear feet of the existing 12 kV circuit overhead distribution line, located on non-BLM land along the south frontage of I-10, will be upgraded to convert the circuit from single-phase to three-phase. This upgrade will require the removal and replacement of eight (8) wood poles located on non-BLM property, in disturbed land adjacent to paved SCE franchise road, as shown on Figure 3. Four (4) additional new wood poles will be installed in the same non-

BLM segment of property. The new wood poles will be approximately 40 feet high. This pole removal, replacement, and installation will result in approximately 500 square feet of permanent disturbance.

Two pull sites will be temporarily located on the non-BLM property to facilitate stringing operations during the distribution line upgrade. Each pull site will be approximately 150 by 50 feet, for a total temporary disturbance area of approximately 15,000 square feet (less than 0.35 acre).

### 3.2 Material Storage Yard

The distribution line upgrade has been awarded to PAR Construction, who currently rents property located within the City of Blythe, for use as an existing material storage yard. Material and equipment to be used in connection with the Red Bluff distribution line upgrade will be stored and maintained at the existing DPV2 Desert Center 1 and Desert Center 2 construction yards or SCE Blythe Service Center Yard. The construction yards are described as follows:

- Desert Center 1 Yard. The Desert Center 1 Construction Yard is an approximate
   5.5-acre DPV2 CPUC approved construction yard located on previously
   disturbed/fenced privately owned property previously developed for a similar use
   (former Wilson construction yard).
- Desert Center 2 Yard. The Desert Center 2 Construction Yard is an approximate 11.5acre DPV2 CPUC-approved construction yard located on privately owned property.
- Blythe Service Center Yard. The Blythe Service Center Yard is located within the
   Blythe Service Center property currently owned, operated, and maintained by SCE.

Because these are existing material storage yards, not collocated with the Red Bluff Substation, no temporary disturbances are associated with the use of these yards.

#### 3.3 Site Work

The primary construction activities associated with the distribution line upgrade are as follows:

- Store and haul materials daily from existing construction material storage yards in Desert Center and Blythe.
- Access existing pole locations and distribution line via existing disturbed paved road.
- Remove, replace, and install new wood poles, anchors, pole hardware, and wire from temporary pull site locations adjacent to existing disturbed road.

#### 3.1.1 Distribution Line Upgrade

During construction, workers will travel in construction vehicles from the existing material storage yards in Desert Center or Blythe, traveling west on I-10 from Blythe, and exit on Desert Center/Rice Road south, to Aztec Road. Workers will travel east on Aztec Road, within the paved boundaries of the road. They will park on the south side of the paved road to remove and replace eight (8) existing wood poles and install four (4) additional new wood poles on the non-BLM segment.

Equipment and vehicles used to remove, replace, and install the wood poles and power cable on non-BLM property, will utilize the existing disturbed paved road along the alignment, to avoid encountering cultural and biological resources. Following installation of the poles, wire will be strung from pull sites located immediately to the east and west ends of the segment. Only two pull sites, approximately 50' x 150' each, will be located on non-BLM property, totaling approximately 15,000 square feet (or) less than 0.35 acre.

Material and equipment will be staged at the existing DPV2 CPUC approved Desert Center 1 and 2 material storage yards and the existing Blythe Service Center or existing Contractor yard in Blythe, which are all currently prepared and ready for use by the Contractor. For dust control, the Contractor may use water from the Riverside County Water District hydrant located at 26251 Parkview Drive, in Desert Center, or another nearby appurtenance identified by the District for the Contractor's use. The Contractor will meter water use at the

hydrant. In addition, the Contractor may use a street sweeper to remove track-out at the end of each day, if necessary.

#### 4.0 ACTIVITY SCHEDULE

Table 1 shows the anticipated schedule for the Red Bluff Substation Distribution Line Upgrade construction activities.

Table 1: Construction Schedule—Red Bluff Substation Distribution Line

Construction Activity	<b>Construction Duration</b>	Start Date		
Distribution Line Material Storage	3 months	September 2011		
Distribution Line Construction	2 months	October 2011		

#### 5.0 REFERENCES

United States Department of the Interior, Bureau of Land Management (BLM). 2011. Desert Sunlight Solar Farm Project, California Desert Conservation Area Plan Amendment and Final Environmental Impact Statement. Accessed on April 15, 2011.

Ironwood Consulting, Inc. (Ironwood). 2010. *Desert Sunlight Solar Farm Project Biological Resources Technical Report*. BLM Case File Number CACA-48649. July.

Ironwood Consulting, Inc. and Huffman-Broadway Group, Inc. 2010. Investigation of the Presence of Wetlands and Other Waters of the United States, Desert Sunlight Solar Farm Project. June.

### **Tables**

Preconstruction	During Construction	Post Construction	Note: This table includes Mitigation Measures (MM) and Applicant Measures (AM) from the DSSF Final EIS, MMCRP, and Conservation Measures from the Biological Opinion applicable to the Red Bluff Station Project. Measures applicable solely to the Solar Farm and Gen-tie are excluded from the list, as they are not applicable to SCE.
			* If a measure has multiple timing requirements, the coloring represents the first phase required.

Resource Area	ММ/АРМ	Measure	Timing	Applicability	Comments
Air Resources	AM-AIR-6	SCE shall develop and implement a dust control plan to ensure compliance with SCAQMD Rule 403 during substation construction.	Preconstruction	YES	The SCE Component Specific Fugitive Dust Emission Control Plan was approved by the CPUC on 7/18/2011.
Air Resources	AM-AIR-7	SCE would require bidders for the construction contract to submit a transportation plan describing how workers would travel to the project site.	Preconstruction	YES	The Distribution Line Contractor's Environmental Specifications include a Transportation Plan that describes how the Contractor and workers must travel to the Project site.
Air Resources	MM-AIR-1	Sunlight and SCE shall require all on-site construction equipment to meet EPA Tier 2 or higher emissions standards according to the following: • April 1, 2010, to December 31, 2011: All off-road diesel-powered construction equipment greater than 50 horsepower (hp) shall meet Tier 2 off-road emissions standards. In addition, all construction equipment shall be outfitted with the BACT devices certified by the California Air Resources Board (CARB). Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 2 or Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. • January 1, 2012, to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. • Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. • A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided when each applicable unit of equipment is mobilized.	During Construction	YES	The Distribution Line Contractor's Environmental Specifications require that all on-site construction equipment must meet the applicable Tier level emission standards defined in MM-AIR-1.
Bio Resources	AM-BIO-1	A Habitat Compensation Plan is being prepared and will be implemented by the Applicant to compensate for the loss of creosote desert scrub, desert dry wash woodland, and jurisdictional resources. Compensation will be accomplished by acquisition of mitigation land or conservation easements or by providing funding for specific land acquisition, endowment, restoration, and management actions under one of several programs including the recently approved mitigation program created by SB 34 and as required under MM-BIO-2, Off-site Compensation. The Habitat Compensation Plan will be reviewed and approved by BLM, the USFWS, and CDFG. The precise details of the mitigation, including mitigation ratios, will be established in the BLM ROW grant, USFWS Biological Opinion, and CDFG 2080.1 Consistency Determination. The draft plan is provided in Appendix H. At a minimum, mitigation ratios required in the NECO Plan/EIS are 1:1 for permanent impacts to creosote bush scrub, 3:1 for permanent impacts to desert dry wash woodland, and 5:1 for permanent impacts to impacts to the Chuckwalla DWMA and Chuckwalla CHU). Mitigation ratios may be greater based upon the requirements of the USFWS and CDFG. Finally, areas occupied by the burrowing owl will be mitigated at 6.5 acres per occupied burrow (which will be covered by mitigation of creosote bush scrub habitat) and creation or enhancement of two burrows will be implemented for every active burrow.	Preconstruction	YES	The DSSF Project-wide Habitat Compensation Plan was approved by the BLM on 8/29/11.
Bio Resources	AM-BIO-2	A Draft Integrated Weed Management Plan (IWMP) has been prepared pursuant to BLM's Vegetation Treatments Using Herbicides on BLM Lands in 17 Western States (BLM 2007) and the National Invasive Species Management Plan (The National Invasive Species Council 2008), and will be implemented by the Applicant to reduce the potential for the introduction of invasive species during construction, operation and maintenance, and decommissioning of the Project. The draft plan is in Appendix H of this document and will be reviewed and approved by the BLM. The following measures are required in the Plan and will be implemented by the Applicant to monitor and control invasive species (details associated with these measures are provided in Section 4.3): • Preventative Measures During Construction • Containment and Control Measures • Monitoring • Reporting • Success Criteria	Preconstruction	YES	The DSSF Project-wide Integrated Weed Management Plan was approved by the BLM on 8/29/11. Pre-construction surveys for weeds will be conducted.

Preconstruction	During Construction	Post Construction	Note: This table includes Mitigation Measures (MM) and Applicant Measures (AM) from the DSSF Final EIS, MMCRP, and Conservation Measures from the Biological Opinion applicable to the Red Bluff Station Project. Measures applicable solely to the Solar Farm and Gen-tie are excluded from the list, as they are not applicable to SCE.
			* If a measure has multiple timing requirements, the coloring represents the first phase required.

Resource Area	мм/арм	Measure	Timing	Applicability	Comments
Bio Resources	AM-BIO-3	Pre-Construction Surveys for Special Status Plant Species and Cacti. Prior to construction, the Applicant will stake and flag the construction area boundaries, including the construction areas for the Solar Farm site, Gen-Tie Lines, and Red Bluff Substation; construction laydown, parking, and work areas; and the boundaries of all temporary and permanent access roads. A BLM-approved biologist will then survey all areas of proposed ground disturbance for special status plant species and cacti during the appropriate blooming period for those species having the potential to occur in the construction areas. All special status plant species and cacti observed will be flagged for transplantation. All cacti observed will be flagged for transplantation and special status plant species observed will be flagged for salvage.	Preconstruction	YES	Suitable habitat for Special Status Plant Species and Cacti occurs within the Red Bluff Substation work area. Therefore, preconstruction surveys and construction monitoring for Special Status Plant Species and Cacti will be implemented. The Salvage Plan was approved by the BLM on 8/29/11 and will be implemented accordingly.
Bio Resources	AM-BIO-4	Worker Environmental Awareness Program (WEAP). The Applicant will implement a WEAP to educate on-site workers about sensitive environmental issues associated with the Project. The program will be administered to all on-site personnel including surveyors, construction engineers, employees, contractors, contractor's employees, supervisors, inspectors, subcontractors, and delivery personnel. The program will be implemented during site mobilization, ground disturbance, grading, construction, operation, and closure. Details of the program are provided in Section 4.3. The training will place special emphasis on the special status species that have been observed in the Project locations or have a high likelihood to occur, including special status plant species, desert tortoise and other special status reptile species, Palm Springs round-tailed ground squirrel, burrowing owl, golden eagle, nesting bird species and bat species, and the American badger. BLM will be responsible for ensuring that each construction worker at the site, throughout the duration of construction activities, receives the above training.	Preconstruction	YES	The WEAP was approved by the CPUC on 9/9/11 and by the BLM on 8/29/11.
Bio Resources	AM-BIO-5	The Applicant will prepare and implement a Vegetation Resources Management Plan that contains the following components (additional detail is provided in Section 4.3):• A Vegetation Salvage Plan which discusses the methods that will be used to transplant cacti present within the Project locations following BLM's standard operating procedures, as well as methods that will be used to transplant special status plant species that occur in the Project locations if feasible.• A Restoration Plan which discusses the methods that will be used to restore creosote bush scrub and desert dry wash woodland habitat that is temporarily disturbed by construction activities.  The Vegetation Salvage Plan and Restoration Plan will specify success criteria and performance standards as required per MM BIO-4, Salvage and Restoration Plan Performance Standards. BLM will be responsible for reviewing and approving the Plan and for ensuring that the Applicant implements the Plan including maintenance and monitoring required in the Plan.	Preconstruction	YES	The DSSF Project-wide Vegetation Salvage Plan was approved by the BLM on 8/29/11. The SCE Component Specific Restoration Plan was approved by the BLM on XX/XX/11.
Bio Resources	MM-BIO-1	Construction Monitoring. A BLM approved biologist shall conduct construction monitoring during all construction activities to ensure that construction activities are contained within the staked and flagged construction areas at all times. The construction monitor shall also be present during all ground disturbing activities to either actively or passively relocate special status wildlife species, other than the desert tortoise, nesting bird species, and burrowing owl (e.g., rosy boa, chuckwalla, Palm Springs round-tailed squirrel, American badger, and Colorado Valley woodrat [and burro deer, Nelson's bighorn sheep, and mountain lion if need be]), found within the construction zones to a suitable location outside of the project footprint. The construction monitor shall also inspect fencing and netting at all construction ponds to ensure that the ponds are not accessible to potential avian or canid desert tortoise predators or to wildlife that could drown or become entrapped within the exclosures. Netting and fencing must prevent the ponds from becoming water source "subsidies" to predators or from becoming hazards to native wildlife. The construction monitor shall have the authority to stop work and report directly to the Applicant's Environmental Manager (EM) to ensure compliance with the Project Description, applicant-proposed measures, and mitigation measures. The construction monitor shall provide the Applicant's EM with weekly updates and quarterly monitoring reports. After construction has been completed, the construction monitor shall provide the Applicant's EM with a field monitoring report. The Applicant's EM shall provide BLM with weekly status updates on the status of construction and monitoring efforts and shall provide BLM with copies of the quarterly monitoring reports and the final monitoring report. BLM shall be responsible for ensuring that construction monitoring is conducted during all construction activities.	During construction	YES	Suitable habitat for special status wildlife and plant species occurs within the Red Bluff Substation work area. Therefore, construction monitoring for special status species will be implemented in accordance with MM-BIO-1.

F	Preconstruction		During Construction		Post Construction	Note: This table includes Mitigation Measures (MM) and Applicant Measures (AM) from the DSSF Final EIS, MMCRP, and Conservation Measures from the Biological Opinion applicable to the Red Bluff Station Project. Measures applicable solely to the Solar Farm and Gen-tie are excluded from the list, as they are not applicable to SCE.  * If a measure has multiple timing requirements, the coloring represents the first phase required.
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Resource Area	ММ/АРМ	Measure	Timing	Applicability	Comments
Bio Resources	MM-BIO-2	Off-site Compensation: This Mitigation Measure provides further detail and specificity to the habitat compensation land requirements described in Applicant Measure AM-BIO-1. The draft Habitat Compensation Plan shall be revised to reflect acreages and habitat types as described herein, The revised habitat Compensation Plan shall be submitted for approval to BLM, USFWS, CDFG, and CPUC before its finalization and implementation. The Applicant (Sunlight or SCE) shall acquire and protect, in perpetuity, compensation habitat to mitigate impacts to biological resources listed below. The compensation lands shall be placed under conservation management to be funded through the terms described herein. The acreages and ratios shall be based upon final calculation of impacted acreage for each resource and on ratios set forth in Applicant Measure AM-BIO-1 and in the draft Habitat Compensation Plan dated 17 Dec 2010. Acreages of anticipated compensation requirements as summarized throughout this measure are based on impacts analysis of Alternative 1 in Sections 4.3 and 4.4 and ratios described in Applicant Measure AM-BIO-1. Acreages shall be adjusted as appropriate for other alternatives.  • Desert dry wash woodland (101 acres at 3:1 ratio).  • Occupied of suitable habitat (2,757 acres at 1:1 ratio; 1,214 acres at 2:1 ratio; 191 acres at 5:1 ratio).  • occupied or suitable habitat for breeding or wintering burrowing owls (13 acres for each occupied burrow, estimated as two burrows), • state-jurisdictional streambeds (302 acres, including the desert dry wash woodland, above, at 3:1 ratio),  • occupied foxtali cactus habitat (estimated as two acres, at 1:1 ratio),  • occupied foxtali cactus habitat for most wildlife species including desert kit fox and American badger (i.e., away from sources of noise or other disturbance such as highways, wind farms, etc.) (4,173 acres, at 1:1 ratio),  • outable foraging habitat for golden eagles, and within foraging range of a known nesting site (4,173 acres, at 1:1 ratio),  • suitable forag	Preconstruction	YES	Native vegetation communities will be impacted during construction of Red Bluff. SCE will provide compensation for vegetation removal at a 5:1 ratio since impacts will occur in Desert Tortoise critical habitat. Mitigation will also be provided for other sensitive resources, in accordance with the HCP, which was approved by the BLM on 8/29/11.
Bio Resources	MM-BIO-3	Implement Transplantation. Cacti flagged for transplantation per AM-BIO-3 shall be transplanted per the Vegetation Salvage Plan described in AM-BIO-5 and special status plant species shall be salvaged per the Vegetation Salvage Plan described in AM-BIO-5. The Applicant and SCE shall be responsible for ensuring that all workers at the site, throughout the duration of construction, operation, and decommissioning activities, receives the training described in AM-BIO-4, above. Specific language in Mitigation Measure BIO-3 will take precedence over any discrepancy with the Applicant Measures cited herein.	During Construction	YES	SCE will flag and transplant cacti and/or sensitive plant species per the Vegetation Salvage Plan approved by BLM on 8/29/11 and will train all workers at the site in accordance with the WEAP approved by the CPUC on 9/9/11, prior to beginning construction work.

Preconstruction During Construction Post Construction	Note: This table includes Mitigation Measures (MM) and Applicant Measures (AM) from the DSSF Final EIS, MMCRP, and Conservation Measures from the Biological Opinion applicable to the Red Bluff Station Project. Measures applicable solely to the Solar Farm and Gen-tie are excluded from the list, as they are not applicable to SCE.  * If a measure has multiple timing requirements, the coloring represents the first phase required.
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Resource Area	ММ/АРМ	Measure	Timing	Applicability	Comments
Bio Resources	MM-BIO-4	Salvage and Restoration Plan Performance Standards. Salvage will occur prior to construction in any area of the proposed Project as described in the approved Vegetation Salvage Plan (described in AM-BIO-5). Post-Project seeding and planting (revegetation) will occur at the decommissioning phase of the Project as described under an approved Restoration Plan (AM-BIO-5). Both salvage and revegetation efforts shall be monitored yearly and shall continue for a period of no less than 10 years or until the defined performance standards are achieved (whichever is sooner). The following performance standards must be met by the end of the monitoring period: (a) at least 80% of the species and vegetative cover observed within the temporarily disturbed areas shall be native species that naturally occur in desert scrub habitats; (b) absolute cover and density of native plant species within the revegetated areas shall equal at least 60% of the pre-disturbance or reference vegetation cover; and (c) the site shall have gone without irrigation or remedial planting for a minimum of three years prior to completion of monitoring. Remediation activities (e.g., whether additional planting, removal of non-native invasive species, or erosion control) shall be taken during the 10-year period if necessary to ensure the success of the revegetation effort. If the mitigation fails to meet the established performance standards after the 10-year maintenance and monitoring period, monitoring and remedial activities shall extend beyond the 10-year period until the performance standards are met, unless otherwise specified by the BLM and CPUC. As needed to achieve performance standards, the project owner shall be responsible for replacement planting or other remedial action as agreed to by BLM and CPUC. Replacement plants shall be monitored with the same survival and growth requirements as required for original revegetation plantings. If a fire or flood damages a revegetation area within the 10-year monitoring period, the owner's activity (as de	Preconstruction	YES	All salvage efforts will be performed in accordance with the DSSF Project-wide Vegetation Salvage Plan, approved by the BLM on 8/29/11. Restoration after decommissioning will be addressed by a Restoration Plan to be prepared at a later date.
Bio Resources	MM-BIO-5	Desert Dry Wash Woodland Monitoring and Reporting Plan. In addition to complying with MM-WAT-3 (Groundwater Level Monitoring, Mitigation, and Reporting), the Project owner shall prepare and submit a Desert Dry Wash Woodland Monitoring and Reporting Plan to BLM and CPUC for review and approval prior to commencing project-related pumping activities. Upon approval, the Project owner shall finalize and implement the Plan. Additional details are provided in Section 4.3. Monthly Desert Dry Wash Woodland Monitoring summary memos shall be submitted to BLM, CDFG, and CPUC during the construction period of the Project. In addition, annual Desert Dry Wash Woodland Monitoring reports shall be submitted for at least the first three years following completion of construction of the Project, if found necessary. The summary memos shall contain the monitoring data required as part of the monitoring program requirements under MM-WAT-3. In addition, each Desert Dry Wash Woodland Monitoring Report shall provide maps and text discussion of each study site, changes in plant health and vigor, changes in groundwater levels in the production wells, and the year's monitoring data. If results of the groundwater monitoring program under MM-WAT-3 indicate that the project pumping has resulted in water level decline of one foot or more below the baseline trend, and vegetation monitoring for plant stress, mortality, and water potential have documented one or more of the sampling sites for the four groundwater dependent plant species as reaching the threshold (above), the Project owner shall reduce groundwater pumping until water levels stabilize or recover, provide for temporary supplemental watering, or compensate for additional impacts to desert dry wash woodland at the ratio of 3:1, consistent with Mitigation Measure MM-BIO-2. Estimated acreage of additional dry wash woodland impacts shall be submitted to BLM and CPUC for approval. Upon approval, the Project owner shall initiate compensation according to the requirements and conditions fo	Preconstruction	NO	The DSSF Project-wide Desert Dry Wash Woodland Monitoring and Reporting Plan was approved by BLM on 8/29/11. Desert dry wash woodland monitoring will take place prior to well installation and throughout the remainder of construction. The distribution line construction will not impact ground water levels, since the majority of work will take place on a paved road, limiting fugitive dust emissions. The water source for the distribution line construction is the Riverside County Water District hydrant.

Preconstruction	During Construction	Post Construction	Note: This table includes Mitigation Measures (MM) and Applicant Measures (AM) from the DSSF Final EIS, MMCRP, and Conservation Measures from the Biological Opinion applicable to the Red Bluff Station Project. Measures applicable solely to the Solar Farm and Gen-tie are excluded from the list, as they are not applicable to SCE.
			* If a measure has multiple timing requirements, the coloring represents the first phase required.

Resource Area	ММ/АРМ	Measure	Timing	Applicability	Comments
Wildlife Resources	AM-WIL-1	A Draft Desert Tortoise Translocation Plan has been prepared for the Project and will be implemented by the Applicant to ensure that construction monitoring will be conducted by a BLM-, USFWS-, and CDFG-approved biologists during all construction activities and that any desert tortoise found with the construction zone will be translocated to a suitable location outside of the project footprint. The draft plan is in Appendix H and will be reviewed and approved by BLM. The Desert Tortoise Translocation Plan contains an analysis of several recipient sites for desert tortoises to be translocated from the Solar Farm site and Red Bluff Substation. The final selected recipient site will be determined by BLM, the USFWS, and CDFG. Desert tortoises found along the linear components of the Project, including the Gen-Tie Line, Telecommunications site, and access roads will be relocated out of harm's way pursuant to USFWS guidance (U.S. Fish and Wildlife Service. 2009. Desert Tortoise Field Manual. Ventura Fish and Wildlife Office, Ventura, California). Specifically, biological monitors will be present during all construction activities to ensure that active burrows are avoided. If a desert tortoise is found, the tortoise will be allowed to passively traverse the site while construction in the immediate area is halted. If the tortoise does not move out of harm's way after approximately 20 minutuse, a biologist authorized to handle desert tortoise, will actively move the animal out of harm's way. Vehicles parked in desert tortoise habitat will be inspected immediately prior to being moved. If a tortoise is found beneath a vehicle, a biologist authorized to handle desert tortoise will be contacted to move the animal out of harm's way, or the vehicle will not be moved until the desert tortoise leaves of its own accord. For desert tortoises in the Solar Farm site and Red Bluff Substation, they will be relocated using the following phased translocation process (additional details are provided in Section 4.4):  • Installation of	Preconstruction	YES	The DSSF Project-wide Desert Tortoise Translocation Plan was approved by the CPUC on 8/29/11 and will be implemented accordingly.
Wildlife Resources	AM-WIL-2	Contribute to a USFWS Regional Raven Management Plan. The Applicant shall contribute to the U.S. Fish and Wildlife Service (USFWS) Regional Raven Management Program by making a one-time payment of \$105 per acre of Project disturbance to the national Fish and Wildlife Federation Renewable Energy Action Team raven control account. A Raven Management Plan has been prepared and will be implemented by the Applicant to minimize the potential for the Project to attract ravens to the Project site. The draft plan is in Appendix H and will be reviewed and approved by BLM. Additional details are provided in Section 4.4.	Preconstruction	YES	SCE has submitted a request to the USFWS to prepare the Deposit Document for the Red Bluff contribution to the REAT-NFWF Raven Management Plan Account. The \$18K check is in process in preparation for deposit, However payment is not required prior to commencement of distribution line construction.
Wildlife Resources	AM-WIL-3	A Draft Avian and Bat Protection Plan has been prepared and will be implemented by the Applicant to specify necessary actions to be taken to protect nesting bird and bat species, including burrowing owls, nesting birds, and roosting bats. The draft plan is in Appendix H and will be reviewed and approved by BLM. The final plan will conform to the 2010 USFWS avian and bat guidelines entitled Considerations for Avian and Bat Protection Plans U.S. Fish and Wildlife Service White Paper. Additional details are provided in Section 4.4.	Preconstruction	YES	The DSSF Project-wide Avian and Bat Protection Plan was approved by the BLM on 8/29/11. This plan was approved by the CPUC on XX/XX/11.

Preconstruction During Construction	Post Construction	Note: This table includes Mitigation Measures (MM) and Applicant Measures (AM) from the DSSF Final EIS, MMCRP, and Conservation Measures from the Biological  Oninion applicable to the Red Bluff Station Project, Measures applicable to the Solar Farm and Gen-tie are excluded from the list, as they are not applicable to SCE
Preconstruction During Construction	Post Construction	Opinion applicable to the Red Bluff Station Project. Measures applicable solely to the Solar Farm and Gen-tie are excluded from the list, as they are not applicable to SCE.  * If a measure has multiple timing requirements, the coloring represents the first phase required.

Resource Area	MM/APM	Measure	Timing	Applicability	Comments
Wildlife Resources	MM-WIL-1	American Badger and Desert Kit Fox Protection Plan. To avoid direct impacts to American badgers or desert kit foxes, pre-construction surveys shall be conducted for these species concurrent with the desert tortoise surveys. Surveys shall be conducted as described below: Biological Monitors shall perform pre-construction surveys for badger and kit fox dens in the Project area, including areas within 90 feet of all Project facilities, utility corridors, and access roads. Surveys may be concurrent with desert tortoise surveys. If dens are detected, each den shall be classified as inactive, potentially active, or definitely active. Inactive dens that would be directly impacted by construction activities shall be excavated by hand and backfilled to prevent reuse by badgers or kit foxes. Potentially and definitely active dens that would be directly impacted by construction activities shall be monitored by the Biological Monitor for three consecutive nights using a tracking medium (such as diatomaceous earth or fire clay) and/or infrared camera stations at the entrance. If no tracks are observed in the tracking medium or no photos of the target species are captured after three nights, the den shall be excavated and backfilled by hand. If tracks are observed, and especially if high or low ambient temperatures could potentially result in harm to badger or kit fox from burrow exclusion, various passive hazing methods may be used to discourage occupants from continued use. After verification that the den is unoccupied it shall then be excavated and backfilled by hand to ensure that no badgers or kit foxes are trapped in the den. In the event that passive relocation techniques fail, the Applicant will contact the California Department of Fish and Game to explore other relocation options, which may include trapping.	Preconstruction	YES	An Other Species Protection Plan has been prepared and will be submitted to the CDFG, BLM, and CPUC by 9/16/11. Pre-construction surveys for these species will be conducted in accordance with this Plan, however none have been observed within the distribution line area.
Wildlife Resources	MM-WIL-2	Nelson's Bighorn Sheep Protection Plan. If effects to Nelson's Bighorn Sheep cannot be avoided, the Applicant shall consult with the California Department of Fish and Game (CDFG) to determine the appropriate level of restoration and mitigation for effects to essential habitat and/or travel corridors for Nelson's bighorn sheep by implementing the following measures: (a) The Project owner shall compensate or replace the permanent loss of Nelson's bighorn sheep habitat at a 1:1 ratio as approved by the CDFG. This may include monetary contributions or donations as mitigation which are tied to programs or activities designed to offset potential resource losses or for mitigation banking for habitat restoration, enhancement, or acquisition projects provided that an appropriate and cooperatively developed mitigation agreement has been finalized between the Applicant and CDFG. (b) Compensation or replacement mitigation should be oriented within or adjacent to the Project area and designed to rectify the same functions, habitat types and species being impacted wherever possible. Off-site compensation should be considered when mitigation measures cannot be applied to adjacent areas or to benefit the same species that are impacted. (c) All final actions associated with compensation mitigation will be approved by CDFG to insure that agreements are consistent with the CDFG's Sonoran Desert Mountain Sheep Meta-Population Plan. (d) Any roads or permanent structures built in Nelson's bighorn sheep habitat or movement corridors must be constructed in such a way as to allow continued bighorn movement, except in the case of the Solar Farm and Substation facilities which will be fenced. Some strategies could include under- or over passes, ramps cut into steep side slopes, alternatives to continuous guard rails or fence specifications along roads that allow sheep movement. Plans for these structures will be developed in coordination with CDFG.	Preconstruction	YES	Pre-construction surveys will be conducted for this species. If Nelson's bighorn sheep sign is detected, SCE will mitigate for loss to Nelson's bighorn sheep movement corridor habitat at a 1:1 ratio. If no sign is detected, no further mitigation is required.
Wildlife Resources	MM-WIL-5	Prepare and Implement a Bird Monitoring and Avoidance Plan. Before a ROW grant is issued, the Applicant shall retain a BLM-approved, qualified biologist to prepare a Bird Monitoring and Avoidance Plan in consultation with CDFG and USFWS. This plan shall follow the Avian Protection Plan guidelines outlined by USFWS and Avian Power Line Interaction Committee (APLIC).  The plan will require monitoring of (1) the death and injury of birds from collisions with facility features such feeder/distribution lines and solar panels, and (2) impacts to aquatic insects from polarized light from solar panels that may affect insectivorous (insect-eating) birds. The study design shall be approved by BLM in consultation with CDFG and USFWS. Additional detail is provided in Section 4.4.	prior to issuance of ROW grant	YES	Included within the Avian and Bat Protection Plan, approved by the BLM on 8/29/11 and CPUC on XX/XX/11.
Wildlife Resources	MM-WIL-6	Prepare and Implement Golden Eagle Nesting Surveys, Nest Site Monitoring, and Adaptive Management. Additional details are provided in Section 4.4. Where details of this Mitigation Measure may conflict with Applicant Measure AM-WIL-3, this measure shall take precedence.	Preconstruction	YES	Included within the Avian and Bat Protection Plan, approved by the BLM on 8/29/11 and CPUC on XX/XX/11, however none have been observed within the distribution line area.

Table 2
Required Environmental Submittals: AM, MM, and BO Measure Table
Red Bluff Substation Project - Distribution Line Upgrade, DSSF Final EIS

Į.	Preconstruction	During Construction	Post Construction	Note: This table includes Mitigation Measures (MM) and Applicant Measures (AM) from the DSSF Final EIS, MMCRP, and Conservation Measures from the Biological Opinion applicable to the Red Bluff Station Project. Measures applicable solely to the Solar Farm and Gen-tie are excluded from the list, as they are not applicable to SCE.
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Resource Area	MM/APM	Measure	Timing	Applicability	Comments
Wildlife Resources	MM-WIL-7	Alternate to long-distance (greater than 500 meters) desert tortoise translocation. The draft Desert Tortoise Translocation Plan defined under Applicant Measure AM-WIL-1 shall be updated to identify and describe, as an alternative to translocation, a strategy to remove desert tortoises on the project site from the wild and place them permanently in facilities approved by USFWS and CDFG, to be fully funded by the applicants. All suitable care or holding facilities for desert tortoises shall be listed and described in the draft plan, and capacity of each facility to accommodate desert tortoises from the project site shall be provided. The updated draft plan and shall be submitted to BLM, CPUC, USFWS and CDFG for review and approval. Upon approval of a final Desert Tortoise Translocation Plan and issuance of state and federal approvals, the applicant (Sunlight and/or SCE), shall either translocate tortoises into the wild or shall permanently place them in approved facilities, consistent with the Final Desert Tortoise Translocation Plan.	Preconstruction	YES	This measure is satisfied by the DSSF Project-wide Desert Tortoise Translocation Plan approved by CPUC on 9/13/11 and BLM on 8/29/11.
Wildlife Resources	MM-WIL-8	Plans required under Applicant Measures AM WIL-1, AM WIL-2, and AM WIL-3 shall be submitted for review and approval by USFWS, CDFG, BLM and CPUC.	Preconstruction	YES	Plans have been submitted to the CDFG, USFWS, and BLM. The Raven Plan was been submitted to the CPUC on 7-1-11, the Avian and Bat Plan was submitted to the CPUC on 8-5-11, and the Desert Tortoise Plan was submitted to the CPUC on 8/19/11.
Cultural Resources	AM-CUL-1	A cultural resources monitoring and mitigation plan has been included as a project design feature and BMP to minimize impacts on cultural resources. The content of this plan is described in Section 2.5 of Chapter 2 of this EIS and includes a description of areas to be monitored during construction, a discovery plan that will address unanticipated cultural resources, and provisions for the education of construction workers. Further, responsible parties for mitigation measures would be identified.		YES	Superseded by MM-CUL-5, MM-CUL-7 and MM-CUL-8
Cultural Resources	MM-CUL-1	The Memorandum of Agreement shall detail the process for activities to proceed in areas where historic properties are now known not to exist; the process for phased completion of field investigations for the evaluation of cultural resources and assessment of effects; a historic property treatment plan (HPTP); procedures to resolve adverse effects under Section 106; coordination between the CEQA process and Section 106 compliance; procedures for treatment of inadvertent discoveries; procedures for determining treatment and disposition of human remains; the process for treating human remains; compliance monitoring; dispute resolution; and tribal participation. Resolution of effects to cultural resources eligible for or listed on the NRHP may include research and documentation, data recovery excavations, curation, public interpretation, use or creation of historic contexts (especially for historic landscapes and the potential DTC-CAMA historic district), and/or report distribution.	60 days prior to construction	YES	The SCE Component Specific MOA was approved by the BLM/CPUC on 6/20/2011.
Cultural Resources	MM-CUL-2	On the basis of preliminary CRHR eligibility assessments, NRHP eligibility assessments made under the Memorandum of Agreement, or existing NRHP eligibility determinations, the BLM and CPUC may require the relocation of project components to avoid or reduce damage to cultural resource values. Where operationally feasible, potentially NRHP-eligible resources shall be protected from direct project impacts by project redesign within previously surveyed and analyzed areas.	60 days prior to construction	YES	Outlined in the Approved HPTP
Cultural Resources	MM-CUL-3	Where the BLM and CPUC decide that CRHR or NRHP-eligible or –listed cultural resources cannot be protected from direct impacts by project redesign, the Applicant shall comply with appropriate mitigative treatment(s) that will be detailed in the Memorandum of Agreement and cultural resources mitigation and monitoring plan.	60 day Prior to and During construction	YES	Outlined in the Approved HPTP
Cultural Resources	MM-CUL-4	All CRHR-listed or eligible cultural resources (as determined by the CPUC) and all NRHP-listed or eligible cultural resources (as determined by the BLM) that will not be affected by direct impacts, but are within 50 feet of project locations will be monitored by a qualified archaeologist. Protective fencing, or other markers, at the BLM's discretion, shall be erected and maintained to protect these resources from inadvertent trespass for the duration of construction in the vicinity.	During Construction	YES	Outlined in the Approved HPTP

Preconstruction	During Construction	Post Construction	Note: This table includes Mitigation Measures (MM) and Applicant Measures (AM) from the DSSF Final EIS, MMCRP, and Conservation Measures from the Biological Opinion applicable to the Red Bluff Station Project. Measures applicable solely to the Solar Farm and Gen-tie are excluded from the list, as they are not applicable to SCE.
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Resource Area	MM/APM	Measure	Timing	Applicability	Comments
Cultural Resources	MM-CUL-5	The historic property treatment plan that will be included in the Memorandum of Agreement will, at a minimum, employ avoidance, mitigation, and data recovery as mitigation alternatives. As part of the historic property treatment plan, the Applicant shall prepare a research design and a scope of work for evaluation of cultural resources and for data recovery or additional treatment of NRHP-listed or eligible sites that cannot be avoided. Data recovery on most resources would consist of sample excavation and/or surface artifact collection, and site documentation. A possible exception would be a site where burials, cremations, or sacred features are discovered that cannot be avoided. Additional content of the treatment plan will be dictated by the consultations associated with the Memorandum of Agreement.	60 days prior to construction	YES	Outlined in the Approved HPTP
Cultural Resources	MM-CUL-6	Construction work within 100 feet of cultural resources that require data-recovery fieldwork shall not begin until authorized by the BLM.	60 day Prior to and During construction	YES	Outlined in the Approved HPTP
Cultural Resources	MM-CUL-7	Archaeological monitoring shall be conducted by a qualified archaeologist familiar with the types of historical and prehistoric resources that could be encountered within the project area, and under direct supervision of a principal archaeologist. All cultural resources personnel will be approved by the BLM through the agency's Cultural Resource Use Permitting process. A Native American monitor may be required at culturally sensitive locations specified by the BLM following government-to-government consultation with Indian tribes. The monitoring plan shall indicate the locations where Native American monitors will be required and shall specify the tribal affiliation of the required Native American monitor for each location. The Applicant shall retain and schedule any required Native American monitors.	60 day Prior to and During construction	YES	Outlined in the Approved HPTP
Cultural Resources	MM-CUL-8	In the event of inadvertent discoveries during construction, operation and maintenance, or decommissioning, procedures outlined in the Memorandum of Agreement and the monitoring and mitigation plan will be adhered to. At a minimum, this will include stop work orders in the vicinity of the find, recordation and evaluation of the find by a qualified archaeologist, notification of the find to BLM, and appropriate treatment measures, possibly including data recovery or avoidance.	60 day Prior to and During construction	YES	Outlined in the Approved HPTP
Cultural Resources	MM-CUL-9	The BLM will continue to consult with Indian tribes to identify sacred sites, TCPs and traditional use areas that might be affected by the Project. If such places are identified, the BLM will consult further with tribes to resolve access impediments or other identified impacts.	On Going	YES	BLM is responsible for consultation

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Resource Area	MM/APM	Measure	Timing	Applicability	Comments
Paleontological Resources	AM-PR-1	The Applicant shall be responsible for the following measures.  A qualified paleontologist will conduct a study to further characterize the paleontological sensitivity of the Project Study Area. The study will result in a map of the Project sites that would identify areas of high paleontological sensitivity and areas of lesser sensitivity. The study may also include a paleontology reconnaissance of the sites by professional paleontologists, if deemed necessary by the BLM after review of the initial site characterization.  Should the site characterization and or the site reconnaissance identify areas of high potential for paleontological resources, additional measures could be implemented, as determined by the BLM.  • A qualified paleontologist will develop a monitoring and mitigation plan prior to construction to mitigate adverse impacts on paleontological resources if excavation is to occur in an area of high paleontological sensitivity or expose new sediments with an unknown potential for paleontological sensitivity. The plan will include measures to be followed in the event that fossil materials are encountered during construction.  • The monitoring and mitigation plan shall include a schedule and plan for monitoring earth-moving activities, and a provision that monitoring personnel have the authority to temporarily halt or divert excavation activities to allow removal of fossil specimens and recording of information on the location, orientation etc. associated with the collected specimen.  • Worker awareness training will be implemented to ensure that the construction personnel understand the potential for fossil remains being uncovered and/or disturbed by earth moving activities; where such remains are most likely to be encountered during earth moving; and requirements and procedures to be followed in the event of suspected fossil discoveries. The awareness training may be given along with other sensitivity trainings (e.g., for biological resources) or incorporated into tailgate safety meetings.  • The App	60 day Prior to and During construction	YES	Inventory and monitoring plan pending completion.
Geology and Soil Resources	AM-GEO-3	SCE shall undertake the following mitigation measures as part of the Substation Project: Prior to final design of the Substation, a combined geotechnical engineering and engineering geology study shall be conducted by SCE to identify site-specific geologic conditions and potential geologic hazards in sufficient detail to support sound engineering. Appropriate mitigations for identified geological hazards will be identified in the geotechnical study. For new substation construction, specific requirements for seismic design will be followed based on the Institute of Electrical and Electronic Engineers' 693 Recommended Practices for Seismic Design of Substations". New access roads, where required, will be designed to minimize ground disturbance during grading. Cut and fill slopes will be minimized by a combination of benching and following natural topography where feasible. Any disturbed areas associated with temporary construction will be returned to preconstruction conditions (to the extent feasible) after the completion of Project construction.	Preconstruction	YES	A combined geotechnical engineering and engineering geology study was conducted by SCE in preparation for the design of the Red Bluff Substation Project.
Geology and Soil Resources	AM-GEO-4	SCE shall implement the following mitigation measures to reduce impacts from wind and water erosion to soils (additional details are in Section 4.8):  Obtain coverage under the NPDES General Permit for Storm Water Discharges Associated with Construction Activity (General Permit) 2009-0009 DWQ.  Use nonhazardous dust suppressants approved by the BLM to suppress wind-blown dust generated at the site during construction.  Implement erosion control measures during construction.	Preconstruction	YES	This measure is satisfied by the Red Bluff Substation SWPPP and the Fugitive Dust and Emissions Control Plan approved by the CPUC on 7/18/11.
Lands and Realty Resources	AM-LAND-1	Property owners within 300 feet of the Project shall be notified of all major Project construction milestones, such as start of Project construction. Said property owners shall be provided with a detailed construction schedule at least 30 days before construction so that they are informed as to the time and location of disturbance. Updates shall be provided as necessary.	Preconstruction	YES	Notice provided in accordance with DPV2 Plan.

Table 2
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Red Bluff Substation Project - Distribution Line Upgrade, DSSF Final EIS

Preconstruction	During Construction	Post Construction	Note: This table includes Mitigation Measures (MM) and Applicant Measures (AM) from the DSSF Final EIS, MMCRP, and Conservation Measures from the Biological Opinion applicable to the Red Bluff Station Project. Measures applicable solely to the Solar Farm and Gen-tie are excluded from the list, as they are not applicable to SCE.
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Resource Area	ММ/АРМ	Measure	Timing	Applicability	Comments
Lands and Realty Resources	AM-LAND-2	The Project shall be designed to minimize disturbance or modification of existing uses such as transmission lines, pipelines, and underground cables. If disturbance or modification of existing uses were necessary, Sunlight shall coordinate with the owners to determine an acceptable solution. Sunlight shall fund any necessary avoidance measures or modifications.	Preconstruction	Yes	Utility research complete.
Noise and Vibration	AM-NZ-1	Sunlight and SCE shall limit most construction activity to daytime hours consistent with Riverside County noise ordinance limitations. Certain electrical connection activities at the Solar Farm site would occur at night for safety reasons, but would not require any heavy equipment operations.	During construction	NO	This measure is not applicable to the distribution line construction, as there are no residences located within 1/4 mile of the site.
Noise and Vibration	AM-NZ-2	SCE shall construct a masonry security wall around the perimeter of the Red Bluff Substation. This wall would also provide localized noise shielding for adjacent areas.	During construction	NO	This measure is not applicable to the distribution line construction, as the wall will not encompass the line, and will be built after the substation construction.
Noise and Vibration	MM-NOI-1	Sunlight and SCE shall limit construction activity within a quarter mile of an inhabited dwelling to 6:00 a.m. to 6:00 p.m. during June through September and 7:00 a.m. to 6:00 p.m. during October through May. Certain electrical connection activities at the Solar Farm site would occur at night for safety reasons, but would not require any heavy equipment operations.	During construction	NO	This measure is not applicable to the distribution line construction, as there are no residences located within 1/4 mile of the site.
Public Health and Safety/Haz Waste	AM-HAZ-2	Based on the preliminary information provided in the Phase I ESA and the Class I cultural inventory of the Project Site, the Applicant proposes to take the following steps to better determine the nature and extent of potential MEC issues and then take appropriate corrective action measures. The first step is to better determine the history of military activities within the proposed Project footprint. This would include further research regarding prior MEC removals that may have been issued in the past for certain areas by military or other investigating entities, and may include consultations with DOD personnel and archival research. As a result of the historical occurrence of military training activities throughout the DTC-CAMA, potentially including the Project area, this MEC consultation and archival research will address the entire Project footprint, including the specific areas of concern identified by the Phase I ESA and cultural resource surveys. With that more comprehensive understanding, the Applicant will propose, as necessary, further appropriate above and below-ground assessments, under the direction of an expert consultant team, to delineate areas for further investigation and then removal. The Applicant, under direction from the BLM, will determine which site-specific in-field investigative techniques and methodologies will be utilized to investigate and resolve potential MEC issues prior to Project construction. Finally, all construction workers will receive appropriate MEC health and safety awareness training to ensure that they know what actions to take if unanticipated MEC or other suspicious articles are encountered during construction.	Preconstruction	YES	The SCE Component Specific MEC Report and Worker Health and Safety Awareness Training Program and was approved by the BLM/CPUC on 7/21/11. The program will be administered to all on-site personnel prior to beginning work at the site.
Public Health and Safety/Haz Waste	AM-HAZ-6a	SCE shall implement standard fire prevention and response practices for the construction activities where hazardous materials are in use. SCE shall be responsible for implementing the approved plan (additional details are in Section 4.11).	During construction	YES	Standard fire prevention and response practices will be implemented at Red Bluff, per the SCE component Specific Fire Prevention Plan, approved by the CPUC on 7/20/11.

Table 2
Required Environmental Submittals: AM, MM, and BO Measure Table
Red Bluff Substation Project - Distribution Line Upgrade, DSSF Final EIS

	Preconstruction	During Construction		Post Construction	Note: This table includes Mitigation Measures (MM) and Applicant Measures (AM) from the DSSF Final EIS, MMCRP, and Conservation Measures from the Biological Opinion applicable to the Red Bluff Station Project. Measures applicable solely to the Solar Farm and Gen-tie are excluded from the list, as they are not applicable to SCE.  * If a measure has multiple timing requirements, the coloring represents the first phase required.
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Resource Area	ММ/АРМ	Measure	Timing	Applicability	Comments
Public Health and Safety/Haz Waste	AM-HAZ-6b	As applicable, SCE shall follow fire codes per California Department of Forestry and Fire Protection (2008) requirements for vegetation clearance during construction of the project to reduce the fire hazard potential.	During construction	YES	Contractor will comply with approved Fire Prevention Plan vegetation clearance requirements.
Public Health and Safety/Haz Waste	AM-HAZ-6c	Hazardous materials and waste handling shall be managed in accordance with the following plans and programs that SCE shall be responsible for implementing:  • Spill Prevention, Countermeasure, and Control Plan (SPCC Plan)  • Hazardous Materials Business Plans (HMBPs)  • Storm Water Pollution Prevention Plan (SWPPP)  • Health and Safety Program -The plan shall include:  • An organizational structure;  • A description of site characteristics and a job hazard analysis;  • A description of site controls that includes a site map; identification of site access restrictions, site security, site work zones, any required exclusion zones, any contaminant reduction zones, relevant support zones, and site communications;  • Training requirements and documentation of training;  • Medical surveillance;  • Personal protective equipment; • Exposure monitoring;  • Hazardous Materials and Hazardous Waste Handling  • Emergency Release Response Procedures	Preconstruction	YES	The DSSF SCE-Specific Component SPCC is applicable to substation O&M and will be submitted to BLM&CPUC prior to operation; the Red Bluff HMBP will be submitted to BLM/CPUC prior to operation, the Red Bluff SWPPP was submitted to BLM/CPUC on XX/XX/11; the SCE-Specific Component Health and Safety Program will be prepared by the Contractor and submitted to the BLM/CPUC prior to construction; the SCE-Specific Component combined Hazardous Materials, Waste Handling and Emergency Release Response Plan was approved by the CPUC on 8/1/11.
Public Health and Safety/Haz Waste	AM-HAZ-6d	Hazardous materials shall be used or stored and disposed of in accordance with Federal, State, and local regulations.	During construction	YES	Hazardous materials shall be used or stored and disposed of in accordance with Federal, State, and local regulations as described in the SCE-Specific Component combined Hazardous Materials, Waste Handling and Emergency Release Response Plan, approved by BLM/CPUC on 8/1/11.
Public Health and Safety/Haz Waste	AM-HAZ-6e	The Substation shall be grounded to limit electric shock and surges that could ignite fires.	During construction	NO	The distribution line construction will occur prior to energizing the substation.

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Preconstruction	During Construction	Post Construction	

Resource Area	ММ/АРМ	Measure	Timing	Applicability	Comments
Public Health and Safety/Haz Waste	AM-HAZ-6f	All construction and demolition waste shall be removed and transported to an appropriately permitted disposal facility.	During construction	YES	Construction waste will be removed and transported to permitted disposal facilities in accordance with Federal, State, and local regulations as described in the SCE-Specific Component combined Hazardous Materials, Waste Handling and Emergency Release Response Plan, approved by BLM/CPUC on 8/1/11.
Public Health and Safety/Haz Waste	AM-HAZ-7	SCE shall submit FAA Form 7460-1 and receive a Determination of No Hazard to Navigable Airspace and comply with any AC 70/7460-1K (Obstruction Marking and Lighting) requirements from the FAA for construction of the 185-foot microwave tower associated with the Desert Center Communications Center.	Preconstruction	NO	The Determination of No Hazard to Navigable Airspace was received by FAA on 1/27/11, however the Desert Center Communications Center microwave tower is located on BLM property and is not affected by the distribution line construction.
Public Health and Safety/Haz Waste	AM-HAZ-8	SCE shall provide the BLM and the County of Riverside with a project-specific Emergency Response and Inventory Plan prior to initiating construction. SCE shall be responsible for implementing the approved plan. SCE shall provide the BLM and the County of Riverside with a Project-specific Emergency Response and Inventory Plan prior to initiating construction. SCE shall be responsible for implementing the approved plan. The plan shall include the following.  •An evacuation plan; •A list of emergency contacts; •A list of emergency resources; •Any special arrangements with emergency responders; •Relevant emergency procedures; •Post-incident reporting/recording responsibilities; •Identification of site components that may be vulnerable to earthquakes with procedures for inspection or isolation after a seismic event; •A list of on-site emergency equipment; and •An employee training plan that documents training areas and capabilities.	Preconstruction	YES	The SCE-Specific Component combined Hazardous Materials, Waste Handling and Emergency Release Response Plan, approved by the CPUC on 8/1/11, was submitted to the County of Riverside on 9/9/11. It was submitted electronically to Eric Camden, Emergency Service Coordinator OES 11, Riverside County Fire Department, on 9/9/11. Hard copies were delivered to Faye Glass on 9/13/11 for distribution to all applicable personnel.
Public Health and Safety/Haz Waste	AM-HAZ-9	Project facilities shall be designed, constructed, and operated in accordance with applicable fire protection and other environmental, health and safety requirements. In compliance with County of Riverside requirements, a Project-specific fire prevention plan for both construction and operation of the substation shall be completed by SCE prior to initiation of construction. The plan shall include the following: The purpose and applicability of the plan; and Procedures for fire prevention and response that include identification of site-specific and operational risks, tools and equipment needed, and fire prevention and safety considerations; red-flag warning system, activity levels, fire-related training, and coordination with BLM and County of Riverside.	Preconstruction	YES	The DSSF SCE-Specific Component Fire Prevention Plan, was approved by BLM/CPUC on 7/20/11. Project facilities were designed in accordance with applicable fire protection, environmental, and health and safety requirements. Submitted electronically to Eric Camden, Emergency Service Coordinator OES 11, Riverside County Fire Department, on 9/9/11. Hard copies delivered to Faye Glass on 9/13/11 for distribution to all applicable personnel.

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Dunanamatian	During Construction	Doot Cometavetica	Note: This table includes Mitigation Measures (MM) and Applicant Measures (AM) from the DSSF Final EIS, MMCRP, and Conservation Measures from the Biological
Preconstruction [	During Construction	Post Construction	Opinion applicable to the Red Bluff Station Project. Measures applicable solely to the Solar Farm and Gen-tie are excluded from the list, as they are not applicable to SCE.
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Resource Area	MM/APM	Measure	Timing	Applicability	Comments
Socioeconomic and Environmental Justice	AM-SOCIO-1	The public shall be notified of Project activities and scheduling to inform the public of projected impacts on the surrounding area. This notification shall provide the public with the opportunity to plan their personal and business activities appropriately.	Preconstruction	YES	Notice provided in accordance with DPV2 Plan.
Special Designations	AM-SD-1	During operation and maintenance of Red Bluff Substation, lights shall normally be off. Where needed during emergency and scheduled work during the night, lights shall be shielded, would be directed downward, and shall be motion sensitive to minimize glare in surrounding areas. Mitigation measures described for Cultural Resources, would be implemented to reduce impacts on cultural resources within the Alligator Rock ACEC.	O&M	NO	Lighting to be used at Red Bluff during O&M will comply with the restrictions described in the Permanent Lighting Mitigation Plan approved by the BLM/CPUC/NPS on XX/XX/XX.
Transportation and Public Access	AM-TRANS-2	Sunlight shall document road conditions at the beginning and end of Project construction and decommissioning and contribute fair share cost for pavement maintenance and other needed repairs.	During construction and decommissioning	YES	Included in Contractor's specs.
Transportation and Public Access	AM-TRANS-3	Sunlight shall share Project information with the airport owners if a transmission line alternative that runs near the former Desert Center Airport's runway is selected to assure that no special precautions are needed.	Preconstruction	NO	Distribution line construction will not affect Desert Center airport.
Transportation and Public Access	AM-TRANS-4	Sunlight shall coordinate with the DOD R-2508 Complex Sustainability Office, Region IX, based in San Diego, California, and with local regional military installations regarding low-level flight operations relative to the Project to assure that no special precautions are needed.	Preconstruction	NO	Sunlight obtained an exemption letter from DOD on 1/24/11, however distribution line construction will not affect DOD operations.
Visual Resources	MM-VR-1	Revegetation. The Applicant and SCE shall minimize the amount of ground surface to be disturbed and revegetate disturbed soil areas (additional details provided in Section 4.16). No less than 30 days following the publication of the BLM's Record of Decision/ROW Issuance, whichever comes first, the Applicant and SCE shall submit to the BLM a final agency-approved revegetation plan that has been reviewed and approved by the BLM. Within 30 days after completion of project construction, the Applicant and SCE each shall provide to the BLM for review and approval a written report identifying which items of the revegetation plan have been completed, a summary of all modifications to mitigation measures made during the project's construction phase, and which items are still outstanding. It shall also include a plan for revegetation monitoring.	Preconstruction	YES	This measure is satisfied by the DSSF SCE Component Specific Restoration Plan, approved by the BLM/CPUC on XX/XX/11.

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Resource Area	ММ/АРМ	Measure	Timing	Applicability	Comments
Visual Resources	MM-VR-2	Litter and Trash Control. During construction, all trash and food-related waste shall be placed in self-closing containers and removed daily from the site. Vehicular traffic shall be confined to existing routes of travel to and from the Project site, and cross-country vehicle and equipment use outside designated work areas shall be prohibited.	During construction	YES	Addressed in the Contractor Specs, SCE-Specific Component SWPPP and combined Hazardous Materials, Waste Handling and Emergency Release Response Plan, approved by BLM/CPUC on 8/1/11. Traffic to and from the site will be confined to established roads or within the site, per the FDECP approved by BLM/CPUC on 7/8/11.
Visual Resources	MM-VR-3	Fugitive Dust Control. To minimize fugitive dust on the Project site, a dust control plan shall be developed that will impose limits on the speed of travel for construction vehicles, and will require that dust palliatives be applied to the site, as described in AM-AIR-1 and AM-AIR6, and in compliance with SCAQMD Rule 403.	Preconstruction	YES	The DSSF SCE Specific Component Fugitive Dust Emission Control Plan was approved by the BLM/CPUC on 7/8/11.
Visual Resources	MM-VR-4	Lighting Control. Consistent with safety and security considerations, the Applicant and SCE shall design and install all permanent exterior lighting and all temporary construction lighting such that a) lamps and reflectors are not visible from beyond the Solar Farm site, including any offsite security buffer areas; b) lighting shall not cause excessive reflected glare; c) direct lighting shall not illuminate the nighttime sky, except for required FAA aircraft safety lighting (which shall be an on-demand, audio-visual warning system that is triggered by radar technology); d) illumination of the project and its immediate vicinity shall be minimized; and e) skyglow caused by Project lighting will be avoided, and f) the plan shall comply with local policies and ordinances. All permanent light sources shall be below 2,500 Kelvin color temperature (warm white) and shall have cutoff angles not to exceed 45 degrees of nadir. The Applicant and SCE each shall submit to the BLM and CPUC for review and approval a Lighting Mitigation Plan (details provided in Section 4.16).	Preconstruction, Construction, and Post	YES	The DSSF SCE Specific Component Construction Lighting Mitigation Plan was approved by the CPUC and NPS on 8/1/11.
Visual Resources	MM-VR-5	Surface Treatment of Project Structures/Buildings. The Applicant and SCE shall treat the surfaces of all project structures and buildings visible to the public such that a) their colors minimize visual contrast by blending with the characteristic landscape colors; b) their colors and finishes do not create excessive glare; and c) their colors and finishes are consistent with local policies and ordinances. The transmission line conductors shall be non-specula and nonreflective, and the insulators shall be nonreflective and nonrefractive. The Applicant and SCE shall comply with BLM requirements regarding appropriate surface treatments for Project elements.	Preconstruction and Construction	NO	Color treatments for substation project facilities will be described in the Permanent Lighting Plan and on the project design drawings. Distribution line construction does not include project structures or buildings, just the removal and replacement of existing wooden poles, which will be matched during replacement.
Visual Resources	MM-VR-6	Project Design. The Applicant and SCE shall use proper design fundamentals to reduce the visual contrast to the characteristic landscape. These include proper siting and location; reduction of visibility; repetition of form, line, color (see Mitigation MM-VR-5) and texture of the landscape; and reduction of unnecessary disturbance. Additional details on design strategies are provided in Section 4.16. The Applicant and SCE and BLM shall develop a set of visual resources BMPs to serve as a running list of proven practices to reduce the overall visual contrast of the proposed Project.	Prior/During construction	YES	Distribution line construction non-BLM land involves remove and replacement of similar existing wooden poles along the current alignment.
Water	AM-WAT-1	Training construction staff in the management of hazardous materials and use of spill control and cleanup equipment	During construction	YES	Construction workers will be trained prior to beginning construction work, in accordance with the Hazardous Materials, Waste Handling, and Response Procedures Plan required by AM-HAZ-6c, and approved by the BLM/CPUC on 8/1/11.

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Resource Area	MM/APM	Measure	Timing	Applicability	Comments
Water Resources	AM-WAT-2	having a clear chain of command within the organizational structure with responsibility for implementing, monitoring, and correcting BMPs	During construction	YES	Construction workers will be trained prior to beginning construction work, in accordance with the SWPPP required by AM-GEO-4, and submitted to the BLM/CPUC on XX/XX/XXXX.
Water Resources	AM-WAT-3	covering and containing hazardous materials so that they are not in contact with precipitation or runoff	During construction	YES	Construction workers will be trained prior to beginning construction work, in accordance with the Hazardous Materials, Waste Handling, and Response Procedures Plan required by AM-HAZ-6c, and approved by the BLM/CPUC on 8/1/11.
Water Resources	AM-WAT-4	storing hazardous materials in one or more central areas, and instituting rules requiring all hazardous materials to be secured at the end of the day	During construction	YES	Construction workers will be trained prior to beginning construction work, in accordance with the Hazardous Materials, Waste Handling, and Response Procedures Plan required by AM-HAZ-6c, and approved by the BLM/CPUC on 8/1/11.
Water Resources	AM-WAT-5	maintaining good inventory records; storing hazardous liquids and dispensing equipment in secondary containment	During construction	YES	Construction workers will be trained prior to beginning construction work, in accordance with the Hazardous Materials, Waste Handling, and Response Procedures Plan required by AM-HAZ-6c, and approved by the BLM/CPUC on 8/1/11.
Water Resources	AM-WAT-6	maintaining adequate quantities of spill containment and response equipment at readily accessible points throughout the site	During construction	YES	Construction workers will be trained prior to beginning construction work, in accordance with the Hazardous Materials, Waste Handling, and Response Procedures Plan required by AM-HAZ-6c, and approved by the BLM/CPUC on 8/1/11.
Water Resources	AM-WAT-7	identifying the worst case and most likely spill scenarios, and providing spill response equipment adequate to respond to these scenarios	During construction	YES	Construction workers will be trained prior to beginning construction work, in accordance with the Hazardous Materials, Waste Handling, and Response Procedures Plan required by AM-HAZ-6c, and approved by the BLM/CPUC on 8/1/11.
Water Resources	AM-WAT-8	using chemicals presenting the least environmental hazard wherever possible	During construction	YES	Construction workers will be trained prior to beginning construction work, in accordance with the Hazardous Materials, Waste Handling, and Response Procedures Plan required by AM-HAZ-6c, and approved by the BLM/CPUC on 8/1/11.

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Resource Area	MM/APM	Measure	Timing	Applicability	Comments
Water Resources	AM-WAT-9	storing the smallest quantities of hazardous materials possible on the site	During construction	YES	Construction workers will be trained prior to beginning construction work, in accordance with the Hazardous Materials, Waste Handling, and Response Procedures Plan required by AM-HAZ-6c, and approved by the BLM/CPUC on 8/1/11.
Water	AM-WAT-10	maintaining site security to reduce vandalism	During construction	YES	Construction equipment will be secured nightly, as feasible.
Water Resources	AM-WAT-11	requiring all contractors to abide by the program BMPs and to identify any hazardous materials and specific BMPs pertaining to their trade or activity.	During construction	YES	Construction workers will be trained prior to beginning construction work, in accordance with the Hazardous Materials, Waste Handling, and Response Procedures Plan required by AM-HAZ-6c, and approved by the BLM/CPUC on 8/1/11.
Water Resources	MM-WAT-1	Groundwater Wells, Installation. The Applicant proposes to construct new groundwater wells in support of the Project, that would produce water from the Chuckwalla Valley Groundwater Basin (CVGB). The Project owner shall ensure that the wells are completed in accordance with all applicable state and local water well construction permits and requirements. Prior to initiation of well construction activities, the Project owner shall submit for review and comment a well construction packet to the County of Riverside and fees normally required for the County's well permit, with copies to the Compliance Project Manager (CPM). The Project shall not construct a well or extract and use groundwater until approval has been issued by the county and the CPM to construct and operate the well. Wells permitted and installed as part of pre-construction field investigations that subsequently are planned for use as Project water supply wells require CPM approval prior to their use to supply water to the Project.  Post-Well Installation. The Project owner shall provide documentation as required under County permit conditions to the CPM that the well has been properly completed. In accordance with California's Water Code Section 13754, the driller of the well shall submit to the Department of Water Resources (DWR) a Well Completion Report for each well installed. The Project owner shall ensure the Well Completion reports are submitted. The Project owner shall ensure compliance with all County water well standards and the County requirements for the life of the wells, and shall provide the CPM with two copies each of all monitoring or other reports required for compliance with the County of Riverside water well standards and operation requirements, as well as any changes made to the operation of the well.	Preconstruction	NO	Prior to the well becoming operational, the Contractor shall use water from the Riverside County Water District hydrant located at 26251 Parkview Drive, in Desert Center, or another nearby hydrant identified by the District for the Contractor's use.
Water Resources	MM-WAT-2	Construction Water Use. The proposed Project's use of groundwater during construction shall not exceed a total of 1,400 AF during the 26-month construction period for the solar farm, 360 AF for the Red Bluff Substation, and 7 AF for the Gen-Tie Line. Before groundwater can be used for construction, the Project owner shall install and maintain metering devices as part of the water supply and distribution system to document Project water use and to monitor and record in gallons per day the total volume of water supplied to the Project from this water source. The metering devices shall be operational for the life of the Project.	During construction	NO	The Contractor shall use water from the offsite hydrant designated by Riverside County Water District, for dust suppressions activities at the site prior to the well becoming operational.

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Preconstruction [	During Construction	Post Construction	Opinion applicable to the Red Bluff Station Project. Measures applicable solely to the Solar Farm and Gen-tie are excluded from the list, as they are not applicable to SCE.
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Resource Area	ММ/АРМ	Measure	Timing	Applicability	Comments
Water Resources	MM-WAT-4	Mitigation for the Use of Fencing. Desert tortoise exclusion fencing and security fencing shall be installed around the entire perimeter of the Project site as described in AM-WIL-1. During construction the desert tortoise exclusion fence will be inspected on a daily basis to ensure the integrity of the fence is maintained. During operation of the Project, fence inspections shall occur at least once per month throughout the life of the Project, and within 24 hours after storms or other events that might affect the integrity and function of desert tortoise exclusion fences. Fence repairs shall be completed within two days (48 hours) of detecting problems that affect the functioning of the desert tortoise exclusion fencing. If fence damage occurs during any time of year when tortoises may be active, the Project owner shall be responsible for monitoring the site of the damaged fence until it is fully repaired, to prevent a desert tortoise from entering the Project area. All incidents of damaged tortoise exclusion fence, including dates of damage and repair; extent of damage, and monitoring summaries (methods and results), shall be reported to the BLM, CPM, CDFG, and USFWS. All wildlife found entrapped or dead in the fence shall be reported to the BLM, CPM, CDFG, and USFWS. Fencing shall be installed with breakaway design features so as not to interfere with or impede storm water or flood flows, or associated sediment loads.	During construction	NO	The distribution line work will not be fenced during construction. Biological monitors will clear the construction area each day prior to the commencement of construction and monitor the construction activities throughout the work day.
BO CM	BO-14	Applicants shall submit the names of the Authorized Biologist(s) along with a completed DT Authorized Biologist Request Form to the Service, BLM, and CDFG for review and final approval.	45 days prior to start	YES	Authorized Biologist is Lehong Chow.
BO CM	BO-16	Applicants shall submit the resume(s), at least 3 references, and contact info of the proposed Biological Monitor(s) to the BLM.	30 days prior	YES	Biological Monitors include: Rachel Woodard (desert tortoise), Michael Honer and Kent Hughes (plants), Crissy Slaughter (birds), CJ Randel (reptiles), Barbara Stein (mammals), and Brooks Hard (ravens).
BO CM	BO-18	Applicants shall provide the USFWS, BLM, and CDFG draft WEAP program for review and approval.	30 days prior	YES	Sent to CPUC and BLM on July 7; sent to USFWS and CDFG on July 27.
BO CM	BO-18	Applicants shall submit 2 copies of final WEAP (workers shall receive and be required to visibly display a hardhat sticker or certificate that they have completed the training).	10 days prior	YES	Sent to CPUC and BLM on July 7; sent to USFWS and CDFG on July 27. Anticipate sending the final WEAP on September 10, 2011.
BO CM	BO-22	Applicant shall submit the final Revegetation Plan that has been reviewed and approved by the BLM. (Under the category of avoidance and minimization measures)The Applicants shall prepare and implement a Reveg Plan to restore all areas subject to temporary disturbance to preproject grade and conditions. 2 years of monitoring. Performance standards: at least 80% of species shall be native, relative cover and density shall equal 60 percent.	30 days prior	YES	Comments from the BLM (Mark Massar) were expected on September 9, 2011. Temporary pull site locations will be allowed to revegetate naturally after limited drive and crush activities.
BO CM	BO-23	DT Plan has been prepared – final submitted to CPUC, BLM, CDFG, and USFWS	Preconstruction	YES	Draft plan submitted to USFWS, BLM, and CDFG by Ironwood Consulting. SCE submitted to CPUC on 8/19. Revised "final" draft incorporating CPUC comments is expected to be completed on September 13, 2011.

Preconstruction	During Construction	Post Construction	Note: This table includes Mitigation Measures (MM) and Applicant Measures (AM) from the DSSF Final EIS, MMCRP, and Conservation Measures from the Biological Opinion applicable to the Red Bluff Station Project. Measures applicable solely to the Solar Farm and Gen-tie are excluded from the list, as they are not applicable to S * If a measure has multiple timing requirements, the coloring represents the first phase required.
Preconstruction	During Construction	Post Construction	

Resource Area	ММ/АРМ	Measure	Timing	Applicability	Comments
BO CM	BO-23	The Applicant shall install perimeter security fencing and DT exclusion fencing around the Substation site. The fence shall be checked on a daily basis. If DT were moved inside fence during fence construction, fencing shall be checked twice per day for the first 7 days to ensure the recently moved DT has not been trapped within or is pacing the fence. Thereafter, permanent fencing shall be inspected monthly and during and within 24 hours following any major rainfall event (flow is detectable within fenced drainage). Damage shall be repaired immediate and permanently repaired within 48 hours.	prior to clearance survey for DT.	NO	The distribution line work will not be fenced during construction. Biological monitors will clear the construction area each day prior to the commencement of construction and monitor the construction activities throughout the work day.
BO CM	BO-23	As part of the Annual Compliance Report, the Authorized Biologist shall provide a report to the BLM that describes compliance with avoidance and minimization measures to be implemented during construction, operations, and maintenance (ie. Summary of road-killed animals, implementation of measures to prevent toxic spills, erosion and sedimentation, efforts to enforce worker guidelines, etc).	Each year following construction	YES	To be implemented
BO CM	BO-24	Clearance surveys for DT can be conducting any time of the year prior to construction of linear features.	Preconstruction	YES	Will be conducted just prior to construction work on the distribution line, and a biological monitor will be present during all construction activities.
ВОСМ	BO-24, 26	Any DT located during clearance surveys for installation of DT fencing during the inactive season (June 1-Aug. 31 and Nov. 1-March 31) will be moved inside fence and translocated during active season. (?)  Any DT located during clearance surveys during inactive season that are inaccessible, would be fenced off in its burrow until the following active season.  Any DT found above ground during the inactive season will be fitted with a transmitter and left until it can be translocated during the active season. Substation will be fenced into subsection with temporary DT fencing and clearance surveys will be performed as each area is fenced. Two clearance surveys per section; if a DT is found on the 2nd survey, a 3rd survey will be conducted.  DT will be monitored in-situ or place in quarantine pens constructed by the Applicant. Applicants will follow specific husbandry procedures. Quarantine period will not exceed 18 months.	During DT clearance surveys	YES	To be implemented
BO CM	BO-27	All translocated DT will be monitored at least once within 24 hours of their release, a minimum of twice weekly for 1st 2 weeks following translocation. All translocated DT will be monitored for 5 years once a week between March 15 and May 31, twice a month between June 1 and Nov. 15, and once a month between Nov. 15 and March 15.  Health assessment will be completed for each translocated DT at the end of the 5-year monitoring period. A health assessment will be completed for each translocated DT prior to overwintering (between Oct. 15 and Nov. 15) and subsequent to overwintering (between March 1 and April 1). Veg transect will be established at the recipient site and will be surveyed annually between March 15 and April 30.	After translocation	YES	To be implemented
ВО СМ	BO-27	Authorized Biologist shall submit a report to the USFWS, BLM, and CDFG describing implementation of each of the conservation measures pertaining to DT.	Within 30 days after completion of DT clearance surveys	YES	To be implemented
BO CM	BO-28	The lead Authorized Biologist will submit daily briefings via email to the USFWS, BLM, CDFG, and Applicant prior to the 5th day of the month summarizing the prior month's translocation activities.  The lead AB will submit quarterly status report via email to the USFWS, BLM, and CDFG.  An annual report submitted to BLM on or before Jan. 15 so that the Feb. 1 deadline for annual report to the USFWS can be met.  Final report submitted to BLM following 5th year of monitoring.	After translocation	YES	To be implemented

Preconstru	ction	During Construction		Post Construction	Note: This table includes Mitigation Measures (MM) and Applicant Measures (AM) from the DSSF Final EIS, MMCRP, and Conservation Measures from the Biological Opinion applicable to the Red Bluff Station Project. Measures applicable solely to the Solar Farm and Gen-tie are excluded from the list, as they are not applicable to SCE.
			* If a measure has multiple timing requirements, the coloring represents the first phase required.		

Resource Area	MM/APM	Measure	Timing	Applicability	Comments
BO CM	BO-28	Authorized biologist shall conduct monthly compliance inspections. Summaries of the records taken shall be submitted to the BLM in Monthly Compliance Reports	During construction	YES	To be implemented
BO CM	BO-28	During project O&M, Authorized Biologist shall submit summaries of compliance activities in an Annual Compliance Report.	O&M	YES	To be implemented
BOCM	BO-29	Notify the USFWS, BLM, and CDFG by phone immediately or no later than noon on the business day following the event. Submit follow-up written notification by FAX or email within two calendar days of the incident.	If injured or dead listed species	YES	To be implemented
BO CM	BO-30	Authorized Biologist shall provide the BLM and Final Listed Species Mitigation Report.	No later than 45 day after initiation of project operations	YES	To be implemented
BO CM	BO-30	Raven plan has been prepared. Final was submitted to CPUC, USFWS, CDFG, and BLM on June 17, 2011.	Preconstruction	YES	BLM has made plan "final" as of August 29, 2011. Further revisions will be made via a change page for the document.
ВО СМ	BO-31	Monitoring for ravens will be conducted throughout the life of the project.  All incidental sightings of ravens in project area will be logged by the Biological Monitor (during construction), personnel authorized by applicants, or project personnel  Raven nest surveys conducted for 5 years following construction (at least twice between March 15 and June 1). Further assessments on the ground underneath nests during spring months to evaluate any evidence of DT predation.  If monitoring shows an increase in raven roosting or nesting behavior, implement deterrents after coordination with the USFWS, BLM, and CDFG On or before Jan. 15 of each calendar year of monitoring, annual report submitted to BLM that summarizes all monitoring activities.	During and O&M	YES	REQUESTING THAT WE ONLY DO 5 YEARS OF RAVEN MONITORING DURING O&M: CPUC HAS GIVEN THAT GUIDANCE IN FEIS.
BO CM	BO-32	Integrated Weed Management Plan has been prepared. The final plan will be reviewed and approved by the BLM. (Details regarding this plan on page 33 state either high pressure air or water will be used to clean equipment and "feet" will be carefully washed.	Preconstruction	YES	BLM has made plan "final" as of August 29, 2011. Further revisions will be made via a change page for the document.

Table 2
Required Environmental Submittals: AM, MM, and BO Measure Table
Red Bluff Substation Project - Distribution Line Upgrade, DSSF Final EIS

Preconstruction	During Construction	Post Construction	Note: This table includes Mitigation Measures (MM) and Applicant Measures (AM) from the DSSF Final EIS, MMCRP, and Conservation Measures from the Biological Opinion applicable to the Red Bluff Station Project. Measures applicable solely to the Solar Farm and Gen-tie are excluded from the list, as they are not applicable to SCE.
			* If a measure has multiple timing requirements, the coloring represents the first phase required.

Resource Area	ММ/АРМ	Measure	Timing	Applicability	Comments
BO CM	BO-34	Weed monitoring	Each year during construction and annually for 3 years following completion of construction	YES	To be implemented
BO CM	BO-35	General management and monitoring will be conducted by authorized personnel each year between November and April. Success of weed plan will be determined by BLM (no more than 10 percent increase in weed species or in overall weed cover in any part of the project).	After 3 years of O&M monitoring	YES	REQUESTING THAT WE ONLY DO 3 YEARS OF WEED MONITORING DURING O&M: CPUC HAS GIVEN OK IN DRAFT OF MMCRP SENT TO US ON SEPT. 7, 2011.
BO CM	BO-36	HCP has been prepared. The plan shall be revised to reflect acreages and habitats reflected in the BO and will be reviewed by the USFWS, BLM, CDFG, and CPUC. (Page 79 states that acquisition lands will be within the Eastern Colorado Recovery Unit in the Chuckwalla DWMA and CHU between Cactus City and Desert Center).	Preconstruction	YES	HCP has been updated to reflect info in BO and re-submitted to CPUC. Approved by BLM on 8/29/11. Letter of credit issued on 8/31.
BO CM	BO-38	Applicants shall submit a formal acquisition proposal to the USFWS, BLM, CDFG, and CPUC describing the parcel selected for acquisition. The Applicants or approved 3rd party shall prepare a management plan for the compensation lands in consultation with the entity that will be managing the lands.	Preconstruction	YES	A request for a proposal to purchase mitigation land was sent to Wildlands on 8-3-11. In preparation.
BO CM	BO-39	The Applicant shall provide financial assurances in the form of an irrevocable letter of credit, a pledged savings account, or another form of security approved by the BLM and CPUC (is this no fewer than 30 days prior or within 60 days of ground disturbance – page 41).	30 days after	YES	The letter of credit was issued on 8/31/11. An addendum to this LOC is being issued by JP Morgan - the first LOC they issued referenced the incorrect CD number and issue date.
BO CM	BO-40	If funds are provided to NFWF (through the Renewable Energy Action Team), compensation funds will be provided no fewer than 30 days prior to ground disturbance and lands will be acquired no later than 18 months after ground disturbance.	30 days prior	NO	SCE is in the process of purchasing mitigation lands through Wildlands instead of providing funds to NFWF. A request for a proposal to purchase mitigation land was sent to Wildlands on 8-3-11.
BO CM	BO-41	SCE will provide to CDFG an irrevocable letter of credit or another form of security approved by CDFG's Office of the General Counsel. Security required for SCE would be \$2,580,000 (base on 172 acreage).	Within 60 days of ground- disturbing activities	YES	MAGDALENA RODRIGUEZ ADVISED THIS NEEDS TO BE DONE WITHIN 30 DAYS OF GROUND-DISTURBING ACTIVITIES.
BO CM	BO-41-42	Applicants will fund the implementation of the following two plans to be prepared by the USGS in coordination with USFWS, BLM, and CDFG: 1)  Desert Tortoise Habitat Linkage Management and Monitoring Plan, and 2) Desert Tortoise Population Connectivity Effectiveness Monitoring Plan	If Phase III of the Desert Sunlight portion of the project is constructed	YES	To be implemented

Preconstruction	During Construction	Post Construction	Note: This table includes Mitigation Measures (MM) and Applicant Measures (AM) from the DSSF Final EIS, MMCRP, and Conservation Measures from the Biological Opinion applicable to the Red Bluff Station Project. Measures applicable solely to the Solar Farm and Gen-tie are excluded from the list, as they are not applicable to SC
			* If a measure has multiple timing requirements, the coloring represents the first phase required.

Resource	ММ/АРМ	Measure	Timing	Applicability	Comments
BO CM	BO-77	SCE will install 11.4 miles of DT exclusion fencing along I-10.	If Red Bluff Recipient Site Used	NO	To be implemented at substation not distribution line
BOCM	BO-84-85	DT will be monitored in-situ or penned on site while awaiting results of disease tests. Applicants will construct quarantine pens and follow husbandry procedures following the most recent service guidelines. A survey of the recipient site to confirm densities, perform health assessments on all DT encountered, and attach transmitters for monitoring purposes. Long-term monitoring of all translocated DT. Construct 11.4 miles of DT exclusion fencing along the south side of I-10 to the east and west of the site.	If DT are found and need to be translocated	YES	PER CONVERSATION WITH LARRY (BLM), KATHY, HEDY/SCOTT (CPUC) ON SEPT. 7, 2011, WILL PLACE TORTOISES JUST OUTSIDE OF DT FENCE IN A PEN OR ON THE FIRST SOLAR SITE IN A PEN SO AS TO NOT DELAY RB CONSTRUCTION; WILL TRY TO AVOID NEEDING TO TRANSLOCATE DT BY ALLOWING THE ANIMAL(S) ENOUGH TIME TO LEAVE ON THEIR OWN.

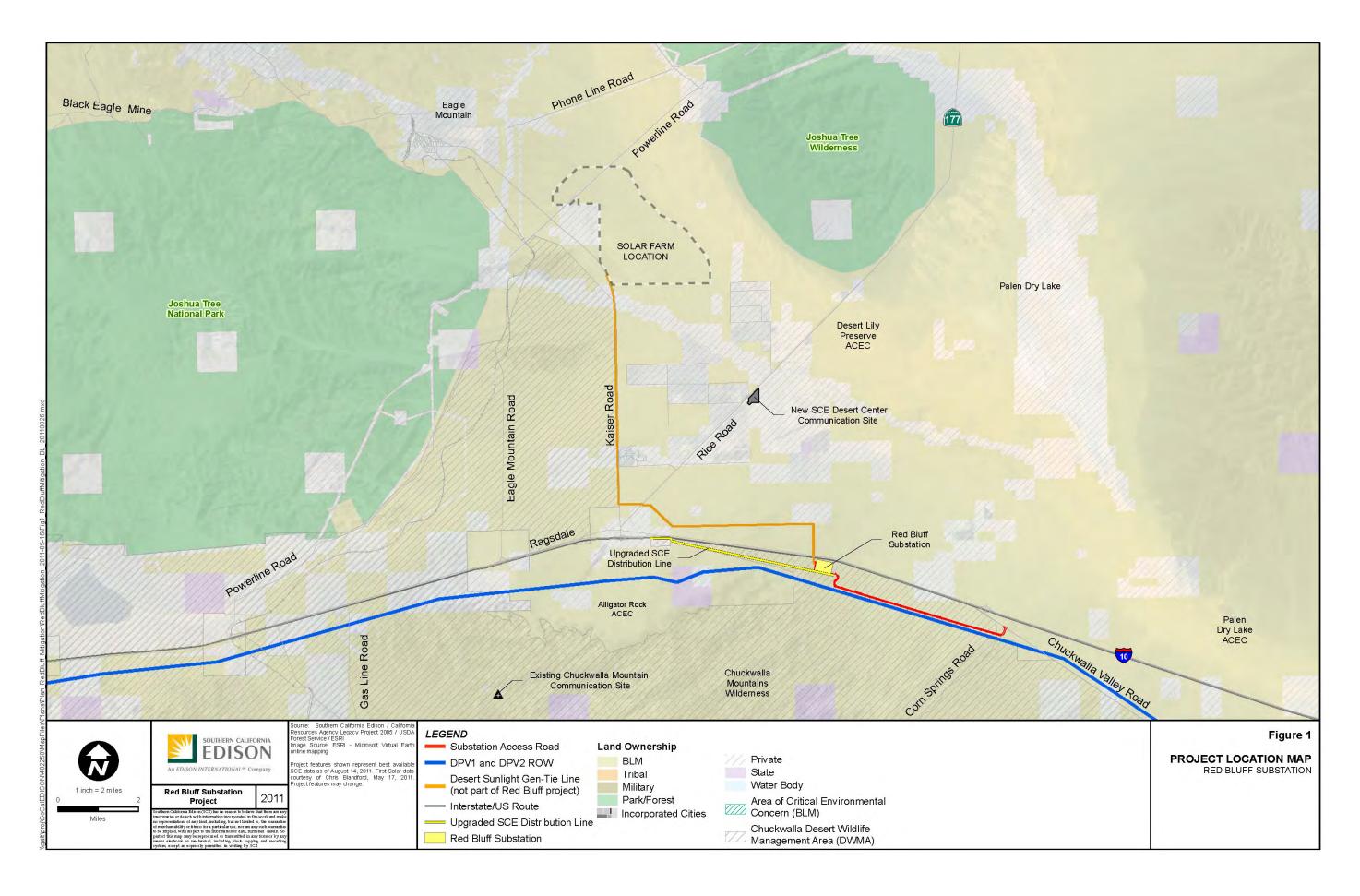
Table 3
Permits Required for the Red Bluff Substation Distribution Line Construction

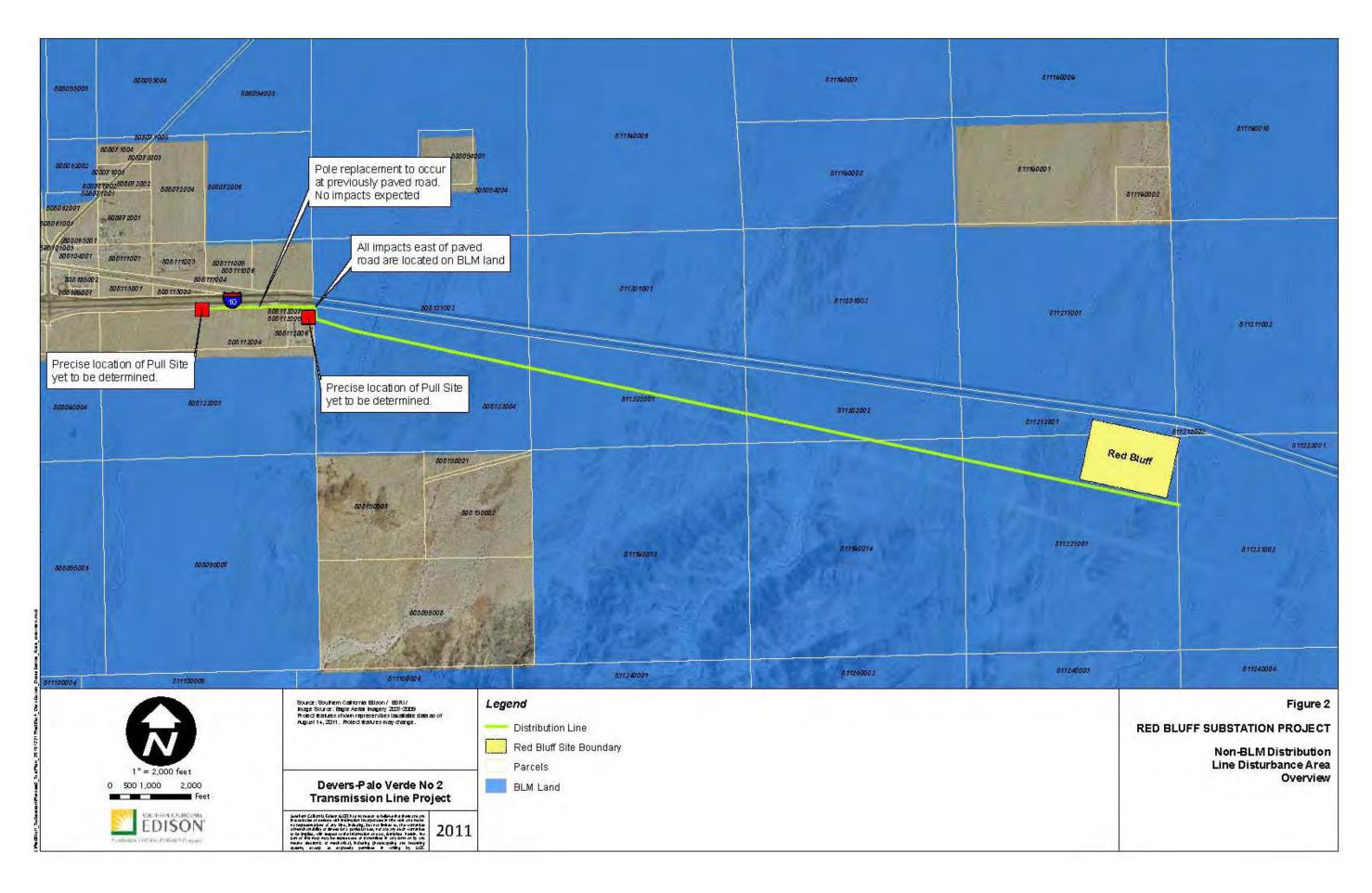
Agency	Permit Name	Applicability	Comments
Local Permits			
Riverside County Dept. of Environmental Health	Septic Tank Application Approval	NO	Not included or required in distribution line scope of work.
CUPA	SPCC	NO	Not included or required in distribution line scope of work.
Riverside County Transportation Department	Encroachment Permit (Commercial Driveway Approach)	NO	Not included or required in distribution line scope of work.
Riverside County Dept. of Building and Safety	Building Permit for Construction - Temporary Certificate of Occupancy SCE Trailer	NO	Not included or required in distribution line scope of work.
Riverside County Dept. of Building and Safety	Building Permit- Testing & Maintenance Bldg.	NO	Not included or required in distribution line scope of work.
Riverside County Dept. of Building and Safety	Grading Permit	NO	No grading/excavation necessary.
Riverside County	WQMP	NO	Not included or required in distribution line scope of work.
Riverside County Dept. of Environmental Health	Well Permit	NO	Not included or required in distribution line scope of work.
Riverside County Dept. of Building and Safety	Mechanical Permit	NO	Not included or required in distribution line scope of work.
Riverside County Dept. of Building and Safety	Electrical Permit	NO	Not included or required in distribution line scope of work.
Riverside County Dept. of Building and Safety	Plumbing Permit	NO	Not included or required in distribution line scope of work.
Riverside County CUPA	Hazardous Materials Business Plan	NO	Not included or required in distribution line scope of work.
Riverside County Dept. of Building and Safety	Building Permit for Construction - Temporary Certificate of Occupancy Contractor's Trailer	NO	Not included or required in distribution line scope of work.
State Level Permits			
California Dept. of Fish and Game Craig Weightman	Streambed Alteration 1602 Permit	NO	Application submitted on 7/29/11. Draft agreement issued by CDFG on 9/13/11. Working on separate letter of credit for JD waters mitigation land. JD waters will not be impacted by distribution line construction.
California Dept. of Fish and Game	Consistency Determination California Endangered Species Action (Section 2080.1)	YES	Determination granted on 8/26/11.
State Water Resource Control Board	Clean Water Act, Section 401 Water Quality Certificate	NO	ROD indicates that no Section 401 permit is required for the Red Bluff Substation Project construction.
California Public Utilities Commission	Permit to Construct	YES	NTPR submitted on 9/9/11.
California Dept. of Toxic Substance Control	EPA Identification Number	NO	O&M
Cal Trans	Flood Control/Drainage Channel Encroachment/Crossing Permit	NO	No Caltrans encroachments impacted by Distribution Line construction.
Caltrans District 8	Encroachment Permit (Distribution Interstate 10 Encroachment / Street Work Permit)	NO	No Caltrans encroachments impacted by Distribution Line construction.
Caltrans District 8 and/or County of Riverside	Overload Permit(s)	NO	Contractor will acquire if necessary. Contractor responsible for plotting route and acquiring requisite approvals
State Water Quality Control Board	Notice of Intent to Comply with terms of General Permit for Storm Water Discharges Associated with Construction Activity (NPDES/SWPPP)	YES	SWPPP submitted to CPUC on XX/XX/XX.

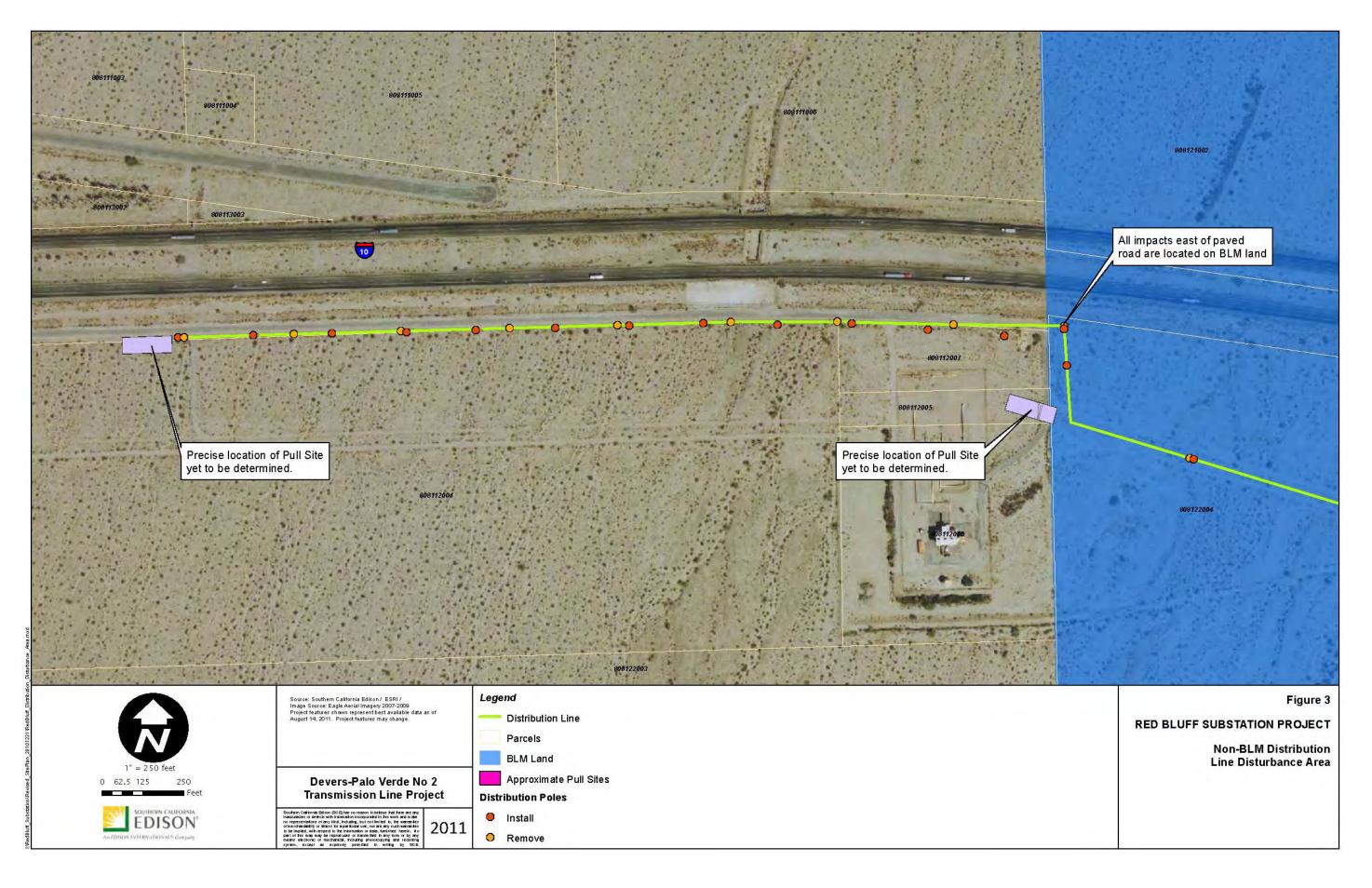
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Permits Required for the Red Bluff Substation Distribution Line Construction

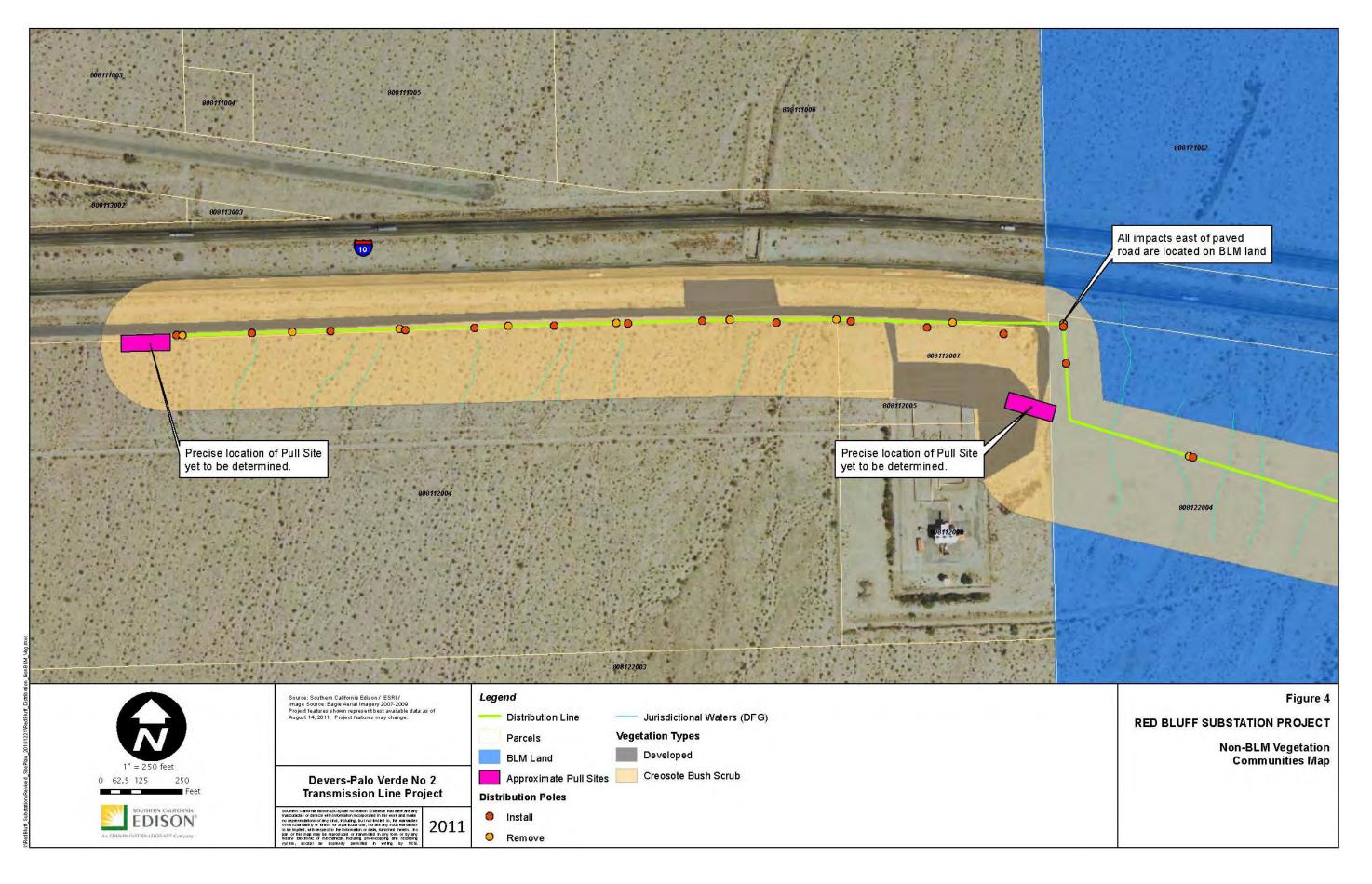
Agency	Permit Name	Applicability	Comments
Regional Level Permits			
South Coast Air Quality Management District	District Notification	YES	Submitted large operator form to SCAQMD on 7/29/11.
Colorado River Region Water Quality Control Board	PLACEHOLDER NPDES Permit for Dewatering	NO	No grading/excavation necessary.
South Coast Air Quality Management District	PLACEHOLDER Emergency Generator Permit	NO	for O&M
Federal Level Permits			
Bureau of Land Management	CDC PLAN Amendment	YES	Pending
Bureau of Land Management	Plan of Development (POD)	YES	Living document
US Fish and Wildlife Service	Incidental Take Permit (National Wildlife Refuge Section 7 of the Federal Endangered Species Act)	YES	BO issued on 7/6/11.
US Army Corp of Engineers	Clean Water Act Section 404 Permit	NO	FEIS and ROD indicate that no Section 404 permit is required for the Red Bluff Substation Project construction.
DOD	Department of Defense Review	NO	No DOD impacts by Distribution Line construction.
Bureau of Land Management	RB Right-of Way Grant / Record of Decision	YES	Draft issued by BLM on 9/14/11.
Bureau of Land Management	Temporary Use Permit	NO	NA NA
Bureau of Land Management	NTP	NO	NTPR submitted on 8/26/11, but not applicable to non-BLM segment.
FAA	Notice to Airmen- 200' + 7460-1 close proximity to runway	NO	No FAA impacts due to Distribution Line construction.

### **Figures**









### Appendix A

**Cultural Resources Assessment** 



#### Red Bluff Substation Project, NTPR Request Red Bluff Distribution Line Cultural Resources Assessment

This Notice to Proceed Request (NTPR) describes the improvements associated with the Project, which will cross property that is not owned by the Bureau of Land Management (BLM), and is hence subject to CPUC approval. These improvements are limited to the upgrade of a segment of the existing Southern California Edison (SCE) 12 kV circuit overhead distribution line, from single phase to three phase power, to supply light and power to the Red Bluff Substation. Material and equipment for this work will be stored at the Contractor's existing material storage yard, located in Blythe, California.

A cultural resources records search and survey was completed for the distribution line (Chandler et al. 2010). No cultural resources are located within the Area of Potential Effect (APE). All measures outlined in the Desert Sunlight Historic Properties Treatment Plan (HPTP) (Chandler and Mason 2011) will be implemented.

#### References

Chandler, Evelyn, Robert Cunningham, Elizabeth Denniston, Jennifer Howard, Melanie Knypstra, and Stephen Pappas

2010 Class III Cultural Resources Inventory of the Desert Sunlight Solar Farm Project, Desert Center Vicinity, Riverside County, California.

Chandler, Evelyn, and Roger D. Mason

2011 Historic Properties Treatment Plan for the Desert Sunlight Solar Farm Project, Desert Center Vicinity, Riverside County, California.