

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



January 10, 2013

Ms. Koral Ahmen  
Devers-Palo Verde No. 2 Transmission Project  
6 Point Drive, 1st Floor  
Brea, CA 92821-6320

RE: SCE Devers-Palo Verde No. 2 Transmission Line Project – Variance Request #57

Dear Ms. Ahmen,

On January 3 and 9, 2013, Southern California Edison (SCE) submitted revised variance requests to the California Public Utilities Commission (CPUC) for minor modifications to temporary disturbance areas for transmission line construction needs along the Devers-Red Bluff segment of the Devers-Palo Verde No. 2 (DPV2) Transmission Project.

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

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

The BLM issued a Record of Decision approving the Project on July 19, 2011 and approved exclusionary fencing activities on August 23, 2011. The Project also crosses lands under jurisdiction of the U.S. Department of Agriculture Forest Service on the San Bernardino National Forest within an existing Forest Service-issued easement. The Forest Service will issue a revised easement signed by the Forest Supervisor. The area requested under this variance does not fall under Forest Service jurisdiction.

The CPUC also adopted a Mitigation, Monitoring, Compliance and Reporting Program (MMCRP) to ensure compliance with all mitigation measures imposed on the DPV2 Project during implementation. The MMCRP also acknowledges that minor project refinements as a result of final engineering are anticipated and common practice for construction efforts of this scale and that a Variance Request would be required for these activities. This letter documents the CPUC's thorough evaluation of all activities covered in this variance. The CPUC has concluded that the activities under this variance are located within the geographic boundary of the study area of the Final EIR/EIS and Supplemental EIR, and do not, without mitigation, result in a new significant impact or a substantial increase in the severity of a previously identified significant impact based on the criteria used in the environmental documents;

conflict with any mitigation measure or applicable law or policy; or trigger an additional permit requirement.

Variance #57, which approves the subject revisions, is granted by CPUC for the proposed activities based on the factors described below.

**SCE Variance Request.** SCE has requested a variance under NTP #9 along the Devers-Red Bluff segment for temporary disturbance modifications required for conductor stringing. Excerpts from the SCE Variance Requests, received on January 3 and 9 are presented below (indented):

*[Received January 3, 2013]:* Subsequent to approval of the Devers to Red Bluff Transmission Line NTPR (NTP #9 dated December 2, 2011) by the CPUC, a constructability review was completed and several changes to temporary disturbance areas for conductor stringing were identified as being needed, as described below and shown in the attached figures: *[in SCE's Variance Request].*

#	Site	Adjacent Tower	Change in Project Component Boundary	Ownership
1	CRD-GS5	2006	Expansion of site to 35 feet wide and shift site 18 feet north	Private
2	CRD-GS12	2009	Expansion of site to 35 feet wide and shift site 22 feet south and 8 feet east.	Private
3	CRD-GS13B	2010	Expansion of site to 35 feet wide and shift site 17 feet south and 5 feet east	Private
4	CRD-GS16A	2012ALAD	Establishment of new guard structure site to encompass and protect and existing overhead line	Private
5	CRD-GS26B	2112	Expansion of site to 35 feet and rotate 30 degrees to provide protection to existing overhead lines.	Private
6	CRD-GS26A	2112	Expansion of site to 35 feet and rotate 30 degrees to provide protection to existing overhead lines.	Private

*[Received January 9, 2013]:* Subsequent of several sites released by the CPUC, a field review was conducted and several minor changes to temporary disturbance areas was identified as being needed, as described below and shown in the attached figures. All shifts and expansions are within previous survey boundaries and were reviewed and approved by the biologists and archaeologist.

#	Site	Adjacent Ownership		Minor Adjustment Description
		Tower #	Info	
1	CRD-GS103	2343	Private	The original dimension was 30x265. The new proposed dimension is 35x260. GS area will be expanded to 35' (w) and 260' (l) from the NTP approved area for existing overhead line/road coverage and protection. GS area will be shifted 4' to the northeast to better center the area on the proposed DPV2 phase alignment. The expansion of the GS area is necessary to be able to fit the equipment/vehicles needed to install the 6 wooden poles. Lane closures and flagmen are proposed to be used during equipment ingress and egress at this location.
2	CRD-GS102	2343	Private	The original dimension was 30x265. The new proposed dimension is 35x260. GS area will be expanded to 35' (w) and 260' (l) from the NTP approved area for existing overhead line/road coverage and protection. GS area will be shifted 13' to the east to better center the area on the proposed DPV2 phase alignment. The expansion of the GS area is necessary to be able to fit the equipment/vehicles needed to install the 6 wooden poles. Lane closures and flagmen are proposed to be used during equipment ingress and egress at this location.

#	Site	Adjacent Ownership		Minor Adjustment Description
		Tower #	Info	
3	CRD-GS101A	2328X	Private	The original dimension was 30x105. The new proposed dimension is 35x103. GS area will be expanded to 35' (w) and 103' (l) from the NTP approved area for existing overhead line/road coverage and protection. GS area will be shifted 22' to the south to "box in" the existing overhead line/road and to better center the area on the proposed DPV2 phase alignment. The expansion of the GS area is necessary due to the utilization of boom trucks and the outriggers or wooden poles required for protection with lane closures and flagmen, as needed.
4	CRD-GS101B	2328X	Private	The original dimension was 30x105. The new proposed dimension is 35x102. GS area will be expanded to 35' (w) and 102' (l) from the NTP approved area for existing overhead line/road coverage and protection. GS area will be shifted 10' to the southwest to "box in" the existing overhead line/road OR to better center the area on the proposed DPV2 phase alignment. The expansion of the GS area is necessary due to the utilization of boom trucks and the outriggers or wooden poles required for protection with lane closures and flagmen, as needed.
5	CRD-GS93B	2326X	Private	The original dimension was 30x105. The new proposed dimension is 35x113. GS area will be expanded to 35' (w) and 113' (l) from the NTP approved area for protection of the existing Julian Hinds-Mirage 220kV overhead line. GS area will be shifted 22' to the southwest to center the area on the proposed DPV2 phase alignment. The expansion of the GS area is necessary due to the utilization of boom trucks and the outriggers or wooden poles required for protection with lane closures and flagmen, as needed.
6	CRD-GS93A	2326X	Private	The original dimension was 30x105. The new proposed dimension is 35x112. Expanding GS to 35' (w) with for existing OHL/road coverage. GS was shifted 25' to the southwest for outer phase coverage.
7	CRD-GS73A	2242	Private	The original dimension was 30x130. The new proposed dimension is 35x113. GS area will be expanded to 35' (w) and 113' (l) from the NTP approved area for protection of Dillon Road. GS area will be shifted 8' to the southwest to "box in" the existing overhead line and Dillon Road. The expansion of the GS area is necessary to be able to fit the boom truck in the area for Dillon Road and overhead line protection. Lane closures and flagmen are proposed to be used during equipment ingress and egress at this location.
9	CRD-GS68	2229	Private	The original dimension was 30x150. The new proposed dimension is 35x129. GS area will be expanded to 35' (w) and 129' (l) from the NTP approved area for protection of the existing 220kV overhead line and parallel road. GS will be shifted 17' to the west to better align the area on the proposed DPV2 phase alignment. The expansion of the GS area is necessary to be able to fit the equipment/vehicles needed to install the 3 wooden poles. Lane closures and flagmen are proposed to be used during equipment ingress and egress at this location.
10	CRD-GS64	2226X	Private	The original dimension was 30x220. The new proposed dimension is 35x129. GS area will be expanded to 35' (w) and 189' (l) from the NTP approved area for protection of the existing 220kV overhead line and parallel road. GS area will be shifted 12' to the southeast to better align the area on the proposed DPV2 phase alignment. The expansion of the GS area is necessary to be able to fit the equipment/vehicles needed to install the 3 wooden poles.
11	CRD-GS55	2208	Private	The original dimension was 30x130. The new proposed dimension is 35x114. GS area will be expanded to 35' (w) and 114' (l) from the NTP approved area for the protection of Washington Street. GS area will be shifted 16' to the southeast to better align the area on the proposed DPV2 phase alignment. The expansion of the GS area is necessary to be able to fit boom trucks or install wooden poles in the area for protection. Lane closures and flagmen are proposed to be used during equipment ingress and egress at this location.

#	Site	Adjacent Ownership		Minor Adjustment Description
		Tower #	Info	
12	CRD-GS44	2130	Private	The original dimension was 30x120. The new proposed dimension is 35x105. GS area will be expanded to 35' (w) and 105' (l) from the NTP approved area for the protection of the existing unnamed road. GS area will be shifted 10' to the southeast to better align the area on the proposed DPV2 phase alignment. The expansion of the GS area is necessary to be able to fit boom trucks or install wooden poles in the area for protection.
13	CRD-GS43	2130	Private	The original dimension was 30x120. The new proposed dimension is 35x105. GS area will be expanded to 35' (w) and 105' (l) from the NTP approved area for the protection of the existing unnamed road. GS will be shifted 7' to the south to better align the area on the proposed DPV2 phase alignment. The expansion of the GS area is necessary to be able to fit boom trucks or install wooden poles in the area for protection.
14	CRD-GS42	2129	Private	The original dimension was 30x120. The new proposed dimension is 35x105. GS area will be expanded to 35' (w) and 105' (l) from the NTP approved area for existing overhead line/road coverage and protection. GS area will be shifted 10' to the southeast to better protect the existing overhead line/road and to better align the area on the proposed DPV2 phase alignment. The expansion of the GS area is necessary to be able to fit boom trucks or install wooden poles in the area for protection.
15	CRD-GS38	2127	Private	The original dimension was 30x105. The new proposed dimension is 35x105. GS area will be expanded to 35' (w) and 105' (l) from the NTP approved area for protection of the existing 12 kV overhead line and Sierra Del Sol. GS area will not be shifted. The expansion of the GS area is necessary to be able to fit boom trucks or install wooden poles in the area for protection of Sierra Del Sol Drive.
16	CRD-GS37	2123	Private	The original dimension was 30x120. The new proposed dimension is 35x105. GS area will be expanded to 35' (w) and 105' (l) from the NTP approved area for protection of the existing 12kV overhead line and Rio Del Sol Road coverage and protection. GS area will be shifted 16' to the southeast to "box in" the existing overhead line/Rio Del Sol Drive and to better align the area on the proposed DPV2 phase alignment. The expansion of the GS area is necessary due to the utilization of boom trucks and the outriggers or wooden poles required for protection with lane closures and flagmen, as needed.
17	CRD-GS25	2110	Private	The original dimension was 30x186. The new proposed dimension is 35x186. GS area will be expanded to 35' (w) and 186' (l) from the NTP approved area for overhead line/Varner Road coverage and protection. GS area will be shifted 5' to the northeast to better align the area on the proposed DPV2 phase alignment. The expansion of the GS area is necessary due to the utilization of boom trucks and the outriggers or wooden poles required for protection with lane closures and flagmen, as needed.
18	CRD-GS23	2100	Private	The original dimension was 30x210. The new proposed dimension is 35x210. The original dimension was 30x186. The new proposed dimension is 35x186. GS area will be expanded to 35' (w) and 210' (l) from the NTP approved area for protection of the existing 115 kV overhead line/Little Morongo Road. GS area will not shift. The expansion of the GS area is necessary due to the utilization of boom trucks and the outriggers or wooden poles required for protection with lane closures and flagmen, as needed.

#	Site	Adjacent Ownership		Minor Adjustment Description
		Tower #	Info	
19	CRD-GS22	2100	Private	The original dimension was 30x210. The new proposed dimension is 35x210. GS area will be expanded to 35' (w) and 210' (l) from the NTP approved area for protection of the existing 115 kV overhead line/Little Morongo Road. GS area will be shifted 5' to the northeast to "box in" the existing overhead line/Little Morongo Road and to better align the area on the proposed DPV2 phase alignment. The expansion of the GS is necessary due to the utilization of boom trucks and the outriggers or wooden poles required for protection with lane closures and flagmen, as needed.
20	CRD-GS21	2100	Private	The original dimension was 30x146. The new proposed dimension is 35x146. GS area will be expanded to 35' (w) and 146' (l) from the NTP approved area for protection of Palm Drive. GS area will be shifted 5' to the east to "box in" Palm Drive and to better align the area on the proposed DPV2 phase alignment. The expansion of the GS area is necessary due to the utilization of boom trucks and the outriggers or wooden poles required for stabilization with lane closures and flagmen, as needed.
21	CRD-GS20	2020	Private	The original dimension was 30x146. The new proposed dimension is 35x146. GS area will be expanded to 35' (w) and 146' (l) from the NTP approved area for protection of Palm Drive. GS area will not shift. The expansion of the GS area is necessary due to the utilization of boom trucks and the outriggers OR wooden poles required for protection with lane closures and flagmen, as needed.
22	CRD-GS18	2020	Private	The original dimension was 30x150. The new proposed dimension is 35x150. GS area will be expanded to 35' (w) and 150' (l) from the NTP approved area for existing overhead line coverage and protection. GS area will be shifted 15' southeast for outer phase coverage. The expansion of the GS area is necessary due to the utilization of boom trucks required for stabilization with lane closures and flagmen, as needed.
23	CRD-GS16	2017	Private	The original dimension was 30x150. The new proposed dimension is 35x136. GS area will be expanded to 35' (w) and 136' (l) from the NTP approved area for protection of the existing 12kV and 115kV overhead line's and parallel road. GS area will be shifted 11' to the southeast to better align the area on the proposed DPV2 phase alignment. The expansion of the GS area is necessary to be able to fit the equipment/vehicles needed to install 3 wooden poles for protection.
24	CRD-GS13A	2012ALAD	Private	The original dimension was 30x170. The new proposed dimension is 35x170. GS area will be expanded to 35' (w) and 170' (l) from the NTP approved area for protection of the existing overhead line and parallel road. GS will be shifted 31' to the east to better align the area on the proposed DPV2 phase alignment. The expansion of the GS area is necessary to be able to fit the equipment/vehicles needed to install 3 wooden poles for protection.
25	CRD-GS11	2010	Private	The original dimension was 30x170. The new proposed dimension is 35x146. GS area will be expanded to 35' (w) and 146' (l) from the NTP approved area for protection of Dillon Road. GS area will be shifted 16' to the northwest to "box in" and protect Dillon Road. The expansion of the GS area is necessary to be able to fit the boom truck in the area adjacent to Dillon Road. Lane closures and flagmen are proposed at this location, if needed.

#	Site	Adjacent Ownership		Minor Adjustment Description
		Tower #	Info	
26	CRD-GS9B	2010	Private	The original dimension was 30x170. The new proposed dimension is 35x146. GS area will be expanded to 35' (w) and 145' (l) from the NTP approved area for existing overhead line/road coverage and protection. GS area will be shifted 19' to the northwest to "box in" an existing overhead line/road to better align the area on the proposed DPV2 phase alignment. The expansion of the GS area is necessary due to the utilization of boom trucks and the outriggers or wooden poles required for protection.
27	CRD-GS9	2008	Private	Expansion of site / shift to the north for overhead line/road coverage. Expanding GS to 35' (w) with varying length for existing OHL/road coverage. No shift other than 5' width expansion to the north.
28	CRD-GS10	2008	Private	Expanding GS to 35' (w) with varying length for existing OHL/road coverage. GS was shifted 20' west and 11' to the north for outer phase coverage. Expansion of site to the north, shift west and north, required for existing overhead line and road coverage as well as outer phase coverage. Boom trucks will be utilized in the access road to the east to "box in" the overhead line for protection.
29	CRD-GS8	2007	Private	The original dimension was 30x150. The new proposed dimension is 35x138. GS area will be expanded to 35' (w) and 138' (l) from the NTP approved area for protection of the existing 12 kV overhead line and N. Indian Canyon Road. GS area will be shifted 16' to the southeast to "box in" an existing overhead line/N. Indian Canyon Road to better align the area on the proposed DPV2 phase alignment. The expansion of the GS area is necessary to be able to fit boom trucks or install wooden poles in the area for protection of N. Indian Canyon Road.
30	CRD-GS7	2007	Private	The original dimension was 30x150. The new proposed dimension is 35x138. GS area will be expanded to 35' (w) and 138' (l) from the NTP approved area for protection of N. Indian Canyon Road. GS area will be shifted 4' to the south to "box in" N. Indian Canyon Road and to better align the area on the proposed DPV2 phase alignment. The expansion of the GS area is necessary to be able to fit boom trucks or install wooden poles in the area for protection of N. Indian Canyon Road.
31	CRD-GS4	2005	Private	The original dimension was 30x170. The new proposed dimension is 35x165. GS area will be expanded to 35' (w) and 165' (l) from the NTP approved area for protection of the existing 12 kV overhead line. GS area will be shifted 5' to the west to "box in" an existing overhead line and to better align the area on the proposed DPV2 phase alignment. The expansion of the GS area is necessary to be able to fit boom trucks or install wooden poles in the area for protection of the existing overhead line.
32	CRD-GS3	2005	Private	The original dimension was 30x170. The new proposed dimension is 35x157. GS area will be expanded to 35' (w) and 157' (l) from the NTP approved area for protection of the existing 12 kV overhead line. GS area will be shifted 5' to the west to "box in" an existing overhead line and to better align the area on the proposed DPV2 phase alignment. The expansion of the GS area is necessary to be able to fit boom trucks or install wooden poles in the area for protection of the existing overhead line.

### CPUC Evaluation of Variance Request

In accordance with the MMRP, the subject variance request was reviewed by CPUC to confirm that the proposed request was within the geographical context of the Final EIR/S and that no new impacts or increase in impact severity would result from the requested variance activities. The following discussion summarizes this analysis for biological resources, cultural resources, paleontological resources, noise/sensitive receptors, and other issue areas. A list of mitigation compliance conditions is presented below to define additional information and clarifications regarding mitigation requirements.

**Biological Resources.** As describes in SCE’s biological review memos (dated January 2 and 7, 2013), implementation of the proposed Devers-Red Bluff pull site revisions would result in additional impacts to modeled and critical desert tortoise habitat, modeled flat-tailed horned lizard habitat, modeled and critical Coachella Valley fringe-toed lizard habitat, and modeled Coachella Valley milk vetch habitat. Because there are sites located in desert tortoise habitat, pre-construction desert tortoise clearance surveys shall be conducted by an Authorized Biologist immediately prior to construction activities within a 100 percent coverage area of all desert tortoise habitat (modeled, critical, and/or occupied) that will be subject to temporary and permanent disturbance. In addition, SCE shall conduct pre-construction surveys for special-status reptiles within 48 hours prior to initiation of construction activities. If special-status reptiles are identified in the Project area during construction, all activities adjacent to the identified location shall be halted and the animal will be allowed to move away from the construction site. If the individual is not moving, a qualified biologist will relocate it to nearby suitable habitat (in the shade of a shrub) outside of the construction area. No jurisdictional waters would be impacted.

Any disturbance impacts have been incorporated into the compensatory mitigation acreages addressed in SCE’s Habitat Acquisition Proposal developed by Wildlands, Inc. and approved by the regulatory agencies in April 2012. Habitat restoration activities for temporary disturbance areas are described in the DPV2 Habitat Restoration and Compensation Plan, which is in the process of being revised and finalized (CH2M HILL, 2012b).

As conditioned below, SCE shall provide updated construction and biological resources constraints maps showing the revised pull sites to the CPUC EMs and all monitors in the field prior to construction activities at the subject sites. All mitigation measures, APMs, and conditions of the Biological Opinion (BO), shall be implemented. This includes, but is not limited to, providing a qualified USFWS, CPUC, and BLM approved tortoise biologist and pre-construction clearance sweeps.

**Cultural Resources.** The Final Historic Properties Management Plan (HPMP) for the Devers-Palo Verde No. 2 Project was accepted on October 20, 2011. Cultural resources sites were identified immediately adjacent to two of the six proposed guard structure revisions and none of the requested minor modifications locations. Therefore, in accordance with the Final HPMP, the following proposed mitigation is required during construction activities for the proposed guard structure revisions:

<b>Proposed Mitigation for Cultural Resources Sites Identified within the Proposed Pull Site Revisions (n=1)</b>		
<b>Resource Designation</b>	<b>NRHP* Eligibility Determinations</b>	<b>Mitigation Compliance Procedure</b>
P-33-18186 / CA-RIV-9338	Not Evaluated	Construction to use bucket truck from existing road to eliminate ground disturbance, monitor avoidance.
P-33-18183 / CA-RIV-9335	Not Evaluated	Construction to use bucket truck from existing road to eliminate ground disturbance, monitor avoidance.

\* NRHP = National Register of Historic Places

In the event of an unanticipated discovery of cultural materials, the find shall be managed in compliance with the following procedures provided in *Section 4.4 - Plan of Discovery of Cultural Resources* of the approved HPMP as itemized below:

- All work within 200 feet of the discovery will be halted and the onsite Archaeological Field Monitor will evaluate the discovery.
- The Environmental Monitor will notify the Lead Archaeological Monitor, Consultant Project Manager (CPM), Work Package Archaeologist(s) (WPA), or SCE Archaeologist (in that order) immediately.

- Activities within 200 feet of the discovery will not resume until the discovery has been assessed by a member of the Cultural Resources Team.

**Paleontological Resources.** Based on the Paleontological Monitoring and Treatment Plan (Plan), submitted to the California Public Utilities Commission on April 20, 2011, there is no potential to encounter paleontological resources near Towers 2326X; no NTP conditions are recommended at this tower. The potential to encounter paleontological resources within the remaining requested guard structure revisions and minor modifications to disturbance areas varies from low to high. Therefore, in accordance with the Plan, high sensitivity units will be monitored full-time during excavations in sediment of high paleontological sensitivity. Moderate sensitivity units will require spot-check monitoring and low sensitivity units will be monitored intermittently, to verify the low sensitivity classification, as determined by the Paleontological Resource Specialist. Disturbance areas will be monitored at the following tower locations:

Paleontological Construction Monitoring				
Full-time Monitoring	Spot-Check Monitoring	Part-time Monitoring		
2229	2328X	2343	2242	2226X
	2012	2208	2203	2202
		2130	2129	2127
		2123	2110	2100
		2020	2017	2012ALAD
		2010	2009	2008
		2007	2004	2006

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

**Noise/Sensitive Receptors.** There are few sensitive receptors in the vicinity of the revised temporary disturbance areas located on privately-owned land. Use of the revised sites would have similar noise-generating activities to those that will occur along the existing access and at the tower sites. Appropriate noise and land use mitigation measures would apply. The overall scope and duration of construction activities has not changed as a result of the variance.

**Other Issue Areas.** No concerns noted under this variance.

**Mitigation Compliance Conditions of Variance Approval.**

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

1. All applicable project mitigation measures, APMs, conditions of the Biological Opinion, compliance plans, permit conditions and NTP conditions shall be implemented. Some measures have on-going/time-sensitive requirements and shall be implemented prior to and during construction where applicable.
2. Copies of all relevant permits, compliance plans, and this Variance approval shall be available on site for the duration of construction activities.
3. Pre-construction surveys shall be conducted, as applicable, and all disturbance areas shall be clearly delineated and marked prior to any ground disturbance associated with the use of the proposed revised sites and results would be submitted to the CPUC's EM for validation.



4. Pre-construction desert tortoise clearance surveys shall be conducted by an Authorized Biologist immediately prior to construction activities within a 100 percent coverage area of all desert tortoise habitat (modeled, critical, and/or occupied) that will be subject to temporary and permanent disturbance.
5. SCE shall conduct pre-construction surveys for sensitive wildlife in accordance with specific conditions provided in Final EIS/EIR Mitigation Measures and conditions of the USFWS BO. The location of sensitive species identified during the pre-construction surveys shall be provided to the BLM and CPUC on updated project maps.
6. SCE shall conduct pre-construction surveys for special-status reptiles within 48 hours prior to initiation of construction activities. If special-status reptiles are identified in the Project area during construction, all activities adjacent to the identified location shall be halted and the animal will be allowed to move away from the construction site. If the individual is not moving, a qualified biologist will relocate it to nearby suitable habitat (in the shade of a shrub) outside of the construction area.
7. SCE shall provide updated construction and biological resources constraints maps showing the new and revised disturbance areas to the CPUC EMs and all monitors in the field prior to use. Updated maps can be provided prior to construction by tower location (s).
8. In accordance with the Paleontological Monitoring and Treatment Plan, SCE shall monitor high sensitivity units full-time during excavations in sediment of high paleontological sensitivity (Tower 2229). Moderate sensitivity units will require spot-check monitoring (Towers 2328X and 2012) and low sensitivity units will be monitored intermittently (Towers 2343, 2242, 2226X, 2208, 2203, 2202, 2130, 2129, 2127, 2123, 2110, 2100, 2020, 2017, 2012ALAD, 2010, 2009, 2008, 2007, 2004, and 2006), to verify the low sensitivity classification, as determined by the Paleontological Resource Specialist.
9. In the event that a paleontological resource discovery is made during site development, all construction activities in the area of the discovery must cease, and the Discovery of Fossils protocol, as specified in the Paleontological Monitoring and Treatment Plan shall be followed (1-Notification, 2-Avoidance and Continued Construction Activities, and 3-Determining Significance of a Discovered Paleontological Resource).
10. In accordance with the final Historic Properties Management Plan, SCE shall use a bucket truck from the existing road to eliminate ground disturbance and shall monitor avoidance of P-33-18186 / CA-RIV-9338 and P-33-18183 / CA-RIV-9335.
11. In the event of an unanticipated discovery of cultural materials, the find shall be managed in compliance with the following procedures provided in Section 4.4 - Plan of Discovery of Cultural Resources of the approved Historic Properties Management Plan as itemized below:
  - All work within 200 feet of the discovery shall be halted and the onsite Archaeological Field Monitor shall evaluate the discovery.
  - The Environmental Monitor shall notify the Lead Archaeological Monitor, Consultant Project Manager (CPM), Work Package Archaeologist(s) (WPA), or SCE Archaeologist (in that order) immediately.
  - Activities within 200 feet of the discovery shall not resume until the discovery has been assessed by a member of the Cultural Resources Team.
12. The CPUC EM shall be notified immediately of any unanticipated cultural, paleontological, or biological resource discoveries.

13. All crew members shall be Safe Worker and Environmental Awareness Program (SWEAP) trained prior to working on the project. A log shall be maintained on-site with the names of all crew personnel trained. For any crew members with limited English, a translator shall be on-site to ensure understanding of the training program. In place of a translator, the SWEAP training brochure can be provided in Spanish or other languages as appropriate. All participants will receive a hard-hat sticker for ease of compliance verification.

Please contact me if you have any questions or concerns.

Sincerely,

*Billie Blanchard*

Billie Blanchard  
CPUC Environmental Project Manager  
DPV2 Transmission Project

cc: Kelly Pell, Southern California Edison  
Suzan Benz, Southern California Edison  
Patty Nevins, Southern California Edison  
Vida Strong, Aspen Environmental Group  
Hedy Koczvara, Aspen Environmental Group  
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Rosina Goodman, Aspen Environmental Group  
Ryann Loomis, Aspen Environmental Group  
Liz Majchrowicz, DNL Environmental