

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 19, 2012

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

RE: SCE Devers-Palo Verde No. 2 (DPV2) Transmission Line Project - Notice to Proceed (NTP #14)

Dear Ms. Benz:

On June 13, 2012, Southern California Edison (SCE) requested authorization from the California Public Utilities Commission (CPUC) for a construction of upgrades to and expansion of Valley Substation as part of the Devers-Palo Verde No. 2 Transmission Line Project to accommodate the new Red Bluff-Devers and Devers-Valley 500 kV transmission lines. The construction activities for under this NTP #14 will occur within the fence line of the existing Valley Substation in the City of Menifee, and include the installation of circuit breakers, disconnect switches, and associated equipment to be installed at position 8X of the existing 500 kV switchrack.

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

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

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

The Devers-Palo Verde No. 2 Transmission Project will be constructed in eight work packages, as defined on the CPUC's project website (<http://www.cpuc.ca.gov/Environment/info/aspen/dpv2/dpv2.htm>). It is anticipated that, even within the eight work packages, SCE will submit multiple separate requests for NTPs during the construction process. This is a typical process for transmission line projects. Given that

the DPV2 Project has been approved by the CPUC and BLM, as described above, this segmented construction review process allows SCE to proceed with individual project components where compliance with all applicable mitigation measures and conditions can be documented.

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

NTP #14 for the Valley Substation expansion and upgrades is granted by CPUC based on the factors described below.

SCE NTP Request

The CPUC has carefully reviewed the NTP request (NTPR) submitted by SCE, and verified that it incorporates compliance with all applicable mitigation measures. Excerpts from the SCE NTPR dated June 13, 2012 are presented as follows (indented).

This Notice to Proceed Request (NTPR) describes approved improvements associated with the Valley Substation Upgrade Project (Project), located entirely within SCE-owned private property, subject to California Public Utilities Commission (CPUC) approval. The Valley Substation will be upgraded to accommodate the construction and operation of the new Devers to Valley No. 2 (D-V2) 500-kV transmission line.

Upgrades within the existing Valley Substation fence line will include the installation of circuit breakers, disconnect switches, and associated equipment to be installed at position 8X of the existing 500 kV switchrack. Two transmission structures will also be installed within the existing substation, by the transmission line contractor, under a separately approved NTPR.

The work described above will be constructed as part of Southern California Edison's (SCE) Devers-Palo Verde No. 2 Transmission Line Project (DPV2). Figure 1 is a project location map and Appendix A references the applicable figures (contained within Project Site and Access Mapbook) that depict the improvements relative to the Valley Substation Upgrade footprint.

The upgrades to the substation were fully analyzed in the Draft EIR/EIS; however, because they were not included in the Final EIR/EIS, the CPUC reviewed the analysis of the upgrades in the Refinements document prepared by SCE, to ensure that the upgrades would not create new significant impacts, nor result in a substantial increase in severity of an existing impact. The CPUC subsequently approved the upgrades detailed in the Refinements document on May 22, 2011. The approved upgrades will occur entirely within the existing substation area and will not result in any new temporary or permanent disturbance areas outside of the existing fence line...

2.0 SITE LOCATION AND CONDITIONS

The Valley Substation is located within the Menifee USGS 7.5' topographic quadrangle. The coordinates for the approximate center of the site are Latitude 33°44'23"W, Longitude 117° 9' 20"N. The Substation is located approximately 2 miles east of Interstate 215 at the southwest corner of Highway 74 and Menifee Road, in the City of Menifee.

Access to the work area within the existing facility will be provided from the two existing entrance gates located along Menifee Road on the east side of the substation property. An interior paved road to the work area will provide direct access for construction workers and equipment, as shown in Figure 1 [of SCE's NTPR]...

3.0 PROJECT COMPONENTS AND DISTURBANCE AREAS

This section describes the main project elements and disturbance areas associated with the Valley Substation Upgrade. Construction operating hours are planned to generally be from 7:00 a.m. to 6:00 p.m., Monday through Saturday, in compliance with the applicable noise ordinance, or a variance from the ordinance restrictions will be requested. In addition, construction may occasionally occur on Sundays.

SCE has established a DPV2 toll-free information line (866-602-3782) and website (www.sce.com/dpv2). The information line is the designated public notification contact for DPV2.

3.1 Existing Substation Site Upgrades

Major elements of the existing substation site upgrades and activities include:

- Installation of new circuit breakers and disconnect switches at the position 8X of the existing operating bus
- Approximately 2 acres, within the existing substation, to be used as a temporary lay down area to support construction.

All of the above upgrades to the Valley Substation will occur on previously disturbed land within the existing substation fence line. The western boundary of the substation was expanded to the west within the existing Edison-owned property line between 2006 and 2007 as part of an upgrade to install two new 500-kV shunt capacitor banks not required for the DPV2 project. As such, the upgrades for this Project will only include the installation of new circuit breakers and disconnect switches at position 8X of the existing operating bus. Up to two acres of previously disturbed land within the substation will be required for a temporary lay down area to support construction.

3.2 Site Work

The table below identifies the primary construction activities associated with the substation improvements.

Expansion Construction Activities

- Trenching and excavation
- Pouring of foundations
- Installation of below ground structures, and conduit
- Installation of above ground equipment and steel structures
- Electrical work
- Other associated above ground construction

3.2.1 Preconstruction Activities

SWPPP BMPs will be installed around the perimeter of the work area. Construction equipment and materials will be stored within the existing Valley Substation, in designated storage areas.

3.2.2 Foundation Work

Existing surfacing will be excavated in preparation for foundation work. Water sources for dust control will be from the existing Valley Substation, nearby fire hydrants, or other approved water sources whose locations have not yet been identified. Water sources will be identified as part of the bid and award process.

3.2.3 Above Ground Construction

Upgrades will occur at position 8X of the existing 500-kV operating bus. The position will be equipped with breakers, disconnects, and associated equipment for the new D-V2 transmission line.

4.0 ACTIVITY SCHEDULE

The anticipated activity schedule for the Valley Substation construction activities is shown in the table below.

| Construction Schedule | | |
|-----------------------|-----------------------|----------------|
| Construction Activity | Construction Duration | Start Date |
| Preconstruction | 1 months | June 2012 |
| Foundations | 1 month | July 2012 |
| Above Ground | 2 months | September 2012 |

CPUC Evaluation of Pre-Construction Mitigation Implementation

All applicable project mitigation measures, APMs, compliance plans, and permit conditions shall be implemented. Some measures have on-going/time-sensitive requirements and are required to be implemented prior to and during construction where applicable. For biological resources, those additional conditions are discussed and defined in this section. The Compliance Status Table in SCE's NTPR provides pre-construction compliance information for the other issue areas addressed by the DPV2 EIR/EIS.

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

Biological Resources

This section presents a background for biological resources that occur, or could occur within the area of the Valley Substation upgrades and expansion for the DPV2 Project. This summary of biological issues is based on information summarized in SCE's Notice to Proceed Request (June 2012) and a field verification study conducted by Aspen Environmental Group.

Construction activities associated with the DPV2 components included in this NTP would occur within the existing Valley Substation in the City of Menifee. According to SCE's NTPR, these activities would occur within the existing substation fence line and there are no natural or special-status vegetation communities located therein. Non-native habitat types and uncategorized land cover types within and adjacent to the project area including agricultural lands, developed and disturbed lands.

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

Special-status Plants. To date, SCE has indicated that no special-status plants species were identified in the project area. In the event that special-status plant species are detected in the project area prior to and/or during construction activities, SCE shall implement the applicable Final EIR/EIS mitigation measures and APMs to minimize and/or avoid impacts to individual plants and populations. These include pre-construction surveys for special-status plants, biological monitoring during construction, and

the implementation of transplanting or salvage methods as outlined in the applicable agency approved plans prepared for the DPV2 Project.

Special-status Wildlife. No special-status wildlife species were detected within the project area during surveys. However, one special-status wildlife species, Stephens' kangaroo rat (*Dipodomys stephensi*; SKR), was detected south of the substation. Occupied habitat for SKR occurs immediately south of the substation.

In order to avoid and/or minimize impacts to special-status and other wildlife species occurring in the project area, SCE will implement broadly based mitigation measures provided in the Final EIR/EIS, such as pre-construction clearance surveys and biological monitoring, along with more specific mitigation measures for mammals, reptiles and nesting birds throughout the duration of all construction activities associated with this NTP.

Jurisdictional Drainages. The SCE NTPR states that no jurisdictional wetland or non-wetland waters regulated by the United States Army Corps of Engineers (USACE), State Water Resources Control Board (SWRCB), and California Department of Fish and Game (CDFG) occur within the limits of the project work areas. However, two jurisdictional drainages occur adjacent to the substation boundaries. One drainage occurs just outside the northwestern portion of the site and the other is approximately 500 feet south of the substation boundary.

Although no direct impacts to federal or State jurisdictional waters will occur, SCE shall implement all applicable Final EIR/EIS mitigation measures, conditions of the USFWS BO and CDFG Consistency Determination, and APMs to avoid and/or minimize impacts to the nearby drainages. Any areas that would meet the criteria for federal and/or State jurisdiction that are disturbed during construction activities shall be mapped and the disturbance acreages shall be reported to the USFWS, CDFG, and CPUC to include in final mitigation/compensation requirements.

Vegetation Management. All construction activities associated with the Valley Substation upgrades and expansion would occur within the existing substation fence line in disturbed and/or non-native habitat. All work shall be strictly limited to defined boundaries. Vegetation clearing in defined temporary disturbance areas shall only occur where necessary to allow for equipment access and storm water management. All material and equipment to be used in connection with activities covered under this NTP will be stored and maintained at CPUC approved construction yards or an existing utility storage yard. Storage at any other location would likely require a Variance or Temporary Extra Work Space (TEWS) request and CPUC approval. Similarly, any water supply locations not previously approved by CPUC, would require CPUC approval.

Additionally, 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). The restoration component of this plan is intended to target areas where onsite restoration is planned for temporary impacts to vegetation communities and jurisdictional waters whereas the compensation component relates to the purchasing and managing of offsite lands targeted for conservation in perpetuity. A formal acquisition proposal for compensatory mitigation lands has been developed by Wildlands, Inc. (Wildlands) on behalf of SCE to meet mitigation requirements for permanent impacts to native vegetation communities and jurisdictional waters. The regulatory agencies approved the plan for DPV2 in April 2012, and coordination between SCE, Wildlands, and the regulatory agencies is ongoing for the Red Bluff Substation proposal. Because compensatory acquisition lands have been approved for DPV2, work would occur on disturbed land within the existing substation fence line, and no special-status species have been detected in the Valley Substation area, SCE may commence

construction activities associated with the components of this NTP prior to final agency approval of the revised Final Habitat Restoration and Compensation Plan.

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

Cultural Resources

Based on background research and a site visit, no known cultural resources were identified within the vicinity of the Valley Substation. In the event that an unanticipated discovery of cultural materials is made within the Valley Substation, the find shall be managed in compliance with the following procedures provided in Section 4.4 - Plan of Discovery of Cultural Resources of the approved HPMP as itemized below:

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

Paleontological Resources

Based on the Paleontological Monitoring and Treatment Plan, submitted to the California Public Utilities Commission on April 20, 2011, the potential to encounter paleontological resources within the identified Valley Substation area is low. Therefore, in accordance with the Plan, low sensitivity units must be monitored intermittently, to verify the low sensitivity classification, as determined by the Paleontological Resource Specialist.

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

Land Use and Sensitive Receptors

The construction activities for under this NTP will occur entirely within SCE's existing Valley Substation, which is located 2 miles east of Interstate 215 at the southwest corner of Highway 74 and Menifee Road, in the City of Menifee. Generally commercial and industrial uses are located near the Valley Substation.

According to the NTPR, in general, construction equipment operating hours for the work on the right-of-way associated with the installation of the transmission line are planned to be from approximately 7:00 a.m. to 6:00 p.m. Monday through Saturday in compliance with the applicable noise ordinance, or a variance from the ordinance restrictions will be requested. Construction may occasionally occur on Sundays as well. Construction activities will occur over approximately four months (June to September 2012) and were addressed in the DPV2 Final EIR/EIS and CPUC's Mitigation Compliance Consistency Determination (May 2011). All residences will be notified of construction per the approved Construction Notification Plan as required in Mitigation Measure L-1a.

Conditions of NTP Approval

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

1. All applicable project mitigation measures, APMs, compliance plans, and permit conditions shall be implemented. Some measures have on-going/time-sensitive requirements and shall be implemented prior to and during construction where applicable. Please see the table of pre-construction requirements in SCE's NTPR. Bulleted items can be found below which provide additional information and clarifications to outstanding requirements.
2. Copies of all relevant permits, compliance plans, and this Notice to Proceed shall be available on site for the duration of construction activities.
3. Verification of noticing mailings including address lists, postings and newspaper postings, as required under Mitigation Measures L-1a, L-1e, WR-1a, and WR-1b shall be submitted to the CPUC prior to construction.
4. All crew members shall be trained through a Worker Environmental Awareness Program (WEAP) prior to working on the project. A log shall be maintained onsite with the names of all crew personnel trained. For any crew members with limited English, a translator shall be onsite to ensure understanding of the training program. In place of a translator, the WEAP training brochure can be provided in Spanish or other languages as appropriate. All participants will receive a hard hat sticker for ease of compliance verification.
5. SCE shall implement all conditions of the Final Noxious Weed Control Plan which specifies the locations of existing weed populations and provides appropriate measures to control the introduction and spread of noxious weeds into the Project area, worker training, specifications, and inspection procedures for construction materials and equipment used in the Project area.
6. Prior to entering the work area for the first time, all ground-disturbing equipment shall be thoroughly cleaned at an approved wash station, or other location with CPUC approval.
7. All seeds, straw wattles, gravel and fill material used during construction shall be certified weed free by the local County Agricultural Commissioner's Office.
8. In the event that additional special-status plant species are detected in the project area prior to and/or during construction activities, SCE shall implement the applicable Final EIR/EIS mitigation measures and APMs to minimize and/or avoid impacts to individual plants and populations. These include pre-construction surveys for special-status plants, biological monitoring during construction, and the implementation of transplanting or salvage methods as outlined in the applicable agency approved plans prepared for the DPV2 Project.
9. 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.
10. 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.

11. Pre-construction surveys for breeding birds shall be conducted within 500 feet of disturbance limits by a CPUC-approved biologist at least fourteen (14) days prior to construction during the appropriate season. If federally or State listed birds with active nests are identified, a qualified biological monitor shall establish a 500-foot buffer around the nest and no activities will be allowed within the buffer until the young have fledged from the nest or the nest fails. A 300-foot buffer shall be implemented in the event that raptors or other species protected under the Migratory Bird Treaty Act (MBTA) are located. The biological monitor shall conduct regular monitoring of any identified nest to determine success/failure and to ensure that construction activities do not occur within established buffers until the nesting cycle is complete or the nest fails. There may be a reduction of these buffer zones depending on site-specific conditions or the existing ambient level of activity. SCE shall coordinate with CDFG and USFWS to determine the appropriate buffer zone.
12. SCE shall conduct biological monitoring in all areas of disturbance during construction activities, including access roads. The biological monitor shall look for special-status wildlife that may be located within or immediately adjacent to construction areas. If special-status species are found, the biological monitor shall avoid or relocate in accordance to the appropriate Final EIR/EIS Mitigation Measures, APMs, and conditions of the USFWS BO.
13. SCE shall implement the conditions of the approved Final HCRP to compensate for temporary disturbance to native vegetation communities.
14. SCE shall install all overhead components utilizing the most current APLIC standards for collision-reducing techniques.
15. No activities, whatsoever, shall be permitted within areas designated as federal wetlands.
16. All federal and State jurisdictional waters shall be avoided to the maximum extent feasible. In the event that jurisdictional waters cannot be avoided by project activities, SCE shall obtain the appropriate USACE, CDFG, and State Water Quality Control Board permits. Documentation of these permits must be provided to the CPUC prior to conducting any activities in these areas which may result in permanent or temporary impacts.
17. Project speed limits shall be posted and strictly adhered to in compliance with Mitigation Measures and APMs provided in the Final EIR/EIS and conditions of the USFWS BO.
18. All auger holes, trenches, pits, or other steep-sided excavations that pose a hazard to wildlife will be securely fenced or covered when unattended to prevent accidental death or injury. At the start and end of each workday, and just before backfilling, all excavations will be inspected for trapped animals. If found, trapped animals will be removed by the Authorized or Qualified Biologist.
19. Project personnel will not be allowed to bring pets into any work areas.
20. Road-killed animals or other carcasses detected within the Project area will be picked up and disposed of immediately (e.g. removal to a landfill or disposal at SCE facility). For any special-status species road-kill, the Qualified Biologist or FCR will contact CDFG and USFWS within 1 working day of receipt of the carcass for guidance on disposal or storage.
21. Immediately after completion of construction activities, the FCR or designated representative will record the perimeter of the post-construction project footprint, including all tower pads, spur roads, pulling and splicing stations and access routes, and other project-related infrastructure in a GIS-compatible format to verify the extent of project disturbance. The GIS coverage layer will be provided to the BLM, Service, and CDFG within 90 days of completing construction; the coverage will

be compared to impact acreages estimated in this biological/conference opinion to determine final ground-disturbance associated with project construction.

22. Construction site dewatering management in accordance with Mitigation Measure H-5a shall be implemented during construction to ensure that any groundwater resources which are unexpectedly encountered would be managed through implementation of appropriate BMPs for dewatering activities.
23. In addition to APM W-1, which requires "potential erosion sites" to be inspected after each major rainstorm during the first year following construction, for the lifetime of the project maintenance personnel shall watch for and repair any areas where infrastructure is located within FEMA-designated Flood Hazard Areas and active erosion is observed near tower foundations.
24. In the event that an unanticipated discovery of cultural materials is made during construction of the Devers Substation upgrades and expansion, the find shall be managed in compliance with the following procedures provided in Section 4.4 - Plan of Discovery of Cultural Resources of the approved HPMP as itemized below:
 - All work within 200 feet of the discovery shall be halted and the onsite Archaeological Field Monitor shall evaluate the discovery.
 - The Environmental Monitor shall notify the Lead Archaeological Monitor, Consultant Project Manager (CPM), Work Package Archaeologist(s) (WPA), or SCE Archaeologist (in that order) immediately.
 - Activities within 200 feet of the discovery shall not resume until the discovery has been assessed by a member of the Cultural Resources Team.
25. In accordance with the Paleontological Monitoring and Treatment Plan, low sensitivity units shall be monitored intermittently, to verify the low sensitivity classification, as determined by the Paleontological Resource Specialist.
26. In the event that a paleontological resource discovery is made during site expansion, all construction activities in the area of the discovery shall cease, and the Discovery of Fossils protocol, as specified in the Plan shall be followed (1-Notification, 2-Avoidance and Continued Construction Activities, and 3-Determining Significance of a Discovered Paleontological Resource).
27. The CPUC Environmental Monitor (EM) shall be notified immediately of any unanticipated cultural, paleontological, or biological resource discoveries.
28. If the application of water is needed to abate dust in construction areas and on dirt roads, SCE shall use the least amount needed to meet safety and air quality standards and prevent the formation of puddles, which could attract wildlife to construction sites.
29. SCE shall obtain required haul and ingress/egress and permits for any temporary lane closures from the County of Riverside or other jurisdictions as necessary. Copies of permits shall be submitted to the CPUC. If temporary lane closures are needed, SCE shall coordinate in advance with emergency service providers and shall provide documentation to the CPUC.
30. In regard to the Hazardous Substance Control and Emergency Response Plan, to fully satisfy the intent of Mitigation Measure P-1b, documentation of training for personnel who would be working near or handling hazardous materials shall be submitted to the CPUC for review after completion of these training activities. Only trained personnel shall be allowed to work near or to handle hazardous materials.

31. In accordance with Mitigation Measure P-1a, prior to project construction, documents prepared by the construction contractors should be submitted to the CPUC along with an acknowledgment that the SCE Certified Industrial Hygienist has reviewed and approved the documents to complete the submittals required for these measures. Documents that the construction contractor would be responsible for would include a hazardous materials inventory that will be used to prepare and/or modify the Hazardous Material Business Plan, documents providing SCE with the names and telephone numbers of persons responsible for the hazardous waste management, an Emergency Response Procedures document that follows SCE's emergency response procedures for the Project.
32. No movement or staging of construction vehicles or equipment shall be allowed outside of the approved areas. If additional temporary workspace areas or access routes, or changes in technique and mitigation implementation to a lesser level are required, a Variance Request, as defined in the Mitigation Monitoring, Compliance and Reporting Plan for this project shall be submitted for CPUC review.
33. No clearing or disturbance to vegetation shall occur outside of approved work areas.
34. If construction debris or spills enter into environmentally sensitive areas, appropriate jurisdictional agencies and the CPUC EM shall be notified immediately.

Please contact me if you have any questions or concerns.

Sincerely,

Billie Blanchard

Billie Blanchard
CPUC Environmental Project Manager
Devers-Palo Verde No. 2 Transmission Project

cc: Holly Roberts, BLM Palm Springs South Coast Field Office
Ysmael Wariner, BLM Palm Springs South Coast Field Office
Vida Strong, Aspen Environmental Group
Jamie Miner, Aspen Environmental Group
Rosina Goodman, Aspen Environmental Group
Ryann Loomis, Aspen Environmental Group
Hedy Koczwara, Aspen Environmental Group
Ryana Parker, Southern California Edison Company