

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 16, 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 Transmission Line Project – Variance Request #33

Dear Ms. Benz,

On April 26, 2012, Southern California Edison (SCE) submitted a variance request to the California Public Utilities Commission (CPUC) for use of 13 additional water sources (fire hydrants) for transmission line construction needs along the Red Bluff-Devers and Devers-Valley segments 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 temporary changes to the project 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, and that no new impacts or increase in impact severity would result from the requested variance activities.

Variance #33, which approves the subject transmission line water sources, is granted by CPUC for the proposed activities based on the factors described below.

SCE Variance Request. SCE has requested a variance under NTPs #9 and #10 for 13 water locations along the Red Bluff-Devers and Devers-Valley segments. Excerpts from the SCE Variance Request, received April 26, 2012 and clarified on May 16, 2012, are presented below (indented):

Southern California Edison (SCE) requests a variance for the Devers to Red Bluff Transmission Line and Devers to Valley Transmission Line, identified in NTPs #9 and #10 for 15 additional offsite water locations identified by the contractors for dust suppression. The following information provides a necessary water source for dust mitigation on the Devers-Palo Verde 500 kV No. 2 Transmission Line Project (DPV2) identified in NTPs #9 and 10, dated December 1 and December 2, 2011. The table below lists the locations of 13 proposed water sources.

Hydrant Locations						
#	Site Location	City	Water District	Latitude	Longitude	Ownership
1	823 E 3rd St (PAR Beaumont Yard)	Beaumont	Beaumont-Cherry Valley Water District	N33.92428	W116.97144	Private
2	5552 Breckenridge Ave	Banning	Banning Water Division	N33.90723	W116.94682	Private
3	43289-43587 Longhorn Rd	Banning	Banning Water Division	N33.89979	W116.91146	Private
4	Turtle Dove Rd/ Old Idyllwild Rd	Banning	Banning Water Division	N33.89985	W116.89622	Private
5	46001-46143 Porter St	Banning	Banning Water Division	N33.91103	W116.85183	Private
6	Corner of Warren St/ Contour Ave	Nuevo	Nuevo Water Company	N33.80883	W117.09943	Private
7	28810-28898 Watson Ave	Romoland	Eastern Municipal Water District	N33.75056	W117.15428	Private
8	23240 Gunther Rd	Romoland	Eastern Municipal Water District	N33.77207	W117.13878	Private
9	85248-85452 Vista Del Norte	Coachella	Coachella Valley Water District	N33.71546	W116.16832	Private
10	85248-85452 Vista Del Norte	Coachella	Coachella Valley Water District	N33.71516	W116.16698	Private
11	85248-85452 Vista Del Norte	Coachella	Coachella Valley Water District	N33.71502	W116.16545	Private
12	Parkview Dr	Chuckwalla	Riverside County Service Area 51	N33.73716	W115.39359	Private
13	Hathaway St/ Wesley St	Banning	Banning Water Division	N33.91180	W116.85934	Private

CPUC Evaluation of Variance Request

In accordance with the MMCRP, the subject variance request was reviewed by CPUC to confirm 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, water resources, and other issue areas. A list of mitigation compliance conditions is presented below to define additional information and clarifications regarding mitigation requirements.

Biological Resources. The water sources have been reviewed in the field. The subject hydrants are located in disturbed areas immediately adjacent to public streets; therefore, there are no biological resources concerns associated with this variance.

All mitigation measures, APMs, and conditions of the Biological Opinion (BO) should be implemented along the water haul routes. This includes, but is not limited to, providing a qualified USFWS, CPUC, and BLM approved tortoise biologist, pre-construction clearance sweeps, and maintaining speed limits.

Cultural Resources. Based on background research and a site visit, there is no potential to encounter cultural resources at the existing hydrants locations identified for dust suppression. In addition, the existing hydrants are located within formerly disturbed areas and are adjacent to existing roads and will be accessed via truck. All trucks will remain on existing roads. Therefore, there are no specific cultural resources conditions applicable to this variance.

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 additional water sources varies from high to low. However, minimal ground disturbing activities will take place within the identified areas. Therefore, there are no specific paleontological resources conditions applicable to this variance.

Noise/Sensitive Receptors. Although several of the hydrants would be located nearby to residences, use of the 13 additional water sources would have similar noise-generating activities to those that will occur for use at the construction yards and transmission line work areas. Appropriate noise and land use mitigation measures would apply. In addition, the contractors would be accessing existing fire hydrants and the overall scope and duration of construction activities has not changed as a result of the variance.

Water Resources. Under this variance, SCE would utilize 13 existing fire hydrants for water for dust suppression. There would be no ground disturbance or new impervious surfaces required under this variance and overall water usage would not change. The hydrants would be equipped with a meter and water would be obtained from six different water agencies/districts. No additional groundwater would be utilized. Therefore, there are no specific water resources conditions applicable to this 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. The CPUC EM shall be notified immediately of any unanticipated cultural, paleontological, or biological resource discoveries.
4. 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.

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Please contact me if you have any questions or concerns.

Sincerely,

Billie Blanchard

CPUC Environmental Project Manager

DPV2 Transmission Project

cc: Kelly Pell, Southern California Edison
Patty Nevins, Southern California Edison
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