

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 21, 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 #38

Dear Ms. Benz,

On August 9, 2012, Southern California Edison (SCE) submitted a revised variance request to the California Public Utilities Commission (CPUC) for use of three additional water sources (fire hydrants), one stand-tank location and associated access routes for transmission line construction needs along the CRS-Red Bluff and Red Bluff-Devers 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 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 #38, which approves the subject transmission line water sources, stand-tank and access routes 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 on July 9, 2012 and revised on August 9, 2012, are presented below (indented):

Southern California Edison (SCE) requests a variance for the Devers to Red Bluff Transmission Line and Red Bluff to Colorado River Substation Transmission, identified in NTPs #8 and #9 for additional offsite water locations and associated access routes identified by the contractors needed for dust suppression. The following table describes the proposed water sources necessary for dust mitigation on the Devers-Palo Verde 500 kV No. 2 Transmission Line Project (DPV2) identified in NTPs # 8 and 9, dated December 1 and December 2, 2011. In addition, SCE requests approval of associated access roads to proposed water sources, shown on the attached figures.

Hydrant and Stand-Tank Locations

#	Site Location	City	Latitude	Longitude	Ownership
<i>Hydrant Locations:</i>					
1	Watt Court and Rio Del Sol	Thousand Palms	N33.82878	W116.40463	Private
2	Tchoupitoulas Lane and Amite Lane	Thousand Palms	N33.82377	W116.34889	Private
3	Las Flores Way and 30th Avenue	Thousand Palms	N33.83051	W116.38942	Private
<i>Stand-Tanks Location:</i>					
1	Directly north of Cactus City Rest Area	Unincorporated Riverside County			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 and stand-tank locations and associated access routes have been reviewed in the field. The subject hydrants are located largely in disturbed areas immediately adjacent to public streets and the stand-tank would be located in a graded area. There are no biological resources concerns associated with the hydrants and access routes located at Watt Court and Rio Del Sol (Hydrant Location #1) and Las Flores and 30th Avenue (Hydrant Location #3). The hydrant and access routes at Tchoupitoulas Lane and Amite Lane (Hydrant Location #2) are located within Critical Coachella Valley fringe-toed Lizard habitat. The stand-tank and access routes located north of Cactus City Rest Area are located within modeled desert tortoise habitat. As conditioned below, SCE shall provide updated maps showing the new approved access routes to the CPUC EMs and all monitors in the field prior to construction activities at the hydrant and stand-tank locations.

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, Coachella Valley fringe-toed lizard 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 three offsite water hydrants, one stand-tank and access routes identified for dust suppression. In addition, the existing hydrants and proposed stand-tank 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 and stand-tank locations and access routes is low. In addition, 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 the hydrants and access routes would be located nearby to residences, use of the additional water sources, stand-tank, and access routes 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 three 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, water would be obtained from water agencies/districts and 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. SCE shall provide updated maps showing the new approved access routes to the CPUC EMs and all monitors in the field prior to construction activities at the hydrant and stand-tank locations.
4. The CPUC EM shall be notified immediately of any unanticipated cultural, paleontological, or biological resource discoveries.
5. 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.

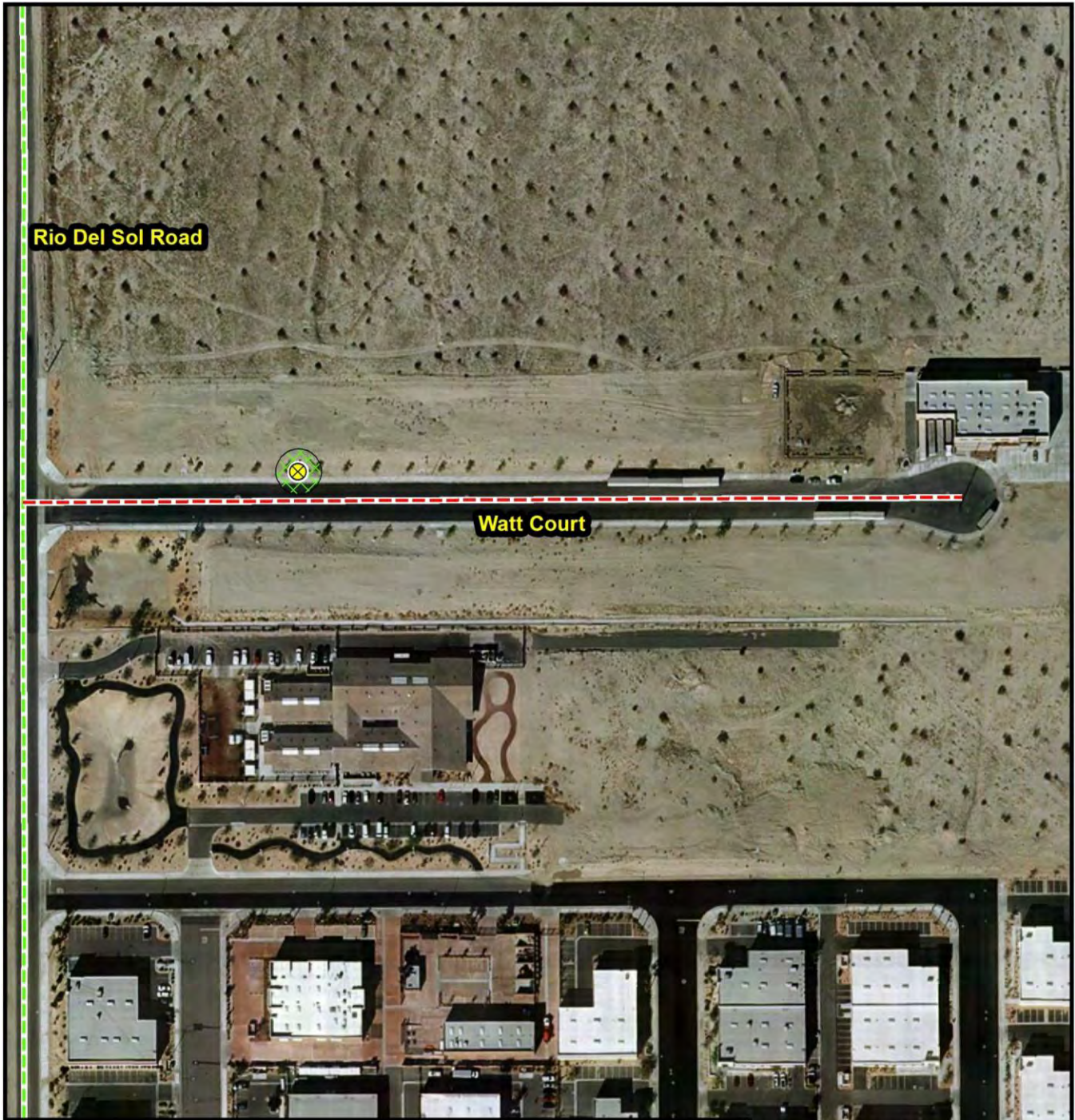
Please contact me if you have any questions or concerns.

Sincerely,

Billie Blanchard

Billie Blanchard
CPUC Environmental Project Manager
DPV2 Transmission Project

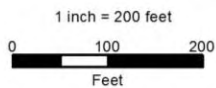
cc: Kelly Pell, Southern California Edison
Patty Nevins, Southern California Edison
Sylvia Granados, Southern California Edison
Vida Strong, Aspen Environmental Group
Hedy Koczwar, Aspen Environmental Group
Jamison Miner, Aspen Environmental Group
Rosina Goodman, Aspen Environmental Group
Ryann Loomis, Aspen Environmental Group



LEGEND

- - - Existing Access Road
- - - Existing Access Road (New Acq)
- Temp Access Road (Const)
- - - Watt Court access road variance
- X Watt Court hydrant location
- X Hydrant 30' buffer

Prepared by:



Projection: NAD 83 UTM Zone 11N

WATT COURT HYDRANT AND ACCESS ROAD



Figure 1
 DEVERS-PALO VERDE NO. 2
 500kV TRANSMISSION LINE
 DEVERS TO CRS SEGMENT
**VARIANCE FOR
 THE ADDITION OF WATER RESOURCES**

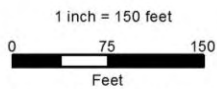
May 10, 2012



LEGEND

- - - Existing Access Road
- - - Existing Access Road (New Acq)
- Temp Access Road (Const)
- - - 30th Avenue road variance
- ⊗ 30th Avenue hydrant location
- Hydrant 30' buffer

Prepared by:



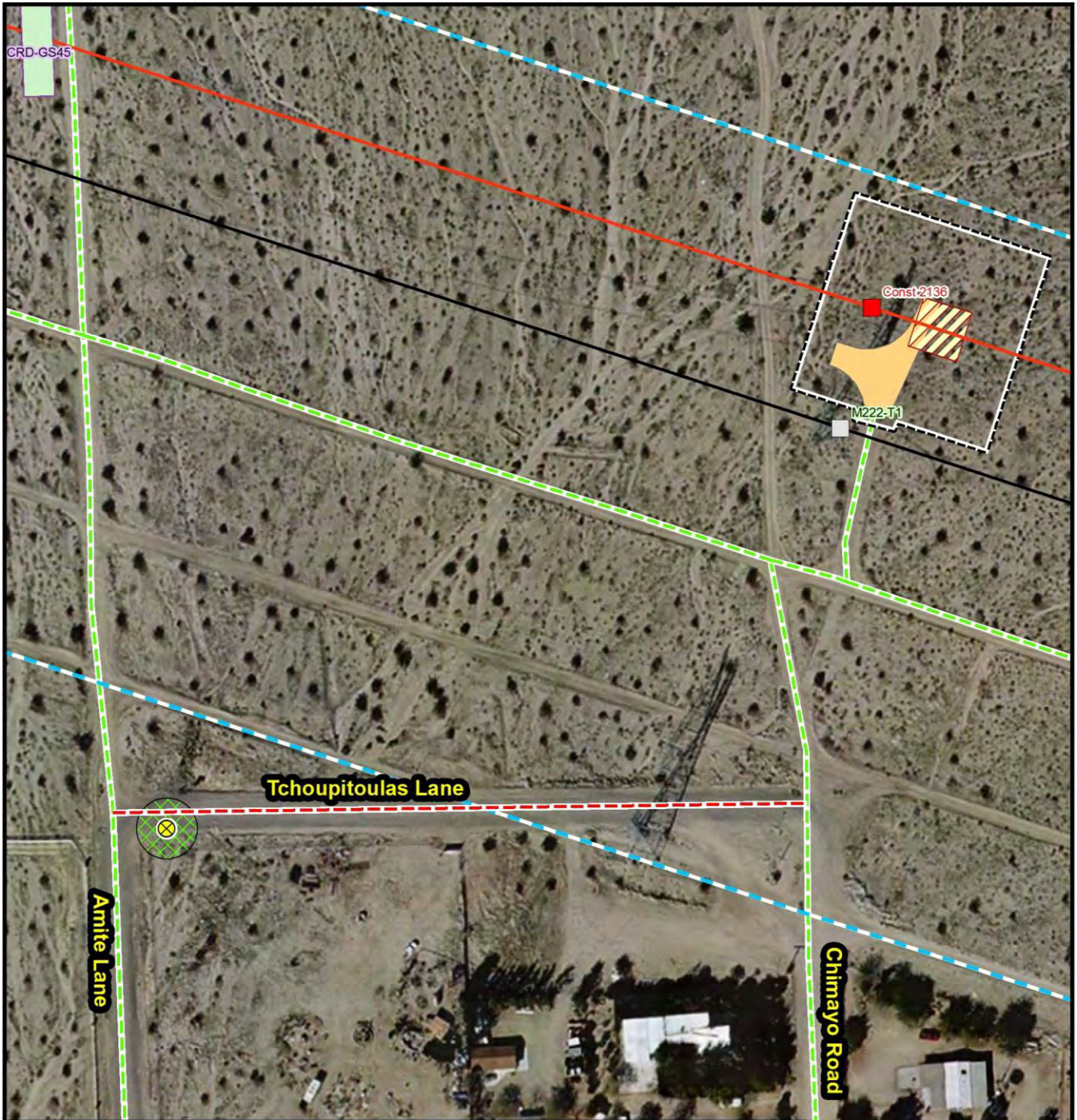
Projection: NAD 83 UTM Zone 11N

30TH AVENUE HYDRANT AND ACCESS ROAD



Figure 2
 DEVERS-PALO VERDE NO. 2
 500KV TRANSMISSION LINE
 DEVERS TO CRS SEGMENT
 VARIANCE FOR
 THE ADDITION OF WATER RESOURCES

May 10, 2012



LEGEND	
	Existing Access Road
	Tchoupitoulas Lane access road variance
	Existing Access Road (New Acq)
	Tchoupitoulas Lane hydrant location
	Temp Access Road (Const)
	Hydrant 30' buffer

Prepared by:

1 inch = 150 feet






Projection: NAD 83 UTM Zone 11N

TCHOUPITOULAS LANE HYDRANT AND ACCESS ROAD



Figure 3
 DEVERS-PALO VERDE NO. 2
 500KV TRANSMISSION LINE
 DEVERS TO CRS SEGMENT
 VARIANCE FOR
 THE ADDITION OF WATER RESOURCES
 May 10, 2012



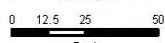
Legend	
	DPV1 Existing Access Road
	New Access Road
	Existing DPV1 Centerline (Devers-CRS Segment)
	Stand Tank Installation Area (3,500 sq. ft)
	DPV 1 and 2 Combined ROW

Prepared by:





1 in = 50 ft



0 12.5 25 50
Feet

Projection: NAD 83 UTM Zone 11N
Meters

**CACTUS CITY
REST STOP
WATER STAND
TANK INSTALL**



FIGURE 1
 DEVERS-PALO VERDE NO. 2
 500KV TRANSMISSION LINE
 DEVERS TO COLORADO RIVER SEGMENT
**VARIANCE ADJUSTMENT TO
 DISTURBANCE AREAS FOR
 WATER STAND TANK**
 June 08, 2012