

## Comment Set A1 Maricopa County Parks and Recreation Department

### Devers–Palo Verde No. 2 Transmission Line Project

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**From:** Christopher Coover - PARKSX [ccoover@mail.maricopa.gov]  
**Sent:** Tuesday, May 30, 2006 8:58 AM  
**To:** dpv2@aspenerg.com  
**Subject:** Devers-Palo Verde No. 2 Transmission Line Project comments

John and Billie,

Please include the Maricopa County Regional Trail System Plan alignment corridors in your project area by reviewing the website document at [www.maricopa.gov/parks/maricopatrail](http://www.maricopa.gov/parks/maricopatrail) to confirm the County interest in being included as a stakeholder.

Thank you for your consideration.

Our address is 234 N. Central Avenue, Suite 6400, Phoenix, Arizona 85004

Chris Coover  
Maricopa Trail Manager  
Parks and Recreation Dept.  
(602) 506-8719  
[ccoover@mail.maricopa.gov](mailto:ccoover@mail.maricopa.gov)  
<http://www.maricopa.gov/parks/MaricopaTrail/>

A1-1

## Responses to Comment Set A1 Maricopa County Parks and Recreation Department

- A1-1 The Maricopa County Regional Trail System Plan website was reviewed as suggested. Based on the map and other information provided on the website, it appears that the Proposed Project would be located entirely west of the Maricopa Trail System. The easternmost end of the DPV2 project (including alternatives) would be at the Palo Verde Nuclear Generating Station, which is located along Wintersburg Road south of Interstate 10. The Buckeye Hills Recreation Area and the White Tank Mountains Regional Park, the westernmost parks included in the Maricopa Trail are both located more than 15 miles east of the Proposed Project at this endpoint and would not be affected by project construction or operation. Regardless, Maricopa County and its Parks and Recreation Department have been included on the mailing list for this project, since the NEPA/CEQA process started in October 2005.

## Comment Set A2 Riverside County Flood Control and Water Conservation District

WARREN D. WILLIAMS  
General Manager-Chief Engineer



1995 MARKET STREET  
RIVERSIDE, CA 92501  
951.955.1200  
951.788.9965 FAX  
www.floodcontrol.co.riverside.ca.us

### RIVERSIDE COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT

May 24, 2006

Mr. Billie Blanchard  
Mr. John Kalish  
California Public Utilities Commission  
and Bureau of Land Management  
c/o Aspen Environmental Group  
235 Montgomery Street, Suite 935  
San Francisco, CA 94104-3002

Dear Messrs Blanchard and Kalish:

Re: Notice of Availability, Draft  
Environmental Impact Report/  
Environmental Impact Statement for the  
Proposed Devers-Palo Verde No. 2  
Transmission Line Project

This letter is written in response to the Notice of Availability of a Draft Environmental Impact Report/Environmental Impact Statement (DEIR/DEIS) for the Devers-Palo Verde No. 2 Transmission Line Project (DPV2) proposed by Southern California Edison (SCE). The DPV2 project as currently proposed by SCE includes a new 230-mile 500kV line from the Harquahala Substation (in Arizona, located near the Palo Verde nuclear power plant) to SCE's Devers Substation (located approximately north of Palm Springs, CA). The 500 kV portion would follow the existing SCE 500 kV transmission line, Devers-Palo Verde No. 1. The DPV2 project will also include upgrades to an additional 50 miles of 230 kV transmission lines west of the Devers Substation. Forty miles of 230 kV transmission line from Devers Substation to San Bernardino Junction at the western end of San Timoteo Canyon would be reconfigured and two separate 230 kV corridors, from the San Bernardino Junction to SCE's Mountain View Substation and from San Bernardino Junction to SCE's Vista Substation would be reconducted.

In reference to the previous comment letter sent by Riverside County Flood Control and Water Conservation District (District) dated November 2, 2005, the District would like to reiterate that the following comments/concerns should be addressed in the EIR/EIS:

1. Sections of the proposed project are located within the District's Garnet Wash Master Drainage Plan (MDP), Banning MDP and Beaumont MDP. When fully implemented, these MDP facilities will provide flood protection to relieve those areas within the plan of the most serious flooding problems and will provide adequate drainage outlets. The draft EIR/EIS should evaluate potential impacts to existing and proposed MDP facilities in the project area. The District's MDP facility maps may be viewed online, under Programs and Services, at <http://www.floodcontrol.co.riverside.ca.us/districtsite/default.asp>. To obtain further information on the MDP and the proposed District facilities, contact Art Diaz of the Planning Section at 951.955.1345.

A2-1

Comment Set A2, cont.  
Riverside County Flood Control and Water Conservation District

Mr. Billie Blanchard and Mr. John Kalish

-2-

May 24, 2006

Re: Notice of Availability, Draft  
Environmental Impact Report/  
Environmental Impact Statement for the  
Proposed Devers-Palo Verde No. 2  
Transmission Line Project

2. Existing District facilities are located within the proposed project area and may be impacted. Any work that involves District rights-of-way, easements or facilities will require an encroachment permit from the District. The construction of facilities within road right-of-way that may impact District storm drains should also be coordinated with us. To obtain further information on encroachment permits or existing facilities, contact Ed Lotz of the Encroachment Permit Section at 951.955.1266.

A2-2

Thank you for the opportunity to comment on the DEIR/DEIS. Please forward any subsequent environmental documents regarding the project to my attention at this office. Any further questions concerning this letter may be referred to Steve Horn at 951.955.5418 or me at 951.955.1233.

Very truly yours,

  
TERESA TUNG  
Senior Civil Engineer

c: TLMA  
Attn: David Mares  
Art Diaz  
Ed Lotz

SCH:mcv  
P8\106744

## Responses to Comment Set A2 Riverside County Flood Control and Water Conservation District

A2-1 The Riverside County Flood Control and Water Conservation District’s Master Drainage Plan (MDP) maps, specifically for Garnet Wash, Banning, and Beaumont, have been viewed online at the District’s website:

<http://www.floodcontrol.co.riverside.ca.us/districtsite/default.asp>

Tables D.12-1 and D.12-2 in Section D.12.3 of this EIR/EIS list all surface water crossings in the Devers-Harquahala and West of Devers segments of the Proposed Project. As stated in the EIR/EIS, Impact H-6 (Encroachment into a floodplain or watercourse by permanent aboveground project features resulting in flooding, flood diversions, or erosion) was found to be potentially significant (Class II) within the District’s jurisdiction. Although the project description (i.e., Applicant Proposed Measure [APM] W-2) states that watercourses would be avoided where possible, the EIR/EIS includes additional mitigation (Mitigation Measure H-6a, Design diversion dikes to avoid damage to adjacent property) in Section D.12.7 to reduce this impact to a less than significant level. Therefore, in addition to the implementation of the APMs and proposed mitigation measures, and because the transmission lines would be overhead and could span any major watercourses and drainage outlets included in the District’s MDPs, impacts to existing and proposed MDP facilities in the project area have been considered and were found to be less than significant. As stated in Response A2-2, the requirement for an encroachment permit for any work that involves Riverside County Flood Control and Water Conservation District rights-of-way, easements, or facilities has been noted and is referred to SCE for compliance prior to construction.

A2-2 The requirement for an encroachment permit for any work that involves Riverside County Flood Control and Water Conservation District rights-of-way, easements, or facilities has been noted. Table A-4 (Permits or Other Actions Required Prior to Construction of the DPV2 in Arizona and California) in Section A.3.5 of this EIR/EIS notes that Riverside County roads and highways, as well as flood control/drainage channels would require a Road/Highway Encroachment/Crossing Permit or a Flood Control/Drainage Channel Encroachment/Crossing Permit, respectively. This comment is referred to SCE for compliance with the District’s permitting requirements.

## Comment Set A3 Flood Control District of Maricopa County



### Flood Control District of Maricopa County

**Board of Directors**  
Fulton Brock, District 1  
Don Stapley, District 2  
Andrew Kunasek, District 3  
Max Wilson, District 4  
Mary Rose Wilcox, District 5

[www.fcd.maricopa.gov](http://www.fcd.maricopa.gov)

2801 West Durango Street  
Phoenix, Arizona 85009  
Phone: 602-506-1501  
Fax: 602-506-4601  
TT: 602-505-5897

June 5, 2006

Billie Blanchard / John Kalish  
California Public Utilities Commission & Bureau of Land Management  
C/o Aspen Environmental Group  
235 Montgomery Street, Suite 935  
San Francisco, CA 94101

**SUBJECT:** Permit Request # 2005P096 for Proposed kV Transmission Lines Within  
Maricopa County Flood Control District's Rights of Way –  
Harquahala FRS and Saddleback FRS

To Whom It May Concern:

The proposed plans for the 500 kV transmission line from Palo Verde Nuclear Generating Station to the Devers substation (DPV2) will cross two, possibly three Rights-of-Way in Maricopa County's Flood Control District. (District) This is a reminder that Right-of-Way permits must be approved by the District before any construction activities are allowed in these areas.

According to the fact sheet, the suggested alignment will be parallel to DPV1, a 500 kV line constructed in 1978 prior to construction of the Harquahala flood retarding structure. (FRS) DPV1 runs downstream of the CAP canal along its alignment and crosses over the Right of Way of the Harquahala FRS from South to North between stations 954+50 and 970+00 with the actual crossing of the FRS at about station 960+00. The information brochure also indicates that construction will be within the utility corridor that contains DPV1 and that the same access roads will be used with some spur roads being extended for construction vehicles.

The transmission lines will terminate at the Harquahala switchyard in Section 31, Township, 2 North, Range 8 West, G&SR B&R. However, Southern California Edison would utilize the existing 500 kV line and the existing 500 kV interconnection from Hassayampa to PVNGS to provide a path to the PVNGS switchyard. There are currently seven poles along this line that crosses the Saddleback FRS Right-of-Way.

A3-1

Comment Set A3, cont.  
Flood Control District of Maricopa County

2

The District likely has permits in place for these two locations. Any change in use will require application to the District for an alteration of the existing permit or a new permit. Each would be judged on their merits and impacts to the District structures. If new easements are required, they will be appraised at fair market value. Since poles already exist in the approximate locations of the proposed DPV2, unless there are serious changes to the impacts on these structures, applications should be approved.

A3-1 cont.

The District requests a more detailed representation of the route through Arizona where these poles will be placed so that we can assess whether a third Flood Control District Right-of-way would be affected. The Centennial Levee Right of Way may be impacted as well.

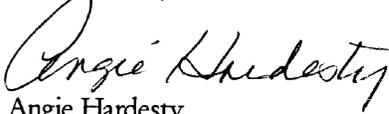
A3-2

We are enclosing an application packet for your convenience. Please allow at least four months for the review process. In addition, approval will be required from NRCS; the agency that originally built this flood retarding structure.

A3-3

If you have any questions concerning the permitting process, please call me at 602-506-5476.

Most Sincerely,



Angie Hardesty  
Right-of-Way Permit Specialist  
Flood Control District of Maricopa County

Enclosure

## Comment Set A3, cont. Flood Control District of Maricopa County



### FLOOD CONTROL DISTRICT of Maricopa County (District)

2801 W. Durango Street  
Phoenix, AZ 85009  
Telephone: 602-506-4583 or 602-506-5476  
Fax: 602-506-2903

A3-3 cont.

#### Right-of-Way Permit Application Process

(Plans that affect District owned or maintained right-of-way)

1. Complete the Permit Application Form, which is Page 3 of this application. If a permanent installation, such as a sewer line, is being proposed within the District's right-of-way, the Applicant must also purchase copies of the District's as-built plans for all District facilities within the right-of-way affected by the proposed installation. Questions regarding the purchase of copies may be directed to 602-506-8783.
2. Submit the completed Permit Application form, the Application Fee of \$250 (See attached Permit Use and Fee Schedule) and the required sets of full-size plans (24" x 36") and/or drainage reports to the attention of Shelby Brown or Angie Hardesty. The required number of plans will depend on the type of permit that is being requested. The general guideline is as follows, but additional sets of plans may be required:
  - a. Permits that will involve storm water runoff into or a permanent crossing (such as a box culvert) of a District structure require seven (7) sets of plans along with two (2) copies of the drainage report.
  - b. Permits that do not involve storm water runoff or permanent crossings require six (6) sets of plans.
3. Once the District has determined the location on District owned or maintained property, the initial Permanent Installation Review Fee of \$650 is due and payable. (The District will notify the applicant when the determination has been made.) Allow 4 to 6 weeks for District review. Upon completion of the review, the District will transmit the results of the review to the Applicant. Revisions to the plans may be necessary.
4. If the Applicant for the permit is a Consultant or other agent representing a private developer or a Municipality proposing a new facility, a final plan approval letter will be transmitted to the Applicant after receipt of revised plans and/or drainage reports that have addressed and incorporated all District comments to the satisfaction of the District. **Please note that written correspondence does not constitute authorization to begin construction activities within the District's right-of-way.**
5. After the District issues the final plan approval letter, the right-of-way permit will be issued only after the Contractor who will be doing the actual work within the District's right-of-way submits the following items:
  - a. Application form completed by the Contractor who will be doing the actual work within the District's right-of-way. Upon receipt of the Permit Application, the District will notify the Contractor of the amount of the Performance Bond and remaining fees due on the right-of-way permit.
  - b. Copy of plan approval letter from the District, if applicable. (See Item 4 above.)
  - c. Copy of the Certificate of Insurance that names the District as additional insured and in the appropriate insurance amounts. (See attached Insurance/Bonding Requirements.)
  - d. Performance Bond, if required. (Bond amount is determined during the review process, with a minimum amount of \$10,000.)
  - e. Payment of the remaining fees due on the right-of-way permit. The fees may include, but are not limited to, additional permanent installation review fees, inspection fees, and rental fees, if applicable.

Comment Set A3, cont.  
Flood Control District of Maricopa County



**FLOOD CONTROL DISTRICT of Maricopa County (District)**

**Plan Checklist**

A3-3 cont.

**THE FOLLOWING ITEMS MUST BE IDENTIFIED IN THE APPLICANT'S PLANS:**

- A. Vicinity and/or Key Map.
- B. Legend
- C. Special details, including but not limited to, plan and profile sheets, cross-sections, construction notes, and general notes.
- D. North Arrow, Bar Scale, and Drawing Scale
- E. General Notes to be added to **ALL** plans:
  - 1. All Construction within Flood Control District (District) Rights-of-way jurisdiction shall conform to the latest Maricopa Association of Governments' (MAG) Specifications, unless the structure involved is a dam. If the structure is a dam, special permit requirements will apply. Dam shall mean a structure that is under the jurisdiction of the Arizona Department of Water Resources and is defined in Arizona Revised Statutes 45-1201.
  - 2. Contractor must obtain necessary District Permit prior to commencement of construction within District right-of-way and maintain a copy of the permit on the project site at all times.
  - 3. Notify the District's Permits Inspector at 602-506-4727 or 602-506-4723 at least 48 hrs prior to any work being performed in the District's rights-of-way.
  - 4. Contractor performing excavation operations is responsible for locating and protecting all underground utilities.
  - 5. All compaction and backfill within District's right-of-way shall conform to the latest MAG Specifications unless stipulated otherwise in the District's Permit.
  - 6. Any damage to District's structures, equipment, materials, vegetation, and/or property shall be replaced and/or repaired in-kind to the satisfaction of the District.
- F. Indicate District Rights-of-way, City limits, and County limits. Also include existing easement information and its recording number. If no easement exists, indicate the proposed location.
- G. Indicate the Title of Subdivision or Job Name (on all sheets).
- H. All existing utilities within the District Rights-of-way shall be located and shown dashed with the size, construction materials, type of utility line, location, and depth below grade.
- I. Include the Blue Stake sticker.
- J. Drawings must include existing topographic features adjacent or in conflict with new construction.
- K. All new construction should be delineated, via leader notes or construction notes.
- L. The Section, Township & Range must be shown on plans(s).
- M. Indicate the street names on plan (s), including distance to nearest intersection.
- N. Provide survey ties for project from known section corner, quarter section corner, or other permanent survey marker. Reference points must be on the Arizona Coordinate System, Central Zone, horizontal datum of 1983. The corresponding elevation must be provided in both 1929 NGVD and 1988 NAVD. All plans must clearly state the vertical datum used for the project.
- O. A plan and profile drawing of any proposed boring pits or excavations must be included on the drawings for work within District Rights-of-way or that may affect District facilities including but not limited to; dams, channels or floodways (lined or unlined), basins, fencing, maintenance roads, landscaping, and any other permanent type structures.
- P. Identify the location of proposed new facilities, easements, use areas, etc., by reference to the District stationing numbers and offsets. The structure station locations are generally identified in the field with station markers at 500 feet intervals and are identified on the District's as-built plans.
- Q. For information regarding Storm Water Quality Standards for runoff into District facilities, please call the District's Water Quality Branch at 602-506-4113.
- R. Show the proposed installation or use area in relation to the District's existing facilities, which shall include horizontal and vertical ties to said facilities.
- S. All proposed construction and related activities must avoid impacts to the flood protection function of the District's facility. When flood protection impacts cannot be avoided, impacts must be minimized and a flood protection mitigation plan for implementation during construction must be submitted to and approved by the District prior to issuance of any permit to conduct construction activities within the District's right-of-way.

Comment Set A3, cont.  
Flood Control District of Maricopa County

**PERMIT APPLICATION**  
to work within Rights of Way (Real Property) of the  
**Flood Control District of Maricopa County**  
**2801 W. Durango Street, Phoenix, AZ 85009**

A3-3 cont.

Contractor Name: \_\_\_\_\_

Address: \_\_\_\_\_

Street

\_\_\_\_\_ City \_\_\_\_\_ State \_\_\_\_\_ Zip

Arizona Contractors License Number: \_\_\_\_\_

(If a consultant or other agent is submitting plans on behalf of a client, they may enter "Review" in the above line.)

Contact Name: \_\_\_\_\_

Phone Number: \_\_\_\_\_ FAX Number: \_\_\_\_\_

Project Name: \_\_\_\_\_

Project Location: \_\_\_\_\_

Section: \_\_\_\_\_ Township: \_\_\_\_\_ Range: \_\_\_\_\_

Purpose of Project: \_\_\_\_\_

Proposed Construction Start Date: \_\_\_\_\_

Proposed Construction End Date: \_\_\_\_\_

Est. construction cost for work in District Right of Way: \_\_\_\_\_

Permanent easement required:  Yes  No

Contact Shelby Brown at 602-506-4583 or Angie Hardesty at 602-506-5476 with any questions.

Comment Set A3, cont.  
Flood Control District of Maricopa County

**FLOOD CONTROL DISTRICT OF MARICOPA COUNTY**

**INSURANCE/BONDING REQUIREMENTS**

A3-3 cont.

Commercial General Liability Insurance Coverage:

The Certificate of Insurance covering public liability and property damage must be submitted in the following amounts:

- Two million dollars (\$2,000,000) General Aggregate.
  - Two million dollars (\$2,000,000) Products/Completed Operation Aggregate.
  - One million dollars (\$1,000,000) Each Occurrence.
- The Flood Control District of Maricopa County is to be named as additional insured.

Performance Bond:

The Performance Bond must be in an amount sufficient to cover damages to the Flood Control District's (District) right-of-way. Whether the Contractor has posted a Surety Bond, through a Bonding Company, or a Security in Lieu of Performance Bond, or other instrument acceptable to the District, a claim will be filed against the bond or security. District staff will determine the exact amount of the bond on a case-by-case basis, depending on the project within the District's right-of-way. However, the minimum bond amount required will be no less than \$10,000. The District may waive the Performance Bond if the contracting agency is another municipality and the municipality provides written correspondence to the District stating that it will not release the Contractor's (Permittee's) Performance Bond until the District provides written notification that all requirements in the District's permit have been met to the satisfaction of the District.

Contact Shelby Brown at 602-506-4583 or Angie Hardesty at 602-506-5476 with any questions concerning insurance or bond. Questions may also be directed by Fax: 602-506-2903.

Comment Set A3, cont.  
Flood Control District of Maricopa County

A3-3 cont.

**PERMIT USE AND FEE SCHEDULE**  
**As Authorized by Resolution FCD 2002R002**

1. Permit Filing Fees (in all cases)	\$250.00 /application
2. Temporary Access *	\$325.00 + Rent
3. Permanent Installation Review Fee	\$650.00 /application \$325.00/review for each review thereafter
4. Inspection Fees	\$70.00/inspection (within 25 miles of Durango Complex) \$80.00/inspection (25 to 50 miles of Durango Complex) \$90.00/inspection (over 50 miles from Durango Complex)
5. Rent (if applicable) **	\$600.00 minimum or appraised value (whichever is greater)
6. Easement (if applicable) **	\$600.00 minimum or appraised value (whichever is greater)
7. Appraisal Fee (if applicable)	\$250.00 (in-house valuation) or actual cost if District appraisal consultants must be utilized
8. Extensions	\$50.00 Filing Fee + Rent and Inspection (if applicable)
9. After-the-Fact Permit	\$1,500.00 (assessed in addition to the above fees)

\* No Permanent Installation Review Fee will be assessed when the District real property is utilized for temporary use only.

\*\* Rent or Easement Fees will not be charged for utilities on existing public utility easements dedicated to the Public.

Permit Filing Fees are non-refundable. Initial Permanent Installation Review Fee covers the first submittal only. Inspection Fees are per trip. The number of inspection trips required is determined by the District on a case-by-case basis.

Commercial General Liability Insurance Coverage - as follows or other limits determined by Risk Management and adopted by the Board of Directors:

\$2,000,000 General Aggregate  
\$2,000,000 Products/Completed Operation Aggregate  
\$1,000,000 Each Occurrence

Note: No evidence of liability insurance shall be required as a condition precedent to the issuance of a permit to federal, state, county or municipal agency, political subdivision, or any public service corporation with a net worth of more than \$1,000,000 as reflected by its most current balance sheet.

Comment Set A3, cont.  
Flood Control District of Maricopa County

PERFORMANCE BOND

A3-3 cont.

KNOW ALL MEN BY THESE PRESENTS:

That, \_\_\_\_\_ hereinafter called the Principal, as Principal, and, \_\_\_\_\_  
\_\_\_\_\_, a corporation organized and existing under the laws  
of the State of \_\_\_\_\_, with its principal office in the City of \_\_\_\_\_  
(hereinafter called the Surety), as Surety, are held and firmly bound unto the Flood Control District of  
Maricopa County, in the County of Maricopa, State of Arizona, in the amount of \_\_\_\_\_  
(\$ \_\_\_\_\_), for the payment whereof,  
the said Principal and Surety bind themselves, and their heirs, administrators, executors, successors and  
assigns, jointly and severally, firmly by these presents.

WHEREAS, the Principal has entered into a certain written Permit No. \_\_\_\_\_ with the Flood  
Control District of Maricopa County, dated the \_\_\_\_\_ day of \_\_\_\_\_, 200\_\_, which is  
hereby referred to and made a part hereof as fully and to the same extent as if copied at length herein.

NOW, THEREFORE, THE CONDITION OF THIS OBLIGATION IS SUCH, that if the said  
Principal shall faithfully perform and fulfill all the undertakings, covenants, terms, conditions and agreements  
of said permit during the original term of said permit and any extension thereof, with or without notice to the  
Surety, and during the life of any guaranty required under the permit, and shall also perform and fulfill all the  
undertakings, covenants, terms, conditions, and agreements of any and all duly authorized modifications of  
said permit that may hereafter be made, notice of which modifications to the Surety being hereby waived; then  
the above obligation shall be void, otherwise to remain in full force and effect;

The prevailing party in a suit on this bond shall be entitled to such reasonable attorney's fees as may be  
fixed by a judge of the court.

Witness our hands this \_\_\_\_\_ day of \_\_\_\_\_, 200\_\_.

Seal \_\_\_\_\_  
Agency of Record, State of Arizona

\_\_\_\_\_  
Agency Address

BOND NUMBER: \_\_\_\_\_

ATTACH SURETY POWER OF ATTORNEY

\_\_\_\_\_  
Principal

By: \_\_\_\_\_

Title: \_\_\_\_\_

\_\_\_\_\_  
Surety Seal

By: \_\_\_\_\_

Revised: July 24, 2002

08/07/2002

Page 6 of 6

## Responses to Comment Set A3 Flood Control District of Maricopa County

A3-1 The requirement for District approval for any work that involves Maricopa County Flood Control District rights-of-way or flood retarding structures (FRS) has been noted and is referred to SCE for compliance. Table A-4 (Permits or Other Actions Required Prior to Construction of the DPV2 in Arizona and California) in Section A.3.5 of the Draft EIR/EIS notes that Maricopa County roads and highways, as well as flood control/drainage channels would require a Road/Highway Encroachment/Crossing Permit or a Flood Control/Drainage Channel Encroachment/Crossing Permit, respectively. This comment is referred to SCE for compliance with the District's permitting requirements.

A3-2 Draft EIR/EIS Appendix 10, which is included in Volume 3 of this EIR/EIS, contains aerial strip maps of the proposed Devers-Harquahala route in Arizona (Sheets 1 through 17 of 39) at a 1:2,500-foot scale. The figures depict both the existing DPV1 and proposed DPV2 routes including tower locations, as well as existing and proposed access roads. These maps are considered to be at a sufficient scale and detail to give an accurate and detailed representation of the route and tower locations through Arizona. However, more detailed maps (1:500) were created for EIR/EIS field studies and can be made available to the District upon request. Please refer to Response A3-1 for a discussion of right-of-way approvals.

The Centennial Levee is located in western Maricopa County, south of Interstate 10 and west of Salome Highway at latitude N33°31'10.0" and longitude W113°15'37.9" (Flood Control District of Maricopa County at <http://156.42.96.39/alert/Flow/5123.htm>). Draft EIR/EIS Appendix 10 Sheets 1 through 4 depict the area of the proposed DPV2 line that would be west of Salome Highway. The proposed 500 kV transmission line would be overhead and would have an average tower-to-tower spacing (span length) of approximately 1,550 feet. Therefore, it could span all watercourses, washes, and/or flood control channels and levees, including all components of the Centennial Levee, and so impacts to floodplains and flood control facilities would be less than significant (see Hydrology and Water Quality, Section D.12 of the Draft EIR/EIS, for a discussion of Applicant Proposed Measures, impacts, and proposed mitigation measures).

A3-3 Please refer to Response A3-1. This comment is referred to SCE for compliance with the District's and the NRCS permitting requirements.

Comment Set A4  
California Regional Water Quality Control Board, Colorado River Basin Region



Linda Adams  
CalEPA Secretary  
Environmental Protection

California Regional Water Quality Control Board  
Colorado River Basin Region

73-720 Fred Waring Drive, Suite 100, Palm Desert, California 92260  
(760) 346-7491 • Fax (760) 341-6820  
<http://www.waterboards.ca.gov/coloradriver>



Arnold Schwarzenegger  
Governor

June 5, 2006

Billie Blanchard  
CPUC/BLM  
c/o Aspen Environmental Group  
235 Montgomery Street, Suite 935  
San Francisco, CA 94104

**RE: RESPONSE TO DEVERS-PALO VERDE NO. 2 TRANSMISSION LINE  
PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT/ENVIRONMENTAL  
IMPACT STATEMENT**

The Regional Board reviews the submitted CEQA documents generated by lead agencies and provides comments regarding overall adequacy of the document, water quality impacts that need to be addressed or are inadequately addressed, and the need for permits, certification, or mitigation from the Regional Board.

The following comments are in response to the submitted Draft Environmental Impact Report/Environmental Impact Statement for the project entitled, "Devers-Palo Verde No. 2 Transmission Line Project" dated May 2006.

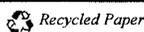
The following permits may be needed:

**A. CONSTRUCTION ACTIVITIES (STORM WATER AND 401 WATER QUALITY  
CERTIFICATION)**

1. Storm Water Construction General Permit 99-08-DWD. Dischargers whose projects disturb 1 or more acres of soil or whose projects disturb less than 1 acre but are part of a larger common plan of development that in total disturbs 1 or more acres, are required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity.
2. 401 Water Quality Certification. If appropriate, an application for water quality certification for this project needs to be filed with this Regional Board. Before anyone can obtain a federal permit for any activity that may result in a discharge to a surface water of the United States, they must obtain certification from the appropriate state pursuant to Section 401 of the Clean

A4-1

*California Environmental Protection Agency*



Comment Set A4, cont.  
California Regional Water Quality Control Board, Colorado River Basin Region

Billie Blanchard  
CPUC/BLM

- 2 -

June 6, 2006

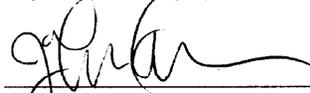
Water Act. Section 401 provides the states with a mechanism to ensure that federally permitted activities meet state requirements to protect water quality. If the United States Army Corp of Engineers (USACE) has determined the project is outside federal jurisdiction and a 404 permit is not needed, provide a copy of the USACE jurisdictional disclaimer letter.

A4-1 cont.

**B. DISCHARGE PERMITS (NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT AND WASTE DISCHARGE REQUIREMENTS)**

1. NPDES Permits. In the event that a National Pollutant Discharge and Elimination System (NPDES) permit is needed for a discharge to waters of the United States (US), you will need to submit a complete NPDES application at least 180 days prior to discharge to waters of the US.
2. Waste Discharge Requirements. In the event that Waste Discharge Requirements (WDRs) is needed for discharges of waste to waters of the state, you will need to submit a complete application at least 140 prior to discharge to waters of the state.

If you have any questions concerning this matter, please contact me at (760) 340-4521.



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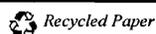
JOHN CARMONA  
Senior Water Resources Control Engineer

JC/cmi

File: Working File, CEQA

*California Environmental Protection Agency*

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## Responses to Comment Set A4 California Regional Water Quality Control Board, Colorado River Basin Region

A4-1 The requirement for California Regional Water Quality Control Board (RWQCB) permits, certification, and/or mitigation has been noted. This comment is referred to SCE for compliance with the RWQCB's and State Water Board permitting requirements. Table A-4 (Permits or Other Actions Required Prior to Construction of the DPV2 in Arizona and California) in Section A.3.5 of this EIR/EIS notes that the RWQCB will have permitting authority for a portion of the Proposed Project under the Clean Water Act and Storm Water Pollution Prevention Plans may be necessary within individual cities' jurisdictions. In addition, the text in Table A-4 has been modified as follows to include additional permits that may be needed during construction activities and for discharge:

Table A-4. Permits or Other Actions Required Prior to Construction of the DPV2 in Arizona and California

Agency	Jurisdiction	Permit
Regional Water Quality Control Board, Region 4 (LA County)	Clean Water Act, Section 401	<ul style="list-style-type: none"><li>• 401 Certification</li><li>• <u>Storm Water Construction General Permit 99-08-DWD</u></li><li>• <u>National Pollutant Discharge and Elimination System (NPDES) Permit</u></li><li>• <u>Waste Discharge Requirements (WDRs)</u></li></ul>

Comment Set A5  
Coachella Valley Water District



ESTABLISHED IN 1918 AS A PUBLIC AGENCY

**COACHELLA VALLEY WATER DISTRICT**

POST OFFICE BOX 1058 • COACHELLA, CALIFORNIA 92236 • TELEPHONE (760) 398-2651 • FAX (760) 398-3711

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JULIA FERNANDEZ, SECRETARY  
DAN PARKS, ASST. TO GENERAL MANAGER  
REDWINE AND SHERRILL, ATTORNEYS

June 13, 2006

File: 0613.1  
1142.03

CPUC/BLM  
c/o Aspen Environmental Group  
235 Montgomery Street, Suite 935  
San Francisco, CA 94104

Dear Sir/Madam:

Thank you for affording the Coachella Valley Water District (District) the opportunity to review the Draft Environmental Impact Report/Environmental Impact Statement (Draft EIR/EIS) for Southern California Edison Company's (SCE) application to build and operate the Devers-Palo Verde No. 2 Transmission Line Project.

After reviewing the Draft EIR/EIS, the District would like to submit the following comments:

1. There are existing Bureau of Reclamation and District facilities located within the proposed project boundaries. The District requests that the appropriate agency acquire the utility clearances from the District prior to construction of the transmission line project.
2. The portion of the proposed Devers-Palo Verde No. 2 Transmission Line Project that lies north of Avenue 30 between Rio Del Sol and Via Las Palmas in Thousand Palms is located within the Army Corps of Engineers' Whitewater River Basin Thousand Palms Flood Control Project, which will provide regional flood control to a portion of the Thousand Palms area. The District is currently in the design phase of this flood control project. If the proposed transmission line is constructed outside of the existing SCE right of way/easement through this area, there may be potential conflicts with the Thousand Palms Flood Control Project.

If you have any questions, please contact Luke Stowe, Environmental Specialist, at extension 2545.

Yours very truly,

Mark L. Johnson  
Director of Engineering

LS:ch\eng\env\06\june\Devers-Palo Verde No. 2

TRUE CONSERVATION  
USE WATER WISELY

A5-1

A5-2

## Responses to Comment Set A5 Coachella Valley Water District

- A5-1 The requirement for District approval and utility clearances for any work that involves Bureau of Reclamation and Coachella Valley Water District facilities has been noted. Table A-4 (Permits or Other Actions Required Prior to Construction of the DPV2 in Arizona and California) in Section A.3.5 of the Draft EIR/EIS notes that construction on or in land administered by the U.S. Bureau of Reclamation would require a Right-of-Way Grant (e.g., crossing CAP Canal) and Utility Clearance and Encroachment Permits must be received from the District. This comment is referred to SCE for compliance with the District’s permitting requirements.
- A5-2 Table F-1 in Section F.2.1 has been updated as follows to include the Thousand Palms Flood Control Project as a project included in the cumulative scenario:

**Table F-1. DPV2 Cumulative Project List**

Project	Type	Location	Status	Map No.
TRAVEL CENTER: Proposed travel center and retail development (City of Cathedral City)	Commercial	Approximately 0.7 miles south of proposed route in the City of Cathedral City. Located north of I-10 and west of Date Palm Dr.	Involved in preliminary discussions; application has not been filed (10/05/05).	31
<u>WHITEWATER RIVER BASIN THOUSAND PALMS FLOOD CONTROL PROJECT: Flood control project by the U.S. Army Corps of Engineers to provide regional flood control to a portion of Thousand Palms</u>	<u>Industrial</u>	<u>The portion of DPV2 that lies north of Avenue 30 between Rio Del Sol and Via Las Palmas in Thousand Palms</u>	<u>In design phase (6/13/06)</u>	<u>N/A</u>

The proposed transmission line would be constructed in SCE’s existing right-of-way/easement through this area of the project and thus should not conflict with the Whitewater River Basin Thousand Palms Flood Control Project. In addition, the proposed transmission line would be overhead and could span all watercourses, washes, and/or flood control channels, including all components of the Thousand Palms Flood Control Project. Implementation of the Applicant Proposed Measures [APM] (e.g., APM W-2, which states that watercourses would be avoided where possible) and mitigation measures included in Section D.12 of this EIR/EIS, would reduce impacts to floodplains, as well as existing and proposed flood control facilities in the project area, to less than significant levels.