

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



February 10, 2014

Mr. Koral Ahmet
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 #93

Dear Mr. Ahmet,

On February 4, 2013, Southern California Edison (SCE) submitted variance requests to the California Public Utilities Commission (CPUC) to leave 37 unpaved access road stabilized rock entrances (“aprons”) in place following construction along the Colorado River-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 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 #93, which approves the modification to leave the rock aprons in place following construction, is granted by CPUC for the proposed activities based on the factors described below.

SCE Variance Request. SCE has requested a variance under NTPs #8, #9 and #10 along the Devers-Valley segment to leave 37 rock aprons in place to improve access and environmental site conditions. Excerpts from the SCE Variance Requests, received on February 4, 2014, are presented below (indented).

Subsequent to approval of the DPV2 CRS to Red Bluff and Devers to Red Bluff Transmission Lines by the CPUC (Notice to Proceed #s 8, 9, and 10 dated December 2nd, 2011), major construction activities have been completed and it has determined that several temporary rock apron construction entrances would provide improved access and environmental site conditions if left in place after construction.

Rock construction entrances are installed at transitions from unpaved to paved access routes for the DPV2 transmission line providing:

- improved stability of access road entrances,
- decreased track-out of dust and debris onto paved roads and
- reduced erosion potential.

Leaving the unpaved access road stabilized rock entrances (identified in the table below) in place will continue to provide the improved environmental and site condition for access to DVP2 during operation of the transmission line. The entrances also provide a benefit to the public at locations where public utilize these unpaved roads.

SCE requests a variance for rock apron construction entrances shown in the table[s] below and in the attached figures [in SCE's Variance Request (VR)] to remain in place.

Colorado River-Devers Variance Request (2/4/14)

#	Location Description	Nearest Tower #	Figure # [in SCE's VR]
1	Access Road - Powerline Road off of Indian Canyon (west)	2007	1
2	Access Road - Powerline Road off of Indian Canyon (east)	2008	1
3	Access Road - Powerline Road off of Dillon Road (north)	2009	2
4	Access Road - Powerline Road off of Dillon Road (south)	2010	2
5	Access Road - Powerline Road off of Palm Drive (west)	2019	3
6	Access Road - Powerline Road off of Palm Drive (east)	2020	3
7	Access Road - Powerline Road off of Varner Road (north)	2100	4
8	Access Road - Powerline Road off of Varner Road (south)	2101	4
9	Access Road - Varner Road (east)	2112	5
10	Access Road - Rio Del Sol (west)	2123	6
11	Access Road - Rio Del Sol (east)	2124	6
12	Access Road - Powerline Road and Viva Las Palmas (west)	2130	7
13	Access Road - Powerline Road and Viva Las Palmas (east)	2131	7
14	Access Road - Washington Street (east)	2204	8
15	Access Road - Washington Street (west)	2208	9
16	Access Road - Washington Street (east)	2209	9
17	Access Road - Dillon Road (west)	2241	10
18	Access Road - Dillon Road (east)	2242	10
19	Access Road - Powerline Road and of Box Canyon Road (west)	2342	11
20	Access Road - Powerline Road and of Box Canyon Road (east)	2343	12

Devers-Valley Variance Request (2/4/14)

#	Location Description	Nearest Tower #	Figure # [in SCE's VR]
1	Access Road - Powerline Road and Diablo Road (east)	1001	1
2	Access Road - 16th Ave and Diablo Road (east)	1003	1
3	Access Road - 16th Ave and Worsely Road (east)	1006	2
4	Access Road - 16th Ave and Worsely Road (west)	1007	2
5	Access Road - Worsely Road (west)	1007	2
6	Access Road - Seely Road (west)	1008	2
7	Access Road - Vernon Road (east)	1008	3
8	Access Road - Vernon Road (west)	1009	3
9	Access Road - Marion Ave (east)	1008	3
10	Access Road - Marion Ave (west)	1009	3
11	Access Road - Tipton Road (east)	1022	4
12	Access Road - Tipton Road (west)	1023	4
13	Access Road - Wendy Road (north)	1023	4
14	Access Road - Snow Creek Road (west)	1028-1031	5
15	Access Road - Esperanza Ave (south)	1061	6
16	Access Road - Gilman Springs Road (north)	1114	7
17	Access Road - Juniper Flats Road (north)	1132	8

CPUC Evaluation of Variance Request

In accordance with the MMRP, the subject variance request was reviewed by CPUC to confirm that the proposed request was within the geographical context of the Final EIR/S and that no new impacts or increase in impact severity would result from the requested variance activities. The following discussion summarizes this analysis for biological resources, cultural and paleontological resources, noise/sensitive receptors, transportation and traffic, soil and water resources, visual 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. Leaving rock entrances in place will not require any additional ground disturbance. All temporary and permanent project impacts to habitat, including impacts from access roads were mitigated through off-site compensation of comparable habitat, described in the DPV2 Habitat Acquisition Plan (HAP), which was approved by CPUC, BLM, California Department of Fish and Wildlife (CDFW) and United States Fish and Wildlife Service (USFWS) on March 30, 2012. Allowing temporary rock aprons to remain permanently in place following construction would not affect the overall compensation acreage as required for project impacts to biological resources.

Cultural and Paleontological Resources. Leaving rock entrances in place will not require any additional ground disturbance so there would be no new or substantially more severe significant impacts to cultural or paleontological resources.

Noise/Sensitive Receptors. Leaving the existing improvements in place is not expected to contribute to additional traffic or related noise along the access roads in the future.

Transportation and Traffic. Leaving the temporary rock entrances in place would improve the stability of access road entrances, decrease track-out of dust and debris onto paved roads, and reduce erosion

potential. Therefore the overall roadway conditions would be improved and the change from temporary to permanent features would not result in a new or substantially more severe significant impact to traffic.

Soil and Water Resources. Leaving rock entrances in place at 37 locations along the access roads would decrease erosion and sedimentation impacts. Therefore, there would be no new or substantially more severe significant impacts to soils or water resources.

Visual Resources. The rock aprons would be left in place along existing permanent access roads. Therefore, the incremental visual change from temporary to permanent features at the unpaved access road entrances would not result in a new or substantially more severe significant impact to visual resources.

Other Issues. There are no other issues of concern associated with leaving the rock aprons as permanent features.

Mitigation Compliance Conditions of Variance Approval.

Once DPV2 project construction is completed, the rock aprons would be maintained under SCE's Operations and Maintenance procedures for access roads. Therefore, no mitigation compliance conditions are required by the CPUC under this variance modification.

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
Sylvia Granados, Southern California Edison
Patty Nevins, Southern California Edison
Vida Strong, Aspen Environmental Group
Hedy Koczwar, Aspen Environmental Group
Jamison Miner, Aspen Environmental Group
Rosina Goodman, Aspen Environmental Group