

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 22, 2011

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 #7

Dear Ms. Benz,

On August 11, 2011, Southern California Edison (SCE) submitted a variance request to the California Public Utilities Commission (CPUC) for offsite water locations for dust suppression at the Perris, Beaumont, Menifee, and Blythe Construction Yards for the Devers-Palo Verde No. 2 (DPV2) Transmission Project. On August 18, 2011, SCE submitted a revised variance request altering the location of the Menifee Yard water source.

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 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 BLM or 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 #7, which approves offsite water locations to serve the Perris, Beaumont, Menifee, and Blythe Construction Yards, is granted by CPUC for the proposed activities based on the factors described below.

SCE Variance Request. SCE has requested a variance for the Perris, Beaumont, Menifee, and Blythe Construction Yards identified in Notice to Proceed #1 for offsite water locations identified by the contractors needed for dust suppression. Excerpts from the revised SCE Variance Request, received August 18, 2011, are presented below (indented):

The Perris, Beaumont, Menifee, and Blythe Construction Yards identified in Notice to Proceed (NTP) #1 dated June 23, 2011 includes requirements as part of the Fugitive Dust Emission Control Plan and Storm Water Pollution Prevention Plan (SWPPP) to water the site at least three times a day. In order to meet this requirement, the contractor has identified two offsite water sources.

For Beaumont, a hydrant owned by the Beaumont Cherry Valley Water District located south of the yard, directly across 3rd Street, has been identified. The hydrant will be affixed with an attachment to provide water to water trucks and will be used during yard preparation and for the duration of the project. The contractor has approval from the District to use the hydrant as described.

For Menifee, a hydrant owned by the Eastern Municipal Water District, located on Antelope Road, just north of the yard, has been identified (TEWS approved on August 4, 2011). The hydrant will be affixed with an attachment to provide water to water trucks and will be used during yard preparation and for the duration of the project. The contractor has approval from the District to use the hydrant as described.

For Perris, a hydrant owned by the City of Perris, located west of the yard across G Street, has been identified. The hydrant will be affixed with an attachment to provide water to water trucks and will be used during yard preparation and for the duration of the project. The contractor has approval from the City to use the hydrant as described.

For Blythe, a hydrant owned by Riverside County Service Area # 122, located north of the yard has been identified (TEWS approved on July 27, 2011). The hydrant will be affixed with an attachment to provide water to water trucks and will be used during yard preparation and for the duration of the project. The contractor has approval from the District to use the hydrant as described.

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, noise/sensitive receptors, and other issue areas. A list of conditions is presented below to define additional information and clarifications regarding mitigation requirements. In some cases, these items exceed the requirements of the Mitigation Measures and Applicant Proposed Measures, and are based on specific site conditions and/or are proposed conditions by SCE.

Biological Resources. The CPUC Environmental Monitor (EM) performed a field check of all proposed water source locations. Based on site reconnaissance and because no additional ground disturbance would be required to access the existing hydrants, there are no biological concerns noted under this variance.

Noise/Sensitive Receptors. Use of the offsite water sources would have similar noise-generating activities to those that will occur in the current yard areas, since water usage by trucks for dust suppression would be occurring already within the yards. There are industrial and residential receptors in the area around the construction yards that would be in slightly closer proximity to the hydrants than to the current yard. However, the Beaumont, Blythe and Menifee Yard areas have been used as storage yards in the past, and the Perris Yard is located in an area of industrial land uses and there are no sensitive noise receptors in its immediate vicinity. 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.

Other Issue Areas. No concerns noted under this variance.

Conditions of Variance Approval.

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

1. All applicable project mitigation measures, APMs, 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. All water source locations shall be included in morning sweeps and monitoring activities.
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
CPUC Environmental Project Manager
DPV2 Transmission Project

cc: Ryana Parker, Southern California Edison
Sheree James, Southern California Edison
Vida Strong, Aspen Environmental Group
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