Comment Set E.9: Applicant – Public Health and Safety

ANTELOPE-PARDEE 500kV TRANSMISSION PROJECT
SCE COMMENTS & SUGGESTED REVISIONS ON DEIR/DEIS
PUBLIC HEALTH AND SAFETY

October 2006

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve	
1	C.6	C-22	Paragraphs 3 & 4	The DEIR/DEIS states that SCE's Field Management Plan for the Antelope-Pardee 500 kV Transmission Project as well as its SCE's EMF Design Guidelines for Electric Facilities: Transmission, Subtransmission, Substation, Distribution are in Appendix 3. However, Appendix 3 contains Air Quality Calculations.	Cite the correct location(s) for SCE's Field Management Plan and EMF Design Guidelines	E.9-1
2	C.6	C-22 Line 27 to C-23 Line 5		C. 6-22 paragraphs 4 and 5 make reference to field reduction measures and the field reduction processes listed in SCE's EMF Design Guidelines for Electrical Facilities: Transmission, Subtransmission, Distribution. However, the language in the DEIR/DEIS comes from an earlier version of SCE's Design Guidelines.	In order to reflect the latest language from SCE's EMF Design Guidelines, the following changes are suggested for C.6-22 paragraphs 4: "SCE's EMF Design Guidelines for Electrical Facilities: Transmission, Subtransmission, Distribution include the following methods that may be available to reduce the magnetic field strength levels from electric power lines: Increase distance from the lines: Increasing pole (structure) height, Increasing the width of right-of-way, and/or Locating power lines closer to the centerline of the corridor Reduce conductor (phase) spacing Optimize phasing in a multi-circuit right-of-ways corridor Convert single-phase to split-phase circuits Place facilities underground"	E.9-2
3	C.6	C-22 Line 27 to C-23		C. 6-22 paragraphs 4 and 5 make reference to field reduction measures and the field reduction processes listed in SCE's EMF	In order to reflect the latest language from SCE's EMF Design Guidelines, the following changes are suggested for C.6-22 paragraphs 5:	E.9-3

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve
		Line 5		Design Guidelines for Electrical Facilities: Transmission, Subtransmission, Distribution. However, the language in the DEIR/DEIS comes from an earlier version of SCE's Design Guidelines.	"SCE's EMF mitigation strategy is based on the following: Design and construction of electric power system must comply with all applicable federal, state, and local regulations, safety, codes, and SCE standards. SCE utilizes a four-stage process to select and implement "no-cost and low-cost" magnetic field reduction measures. The measures are implemented in the following order: 1. "No-Cost" option(s) that can be uniformly applied to the entire project. "Phasing" will almost always be a selected option. 2. Existing public schools or those under development (if known) should be the next priority for mitigation. Measures should be applied equitably along the project route if multiple schools are involved. It is possible that all the "low-cost" funds available to the project (i.e., below 4% of the sum of the cost of all project elements) will be expended upon measures near schools leaving no funds available for other "low-cost" measures in other areas. 3. Residential, Public Parks, Commercial, and Industrial developments should be considered for "low-cost" mitigation techniques only if the "low-cost" measures can be applied equitably to ensure fairness. 4. Land that is not expected to be developed need not have any "low-cost" measures applied, for example: a. State Parks, b. U.S. Forest Service land, c. U.S. Bureau of Land Management land, and d. Formally designated "open space".

E.9-3 cont'd

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve	
4	C.6.5	C.6-24	Mitigation Measusre PH-1c	This mitigation measure handles the disposal of all waste material similarly. However, hazardous and non-hazardous wastes have different disposal requirements.	Revise to read "Ensure proper disposal of construction waste including all non-hazardous construction and demolition waste including trash, litter, garbage and other solid waste. Petroleum products and other potentially hazardous materials shall be removed to a hazardous waste facility permitted or otherwise authorized to treat, store, or dispose of such materials."	E.9-4
5	C.6.5	C.6-26	Mitigation Measure PH-4a	Part (b) of this mitigation measure is not needed. All SCE field personnel, including substation operators, are required to complete hazardous materials training annually.	Remove part (b) of Mitigation Measure PH-4a.	E.9-5
6	C.6.6.2	C.6-29	Impacts and Mitigation Measures; Mobilization of existing soil contamination	It is unrealistic to state that the segments of Alternative 1 which would require underground excavation would occur in areas with no potential to encounter existing environmentally contaminated sites. Unknown contamination could be encountered during underground excavation due to nearby past and current uses in the vicinity.	Revise language to state that there is a potential to encounter existing environmentally contaminated sites during underground excavation.	E.9-6

Response to Comment Set E.9: Applicant – Public Health and Safety

E.9-1 Section C.6.4 under "SCE's Proposed EMF Mitigation" has been updated to reflect that the Field Management Plan for the proposed Project is presented in Appendix 3 of SCE's application for a Certificate of Public Convenience and Necessity (CPCN) (A.04-12-007).

E.9-2 The information presented regarding SCE's EMF Design Guidelines for Electric Facilities: Transmission, Subtransmission, Substation, Distribution was provided in SCE's application for a CPCN (A.04-12-007). Therefore, the EIR/EIS reflects this information.

E.9-3 See the response to Comment E.9-2.

E.9-4 Mitigation Measure PH-1c has been updated for clarification. The updates are as follows:

"All construction and demolition waste, determined to be potentially hazardous, including trash and litter, garbage, other solid waste, petroleum products and other potentially hazardous materials, will be removed to a hazardous waste facility permitted or otherwise authorized to treat, store, or dispose of such materials…"

E.9-5 Part (b) of Mitigation Measure PH-4a has been retained to maintain documentation of environmental training for the CPUC.

E.9-6 Section C.6.6.2 under Criterion PHS2 has been updated to clarify that the underground portions have "limited potential to encounter existing environmentally contaminated sites" rather than "no potential".