

Comment Set E1
Southern California Edison Company



Thomas A. Burhenn
Manager
Regulatory Operations

July 13, 2006

Ms. Billie Blanchard
Energy Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Ms. Susan Lee
Aspen Environmental Group
235 Montgomery Street, Suite 800
San Francisco, CA 94104

Dear Billie and Susan:

Enclosed is SCE's initial set of comments on the DPV2 DEIS/DEIR. We expect to be submitting additional comments on certain subject areas including visual impacts in the KOFA, corona noise impacts, and Alligator Rock routing issues. We will also submit comments on certain proposed mitigation measures and mitigation monitoring plans. We will submit these comments no later than the due date of August 11, 2006 and hopefully earlier.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads 'Tom Burhenn' followed by a stylized flourish.

Enclosure

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**DPV2 PROJECT
SCE COMMENTS AND SUGGESTED REVISIONS TO DEIR/DEIS
JULY 2006**

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve
1	ES.1 Introduction /Background	ES-1 Proposed Project and Historical Background	Paragraph 1, Line 7	“SCE’s Mountain View Substation” should be “SCE’s San Bernardino Substation”.	Change to San Bernardino Substation.
2	ES.1 Introduction /Background	ES-2 Proposed Project Purpose and Need	Paragraph 4, Line 4	“However, because the project is designed to provide economic benefits and it is not primarily a reliability enhancement project, SCE did not present a specific project objective related to the date of project operation. ”	SCE provided a project operation date of June 2009. Delete last sentence.
3	ES.1.2.3 – System Improvements	ES-7	Bullet 1	The 500kV SVC and shunt capacitors should be listed at Devers Substation.	Change the bullet to read: “Construction of a 500 kV shunt line reactor bank, a static VAR compensator and two shunt capacitors within Devers Substation.”
4	ES.1.2.4 Environmental Setting of the Proposed Project	ES-8 Arizona Environmental Setting	Paragraph 2, Line 6	“...would then turn southeast crossing over I-10 again,…”	Change “southeast” to “southwest.”
5	ES.2.2.1 Transmission Line Route Alternatives: Devers-Harquahala	ES-19 Rationale for full analysis	Paragraph 1, Line 2	“...would eliminate or defer the need for almost 20 miles of new 500kV transmission line..”	Change to ..”5 miles of new 500kV transmission line..”

E1-1

E1-2

E1-3

E1-4

E1-5

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Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve
6	ES.2.2.2 Transmission Line Route Alternatives: West of Devers ES.4.4.2 Alternatives	ES-21, Devers- Valley No. 2 ES-43, Devers – Valley No. 2 Alternative	Paragraph 1, Line 8 Paragraph 1, Line 4	“Based on this determination the alternative could require amendments to the SBNF Land Management Plan, the National Monument Proposed Management Plan and an existing MOU between BLM, Forest Service and the Pacific Coast Trail Association.” “The Devers-Valley No. 2 Alternative would create permanent impacts to...:Santa Rosa and San Jacinto Mountains National Monument, PCT, SBNF San Jacinto WA, and the Portrero ACEC...impacts to these resources would be significant and unmitigatable.	SCE believes the SBNF Land Management Plan Scenic Integrity rating for the DV2 line should be low not very high when taking into account the fact that the DV2 line is proposed to be located within an existing transmission corridor. SCE believes there is sufficient data to support SCE’s position that the rating should be low. It should be pointed out that the DV2 line can not be accommodated outside of the SBNF if the Morongo will not negotiate a right-of-way. A more detailed discussion of SCE’s position will be submitted under separate cover. SCE has met and consulted with the BLM and SBNF regarding these Plans and the MOU. The SBNF indicated that Scenic Integrity ratings of very high for the DV2 line in the SBNF Land Management Plan may be higher than they should be since the DV1 line was not properly accounted for in the SBNF Land Management Plan. They indicated that impacts will probably not continue to be significant and unmitigatable. The SBNF will address these issues in their comments on the DEIR/DEIS. The proposed DV2 route would not affect the San Jacinto WA as the line would be placed in an existing utility corridor outside the WA.
7	ES.2. 2. 3 Other Project Alternatives	ES-21, Desert Southwest Transmission	Paragraph 1, Line 3	“...(Figure ES-3)” reference should be (Figure ES-2)	Change to ES-2.

E1-6

E1-7

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Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve
8	ES.2.3.3 Other Project Alternatives	ES-30, Underground Alternative	Paragraph 2, Line 1	“Undergrounding a 230 KV line for the West of Devers segment....has been completed by SCE...”	This statement gives the impression that SCE has undergrounded long distances of 230 kV line such as would be needed for the West of Devers segment (i.e. – about 40 miles). It should be mentioned that SCE has undergrounded a maximum of about 1 circuit-mile of 230 kV line.
9	ES.3 Electric and Magnetic Fields	ES-33, Paragraph 1, Line 4		Using the 4 percent benchmark, SCE has incorporated low-cost and no-cost measures to reduce magnetic field levels near schools along the proposed route (including deeper burial of underground lines combining several existing 230 kV circuits on to double-circuit transmission line structures and changing phase configurations). There are additional potential measures for reducing magnetic fields, mostly beyond the no-cost/low-cost parameters (including increasing distance from conductors, reducing conductor spacing, “converting single-phase to split-phase circuits, and or placing proposed transmission lines underground minimizing current), which are described for the benefit of the public and decision-makers in reviewing the Proposed Project.	
10	ES.4.3.2 Alternatives	ES-41 – SCE Palo Verde Alternative and Harquahala Junction Switchyard Alternative	Paragraphs 2 and 3	These two paragraphs state that these two alternatives would ...avoid rural residents that would be impacted by the Proposed Project, thereby creating less than significant impacts to existing land uses.” Section D.4.6 (Land Use), Environmental Impacts and Mitigation for the Proposed Project-Devers-Harquahala No significant impacts to existing land uses are identified for the two proposed route segments that are comparable to the Palo Verde and Harquahala Junction alternatives.	Make consistent.

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E1-9

E1-10

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Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve
11	ES.4.6.1 Proposed Project	ES-45 West of Devers (230kV Upgrade)	Paragraph 1, Line 3	Concludes that for West of Devers (WOD), the proposed project “will have no adverse affects to known historic properties” which appears to be inconsistent with the Bullet 1 conclusion on ES-63 that concludes that WOD “would cause an adverse change to known historic properties.”	Fix inconsistency.
	ES.5.2.2 Transmission Line Route Alternatives: West of Devers Segment.	ES-63	Bullet 1	These two conclusions re: WOD cultural resources appear inconsistent.	
12	ES.4.10.2 - Alternatives	ES-53 West of Devers Alternative	Devers-Valley No. 2 Alternative, Paragraph 1, Line 1 ¶	“The Devers Valley No. 3 Alternative . . .” should be “No.2 Alternative”	Change to Devers-Valley No. 2 Alternative.
13	A.1.1- Historical Background of DPV1 and DPV2 Projects	A-2	Paragraph 3, Line 1	“After construction of the DPV1 line, applications to construct the Devers-Harquahala No. 2 500kV. . .”.	The description should read “. .to construct the Devers-Palo Verde No. 2 500 kV (DPV2) project.....”
14	A.2.1- Statement of Purpose and Objectives	A-7	Paragraph 2, 4 th bullet	The phrase “.and flexibility in operating California’s transmission grid.” should refer to the southwest, not just California	Change the text to read: “operating the Southwest’s transmission grid”
15	A.2.1 – Increase California’s Transmission Import Capability	A-7	Last sentence in the final paragraph	“The Southwest Transmission Expansion Planning (STEP)” should be Southwest Transmission Expansion Plan (STEP).	Change the word Planning to Plan

E1-11

E1-12

E1-13

E1-14

E1-15

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Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve	
16	A.2.1 - Support the Energy Market in the Southwest	A-9	Paragraph 1, Line 2	The WECC includes only 2 Canadian provinces.	Add the number 2 in front of the following text: “..Mexico and <u>2</u> western Canadian provinces)..”	E1-16
17	A.2.2 - Arizona to California Transmission Capacity	A-10	Paragraph 2, Line1	Correct the statement that “ The import paths to Southern California (east of the Colorado River, or EOR) are currently constrained to roughly 7550 MW ...and the existing 500 kV DPV1 line carries about 1950 MW.”	The paragraph should read: The import path to southern California (east of the Colorado River, or EOR) currently is rated at 8055 MW and the existing DPV1 line is allocated 1800 MW.	E1-17
18	A.2.2 – Southwest Transmission Expansion Plan	A-10	Paragraph 1, Line 3	List Nevada as one of the states from which stakeholders participate at STEP.	The paragraph should read: The primary forum for regional transmission planning in the southwest is called Southwest Transmission Expansion Plan (STEP). STEP is a regional planning group for transmission and generation stakeholders in Arizona, <u>Nevada</u> , and southern California.	E1-18
19	A.2.2 – Southwest Transmission Expansion Plan	A-10	Paragraph 2, last sentence	The EOR 9000 project was not part of the STEP evaluation.	Delete the sentence “Additional short-term upgrades ...using a plan called EOR (East of River) 9000”.	E1-19
20	A.2.2 – Southwest Transmission Expansion Plan	A-10	Paragraph 3, 1 st sentence	The projects listed in the 4 bullets were identified as mid-term projects not longer-term projects.	Change the sentence to read: “STEP also envisions mid-term upgrades...”	E1-20
21	B.2.2	B-9	Table B-1	A new telecommunication facility location has been proposed on Harquahala Mountain to mitigate cultural resource concerns.	Telecommunications New Permanent Area Occupied: Replace 0.8 acre with 0.25.	E1-21
22	B.2.2	B-9	Table B-1	A new telecommunication facility location has been proposed on Harquahala Mountain to mitigate cultural resource concerns.	Telecommunications Temporary Area occupied: Replace 2.0 acre with 0.125	E1-22
23	B.2.2	B-10	Table B-2, Line 6	Updated project description data based on latest design information.	Total number of new structures to be installed: Replace 173 with 182.	E1-23

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Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve	
24	B.2.3 – West of Devers	B-13	Paragraph 1, Line 1	Change “..the Proposed Project would include improvements to the west of Devers Substation.” .to ..”would include improvements to the west of Devers 230 kV system.”		E1-24
25	B.2.3.1- Devers to San Bernardino Junction	B-14	Paragraph 3, Bullet 3	Updated project description data based on latest design information.	Change “...which includes approximately 157 new structures.” to read “... which includes approximately 166 new structures.”	E1-25
26	B.2.3.1 – Devers to San Bernardino Junction	B-14	Paragraph 3, Bullet 3	Add “and a new OPGW” after the word structures.		E1-26
27	B.2.3.2 San Bernardino Junction to San Bernardino Substation	B-17	Paragraph 1, Line 5.	Add: “The existing fiber optic cable would be replaced with a new OPGW” before the last sentence that begins with “Detailed maps..”		E1-27
28	B.2.3.3 San Bernardino Junction to Vista Substation	B-17	Paragraph 1, Last line.	Add: “In addition, the existing fiber optic cable would be replaced with a new OPGW.” after “..and one inter-set structure.”		E1-28
29	B.2.4 Related Transactional issues	B-19 Los Angeles Department of Water and Power	Last paragraph	“LADWP has not yet committed to participate in DPV2; however, SCE stated on April 14, 2006 that it believes that the parties are close to finalizing an agreement that would provide for SCE’s construction of DPV2 as proposed. Although most...” This paragraph does not reflect current SCE/LADWP negotiation status.	Replace the last paragraph with “SCE and LADWP are continuing to discuss issues concerning LADWP’s participation in DPV2. SCE is hopeful that a resolution of those issues will be reached soon.”	E1-29
30	B.3.1- Structures	B-22	Paragraph 5, Last line	Add: “The existing static ground wire would be replaced with a new OPGW.” before “The tower diagram is shown ...”.		E1-30

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31	B.3.4 Substations, Series Capacitors, and Switchyards	B-46	Paragraph 1, last sentence	An SVC at Valley is no longer required.	Delete ..." and another 500 kV SVC would be installed and terminate at the 500 kV switchyard inside the Valley Substation."	E1-31
32	B3.4.1 Devers Substation	B-49	Paragraph 1	Incorrect description.	Change paragraph 1 to "The proposed modifications to the Devers Substation would be installed in the existing switchyard. Modifications include the installation of new 135-foot-high by 90-foot wide dead-end structures, circuit breakers, and disconnect switches. Electrical equipment associated with the new 500kV Devers-Harquahala transmission line would be installed at the northwest part of the switchrack. With the Proposed Project, the terminating transmission tower or turning pole would be the tallest structure at the substation, ranging between 150 and 180 feet tall."	E1-32
33	B3.4.1 Devers Substation	B-49	Paragraph 2	Incorrect description.	Change Paragraph 2 to " A 500 kV shunt line bank and associated disconnect switches would be installed within Devers Substation. A 500kV Static VAR Compensator (SVC) would be installed north of the 500kV switchyard within the existing Devers Substation. The SVC would terminate into the 500kV switchrack. Two 150 MVAR shunt capacitors would be installed to the east of the 500kV switchrack."	E1-33
34	B.3.4.4 Valley Substation	B-51		Scope changed and no longer needed.	Delete section B.3.4.4	E1-34

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Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve	
35	B.3.5 Special Protection Scheme	B-52	Paragraph 2, Line 2	Between the word Padua and the words Vista Substations add: "Walnut, San Bernardino, Villa Pak, Viejo, Johanna, Ellis."		E1-35
36	B.3.6 Telecommunications System	B-53	Table B-5	Add to table B-5: Facility column: Harquahala Switchyard Building column: 12-foot by 36-foot prefabricated building Tower/Antenna column: 110-foot self-supporting tubular steel tower Power Supply column: 120/240-volt alternative current service direct current power system Air Conditioning System column: 2 air conditioning systems Communications System column: 1 microwave system and 1 SONET system		E1-36
37	B.3.6.1 Harquahala Mountain	B-53	Paragraph 2, last sentence.	Replace 1.0 acre with 0.125 acres to reflect updated facility design and location.	Change from.." the temporary construction area would occupy approximately 1.0 acre" to "...approximately 0.125 acres."	E1-37
38	B.3.6.1 Harquahala Mountain	B-53	Paragraph 2, last sentence.	Replace 0.5 acres with 0.125 acres to reflect updated facility design and location.	Change from.." the permanent facility would occupy approximately 0.5 acres" to "...approximately 0.125 acres."	E1-38
39	B.3.6.1 Harquahala Mountain	B-53	Paragraph 3, Line 2	Replace 100 feet with 150 feet to reflect updated facility design and location.	Change from.." is located approximately 100 feet to the south" to "...approximately 150 feet..."	E1-39
40	B.3.6.1 Harquahala Mountain	B-54	Line 1	Replace the word south to west to reflect updated facility design and location	Replace the word "south" with "west" after the words "... 35 feet of the CAP facility."	E1-40
41	B.3.6.2 Blythe Optical Repeater Site	B-54	Paragraph 2, last line	Replace 1.0 acre with 0.125 acres to reflect updated facility design and location.	Replace 1 acre with 0.125 acres in the phrase ".the temporary construction would occupy approximately 1 acre.."	E1-41

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Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve	
42	B.3.6.2 Blythe Optical Repeater Site	B-54	Paragraph 2, last line	Replace 0.25 acre with 0.125 acres to reflect updated facility design and location.	Replace 0.25 acre with 0.125 acres in the phrase “.the permanent facility would occupy approximately 0.25 acres.”	E1-42
43	B.3.6.3 Substations and Series Capacitor Banks	B-54	Paragraph 2, last line	The Midway Substation telecommunication facility will be constructed only if the Midway Substation is constructed.	Add: “(this is an optional component of the proposed project that SCE may not construct)”.	E1-43
44	B.3.6.1 Harquahala Mountain	B-55	Figure B-19	Revise figure to reflect updated facility design and location.	Move proposed communication site to area adjacent to and west of existing CAP site.	E1-44
45	B.3.6.1 Harquahala mountain	B-55	Figure B-19	The word “Mountain” is mis-spelled on the figure title.		E1-45
46	B.3.6.4 Communicati on Sites	B-57	Paragraph 4, 1 st sentence	Replace Cunningham Communication Site with Blythe Service Center Site to reflect updated telecommunication system design and location.	Delete the words “and Cunningham” before the word Communications. Delete the letter “s” from the word Sites after the word Communications. Add: “and Blythe Service Center” between the words site and would.	E1-46
47	B.3.6.4 Communicati on Sites	B-57	Paragraph 4, Line 3	The Midway Substation telecommunication facility will be constructed only if the Midway Substation is constructed.	After “.towards Midpoint Substation.” Add: “(this is an optional component of the proposed project that SCE may not construct).”	E1-47
48	B.3.7.3 Clearing and Grading	B-61	Paragraph 2; 3rd sentence	Delete reference to “and Vista Substation”	This sentence should read “Between the San Bernardino Substation and San Bernardino Junction, access is available and no new tower construction is planned, therefore no new access roads would be required.”	E1-48
49	B.3.7.4 Foundation Installation	B-62	Last Paragraph, 1st sentence	Updated project description data based on latest design information.	Change from “.for approximately 173 structures.” to “.for approximately 186 structures.”	E1-49
50	B.3.7.6 Stringing Activities	B-63	Last Paragraph, 1st sentence	The references to stringing conductors in Copper Bottom Pass should be deleted. Only OPGW will be strung through Copper Bottom Pass.	Change from “. stringing for conductors and OPGW would be required. “ to :.stringing for OPGW would be required.”	E1-50

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Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve
51	C.4.2.4.1 Alligator Rock-North of Desert Center Alternative 4.2.9.1	C-22 App. 1-64	Paragraph 1, Line 3	The second to the last sentence states, "The 11.8 miles route would be entirely on BLM land". The "North of Interstate 10 Alternative" on Figure Ap. 1-5 traverses private land on miles 8-11 of the reroute. There is conflicting information presented in these sections.	Fix land jurisdiction inconsistency.
52	D.2.1.1 Regional Setting	D.2-3 - Arizona	Paragraph 1, Line 5	Pinyon-juniper woodland does not occur anywhere along the right of way in Arizona	Remove
53	D.2.1.1.1 Vegetation Overview	D.2-4 Arizona	Paragraph 1, Line 6	Most of the project area in Arizona is ecotonal, not just several areas	Reword
54	D.2.1.1.1 Vegetation Overview	D.2-4 Creosote Bush-White Bursage Series	Paragraph 2, Line 5	Blue palo verde is also an important xeroriparian species in the area	Add to sentence: "Common species include .."Blue Palo verde, mesquite.."
55	D.2.1.1.1 Vegetation Overview	D.2-5 Sonoran Riparian Deciduous Forest and Woodlands	Paragraph 1, Line 8	There should be a statement that there is no cottonwood-willow forest at the line's crossing of the Colorado River. The way the paragraph reads now it sounds as if there is cottonwood-willow there but it has been invaded by salt cedar. The fact is there is nothing there but rip-rapped banks and salt cedar.	Revise paragraph
56	D.2.1.1.1 Vegetation Overview	D.2-5 California	Paragraph 1, Line 10	Cercidium is not the proper generic name for blue palo verde	Change to Parkinsonia
57	D2..1.1.4 Overview of Special Habitat Management Areas	D.2-41 Cactus Ferruginous Pygmy-owl Survey Zone 3	Paragraph 1, Line 1	The Cactus Ferruginous Pygmy-owl has been delisted	Note change in status

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Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve	
58	D.2.6.1.1 Vegetation	D.2-114	Table D2-9, Line 5	There is no cottonwood-willow at the Colorado River crossing on either the AZ or CA side of the river	Reword	E1-58
59	D.2.6.1.6 Threatened or Endangered Species	D.2-120 Impact B-6	Paragraph 1, Line 1	The project has virtually no possibility of having any impact on the Arizona agave and the Arizona cliff rose.	Make changes universally to indicate that no threatened or endangered plants in Arizona will be affected by the project.	E1-59
60	Table D.2-11	D.2-124 Impact B-7	Harquahala to Kofa NWR, Line 2	Osprey may occasionally occur along the nearby CAP canal owing to the presence of prey in the form of fish, however, there are no resources utilized by Osprey anywhere along the Harquahala-Kofa reach of the line	Remove	E1-60
61	Table D.2-11	D.2-124 Impact B-7	Kofa NWR to Colorado River, Line 2	There is no suitable habitat for Mohave Fringe-toed Lizard between the Kofa NWR and the Colorado River	Remove	E1-61
62	Table D.2-11	D.2-124	Palo Verde Valley, Line 1	Is there any record of HIGH potential for Willow Flycatcher, Elf Owl, Least Bell's Vireo, Yellow Warbler, Black Rail, or Western Yellow-billed Cuckoo in the Palo Verde Valley?	Consider Revising Table	E1-62
63	D.2.6.1.6	D.2-128 Reptiles	Paragraph 1, Line 1	The Sonoran population of the Desert Tortoise is not federally listed	Make change universally	E1-63
64	D.2.6.1.6	D.2-132 Birds	Bullets under Paragraph 1	There should be some distinction made between state and federally listed species in these lists. It is misleading to have Gila Woodpeckers and Elf Owls in a list of "listed" species along with Southwestern Willow Flycatcher and Yuma Clapper Rail		E1-64
65	D.2.6.1.8 State or Federal Species of Special Concern- Federal	D.2-139 Amphibians	Paragraph 1, Line 1	The DEIR/DEIS acknowledges that "there is no indication that any sensitive amphibians occur in the Arizona portion of the Proposed Project". Of what value would pre-construction surveys for amphibians in Arizona be? How would such surveys be conducted? The same question applies regarding pre-construction surveys for all non-sensitive vertebrates. How would they be done? Why?	Consider withdrawing these survey recommendations.	E1-65
66	D.2.6.1.8	D.2-141 D.2-142 Reptiles		The Sonoran Desert Tortoise should be included in this discussion.	Include Sonoran Desert Tortoise	E1-66

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67	D.2.6.1.8.	D.2-149 Harquahala to Kofa NWR	Paragraph 2, Line 2	SCE's experience with construction of Devers – Palo Verde 1 was exactly opposite. At the time of construction in Copper Bottom Pass, for example, the radio-collared sheep spent more time in the construction zone during construction than they had before construction or they did after construction. The radio-collared animals were attracted to the activity and construction workers often reported bands of Bighorn standing on ridges or hillsides watching them. This project should have no effect at all on sheep in the Harquahalas or on Burnt Mountain.	Reword.
68	D.2.6.1. D.2.7.1 Harquahala West Alternative	D.2-150 Kofa NWR D.2-182 Mammals	Paragraph 2, Line 1 Paragraph 2	SCE studies on the DPV1 line show the following about bighorn sheep lambing. Ewes do not abandon lambs when they are disturbed. Lamb mortality will not occur as a result of ewes being disturbed by construction activities. Limiting construction activities to periods outside the breeding and lambing season would essentially preclude construction. SCE studies noted the onset of the breeding season occurring between April and July with lambs being born in every month of the year except August. There is a lambing peak in the December – February timeframe and rams often occur in pre-rut staging areas in summer.	Refer to SCE DPV1 bighorn sheep study reports including copies of annual reports 1978-1983. Reword.
69	D.2.6.2 Impacts of Transmission Line Operation	D.2-173	Paragraph 1, Line 1	General Comments on the first Paragraph on the page. Golden Eagles are not listed under the ESA. This paragraph also needs to make a statement about the differences in collision hazard potential between shield wires and conductors – on lines of this size the difference between the two makes a difference.	The "listing" needs to be clarified. The words "listed" or "listing" implies federal listing to many.

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70	D.2.7.1 SCE Harquahala- West Alternative	D.2-177 Impact B-5	Paragraph 1, last line.	Universally change “Eagle Mountains” to Eagletail Mountains.		E1-70
71	D.2.7.1 Harquahala West Alternative	D.2-179 Reptiles- Desert Tortoise	Paragraph1, Line 1	The Sonoran Desert Tortoise is not federally listed	Change throughout document.	E1-71
72	D.4.1 Regional Setting and Approach to Data Collection	D.4 - 3	Fig. D.4.1	The map shows “Residential Areas Along Route” to include a parcel located east of SR 95 at milepost 80. That parcel is BLM land and no residences are located within that area. (See map legend and aerial photograph in Appendix 10, Sheet 13 of 39.)	Correct the map to show locations of existing residential units or a graphic representation of residential densities.	E1-72
73	D.4.1 Regional Setting and Approach to Data Collection	D.4-3	Fig. D.4.1	The map shows “Residential Areas Along Route” to include an area on the Harquahala-West route shown to include a rectangular area of approximately 10 square miles west of Harquahala Generating Station along the alternative centerline. Because there are less than 6 isolated residences located in that area, this map feature is an inappropriate generalization.	Correct the map to show locations of existing residential units or a graphic representation of residential densities (e.g., 1 unit per 1000 acres).	E1-73

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74	D.4.8.1 Harquahala - Wets Alternative	D.4-45 Impact L-2	Paragraph 1, Lines 7-15	The Operational Impact is described as significant and unmitigatable because the Harquahala-West Alternative would “physically divide land uses...that would preclude the use of corridor land for agricultural and rural residential uses.” This consequence would not occur if the proposed alignment of the alternate route is constructed along section lines in order to avoid dividing rural residential subdivisions, if any were developed in the future. As stated in the previous paragraph (p.D.4-44), the alternative “would be consistent with applicable land use plans and policies.” The significance criterion under D.6.5.1, page D.6-35 states: “The conversion of farmland is considered significant if greater than 10 acres of Prime Farmland is converted to non-agricultural use...” Mitigation is incorporated in the project description; tubular steel poles would be used on agricultural lands to effectively minimize the permanent ground disturbance. The farm fields are typically divided along section lines by roads and/or irrigation ditches, which would allow poles to be placed between fields with minimal disturbance to farming operations. The net loss would be less than 1 acre, well within the threshold of significance.	Revise the characterization of residual impacts to incorporate the project description of the Harquahala-West Subalternate Route; i.e., to construct the line on section lines and parallel to the existing pipeline road, and use steel poles on agricultural lands. Also, implementing Mitigation Measure AG-4a would minimize impacts to farmland, resulting in less than significant impact.
75	D.4.9.2.1 Devers- Valley No. 2 Alternative	D.4-57 Impact L-2	Paragraph 1, Line 8	The DEIR/DEIS states that the Devers-Valley alternative will be sited within the existing SCE ROW and that "SCE does not anticipate the need for an expansion of the existing ROW in order to accommodate a new 500 kV transmission line." There are areas of the existing ROW that are less than 330 feet in width that will require additional right of way.	Revise
76	D.6.8.2 SCE Palo Verde Alternative	D.6-62 Impact AG-1	Paragraph 2, Line 6	As stated, construction of “the SCE Palo Verde Alternative would temporarily convert a total of 22.8 acres of Farmland to non-agricultural use, .” Although NRCS maps may indicate that the lands are classified as Farmland, none of the lands traversed by the existing DPV1 and proposed Palo Verde routes are being cultivated. There would be no conversion of existing farmland to non-agricultural use.	Revise Impact AG-1 to accurately reflect existing conditions. There is no impact to farmland on the Palo Verde route.

E1-74

E1-75

E1-76

Comment Set E1, cont.
 Southern California Edison Company

Addition to E1-75

New r/w	State	APN/Section #	Property Owner	Comments
AG		AG	AG	AG
3.28 Acres	CA	T3S, R3E; Section 12	BLM	Need additional 130' of r/w
8.28 Acres	CA	T3S, R3E; Section 20	BLM	Need additional 130' of r/w
12.5 acres	CA	528-240-001	Rippco, East Hampton NY	Need additional 330' of r/w
2.5 acres	CA	528-230-001	Mehnaz & Iqbal Ehmed	Need additional 330' of r/w
1.21 acres	CA	421-140-018	William McCauley	Need additional 40' of r/w
4.64 acres	CA	T4S, R2W; Section 22 427-180-004	USA 427 (BLM)	Need additional 140' r/w
0.83 acres	CA	872-080-014	Velasco Salvador & Guadalupe R	Need additional 170' r/w
2.34 acres	CA	879-130-021	FHEA	Need additional 170' r/w
6.89 acres	AZ	T3N,R11W section 28	Southwestern Agricultural Svc. Inc. Southwestern Agricultural Svc./Water Bank	Need additional 130' of r/w
10 acres	AZ	T3N,R11W section 28	St. of Arizona Dept of Transportaion	Need additional 170' of r/w
26.8 acres	AZ	T3N,R11W section 21 & 22	Arizona State Of / Arizona Highway Dept.	Need additional 170' of r/w
41.2 acres	AZ	T3N,R10W section 21 & 22	Unassessed	Need additional 170' of r/w
0.59 Acres	AZ	T2N,R8W section 2	Unassessed	California Aqueduct crossing
21.89 Acres	AZ	T2N,R8W section 36	Unassessed	Need additional 170' of r/w
21.20 Acres	AZ	T1S,R7W section 2	Unassessed	Need additional 170' of r/w
20.6 acres	AZ	506-30-024A	Giora & Arlene Ben-Horin	Need additional 170' r/w
5.15 acres	AZ	506-30-012B	Four Hundred Eighty Third & Thomas 40 LLC	Need additional 170' r/w
5.15 Acres	AZ	506-30-012C	Linda A Booker	Need additional 170' r/w
10.3 acres	AZ	506-30-010	L Mill Iron Ranch, LLC	Need additional 170' r/w
3.4 Acres	AZ	506-31-014F	A&M Partnership	Need additional 170' r/w
3.86 Acres	AZ	506-31-014G	AA American Development Corp. & Kataria	Need additional 170' r/w
28.25 Acres	AZ	506-31-014C 506-31-013 506-31-007F 506-31-008B	Flood Control District of Maricopa County	Need additional 170' r/w
5.15 Acres	AZ	506-31-010E 506-31-010F	Subhash & Kamlesh Kataria	Need additional 170' r/w
10.3 Acres	AZ	506-31-006B	Demuro Properties	Need additional 170' r/w

Comment Set E1, cont.
 Southern California Edison Company

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve	
77	D.7.1 Regional Setting and Approach to Data Collection	D.7- 2 Data Collection Methodology	Paragraph 1, Line 2 and following four bullets	Arizona SHPO is not listed as a record search institution. Records from the SHPO should be reviewed.	Add SHPO to the list of institutions.	E1-77
78	D.7.1 Regional Setting and Approach to Data Collection	D.7- 2 Data Collection Methodology	Paragraph 6, Line1	Glenn Darrington did not conduct field surveys in 2003 in Arizona. The report should document that surveys were conducted by Sharon Bauer, Scott Wilcox, Glenna Luhnnow, Kelly Peoples, Jeff Roberson, Elizabeth Alter, Kris Dobschuetz, Yumi Yoshino, Torrey Cunningham, and Lisa Champagne in 2003 and 2004.	Correct the statement in text.	E1-78
79	D.7.1 Regional Setting and Approach to Data Collection	D.7 – 4 Arizona Findings Summary	Paragraph 1, Line 1	EPG [Dobschuetz et al. (2004)] identified a total of 237 previously recorded sites within a one mile area. Luhnnow and Dickinson (2004) identified 62 previously recorded sites within a one mile area. Luhnnow (2004) identified 15 previously recorded sites within a one mile area. Dobschuetz (2006) identified 7 previously recorded sites within a one mile area. For the proposed and alternative alignments, EPG identified a total of 321 previously recorded sites within a one mile area.	Revise the description to accurately state the number of recorded sites recorded.	E1-79
80	D.7.1 Regional Setting and Approach to Data Collection	D.7 – 4 Arizona Findings Summary	Paragraph 2, Line 1	EPG identified a total of 7 eligible sites within the project APE for both the proposed and all of the alternatives. For the proposed Devers-Harquahala transmission line route in Arizona, EPG identified only 2 register-eligible sites within the project APE (AZ S:8:1(ASM) and AZ S:8:17(ASM). Site AZ S:3:1(ASM) is located on Harquahala Mountain.	Revise the description to accurately state the number of recorded sites recorded.	E1-80

Comment Set E1, cont.
 Southern California Edison Company

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve	
81	D.7.1 Regional Setting and Approach to Data Collection	D.7 – 4 Arizona Findings Summary	Paragraph 3, Line 1	For the proposed Devers-Harquahala transmission line route in Arizona, EPG identified only 2 register-eligible sites within the project APE (AZ S:8:1(ASM) and AZ S:8:17(ASM). Site AZ S:3:1(ASM) is located on Harquahala Mountain. One site, AZ S:8:17(ASM), was not relocated in the APE. The other two sites, AZ S:3:1(ASM) and AZ S:8:1(ASM), are present within the project APE for the Harquahala Mountain telecommunications facility, and the APE for the proposed transmission line route, respectively.	Revise the description to accurately describe the recorded sites within the APE.	E1-81
82	D.7.1 Regional Setting and Approach to Data Collection	D.7 – 4 Arizona Findings Summary	Paragraph 3	It is unclear whether the class III surveys of the Arizona Alternatives discussed include only EPG reports or whether surveys conducted by SWCA are included. Only 10 sites were recorded by EPG within the APE for the alternatives.	Revise the description to accurately state the number of recorded sites recorded within the APE.	E1-82
83	D.7.2.1 Harquahala to Kofa NWR	D.7 – 16 Cultural Resources	Paragraph 1, Line 1	The Class I records review for the Harquahala to KOFA identified 67 previously recorded resources within the one-mile area (Dobschuetz et al. 2004)	Revise the description to accurately state the number of recorded sites listed in the records search.	E1-83
84	D.7.2.1 Harquahala to Kofa NWR	D.7 – 16 Cultural Resources	Paragraph 2, Line 1	For the proposed Devers-Harquahala transmission line route in Arizona, EPG identified only 2 register-eligible sites within the project APE (AZ S:8:1(ASM) and AZ S:8:17(ASM). Site AZ S:3:1(ASM) is located on Harquahala Mountain. One site, AZ S:8:17(ASM), was not relocated in the APE. The other two sites, AZ S:3:1(ASM) and AZ S:8:1(ASM), are present within the project APE for the Harquahala Mountain telecommunications facility, and the APE for the proposed transmission line route, respectively.	Revise the description to accurately describe the recorded sites within the APE.	E1-84
85	D.7.2.1 Harquahala to Kofa NWR	D.7 – 16 Cultural Resources	Paragraph 2, Lines 1-4	There are a total of 7 sites within the APE for this transmission line segment. These include AZ S:6:12(ASM), AZ S:6:21(ASM), AZ S:7:1(ASM), AZ S:7:15(ASM), AZ S:8:1(ASM), AZ S:8:10(ASM), and AZ S:8:17(ASM).	Revise the description to accurately describe the recorded sites within the APE.	E1-85

Comment Set E1, cont.
Southern California Edison Company

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve	
86	D.7.2.1 Harquahala to Kofa NWR	D.7 -17 Harquahala Telecommuni cations Site	Paragraph 2, Line 2	The Solar Observatory site, AZ S:3:1(ASM), is located within the project APE for the proposed telecommunications facility.	Revise the description to accurately describe the recorded site within the APE.	E1-86
87	D.7.2.2 Kofa NWR	D.7-17 Cultural Resources	Paragraph 1, Line 1	According to the Dobschuetz et al. (2004) report, there are 41 previously recorded cultural resources within the one-mile class I study area for the Kofa National Wildlife Refuge portion of the report.	Correct the statement or omit it from the text.	E1-87
88	D.7.2.2 Kofa NWR	D.7-17 Cultural Resources	Paragraph 1, Line 3	There is only one site within the project APE for this segment: AZ S:5:15(ASM). The other sites mentioned are not within the project APE.	Revise the description to accurately describe the recorded site within the APE.	E1-88
89	D.7.2.2 Kofa NWR	D.7-18 Cultural Resources	Paragraph 2, Line 1	Sites AZ R:8:51(ASM) and AZ S:5:2(ASM) are not within the project APE.	Delete this discussion and paragraph.	E1-89
90	D.7.2.3 Kofa NWR to Colorado River	D.7-18 Cultural Resources	Paragraph 1, Line 1	According to Dobschuetz et al. (2004), there are a 103 previously recorded sites within the class I study area for this segment of the project.	Correct the statement or omit it.	E1-90
91	D.7.2.3 Kofa NWR to Colorado River	D.7-17 Cultural Resources	Paragraph 2, Line 1	Sites AZ R:7:53(ASM), AZ R:7:54(ASM), and AZ R:7:64(ASM) are not within the project APE, as the surveys did not identify any cultural resources within the proposed tower locations or spur roads near the site locations (Dobschuetz et al. 2004). There are 4 sites within the project APE for this segment of the project; AZ R:7:49(ASM), AZ R:8:37(ASM), AZ R:8:44(ASM), and AZ R:8:60(ASM). None of these sites are recommended eligible	Correct the text.	E1-91
92	D.7.4 Applicable Regulations	D.7-30 State - Arizona	Paragraph 1	The Arizona State Law section should include the following laws: Arizona State Historic Preservation Act and the Arizona Antiquities Act (governs the requirements for conducting archaeological studies on State Lands)	Add these laws to the list.	E1-92
93	D.7.6.1 Environmenta l Impacts and Mitigation Measures	D.7-37 Harquahala to Kofa NWR Impact C-1	Table D7.5	The table does not include the Harquahala Telecom Site, AZ S:3:1(ASM).	Add site to the list.	E1-93

Comment Set E1, cont.
Southern California Edison Company

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve	
94	D.7.6.1 Environmental Impacts and Mitigation Measures	D.7-37 Harquahala to Kofa NWR Impact C-1	Table D7.5	The table states that AZ S:8:17(ASM) is not eligible, this does not match Dobschuetz et al. (2004) which stated that it was eligible, but not relocated.	Correct the listing in the table.	E1-94
95	D.7.6.1 Environmental Impacts and Mitigation Measures	D.7-40 Harquahala Peak	Table D7.6	The table lists site AZ S:3:1(ASM) as located near the APE; it is actually within the APE.	Correct the listing in the table.	E1-95
96	D.7.8.2 SCE Palo Verde Alternative	D.7-92 Environmental Setting	Paragraph 1, Line 9	Comment states “Surveyors in 2004 were hesitant to make this recommendation” – this is not accurate.	Remove this comment.	E1-96
97	D.7.8.2 SCE Palo Verde Alternative	D.7-93 Impact C-1	Table D7.24	The table lists preliminary NRHP eligibility for Site AZ T:9:12(ASM) and AZ T:9:64(ASM) as insufficient data. For the Palo Verde Hub to TS5 Project, the BLM PFO and the SHPO determined in 2005 that sites AZ T:9:12(ASM), AZ T:9:21(ASM), AZ T:9:64(ASM), and AZ T:9:65(ASM) are all eligible.	Correct the listing in the table.	E1-97
98	D.10.11.1 EMF in the Proposed Project Area	D.10-27 Magnetic Field – Devers-Harquahala 500 kV Segment	Paragraph 1, Line 9	In the developed areas of the Devers-Harquahala section of the Proposed Project there are a number of additional <u>existing</u> electric transmission lines. In developed areas,		E1-98
99	D.10.11.1 EMF in the Proposed Project Area	D.10-28 Magnetic Field – West of Devers	Table D. 10-3, Last sentence of Note.	Source: Application for CPCN, Appendix B, Field Management	delete “Source: Application for CPCN, Appendix B, Field Management”	E1-99
100	D.10.11.2 Other Field-Related Public Concerns	D.10-32 Radio/ Television/ Electronic Equipment Interference	Paragraph 1, Line 6	Interference with typical <u>cathode ray tube (CRT) type</u> computer monitors can be detected at magnetic field levels of 10 mG and above, while large screen or high-resolution <u>CRT</u> monitors can be susceptible to interference at levels as low as 5 mG.	delete “typical” add “cathode ray tube (CRT) type” add “CRT”	E1-100

Comment Set E1, cont.
 Southern California Edison Company

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve	
101	D.10.11.2 Other Field– Related Public Concerns	D.10-32 Radio/ Television/ Electronic Equipment Interference	Paragraph 2, Line 1	The most common electronic equipment that can be susceptible to magnetic field interference is probably <u>CRT type</u> computer monitors.Possible solutions to this problem include: relocation of the monitor, use of magnetic shield enclosures, software programs, and replacement of <u>CRT</u> monitors with liquid crystal displays that are not susceptible to magnetic field interference.	add “CRT type” add “CRT”	E1-101
102	D.10.11.2 Other Field– Related Public Concerns	D.10-32, Induced Currents and Shock Hazards	Paragraph 1, Line 3	... a perceptible current or small secondary-electric shock may occur. Secondary <u>Electric</u> shocks cause no physiological harm; however, they may present a nuisance.	Delete “secondary” and add “electric” Delete “Secondary” and add “Electric”	E1-102
103	D.10.11.3 Scientific Background and Regulations Applicable to EMF	D.10-33, EMF Research	Foot-note	The power frequencies (50/60 Hz) are part of the ELF (3 Hz to <u>3,000</u> Hz) bandwidth.	Change (300 Hz to 3,000 Hz)	E1-103
104	D.10.11.3 Scientific Background and Regulations Applicable to EMF	D.10-35, Scientific Panel Reviews	Paragraph 6, Line 5	“...less than sufficient evidence- for <u>of</u> carcinogenicity in experimental animals.	Delete “for” and add “of”	E1-104
105	D.10.11.3 Scientific Background and Regulations Applicable to EMF	D.10-35, Scientific Panel Reviews	Paragraph 1, Line 2	... increased risk for certain health problems, the report did not quantify the degree of risk <u>or make any specific recommendations to the CPUC.</u>	Add “or make any specific recommendations to the CPUC.”	E1-105

Comment Set E1, cont.
 Southern California Edison Company

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve
106	D.10.11.4 Consideration of Electric and Magnetic Fields (EMFs)	D.10-50, West of Devers— 230 kV Transmission Line Upgrade Segment	Paragraph, Line 3	“... that are currently on separate structures on to double-circuit transmission line structures <u>and phase those circuits optimally.</u> “	Add “ and phase those circuits optimally.”
107	D.10.11.4 Consideration of Electric and Magnetic Fields (EMFs)	D.10-53, SCE's Proposed EMF Mitigation	Paragraph 2, Bullet 6	Devers–San Bernardino Junction. Locate <u>less more</u> loaded 230 kV lines furthest from Beaumont High School (no-cost magnetic Field Reduction Measure)	Delete “less” and add “more”

E1-106

E1-107

Comment Set E1, cont.
 Southern California Edison Company

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve
109	D.10.11.4 Consideration of Electric and Magnetic Fields (EMFs)	D.10-53, SCE's Proposed EMF Mitigation	Paragraph 4	<p>that can be mitigated</p> <p>Low cost measures must be applied equitably</p> <p>Total cost of mitigation should not exceed 4% of the total cost of the project</p> <p>Total field reduction must be 15% or greater</p> <p>The solution should not downgrade reliability or operating characteristics and should not create a hazard to maintenance personnel or the public</p>	

E1-109

Comment Set E1, cont.
 Southern California Edison Company

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve
110	D.10.11.4 Consideration of Electric and Magnetic Fields (EMFs)	D.10-53, SCE's Proposed EMF Mitigation	Paragraph 5	<p>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:</p> <ol style="list-style-type: none"> 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 school-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: <ul style="list-style-type: none"> • State Parks; • U.S. Forest Service land; • U.S. Bureau of Land Management land; and, • Formally designated “open space” <p>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.</p>	

E1-110

Comment Set E1, cont.
Southern California Edison Company

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve	
111	D.10.11.4 Consideration of Electric and Magnetic Fields (EMFs)	D.10-53, SCE's Proposed EMF Mitigation	Paragraph 5, Line 3	..circuits in the West of Devers segments as a no-cost and low-cost design measure to mitigate EMF levels.	Add "and low-cost"	E1-111
112	D.10.11.4 Consideration of Electric and Magnetic Fields (EMFs)	D.10-54, SCE's Proposed EMF Mitigation	Paragraph 1, Line 1	In the vicinity of Beaumont High School in the West of Devers segment SCE proposes locating less more loaded 230 kV line furthest from the school as a no-cost EMF reduction measure.	Delete "less" and add "more"	E1-112
113	Appendix 1; Section 1.3.2 West of Devers	Ap.1-4	Last two bullets	The last 2 bullets should begin with "Upgrade" or "Reconductoring" rather than "Replacement".		E1-113
114	Appendix 1; Section 4.2.9.3	Ap.1-71 Environmental Disadvantages	Paragraph 1	Change "...-10 Frontage Alternative would be 0.45 miles longer..." to "...l-10 Frontage Alternative would be 0.57 miles longer..."		E1-114
115	Appendix 1 Section 4.2.9.3	Ap.1-71 Environmental Disadvantages	Paragraph 4	Change "... (if not constructed in addition to DPV2)..." to "... (if not constructed in addition to DSWTP)..."		E1-115
116	Appendix 3	Ap.3-1	Table 1	The "Existing Tower Heights" shown in this table appear to be tower heights measured to the conductor points of support, but have not been verified by SCE. Note that all other references in the document to tower heights refer to overall tower heights.		E1-116
117	Appendix 3	Ap.3-8	Table 3	This table is difficult to comprehend, and the table headings appear to be reversed on each page, i.e. the headings on the left side of each page seem to refer to the data on the right side of the page and vice versa. The attached Table 3, with changes indicated in red, represents our opinion of what the headings should be.		E1-117
118	Appendix 10	Sheet 1 of 39		It is our understanding that the new Devers-Harquahala 500 kV Line in the 5-mile segment east of Harquahala Substation would be located on the north side of the existing Harquahala-Hassayampa Line rather than on the south side as is shown on Sheet 1.		E1-118

Comment Set E1, cont.
 Southern California Edison Company

Devers–Palo Verde No. 2 Transmission Line Project
 APPENDIX 3. TOWER HEIGHT TABLES

E1-119

Table 1. Existing Tower Heights along the Devers-Harquahala Alignment – Line 1

Station	Elevation	Height	Station	Elevation	Height	Station	Elevation	Height
19790.93	1,151.91	111.49	99656.64	284.93	90.27	173841.52	278.08	89.92
20999.72	1,140.50	87.00	101029.89	261.60	102.40	175348.00	322.65	99.55
22149.93	1,141.20	85.90	102625.93	245.04	98.96	176963.57	362.44	106.96
23388.82	1,118.57	101.53	103986.63	265.55	105.45	178757.84	444.12	126.38
24900.40	1,070.40	110.70	105548.20	263.46	105.54	180836.45	473.61	135.19
26598.95	1,005.70	106.50	107145.19	284.96	90.34	182572.50	495.59	126.51
28089.74	965.74	130.36	108632.25	309.70	104.20	184428.97	542.51	141.49
29500.02	931.22	128.78	109839.43	321.11	117.29	186120.06	600.85	114.65
31150.01	898.88	132.52	111520.33	312.75	117.25	187583.81	640.55	111.25
32399.04	873.59	129.41	113054.25	285.91	95.99	189189.11	690.71	104.99
34288.55	839.41	135.59	114554.46	254.49	93.31	190740.35	752.60	104.80
35908.30	816.88	124.72	116033.53	229.00	87.00	192378.41	782.13	138.07
37543.41	791.45	132.05	117493.22	215.30	102.00	194357.81	830.30	137.10
38973.19	789.62	150.38	118971.39	186.09	93.91	195887.94	873.63	107.87
40880.90	729.80	145.20	120496.64	172.30	96.00	197704.38	936.07	145.33
42385.75	726.85	89.75	121956.11	157.45	93.05	199672.35	994.31	121.19
43892.30	707.43	111.37	123291.89	153.91	96.09	201016.78	1,015.49	111.41
45689.53	682.81	134.69	124798.86	151.29	108.91	202961.82	1,077.18	93.32
47436.57	659.40	111.50	126361.17	112.04	116.76	203827.90	1,132.32	107.68
49030.29	637.10	107.30	127917.16	111.56	93.44	205471.62	1,201.83	124.67
50480.15	620.80	131.40	129352.83	164.80	93.50	207147.53	1,251.51	96.09
52000.00	604.18	131.82	130604.80	169.85	90.55	208500.32	1,305.01	87.99
53576.19	587.40	113.20	132038.24	153.75	94.25	209895.52	1,351.21	93.69
55290.93	590.70	111.60	133528.96	168.45	105.85	211259.82	1,397.30	93.50
56918.68	637.00	113.20	134962.29	141.43	106.37	213038.93	1,443.82	122.18
58518.70	681.10	100.70	136672.08	170.21	107.09	214420.51	1,498.25	83.75
60003.19	726.00	90.40	138043.20	217.90	82.50	215815.02	1,506.93	113.67
61432.54	784.19	93.51	139361.20	221.39	93.11	217428.75	1,511.84	119.26
62676.21	812.83	90.97	140646.84	220.19	122.91	218835.08	1,545.68	93.82
63942.19	757.17	118.53	142380.37	199.62	103.38	220668.61	1,696.96	93.04
65527.77	500.19	165.91	143852.98	166.98	144.22	221300.86	1,721.21	83.39
67647.71	588.59	138.41	145464.10	98.32	136.68	222562.53	1,715.07	106.93
69263.90	653.30	119.70	147388.87	125.86	109.14	223418.73	1,809.48	104.52
70616.85	678.94	99.56	147474.05	150.88	157.22	225613.69	1,740.40	125.60
72151.41	732.59	93.01	148526.83	141.97	147.23	227090.69	1,707.91	111.69
73354.83	782.49	83.51	150141.59	142.44	98.36	228371.09	1,680.56	97.24
74250.01	779.20	105.20	151480.17	118.58	122.12	229780.16	1,690.97	99.43
75752.68	722.45	123.05	152770.55	121.41	78.99	231133.23	1,688.25	89.85
77473.93	642.12	124.18	153626.97	190.39	78.61	232647.15	1,686.75	104.65
78993.24	553.16	93.14	154525.23	157.00	124.40	234138.19	1,665.97	95.63
80367.76	499.68	103.12	156554.28	128.35	140.65	235668.13	1,635.42	98.68
82011.79	473.64	88.36	157967.90	114.61	141.29	237093.97	1,604.05	94.45
83431.43	409.39	99.81	159049.33	135.01	122.29	238461.72	1,568.46	87.44
84882.91	405.73	102.27	160854.23	127.41	113.49	239782.92	1,525.89	82.11
86328.68	383.97	90.23	162087.42	81.84	108.16	241108.04	1,485.67	91.13
87879.67	355.24	104.76	163655.52	96.09	92.91	242594.18	1,496.28	84.72
89511.94	352.59	117.91	165165.44	94.44	101.46	243855.17	1,529.06	138.24
90822.07	345.47	89.53	166321.55	101.85	92.85	245654.44	1,388.77	116.63
92298.62	331.21	98.79	167282.31	93.80	95.70	247271.33	1,325.15	101.85
93853.12	319.24	107.46	168315.47	154.79	115.91	248901.26	1,269.10	114.20
95327.96	306.62	92.88	169060.64	194.07	135.23	250435.87	1,222.66	96.34
96714.30	292.99	93.11	170979.91	186.63	123.57	251932.03	1,186.05	98.85
98235.69	281.05	98.95	172357.35	222.17	83.93	253402.58	1,150.36	96.64

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Comment Set E1, cont.
 Southern California Edison Company

Devers–Palo Verde No. 2 Transmission Line Project
 APPENDIX 3. TOWER HEIGHT TABLES

E1-119 cont.

Table 1. Existing Tower Heights along the Devers-Harquahala Alignment – Line 1, cont.

Station	Elevation	Height	Station	Elevation	Height	Station	Elevation	Height
255059.46	1,123.32	117.28	337850.45	1,487.12	116.88	422975.05	893.94	104.56
256816.02	1,111.81	119.09	339235.69	1,460.44	108.56	424604.70	864.46	106.54
258405.38	1,119.36	105.54	340850.32	1,449.57	101.63	426109.70	843.40	95.70
260095.64	1,132.57	117.03	342068.20	1,481.34	89.86	427152.19	835.52	90.48
261772.04	1,154.44	110.76	343396.25	1,462.25	126.35	428556.31	886.84	103.86
263370.23	1,173.24	102.16	345165.86	1,462.72	134.78	430035.49	917.06	88.24
264823.33	1,189.28	106.12	347067.88	1,442.24	138.06	431699.97	836.85	95.35
266569.46	1,224.36	128.94	348824.87	1,442.44	117.36	433134.08	850.75	95.55
268306.01	1,275.73	105.27	350581.44	1,438.15	129.45	434641.72	860.46	108.14
269809.32	1,320.98	96.32	352372.16	1,432.89	122.61	436217.03	873.14	117.66
271238.78	1,364.75	99.15	354162.98	1,437.39	119.81	437540.56	854.36	130.14
272695.42	1,408.80	129.30	355842.24	1,430.57	117.43	439256.75	835.58	109.12
274445.04	1,462.29	116.71	357533.57	1,412.56	107.74	440858.81	830.47	120.03
276049.11	1,504.95	108.25	359207.45	1,412.33	110.37	442759.49	828.54	128.46
277650.09	1,539.79	105.51	360778.66	1,412.42	120.08	444425.92	834.12	120.48
279162.73	1,570.41	104.49	361177.40	1,412.69	120.11	446130.71	833.48	110.52
280737.34	1,588.54	104.96	362470.33	1,416.63	104.47	447848.69	824.77	114.03
282305.73	1,637.37	105.53	364141.91	1,414.89	116.31	449567.62	819.11	117.89
283913.33	1,677.36	114.44	365805.32	1,412.71	110.89	451303.79	811.03	116.67
285360.47	1,671.54	90.06	367498.83	1,410.09	122.51	452960.10	797.39	114.91
286937.54	1,674.84	90.26	369263.70	1,417.42	119.58	454554.46	790.72	117.28
288364.73	1,705.85	99.75	370868.51	1,424.09	137.61	456319.66	777.94	110.86
289929.25	1,725.31	106.69	371715.39	1,427.48	135.12	457939.85	765.89	109.11
291521.52	1,751.83	109.27	373433.50	1,431.21	113.79	459554.01	746.95	104.75
293096.57	1,762.75	122.65	375097.72	1,414.88	123.12	461301.08	726.84	117.36
294791.78	1,765.04	113.06	376621.10	1,374.26	95.74	462991.89	713.28	128.72
296259.87	1,762.04	110.76	378325.62	1,353.72	111.38	464869.15	639.31	191.99
297913.99	1,753.35	113.85	379741.56	1,334.94	121.66	466181.10	680.39	125.61
299662.33	1,746.48	126.32	381425.33	1,331.70	123.30	468526.57	664.76	125.44
301297.48	1,738.66	119.24	383087.70	1,351.90	123.00	470348.99	646.61	117.19
302981.55	1,730.97	110.63	384658.70	1,365.75	98.75	472074.79	641.51	108.49
304624.04	1,739.94	104.36	386164.14	1,361.93	139.37	473669.53	638.18	98.52
306191.55	1,750.61	113.39	388133.03	1,305.83	147.17	475224.87	631.74	102.36
308041.57	1,757.29	146.91	389779.48	1,273.42	151.18	476790.04	626.95	98.65
309180.84	1,787.17	116.73	391900.31	1,289.32	134.78	478409.50	621.62	105.38
310615.46	1,842.63	108.37	393658.16	1,320.00	120.00	480086.78	614.90	114.40
312775.15	2,123.60	133.40	395376.77	1,269.30	114.30	481753.66	607.44	105.26
314365.49	2,183.33	115.97	397097.47	1,252.48	114.52	483378.46	601.16	104.54
316211.22	1,921.71	155.29	398777.99	1,240.91	126.49	485066.96	594.21	109.89
317176.44	1,978.90	65.20	400343.90	1,213.61	138.99	486764.49	583.31	110.49
318043.79	2,011.15	80.85	402170.20	1,158.91	117.99	488389.60	573.36	107.64
320007.89	1,841.12	82.18	403494.25	1,122.60	101.70	490103.92	562.15	116.15
321505.70	1,795.11	132.79	404614.96	1,112.54	99.96	491800.40	550.70	104.80
323168.56	1,787.59	115.81	406093.33	1,086.52	95.38	493459.95	539.56	105.14
324734.67	1,863.78	112.62	407727.24	1,068.86	117.44	495166.70	530.22	116.28
326688.46	1,810.97	138.63	409469.27	1,049.39	120.11	496864.23	521.41	108.09
327405.49	1,771.95	64.15	411054.68	1,035.87	119.63	498557.45	514.55	111.45
328497.35	1,623.94	150.06	412827.24	1,017.81	125.69	500301.79	507.33	119.67
329918.33	1,765.91	64.69	414414.94	1,001.98	87.12	501962.16	502.82	113.48
331446.48	1,619.28	90.72	415811.80	1,001.91	124.09	503701.96	500.05	113.55
333280.77	1,515.70	100.30	417598.78	1,003.86	140.64	505405.46	496.07	110.53
334665.37	1,522.15	93.95	419269.17	965.92	156.88	507065.19	492.67	113.43
336089.50	1,511.89	132.51	421240.87	918.13	133.57	508720.80	492.37	114.03

Comment Set E1, cont.
 Southern California Edison Company

Devers–Palo Verde No. 2 Transmission Line Project
 APPENDIX 3. TOWER HEIGHT TABLES

E1-119

Table 1. Existing Tower Heights along the Devers-Harquahala Alignment – Line 1, cont.

Station	Elevation	Height	Station	Elevation	Height	Station	Elevation	Height
510346.22	493.24	98.56	548865.21	390.74	116.36	588513.09	420.41	111.59
511906.75	492.54	101.76	550514.06	391.28	116.62	590262.76	425.21	120.09
513111.39	494.62	89.58	552250.64	388.88	111.12	592037.06	436.19	120.01
514553.77	486.32	100.08	553967.62	388.04	110.36	593764.45	449.66	110.34
516236.16	476.83	116.47	555677.91	384.68	113.62	595460.59	449.09	113.11
517947.68	468.93	113.27	557422.45	381.82	113.28	597159.46	456.21	98.69
519714.15	461.07	119.33	559124.16	383.90	102.10	598767.51	478.91	102.09
521413.53	453.02	122.38	560760.69	385.51	104.49	600399.02	471.98	113.52
523134.43	443.74	107.76	562473.88	387.65	113.65	602171.60	457.96	116.44
524863.35	434.96	119.64	564135.78	391.95	107.35	603907.77	450.03	113.87
526658.87	427.40	117.10	565823.47	400.03	105.87	605653.60	445.17	107.53
528437.31	421.35	113.65	567424.26	398.52	116.48	607320.05	433.40	114.00
530129.93	418.63	104.17	569172.64	401.19	114.01	609030.44	425.81	110.69
531804.19	415.11	110.69	570914.33	402.92	114.18	610741.19	402.95	113.75
533519.64	412.20	110.30	572680.87	404.81	117.19	612548.16	383.92	122.08
535226.83	409.62	113.38	574464.42	406.54	114.96	614347.82	382.13	116.37
536916.45	407.16	110.84	576220.14	407.79	116.21	616040.31	382.42	113.38
538613.41	404.09	113.41	577975.98	409.67	116.23	617826.14	377.85	128.05
540306.97	401.92	110.58	579733.03	410.36	113.94	619712.74	376.48	128.62
542029.44	398.62	110.68	581434.62	412.13	113.47	621581.76	379.21	122.29
543703.36	399.29	107.71	583185.27	414.19	117.81	623440.07	377.30	128.40
545415.64	395.76	114.04	584966.79	415.75	118.25	625304.15	379.06	128.64
547130.36	393.23	111.57	586765.22	416.20	116.50	626850.90	372.91	137.69

Table 1. Existing Tower Heights along the Devers-Harquahala Alignment – Line 2

Station	Elevation	Height	Station	Elevation	Height	Station	Elevation	Height
793283.93	259.01	111.69	832498.40	663.05	104.05	895618.95	1,165.25	116.85
794407.25	260.64	116.36	834502.94	671.28	104.92	896944.99	1,142.19	113.81
796119.26	262.55	137.45	835732.00	669.60	113.80	898637.00	1,113.38	129.22
797339.61	377.94	82.06	837404.70	666.87	115.23	900431.22	1,085.45	117.05
798755.03	316.58	115.62	839090.88	689.38	142.32	901892.75	1,069.64	95.46
800401.23	329.96	123.14	841153.94	735.27	135.73	903433.32	1,053.34	101.66
801583.96	337.73	110.97	842431.77	761.72	126.28	904872.12	1,044.69	102.01
803317.01	405.22	112.78	843808.41	824.43	109.67	906437.74	1,037.62	98.78
805016.59	451.70	126.60	845114.72	864.31	110.39	907744.01	1,039.72	92.98
806888.58	496.90	111.40	846579.29	925.02	125.68	909016.51	1,047.75	95.95
808623.19	473.04	98.96	847697.86	917.69	124.11	910422.99	1,058.24	104.06
810309.16	450.80	125.20	865667.16	1,564.09	85.91	911979.06	1,072.39	101.61
811861.05	496.22	122.78	867208.07	1,732.97	111.63	913443.57	1,084.67	104.33
813473.32	506.04	121.96	868172.07	1,776.38	84.82	914664.71	1,097.02	104.98
815511.38	519.92	110.68	869623.55	1,595.22	110.18	916313.40	1,113.73	114.27
817012.58	521.79	112.41	870681.27	1,525.77	94.63	918032.25	1,132.07	117.93
818473.58	547.30	105.40	871717.03	1,507.13	102.67	919658.49	1,147.16	116.34
820116.92	559.19	123.51	873203.47	1,467.06	112.94	920885.97	1,160.75	92.25
822220.07	578.09	127.21	874664.94	1,530.56	81.44	922320.64	1,176.56	89.44
823871.89	632.57	125.93	875756.66	1,517.12	96.38	923660.81	1,186.16	84.44
825946.90	620.75	113.25	877669.58	1,427.55	134.45	924563.44	1,201.50	92.50
827223.92	603.28	103.32	889664.01	1,355.38	100.32	925879.27	1,216.16	86.24
828279.30	611.09	98.91	890871.50	1,282.61	111.69	927236.25	1,232.87	86.23
830021.45	629.10	101.50	892635.96	1,229.84	114.16	928610.48	1,250.45	92.55
831453.07	649.30	87.40	894037.37	1,194.18	113.82	930042.37	1,267.51	89.69

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Comment Set E1, cont.
 Southern California Edison Company

Devers–Palo Verde No. 2 Transmission Line Project
 APPENDIX 3. TOWER HEIGHT TABLES

E1-119 cont.

Table 1. Existing Tower Heights along the Devers-Harquahala Alignment – Line 2, cont.

Station	Elevation	Height	Station	Elevation	Height	Station	Elevation	Height
931319.30	1,281.68	89.52	1011242.84	1,897.78	128.72	1093238.13	1,319.26	116.34
932329.05	1,290.33	111.17	1012779.13	1,905.48	125.32	1094874.76	1,311.84	104.46
933964.43	1,310.97	104.43	1014518.60	1,878.77	116.43	1096523.73	1,305.87	105.63
935134.32	1,322.74	101.66	1015901.04	1,886.35	96.05	1098173.77	1,299.55	104.15
936676.89	1,342.32	101.28	1017395.12	1,881.47	92.03	1099814.06	1,296.28	105.42
937945.29	1,349.49	109.61	1018102.87	1,841.16	104.64	1101473.40	1,293.33	105.67
939546.24	1,368.94	92.46	1019715.11	1,823.34	101.56	1103127.05	1,293.08	105.52
940539.98	1,385.03	83.87	1020456.33	1,820.37	103.53	1104768.86	1,293.92	113.28
941773.19	1,402.04	86.46	1022068.09	1,796.30	129.30	1106439.30	1,294.36	105.44
942878.11	1,411.22	93.68	1023883.98	1,791.56	111.34	1108076.79	1,298.62	106.38
944389.99	1,437.50	102.40	1025028.00	1,765.77	122.23	1109733.98	1,303.29	106.41
945956.72	1,472.21	101.89	1026764.43	1,753.90	141.10	1111386.24	1,307.50	113.60
947219.57	1,498.60	109.30	1028562.59	1,735.56	118.64	1113040.35	1,312.12	104.68
948788.01	1,529.58	101.92	1030307.26	1,721.91	110.09	1114676.04	1,316.98	110.42
950023.94	1,552.53	97.47	1031947.84	1,712.65	101.85	1116332.05	1,321.93	107.47
951636.58	1,567.31	99.19	1033594.40	1,700.16	113.84	1117983.68	1,327.68	113.12
952944.71	1,574.44	101.36	1035322.21	1,694.93	113.47	1119624.18	1,332.89	104.41
954540.95	1,570.30	113.80	1036810.83	1,682.00	92.50	1121281.71	1,338.12	113.38
955869.46	1,577.40	93.10	1038176.90	1,673.78	104.32	1122928.28	1,342.84	104.46
957514.24	1,577.10	114.40	1039862.61	1,659.44	113.36	1124593.36	1,381.84	125.16
959320.47	1,601.95	128.75	1041514.30	1,646.18	104.42	1126135.25	1,366.22	119.28
960623.12	1,616.92	126.58	1043161.34	1,633.22	113.28	1127796.30	1,362.42	98.28
962392.46	1,648.13	116.77	1044872.52	1,618.15	113.75	1129453.21	1,364.34	110.16
964099.48	1,672.77	116.43	1046487.60	1,604.16	119.44	1131108.06	1,372.07	101.13
965654.30	1,733.13	96.77	1048267.40	1,576.70	134.70	1132642.91	1,380.10	98.10
967339.96	1,721.48	110.52	1049837.08	1,575.98	98.12	1134213.24	1,390.03	101.47
968621.08	1,728.15	126.85	1051538.05	1,563.53	134.87	1135818.53	1,397.86	101.84
970353.46	1,760.16	110.64	1052936.62	1,552.48	89.52	1137393.70	1,407.63	95.27
971411.28	1,766.81	102.19	1054359.61	1,544.23	89.37	1138970.27	1,413.66	104.44
972857.92	1,791.89	113.11	1055619.73	1,533.84	92.46	1140570.25	1,416.88	101.42
974593.42	1,818.20	120.20	1056928.02	1,525.27	121.83	1142109.05	1,423.97	98.23
976314.06	1,845.58	116.22	1058798.61	1,513.92	128.68	1143659.96	1,429.33	98.47
977884.14	1,873.11	101.49	1060695.64	1,498.85	134.55	1145237.64	1,433.72	98.58
979517.39	1,894.73	137.07	1062332.47	1,485.25	107.35	1146771.61	1,437.24	105.76
981274.21	1,940.77	90.13	1063983.09	1,473.00	110.00	1148398.98	1,439.43	110.57
982702.88	1,983.31	83.99	1065631.01	1,459.71	104.39	1150003.89	1,437.52	101.38
984416.99	1,925.17	123.43	1067280.76	1,449.40	110.30	1151535.50	1,437.04	101.26
986056.27	2,014.17	123.73	1068882.75	1,440.02	116.78	1153158.56	1,437.25	104.35
987187.38	2,170.40	89.80	1069282.98	1,437.34	116.86	1154739.75	1,436.12	101.88
988646.93	2,157.27	98.73	1070599.88	1,428.72	98.38	1156354.15	1,436.35	101.35
990322.54	2,135.93	126.37	1071977.65	1,419.77	105.23	1157749.71	1,436.27	92.23
991874.49	2,123.10	125.90	1073627.19	1,409.72	105.28	1159205.84	1,434.76	84.34
993555.77	2,081.21	113.39	1075279.76	1,399.28	104.12	1160665.58	1,424.81	107.79
995225.74	2,058.10	107.80	1076936.88	1,389.20	113.80	1162509.41	1,412.80	146.70
996899.87	2,037.18	107.32	1078577.70	1,381.44	101.36	1164286.52	1,403.76	116.74
998543.83	2,015.00	113.30	1080227.92	1,374.06	110.14	1166062.63	1,393.79	117.21
1000126.96	1,964.35	120.15	1081872.55	1,366.14	104.36	1167851.38	1,388.38	117.02
1001995.87	1,969.93	135.07	1083520.94	1,358.26	110.44	1169438.01	1,389.01	116.59
1003270.20	1,981.75	107.25	1085168.17	1,350.88	105.12	1171213.89	1,391.92	116.58
1004642.86	1,969.82	121.18	1086858.67	1,345.15	116.35	1172365.63	1,393.18	101.82
1006416.09	1,941.73	140.37	1088476.24	1,336.58	98.42	1173526.74	1,393.95	101.15
1007801.83	1,983.33	107.67	1090065.07	1,330.92	104.48	1174811.28	1,392.97	119.43
1009491.57	1,925.86	125.94	1091582.19	1,325.71	104.49	1176664.85	1,391.29	131.71

Comment Set E1, cont.
 Southern California Edison Company

Devers–Palo Verde No. 2 Transmission Line Project
 APPENDIX 3. TOWER HEIGHT TABLES

E1-119 cont.

Table 1. Existing Tower Heights along the Devers-Harquahala Alignment – Line 2, cont.

Station	Elevation	Height	Station	Elevation	Height	Station	Elevation	Height
1178455.81	1,389.27	113.53	1253185.82	1,362.24	105.06	1325264.05	1,255.25	119.45
1179858.92	1,388.37	113.83	1254819.57	1,376.10	116.70	1326949.89	1,248.86	111.44
1181159.97	1,386.90	101.10	1256535.90	1,379.88	111.42	1328443.57	1,257.14	103.26
1182490.32	1,387.04	122.96	1258165.12	1,385.22	105.28	1329844.99	1,273.31	119.69
1184142.47	1,387.39	131.11	1259830.77	1,383.85	114.05	1331570.99	1,276.64	119.56
1185839.83	1,387.29	115.01	1261523.90	1,383.18	113.62	1333162.50	1,254.56	101.54
1187555.04	1,385.91	113.19	1263247.16	1,374.37	113.73	1334647.63	1,233.33	110.77
1189236.37	1,384.20	113.80	1264937.35	1,379.31	104.99	1335931.01	1,213.03	112.77
1190900.55	1,384.75	110.25	1266469.09	1,383.18	105.02	1337669.93	1,203.84	113.36
1192594.51	1,388.39	112.61	1266763.84	1,385.96	147.14	1339208.89	1,220.11	111.09
1194295.76	1,387.44	113.86	1268383.47	1,408.46	144.24	1341146.37	1,165.09	139.11
1195976.24	1,388.32	110.68	1270083.70	1,451.72	119.68	1343016.23	1,151.95	146.95
1197689.96	1,387.72	113.28	1271733.53	1,494.92	86.78	1344817.11	1,133.37	104.93
1199412.94	1,388.47	113.43	1273141.94	1,468.87	105.83	1346342.68	1,111.26	111.14
1201112.70	1,390.37	110.63	1274623.76	1,482.70	88.40	1347285.48	1,094.36	125.94
1202793.80	1,391.98	110.42	1275853.58	1,478.81	95.59	1349160.92	1,090.47	129.03
1204474.63	1,392.28	110.22	1277364.10	1,488.25	95.75	1350939.35	1,074.27	104.43
1206175.00	1,392.53	110.77	1278606.14	1,502.60	77.60	1352639.23	1,056.83	113.17
1207875.24	1,389.75	110.25	1279990.19	1,477.18	105.32	1354339.32	1,049.16	113.34
1209581.80	1,389.19	110.21	1281403.76	1,463.45	113.85	1356039.17	1,037.67	113.83
1211264.54	1,389.10	110.40	1282936.20	1,470.95	126.65	1357738.98	1,027.44	110.36
1212916.13	1,385.73	113.47	1284564.22	1,471.01	140.99	1359438.30	1,011.92	110.48
1214632.87	1,386.36	110.44	1286504.28	1,447.42	141.68	1361138.88	1,002.63	113.07
1216331.23	1,383.73	105.37	1288004.26	1,431.98	104.62	1362838.87	989.02	110.18
1218029.58	1,382.58	113.02	1289729.03	1,415.64	116.56	1364538.72	976.84	113.36
1219728.57	1,380.04	110.46	1291452.83	1,393.97	134.93	1366239.02	966.29	113.31
1221414.78	1,378.12	110.08	1292952.75	1,375.77	128.63	1367647.37	959.24	98.26
1223114.91	1,375.46	113.54	1294737.71	1,357.11	125.39	1369110.20	952.19	98.61
1224751.51	1,371.48	102.02	1296371.46	1,340.98	113.52	1370765.44	942.69	110.41
1226364.24	1,372.39	113.81	1298075.98	1,324.07	116.63	1372492.55	935.56	116.44
1228064.64	1,373.72	110.78	1299801.41	1,309.48	113.52	1374195.65	932.35	110.65
1229765.39	1,374.58	113.92	1301529.63	1,293.60	117.20	1375913.92	925.69	113.31
1231436.36	1,374.90	120.20	1303290.68	1,281.10	119.50	1377521.37	920.05	98.15
1233128.88	1,375.46	116.74	1304645.33	1,269.50	105.50	1379073.96	913.27	128.53
1234815.00	1,376.86	113.54	1306345.28	1,256.14	119.56	1380946.30	909.35	128.65
1236541.14	1,374.83	116.17	1308044.94	1,244.65	113.35	1382901.18	902.40	138.60
1238266.75	1,372.22	113.98	1309745.67	1,234.91	113.29	1384602.57	916.07	105.03
1240031.43	1,370.55	117.45	1311446.68	1,227.85	122.45	1385988.44	919.92	104.38
1241767.24	1,369.43	122.87	1313146.41	1,225.11	113.49	1387151.88	927.20	132.10
1243490.39	1,365.42	116.38	1314846.70	1,225.51	104.29	1388822.99	940.23	116.77
1245209.43	1,359.10	122.90	1316502.22	1,229.60	113.80	1390587.87	934.86	125.94
1246809.34	1,351.69	113.51	1318314.93	1,231.44	135.16	1392452.44	937.00	143.80
1248499.51	1,354.06	110.74	1320209.10	1,252.85	143.85	1394354.98	934.87	135.63
1250193.16	1,355.90	112.10	1322186.55	1,256.48	129.82			
1251524.26	1,360.99	108.01	1323646.42	1,250.07	117.03			

Comment Set E1, cont.
 Southern California Edison Company

Devers–Palo Verde No. 2 Transmission Line Project
 APPENDIX 3. TOWER HEIGHT TABLES

E1-119 cont.

**Table 2. Structure Information for Devers–San Bernardino #1 230 kV Transmission Lines
 (Towers removed from Devers Substation to San Bernardino Junction; line reconducted from
 San Bernardino Junction to San Bernardino Substation)**

EXISTING TOWER			EXISTING TOWER			EXISTING TOWER		
Number	Height	Status	Number	Height	Status	Number	Height	Status
POS 8L	60	Leave	71-2	84.5	Remove	81-3	81.5	Remove
60-1	149	Leave	71-3	81.5	Remove	81-4	81.5	Remove
60-2	105.5	Remove	71-4	105.5	Remove	82-1	81.5	Remove
60-3	81.5	Remove	72-1	87.5	Remove	82-2	81.5	Remove
61-1	87.5	Remove	72-2	93.5	Remove	82-3	93.5	Remove
61-2	87.5	Remove	72-3	87.5	Remove	82-4	81.5	Remove
61-3	81.5	Remove	73-1	105.5	Remove	83-1	87.5	Remove
61-4	75.5	Remove	73-2	87.5	Remove	83-2	105.5	Remove
62-1	81.5	Remove	73-3	105.5	Remove	83-3	81.5	Remove
62-2	75.5	Remove	74-1	77.75	Remove	84-1	99.5	Remove
62-3	81.5	Remove	74-2	81.5	Remove	84-2	78.5	Remove
62-4	84.5	Remove	74-3	81.5	Remove	84-3	99.5	Remove
63-1	81.5	Remove	74-4	77.75	Remove	84-4	99.5	Remove
63-2	78.5	Remove	75-1	81.5	Remove	85-1	99.5	Remove
64-1	78.5	Remove	75-2	81.5	Remove	85-2	81.5	Remove
64-2	81.5	Remove	75-3	87.5	Remove	85-3	81.5	Remove
64-3	87.5	Remove	75-4	81.5	Remove	85-4	99.5	Remove
65-1	81.5	Remove	75-5	81.5	Remove	86-1	87.5	Remove
65-2	87.5	Remove	76-1	77.75	Remove	86-2	87.5	Remove
65-3	87.5	Remove	76-2	75.5	Remove	86-3	99.5	Remove
66-1	84.5	Remove	76-3	87.5	Remove	87-1	84.5	Remove
66-2	87.5	Remove	76-4	74.75	Remove	87-2	87.5	Remove
66-3	99.5	Remove	77-1	84.5	Remove	87-3	75.5	Remove
66-4	87.5	Remove	77-2	81.5	Remove	87-4	75.5	Remove
67-1	87.5	Remove	77-3	99.5	Remove	88-1	105.5	Remove
67-2	75.5	Remove	78-1	87.5	Remove	88-2	105.5	Remove
67-3	81.5	Remove	78-2	75.5	Remove	89-1	99.5	Remove
68-1	81.5	Remove	78-3	81.5	Remove	89-2	84.5	Remove
68-2	81.5	Remove	78-4	81.5	Remove	89-3	74.75	Remove
68-3	81.5	Remove	79-1	81.5	Remove	90-1	84.5	Remove
68-4	87.5	Remove	79-2	81.5	Remove	90-2	84.5	Remove
69-1	81.5	Remove	79-3	87.5	Remove	90-3	84.5	Remove
69-2	87.5	Remove	80-1	84.5	Remove	90-4	81.5	Remove
69-3	99.5	Remove	80-2	87.5	Remove	91-1	84.5	Remove
70-1	75.5	Remove	80-3	99.5	Remove	91-2	81.5	Remove
70-2	78.5	Remove	80-4	87.5	Remove	91-3	84.5	Remove
70-3	75.5	Remove	81-1	81.5	Remove	92-1	81.5	Remove
71-1	99.5	Remove	81-2	81.5	Remove	92-2	105.5	Remove

Comment Set E1, cont.
 Southern California Edison Company

Devers–Palo Verde No. 2 Transmission Line Project
 APPENDIX 3. TOWER HEIGHT TABLES

E1-119 cont.

**Table 2. Structure Information for Devers–San Bernardino #1 230 kV Transmission Lines
 (Towers removed from Devers Substation to San Bernardino Junction; line reconducted from
 San Bernardino Junction to San Bernardino Substation)**

EXISTING TOWER			EXISTING TOWER			EXISTING TOWER		
Number	Height	Status	Number	Height	Status	Number	Height	Status
92-3	84.5	Remove	98-1	105.5	Remove	1-5	129	Leave
93-1	78.5	Remove	98-2	105.5	Remove	1-4	114	Leave
93-2	84.5	Remove	98-3	87.5	Remove	1-3	121	Reinf.
93-3	99.5	Remove	99-1	81.5	Remove	1-2	121	Reinf.
93-4	75.5	Remove	99-2	81.5	Remove	1-1	136	Reinf.
94-1	78.5	Remove	99-3	89	Remove	0-8	128.5	Reinf.
94-2	75.5	Remove	— San Bernardino Junction —			0-7	143.5	Reinf.
95-1	84.5	Remove	3-2	129	Leave	0-6	136	Reinf.
95-2	75.5	Remove	3-1	155	Leave	0-5	136	Reinf.
95-3	81.5	Remove	2-5	116	Leave	0-4	128.5	Reinf.
96-1	81.5	Remove	2-4	176	Reinf.	0-3	124.8	Reinf.
96-2	81.5	Remove	2-3	143.5	Reinf.	0-2	129	Leave
96-3	87.5	Remove	2-2	143.5	Reinf.	0-1	150	Leave
97-1	81.5	Remove	2-1	176	Reinf.	POS 1L	60	Leave
97-2	81.5	Remove	1-7	128.5	Reinf.			
97-3	87.5	Remove	1-6	128.5	Reinf.			

Comment Set E1, cont.
 Southern California Edison Company

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Devers–Palo Verde No. 2 Transmission Line Project
 APPENDIX 3. TOWER HEIGHT TABLES

E1-119 cont.

Table 3. Information for Structures in the Devers-San Bernardino and Devers-Vista Alignments

DEVERS-SAN BERNARDINO (DOUBLE-CIRCUIT LINE ON NORTHERN SIDE OF THE ROW)			DEVERS-VISTA #1 & #2		DEVERS-VISTA (DOUBLE-CIRCUIT LINE ON SOUTHERN SIDE OF THE ROW)			DEVERS-SAN BERNARDINO #1	
Existing Tower			New Tower		Existing Tower			New Tower	
Number	Height	Status*	Number	Height	Number	Height	Status*	Number	Height
59-5	164	No Change			POS 8H	80	No Change		
60-1	149	No Change							
45-3	104	Replace	201	137	0-1	183.5	No Change		
45-2	110	Replace	202	137	0-2	152	No Change		
45-1/T272	85	Remove							
			203	130	0-3	160	No Change		
T271	85	Remove							
T270	85	Replace	204	155	0-4	149	No Change		
T269	85	Remove							
			205	148	0-5	143	No Change		
T268	85	Remove							
T267	80	Replace	206	113					
T266	95	Replace	207	131	1-1	140	No Change		
T265	85	Remove							
T264	85	Replace	208	175	1-2	143	No Change		
T263	85	Remove							
T262	85	Remove							
			209	128	1-3	131	No Change		
T261	85	Remove							
T260	85	Replace	210	146	1-4	134	No Change		
T259	85	Remove							
T258	85	Replace	211	180	2-1	128	No Change		
T257	85	Remove							
T256	85	Replace	212	119	2-2	137	No Change		
T255	90	Replace	213	122					
T254	110	Remove			2-3	137	No Change		
T253	85	Replace	214	180					
T252A	85	Remove			2-4	131	No Change		
T252	85	Remove							
T251	60	Replace	215	131	3-1	134	No Change		
T250	60	Replace	216	180	3-2	122	No Change		
T249	100	Remove							
T248	90	Replace	217	137					
T247A	85	Remove			4-1	128	No Change		
T247	90	Remove							
T246	90	Replace	218	137					
T245	90	Remove			4-2	119	No Change		
T244	90	Replace	219	137	4-3	119	No Change		
T243	90	Remove							
T242	90	Replace	220	113					
T241	85	Remove			5-1	146	No Change		

Comment Set E1, cont.
 Southern California Edison Company

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Devers-Palo Verde No. 2 Transmission Line Project
 APPENDIX 3. TOWER HEIGHT TABLES

E1-119 cont.

Table 3. Information for Structures in the Devers-San Bernardino and Devers-Vista Alignments

DEVERS-SAN BERNARDINO (DOUBLE-CIRCUIT LINE ON NORTHERN SIDE OF THE ROW)			DEVERS-VISTA #1 & #2		DEVERS-VISTA (DOUBLE-CIRCUIT LINE ON SOUTHERN SIDE OF THE ROW)			DEVERS-SAN BERNARDINO #1	
Existing Tower SOUTHERN			New Tower		Existing Tower NORTHERN			New Tower	
Number	Height	Status*	Number	Height	Number	Height	Status*	Number	Height
T240	85	Remove							
T239	95	Replace	222	137	5-2	155	No Change		
T238	95	Remove							
			223	137					
T237	85	Remove			5-3	149	No Change		
T236	100	Remove							
T235	100	Replace	224	128					
T234	85	Remove			6-1	155	No Change		
T233	80	Replace	225	137					
T232	90	Remove			6-2	146	No Change		
T231	85	Replace	226	146					
T230	85	Remove			6-3	152	No Change		
T229	85	Replace	227	137					
T228	70	Replace	228	113					
T227	75	Replace	229	113					
T226	85	Replace	230	149	7-1	143	No Change		
T225	85	Remove							
			231	128	7-2	125	No Change		
T224	85	Remove							
T223	85	Replace	232	149					
T222	85	Remove			7-3	134	No Change		
T221	85	Replace	233	131					
T220A	110	Remove			7-4	125	No Change		
T220	100	Replace	234	131					
T219	85	Replace	235	128	8-1	134	No Change		
T218	85	Remove							
T217A	85	Replace	236	149	8-2	134	No Change		
T217	85	Remove							
T216	85	Replace	237	140	8-3	146	No Change		
T215	85	Remove							
T214	85	Replace	238	155	8-4	146	No Change		
T213	85	Remove							
T212	85	Remove							
			239	170	9-1	155	No Change		
T211	90	Remove							
T210	85	Remove							
T209	85	Remove							
			240	152	9-2	149	No Change		
T208	85	Remove							
T207	95	Remove							
			241	155	9-3	125	No Change		

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Devers–Palo Verde No. 2 Transmission Line Project
 APPENDIX 3. TOWER HEIGHT TABLES

E1-119 cont.

Table 3. Information for Structures in the Devers-San Bernardino and Devers-Vista Alignments

DEVERS-SAN BERNARDINO (DOUBLE-CIRCUIT LINE ON NORTHERN SIDE OF THE ROW)			DEVERS-VISTA #1 & #2		DEVERS-VISTA (DOUBLE-CIRCUIT LINE ON SOUTHERN SIDE OF THE ROW)			DEVERS-SAN BERNARDINO #1	
Existing Tower			New Tower		Existing Tower			New Tower	
Number	Height	Status*	Number	Height	Number	Height	Status*	Number	Height
T206	85	Remove							
T205	85	Remove							
T204	75	Replace	242	134	10-1	137	No Change		
T203	85	Remove							
T202	85	Replace	243	155	10-2	125	No Change		
T201	85	Remove							
T200	85	Remove							
			244	180	10-3	152	No Change		
T199	85	Remove							
T198	85	Remove							
T197	85	Replace	245	175	11-1	149	No Change		
T196	85	Remove							
T195	85	Remove							
			246	155	11-2	131	No Change		
T194	85	Remove							
T193	85	Remove							
			247	143	11-3	152	No Change		
T192	90	Remove							
T191	85	Replace	248	116	12-1	149	No Change		
T190	85	Replace	249	128					
T189	85	Remove							
T188	85	Replace	250	137	12-2	134	No Change		
T187	85	Remove							
T186	85	Replace	251	175	12-3	146	No Change		
T185	85	Remove							
T184	90	Replace	252	143	12-4	152	No Change		
T183	85	Remove							
T182	90	Remove							
			253	170	13-1	155	No Change		
T181	90	Remove							
T180	85	Remove							
			254	146	13-2	152	No Change		
T179	85	Remove							
T178	85	Remove							
T177	85	Remove							
T176	80	Replace	255	175	13-3	140	No Change		
T175	100	Remove							
T174	85	Remove							
			256	131	14-1	125	No Change		
T173	85	Remove							
T172	85	Remove							

Comment Set E1, cont.
 Southern California Edison Company

REFER TO COMMENT NUMBER 16

Devers–Palo Verde No. 2 Transmission Line Project
 APPENDIX 3. TOWER HEIGHT TABLES

E1-119 cont.

Table 3. Information for Structures in the Devers-San Bernardino and Devers-Vista Alignments

DEVERS-SAN BERNARDINO (DOUBLE-CIRCUIT LINE ON NORTHERN SIDE OF THE ROW)			DEVERS-VISTA #1 & #2		DEVERS-VISTA (DOUBLE-CIRCUIT LINE ON SOUTHERN SIDE OF THE ROW)			DEVERS-SAN BERNARDINO #1	
Existing Tower SOUTHERN			New Tower		Existing Tower NORTHERN			New Tower	
Number	Height	Status*	Number	Height	Number	Height	Status*	Number	Height
			257	140	14-2	134	No Change		
T171	90	Remove							
T170	75	Replace	258	122	14-3	131	No Change		
T169	85	Remove							
			259	137	14-4	125	No Change		
T168	85	Remove							
T167	90	Remove							
			260	131	15-1	119	No Change		
T166	90	Remove							
T165	90	Remove							
			261	131	15-2	128	No Change		
T164	85	Remove							
T163	85	Replace	262	137	15-3	128	No Change		
T162	85	Remove							
			263	137	15-4	119	No Change		
T161	90	Remove							
T160	75	Replace	264	128	16-1	122	No Change		
T159A	80	Remove							
T159	90	Replace	265	113	16-2	122	No Change		
T158	95	Replace	266	113					
T157	110	Replace	267	131	16-3	143	No Change		
T156	110	Replace	268	125					
T155	90	Remove			16-4	165	No Change		
Banning Junction									
16-5	56	Remove	269	152	T154	65	Replace	101	113
17-1	122	No Change			T153	75	Replace	102	113
					T152	85	Replace	103	113
					T151	100	Remove		
17-2	134	No Change			T150	90	Replace	104	119
					T149A	100	Remove		
17-3	137	No Change						105	131
					T149	95	Remove		
					T148	65	Replace	106	113
					T147	85	Replace	107	116
18-1	131	No Change			T146A	85	Remove		
					T146	85	Replace	108	152
18-2	155	No Change			T145	90	Remove		
					T144A	85	Replace	109	128
					T144	100	Replace	110	116
18-3	125	No Change			T143	90	Replace	111	113

Comment Set E1, cont.
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Devers-Palo Verde No. 2 Transmission Line Project
 APPENDIX 3. TOWER HEIGHT TABLES

E1-119 cont.

Table 3. Information for Structures in the Devers-San Bernardino and Devers-Vista Alignments

DEVERS-SAN BERNARDINO (DOUBLE-CIRCUIT LINE ON NORTHERN SIDE OF THE ROW)			DEVERS-VISTA #1 & #2		DEVERS-VISTA (DOUBLE-CIRCUIT LINE ON SOUTHERN SIDE OF THE ROW)			DEVERS-SAN BERNARDINO #1	
Existing Tower SOUTHERN			New Tower		Existing Tower NORTHERN			New Tower	
Number	Height	Status*	Number	Height	Number	Height	Status*	Number	Height
18-4	122	No Change			T142	90	Remove		
								112	122
			M18-4A	113	T141	85	Remove		
					T140	95	Remove		
19-1	134	Raise						113	155
					T139	90	Remove		
					T138	95	Remove		
19-2	131	Raise						114	143
					T137	85	Remove		
19-3	152	No Change			T136	85	Remove		
19-4	128	No Change			T135	85	Replace	115	170
					T134	110	Remove		
					T133A	85	Remove		
20-1	128	No Change						116	160
					T133	85	Remove		
					T132	85	Remove		
20-2	146	No Change			T131	85	Replace	117	149
					T130	85	Remove		
20-3	125	No Change			T129	85	Replace	118	137
					T128	85	Remove		
21-1	125	No Change			T127	85	Replace	119	125
					T126	85	Remove		
21-2	122	No Change						120	155
					T125	85	Remove		
					T124	85	Remove		
21-3	128	No Change			T123	85	Replace	121	137
					T122	85	Remove		
21-4	125	No Change						122	128
					T121	85	Remove		
22-1	119	No Change			T120	85	Replace	123	134
					T119	85	Remove		
22-2	128	No Change						124	122
					T118	85	Remove		
					T117	90	Remove		
22-3	134	Raise			T116A	80	Replace	125	155
					T116	85	Remove		
					T115	85	Remove		
22-4	131	No Change						126	128
					T114	85	Remove		
23-1	128	No Change			T113	85	Replace	127	122
					T112	85	Remove		

Comment Set E1, cont.
 Southern California Edison Company

REFER TO COMMENT NUMBER 16

Devers-Palo Verde No. 2 Transmission Line Project
 APPENDIX 3. TOWER HEIGHT TABLES

E1-119 cont.

Table 3. Information for Structures in the Devers-San Bernardino and Devers-Vista Alignments

DEVERS-SAN BERNARDINO (DOUBLE-CIRCUIT LINE ON NORTHERN SIDE OF THE ROW)			DEVERS-VISTA #1 & #2		DEVERS-VISTA (DOUBLE-CIRCUIT LINE ON SOUTHERN SIDE OF THE ROW)			DEVERS-SAN BERNARDINO #1	
SOUTHERN			New Tower		NORTHERN			New Tower	
Existing Tower	Height	Status*	Number	Height	Existing Tower	Height	Status*	Number	Height
					T111	95	Remove		
23-2	152	No Change						128	155
					T110	90	Remove		
					T109	80	Remove		
23-3	152	No Change			T108	85	Replace	129	180
					T107	85	Remove		
					T106	85	Remove		
24-1	143	Raise						130	143
					T105	85	Remove		
24-2	116	No Change			T104	80	Replace	131	119
					T103	85	Remove		
24-3	143	No Change			T102A	85	Replace	132	170
					T102	85	Remove		
					T101	85	Remove		
24-4	137	No Change						133	125
					T100	80	Remove		
					T99	80	Remove		
25-1	143	No Change						134	137
					T98	85	Remove		
					T97	80	Remove		
25-2	122	No Change						135	131
					T96	85	Remove		
25-3	143	No Change			T95	85	Replace	136	149
					T94	85	Remove		
					T93	80	Replace	137	113
25-4	137	No Change			T92	90	Replace	138	113
26-1	134	No Change			T91	90	Replace	139	125
26-2	155	No Change			T90	80	Replace	140	113
					T89	80	Replace	141	113
26-3	149	No Change						142	125
					T88	80	Remove		
					T87	80	Remove		
								143	175
27-1	134	No Change			T86	80	Remove		
					T85	80	Remove		
								144	155
27-2	155	No Change			T84	80	Remove		
					T83	90	Remove		
								145	143
27-3	143	No Change			T82	90	Remove		
								146	134

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REFER TO COMMENT NUMBER 16

Devers–Palo Verde No. 2 Transmission Line Project
 APPENDIX 3. TOWER HEIGHT TABLES

E1-119 cont.

Table 3. Information for Structures in the Devers-San Bernardino and Devers-Vista Alignments

DEVERS-SAN BERNARDINO (DOUBLE-CIRCUIT LINE ON NORTHERN SIDE OF THE ROW)			DEVERS-VISTA #1 & #2		DEVERS-VISTA (DOUBLE-CIRCUIT LINE ON SOUTHERN SIDE OF THE ROW)			DEVERS-SAN BERNARDINO #1	
SOUTHERN			New Tower		NORTHERN			New Tower	
Existing Tower	Height	Status*	Number	Height	Existing Tower	Height	Status*	Number	Height
27-4	125	No Change			T81	90	Remove		
28-1	180	No Change			T80	80	Replace	147	119
					T79	80	Replace	148	113
					T78	80	Replace	149	137
28-2	146	No Change			T77	80	Remove		
28-3	155	No Change			T76	90	Remove		
					T75	90	Replace	150	152
29-1	180	No Change			T74	80	Replace	151	134
29-2	113	No Change			T73	90	Remove		
29-3	180	No Change			T72	90	Replace	152	131
					T71	80	Replace	153	113
					T70	80	Replace	154	113
30-1	180	No Change			T69	80	Replace	155	113
30-2	152	No Change			T68	80	Replace	156	113
30-3	122	No Change			T67	80	Replace	157	119
					T66	80	Remove		
30-4	149	No Change			T65	80	Replace	158	131
31-1	128	No Change			T64	80	Replace	159	113
31-2	155	No Change			T63	80	Replace	160	113
					T62	80	Remove		
								161	170
31-3	149	No Change			T61	80	Remove		
32-1	146	No Change			T60	80	Replace	162	140
					T59	90	Remove		
32-2	149	No Change						163	137
					T58	90	Remove		
					T57	80	Remove		
32-3	131	No Change						164	137
					T56	80	Remove		
33-1	122	No Change			T55	80	Replace	165	119
33-2	155	No Change			T54	80	Replace	166	113
					T53	80	Remove		
33-3	134	No Change			T52	80	Replace	167	113
33-4	122	No Change			T51	80	Replace	168	113
33-5	119	No Change			T50	80	Replace	169	113
34-1	122	No Change			T49	80	Replace	170	113
					T48	80	Remove		
34-2	119	No Change						171	134
					T47	80	Remove		
34-3	149	No Change			T46	80	Replace	172	170
					T45	80	Remove		

Comment Set E1, cont.
 Southern California Edison Company

REFER TO COMMENT NUMBER 16

Devers–Palo Verde No. 2 Transmission Line Project
 APPENDIX 3. TOWER HEIGHT TABLES

E1-119 cont.

Table 3. Information for Structures in the Devers-San Bernardino and Devers-Vista Alignments

DEVERS-SAN BERNARDINO (DOUBLE-CIRCUIT LINE ON NORTHERN SIDE OF THE ROW)			DEVERS-VISTA #1 & #2		DEVERS-VISTA (DOUBLE-CIRCUIT LINE ON SOUTHERN SIDE OF THE ROW)			DEVERS-SAN BERNARDINO #1	
Existing Tower SOUTHERN			New Tower		Existing Tower NORTHERN			New Tower	
Number	Height	Status*	Number	Height	Number	Height	Status*	Number	Height
35-1	128	No Change			T44	80	Replace	173	122
					T43	80	Remove		
35-2	125	No Change			T42	80	Replace	174	125
					T41	80	Remove		
36-1	125	No Change						175	155
					T40	80	Remove		
36-2	137	No Change			T39	80	Replace	176	113
36-3	122	No Change			T38	80	Replace	177	113
					T37	80	Remove		
37-1	134	No Change						178	113
					T36	90	Remove		
								179	125
37-2	134	No Change			T35	90	Remove		
					T34	90	Replace	180	122
37-3	180	No Change			T33	80	Remove		
					T32	80	Remove		
								181	125
					T31	80	Remove		
38-1	180	No Change						182	137
					T30	80	Remove		
					T29	80	Remove		
38-2	155	No Change						183	137
					T28	80	Remove		
					T27	90	Remove		
38-3	143	No Change						184	155
38-4	131	No Change			T26	80	Remove		
					T25	80	Replace	185	122
39-1	134	No Change			T24	80	Replace	186	119
					T23	80	Remove		
39-2	146	No Change			T22	80	Replace	187	155
39-3	180	No Change			5-1	139	Replace	188	143

Comment Set E1, cont.
 Southern California Edison Company

REFER TO COMMENT NUMBER 16

Devers–Palo Verde No. 2 Transmission Line Project
 APPENDIX 3. TOWER HEIGHT TABLES

E1-119 cont.

Table 3. Information for Structures in the Devers-San Bernardino and Devers-Vista Alignments

DEVERS-SAN BERNARDINO (DOUBLE-CIRCUIT LINE ON NORTHERN SIDE OF THE ROW)			DEVERS-VISTA #1 & #2		DEVERS-VISTA (DOUBLE-CIRCUIT LINE ON SOUTHERN SIDE OF THE ROW)			DEVERS-SAN BERNARDINO #1	
Existing Tower			New Tower		Existing Tower			New Tower	
Number	Height	Status*	Number	Height	Number	Height	Status*	Number	Height
San Bernardino Junction – Line Continues North to San Bernardino Substation			WEST TO VISTA SUBSTATION		San Bernardino Junction – Line Continues West to Vista Substation				
39-4	180	No Change			3-1	155	Leave		
40-1	175	Replace	40-1	122	2-5	116	Leave		
40-2	113	Replace	40-2	113	2-4	176	Reinf.		
40-3	137	Replace	40-3	137	2-3	143.5	Reinf.		
40-4	119	Replace			2-2	143.5	Reinf.		
41-1	124.75	Remove			2-1	176	Reinf.		
41-2	125	Replace	41-2	155	1-7	128.5	Reinf.		
41-3	155	Replace	41-3	128	1-6	128.5	Reinf.		
41-4	155	Replace	41-4	131	1-5	129	Leave		
			M41-4A	113	1-4	114	Leave		
42-1	113	Replace	42-1	113	1-3	121	Reinf.		
42-2	113	Replace	42-2	113	1-2	121	Reinf.		
42-3	113	Replace	42-3	122	1-1	136	Reinf.		
42-4	180	Replace	42-4	137	0-8	128.5	Reinf.		
42-5	155	Replace	42-5	131	0-7	143.5	Reinf.		
43-1	180	Replace	43-1	113	0-6	136	Reinf.		
43-2	116	Reinf.			0-5	136	Reinf.		
43-3	124	Reinf.			0-4	128.5	Reinf.		
43-4	128.5	Reinf.			0-3	124.8	Reinf.		
43-5	164	No Change			0-2	129	Leave		
43-6	155	No Change			0-1	150	Leave		
44-1	137	No Change			POS 7L	60	Leave		
44-2	155	No Change							
44-3	155	No Change							
44-4	155	No Change							
44-5	146	Replace	44-5	113					
44-6	139	No Change							
44-7	139	No Change							
44-8	139	Reinf.							
POS 1X	58	No Change							

Responses to Comment Set E1 Southern California Edison Company

E1-1 Executive Summary Section ES.1 (page ES-1, paragraph 1, line 7) of the Draft EIR/EIS has been corrected as follows:

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 San Bernardino Junction to SCE's ~~Mountain View~~ San Bernardino Substation and from San Bernardino Junction to SCE's Vista Substation would be re-conducted (see Figure ES-1).

E1-2 Executive Summary Section ES.1 (page ES-2, paragraph 4, line 4) of the Draft EIR/EIS has not been changed as requested because it was an accurate statement regarding the content of SCE's objectives. The sentence has been modified as follows:

However, ~~because the project is designed to provide economic benefits and it is not primarily a reliability enhancement project,~~ SCE did not present a specific project objective related to the date of project operation.

E1-3 Executive Summary Section ES.1.2.3 (page ES-7, bullet 1) of the Draft EIR/EIS has been modified as follows:

- Construction of a 500 kV shunt line reactor bank, a static VAR compensator and two shunt capacitors ~~and associated disconnect switches~~ within Devers Substation.

E1-4 Executive Summary Section ES.1.2.4 (page ES-8, paragraph 2, line 6) of the Draft EIR/EIS has been modified as follows:

The route would then turn ~~southeast-southwest~~ crossing over I-10 again, and would continue across the Harquahala Plain through the northern end of the Eagletail Mountains until it would enter into La Paz County.

E1-5 As discussed in Section 4.2.3 of Appendix 1 of the Draft EIR/EIS, the Harquahala Junction Switchyard Alternative would eliminate 5 miles of temporary and permanent impacts associated with the construction of a 500 kV transmission line between the Harquahala Generating Station and Harquahala Junction. In addition, this alternative could also defer or eliminate the need for APS to build roughly 14.7 miles of new 500 kV line for the TS-5 Project along the existing DPV1 alignment between Harquahala Junction and the PVNGS or Arlington Power Plant. Therefore, in total the alternative would indeed eliminate or defer the need for almost 20 total miles of new 500 kV transmission line segments. To clarify this discussion, Executive Summary Section ES.2.2.1 (page ES-19, paragraph 1, line 2) of the Draft EIR/EIS has been modified as follows:

Rationale for Full Analysis. This alternative would meet project objectives and would be feasible. This alternative would eliminate or defer the need for almost 20 total miles of new 500 kV transmission line segments (5 miles of the Proposed Project from Harquahala Junction to the Harquahala Generating Station Switchyard would be eliminated and 14.7 miles of the TS-5 Project 500 kV line between Harquahala Junction and the PVNGS or Duke Arlington Power Plant could be deferred).

E1-6 Please see Comment Set A15 from the San Bernardino National Forest. The Forest’s comments (Comment A15-3) clarify that the Scenic Integrity Objective for the portion of the Devers-Valley No. 2 Alternative that passes through the SBNF is within an area that should have been designated as *HIGH* and not *VERY HIGH* by the 2005 adopted SBNF South Land Management Plan (LMP). However, at the time that the Draft EIR/EIS was prepared, lands within SBNF that would be crossed by the Devers-Valley No. 2 (D-V2) Alternative were assigned a *VERY HIGH* Scenic Integrity Objective (SIO). The LMP is the policy document that guides development within the SBNF. The SBNF in its Comment A15-3 states its intention to modify the SIO by correcting the SIO map. However, until that time, the Devers-Valley No. 2 Alternative must be assessed for consistency with the SBNF South LMP based on the existing SIO as discussed in the Draft EIR/EIS Section D.3 in Table D.3-10 and on pages D.3-213 and D.3-214.

Table D.3-10 in Section D.3.9.1 under Policy Consistency Analysis in the EIR/EIS has been modified to include the following note on the row discussing the U.S. Forest Service San Bernardino National Forest:

E1-7 Executive Summary Section ES.2.2.3 (page ES-21, paragraph 1, line 3) of the Draft EIR/EIS has been modified as follows:

Description. The Desert Southwest Transmission Line Project (DSWTP) Final EIS/EIR, published by the Imperial Irrigation District (IID) and BLM in October 2005, analyzes a proposed new 118-mile 500 kV line between Blythe and SCE’s Devers Substation (see Figure ES-~~32~~).

E1-8 The text has been clarified to state that SCE has not previously installed long distances of underground 230 kV line. However, as not to give the impression that undergrounding of 230 kV lines is not technically feasible, projects by PG&E and SDG&E with longer 230 kV underground segments have also been mentioned. Executive Summary Section ES.2.3.3 (page ES-30, paragraph 2, line 1) of the Draft EIR/EIS has been modified as follows:

Undergrounding a 230 kV line for the West of Devers segment would be feasible. ~~and has been completed by SCE~~ currently has about one circuit-mile of underground 230 kV line within its system. Other utilities have longer segments of underground 230 kV lines within their systems [e.g., Pacific Gas and Electric for the Jefferson-Martin 230 kV Transmission Project (23.5 miles) and the Tri-Valley Capacity Increase Project (11.8 miles), and by San Diego Gas and Electric (SDG&E) for the Otay Mesa Power Purchase Agreement Transmission Project (10 miles)]; ~~However,~~ however, each circuit would require a 3-foot-wide continuous trench creating much greater construction and habitat disturbance impacts than with the overhead Proposed Project.

E1-9 Executive Summary Section ES.3 (page ES-33, paragraph 1) of the Draft EIR/EIS has been modified as follows:

Using the 4 percent benchmark, SCE has incorporated low-cost and no-cost measures to reduce magnetic field levels ~~near schools~~ along the proposed route (including ~~deeper burial of underground lines~~ combining several existing 230 kV circuits onto double-circuit transmission line structures and changing phase configuration). There are additional potential measures for reducing magnetic fields, mostly beyond the no-cost/low-cost parameters (including increasing distance from conductors, reducing conductor spac-

ing, converting single-phase to split-phase circuits, or placing proposed transmission lines underground and minimizing current), which are described for the benefit of the public and decision-makers in reviewing the Proposed Project.

E1-10 The two statements referenced actually say the same thing, using different wording, so there is no inconsistency. Regardless, for clarity, Executive Summary Section ES.4.3.2 (page ES-41, paragraph 2) of the Draft EIR/EIS has been modified as follows:

SCE Palo Verde Alternative. This alternative would avoid rural residences that would be impacted by the Proposed Project, thereby creating ~~less than no~~ significant impacts to existing land uses. No mitigation measures would be implemented for the alternative.

Executive Summary Section ES.4.3.2 (page ES-41, paragraph 3) of the Draft EIR/EIS has been modified as follows:

Harquahala Junction Switchyard Alternative. Similar to the SCE Palo Verde Alternative, the Harquahala Junction Switchyard Alternative would avoid rural residences that would be impacted by the Proposed Project. ~~Less than No~~ significant impacts to existing land uses would occur, and no mitigation measures would be implemented.

E1-11 Section ES.4.6.1 (page ES-45) of the Draft EIR/EIS has not been modified because it is correct. Executive Summary Section ES.5.2.2 (page ES-63, bullet 1) of the Draft EIR/EIS has been modified as follows to clarify the apparent inconsistency:

- Construction of the project ~~could would~~ cause an adverse change to known historic properties if they cannot be protected from direct construction and operational impacts.

E1-12 Executive Summary Section ES.4.10.2 (page ES-53, last paragraph) of the Draft EIR/EIS has been corrected as follows:

Devers-Valley No. 2 Alternative. The Devers-Valley No. ~~32~~ Alternative would result in greater levels of daily NO_x and CO construction emissions within the SCAB compared to the Proposed Project.

E1-13 Section A.1.1 (page A-2, paragraph 3, line 1) of the Draft EIR/EIS has been modified as follows:

After construction of the DPV1 line, applications to construct the Devers–Palo Verde Harquahala–No. 2 500 kV (DPV2) line between Devers Substation and PVNGS were submitted by SCE in 1985.

E1-14 Section A.2.1 (page A-7, paragraph 2, 4th bullet) of the Draft EIR/EIS has been modified as suggested:

- Provide increased reliability of supply, insurance value against extreme events, and flexibility in operating the Southwest's California's transmission grid.

E1-15 Section A.2.1 (page A-7, last paragraph, last sentence) of the Draft EIR/EIS has been modified as suggested:

The Southwest Transmission Expansion Planning (STEP)³ working group independently concluded a similar magnitude of generation is available for import into California.

E1-16 Section A.2.1 (page A-9, paragraph 1, line 2) of the Draft EIR/EIS has been modified as suggested:

The Western Electricity Coordinating Council (WECC) transmission system is an interstate regional system (including northwestern Mexico and 2 western Canadian provinces)...

E1-17 Section A.2.2 (page A-10, paragraph 2, line 1) of the Draft EIR/EIS has been modified as suggested:

The import path ~~paths~~ to southern California (east of the Colorado River, or EOR) ~~are~~ currently ~~constrained to is rated at 8,055 MW roughly 7,550 MW by the existing system~~ and the existing 500 kV DPV1 line is allocated 1,800 MW ~~carries about 1,950 MW~~.

E1-18 Section A.2.2 (page A-10, paragraph 1, line 3) of the Draft EIR/EIS has been modified as follows:

The primary forum for regional transmission planning in ~~this region, the southwest is~~ called Southwest Transmission Expansion Plan (STEP). STEP is a ~~sub~~-regional planning group for transmission and generation stakeholders in Arizona, Nevada, and southern California.

E1-19 Section A.2.2 (page A-10, paragraph 2) of the Draft EIR/EIS has been modified as follows:

The current STEP recommendations include many “short-term” upgrades in California and Arizona. Some were approved by the CAISO board in June 2004. These include upgrades to increase the capacity on the Hassayampa–North Gila–Imperial Valley line (SWPL) and increase the capacity of the existing DPV1 500 kV line. ~~Additional short term upgrades in Arizona could be used to bring the combined capacity of the import paths (east of the Colorado River) from the present 7,550 MW to 9,000 MW using a plan called EOR (East of River) 9000-~~

E1-20 Section A.2.2 (page A-10, paragraph 3) of the Draft EIR/EIS has been modified as follows:

STEP also envisions ~~longer~~-mid-term upgrades such as new 230 kV and 500 kV lines between Arizona and California and a line into San Diego.

E1-21 Section B.2.2 (page B-9, Table B-1) of the Draft EIR/EIS has been modified as follows:

Table B-1. Proposed Devers-Harquahala 500 kV Transmission Line Summary	
New Permanent Area Occupied (acres)	
Telecommunications	0.8 <u>0.25</u>
Total	107.1 <u>106.5</u>

E1-22 Section B.2.2 (page B-9, Table B-1) of the Draft EIR/EIS has been modified as follows:

Table B-1. Proposed Devers-Harquahala 500 kV Transmission Line Summary	
New Temporary Area Occupied (acres)	
Telecommunications (optical repeater)	2.0 <u>0.125</u>
Total	839.6 <u>837.7</u>

E1-23 Section B.2.2 (page B-10, Table B-2) of the Draft EIR/EIS has been modified as follows:

Table B-2. Proposed West of Devers 230 kV Upgrade Summary	
Total number of new structures to be installed	173 182
Area affected by new structure installation	50.2 52.8 acres (permanent)

E1-24 Section B.2.3 (page B-13, paragraph 1, line 1) of the Draft EIR/EIS has been modified as follows:

In addition to the Devers Substation to Harquahala Substation component, the Proposed Project would include improvements to the west of Devers ~~Substation-230 kV system~~.

E1-25 Section B.2.3.1 (page B-14, paragraph 3, bullet 3) of the Draft EIR/EIS has been updated with information provided by SCE as follows:

- Constructing a new 40-mile, double-circuit 230 kV transmission line within the existing ROW, which includes approximately ~~157-166~~ new structures and a new OPGW.

E1-26 Please refer to Response E1-25.

E1-27 The following sentence has been added to Section B.2.3.2 (page B-17, paragraph 1, line 5) of the Draft EIR/EIS:

The San Bernardino Junction to San Bernardino Substation portion of the Proposed Project would consist of reconductoring one circuit on each of the two existing 3.4-mile, double-circuit 230 kV lattice steel tower lines. The existing fiber optic cable would be replaced with a new OPGW. Detailed maps of this segment are presented in Appendix 10.

E1-28 The following sentence has been added to Section B.2.3.3 (page B-17, paragraph 1, last line) of the Draft EIR/EIS:

The reconductoring will require the replacement of approximately 14 structures and one inter-set structure. In addition, the existing fiber optic cable would be replaced with a new OPGW.

E1-29 Section B.2.4 (page B-19, last paragraph) of the Draft EIR/EIS has been updated with information from SCE as follows:

~~LADWP has not yet committed to participate in DPV2; however, SCE stated on April 14, 2006 that it believes that the parties are close to finalizing an agreement that would provide for SCE's construction of DPV2 as proposed. Although most of the outstanding issues have been resolved, some still require further discussion between LADWP and the CAISO. SCE and LSDWP are continuing to discuss issues concerning LADWP's participation in DPV2. SCE is hopeful that a resolution of those issues will be reached soon.~~

E1-30 The following sentence has been added to Section B.3.1 (page B-22, paragraph 5, last line) of the Draft EIR/EIS:

Because of the placement of these existing towers, no new towers would be constructed in Copper Bottom Pass and no double-circuit lattice steel towers would be constructed as a part of the Proposed Project. The existing static ground wire would be replaced with a new OPGW. The tower diagram is shown in Figure B-9.

E1-31 The following clause was deleted from Section B.3.4 (page B-46, paragraph 1, last sentence) of the Draft EIR/EIS:

One 500 kV SVC would be installed and terminate at the 500 kV switchrack at Devers Substation ~~and another 500 kV SCV would be installed and terminate at the 500 kV switchyard inside the Valley Substation.~~

E1-32 Section B.3.4.1 (page B-49, paragraph 1) of the Draft EIR/EIS has been modified as follows:

The proposed modifications to the Devers Substation would be installed in the existing switchyard. Modifications include the installation of a new ~~133~~ 135-foot-high by 90-foot-wide dead-end ~~structure~~ structures, circuit breakers, and disconnect switches. ~~Disconnect switches~~ Electrical equipment associated with the new 500 kV Devers-Harquahala transmission line would be installed ~~adjacent to and northwest of the existing DPV1 500 kV shunt reactors~~ at the northwest part of the switchrack.

E1-33 Section B.3.4.1 (page B-49, paragraph 2) of the Draft EIR/EIS has been modified as follows based on information provided in the comment:

A ~~new transformer bank and a~~ 500 kV shunt line ~~reactor~~ bank and associated disconnect switches would be installed within Devers Substation. A 500 kV Static VAR Compensator (SVC) would be installed north of the 500 kV switchyard within the existing Devers Substation. The SVC would terminate ~~at~~ into the 500 kV switchrack. Two 150 MVAR shunt capacitors would be installed to the east of the 500 kV switchrack.

E1-34 Section B.3.4.4 (page B-51) of the Draft EIR/EIS has been deleted as follows:

~~B.3.4.4 Valley Substation~~

~~A 500 kV SVC would be installed and terminate at the 500 kV switchyard inside the existing Valley Substation property line. With the Proposed Project, the terminating transmission tower or turning pole would be the tallest structure at the substation, ranging between 150 and 180 feet tall. The western substation fence would be relocated to the west property line. The Proposed Project would permanently disturb approximately 16 acres within the substation. An area of approximately 2 acres within the substation property would be used for temporary laydown and construction.~~

As a result, the section numbers following the deleted section have been modified:

~~B.3.4.4~~B.3.4.5 San Bernardino Substation

~~B.3.4.5~~B.3.4.6 Vista Substation

~~B.3.4.6~~B.3.4.7 Series Capacitor Banks

~~B.3.4.7~~B.3.4.8 500 kV Shunt Reactor

E1-35 The following was inserted into Section B.3.5 (page B-52, paragraph 2, line 2):

These may include Devers, Padua, Walnut, San Bernardino, Villa Pak, Viejo, Johanna, Ellis, and Vista Substations in California, and the PVNGS, Hassayampa, and Harquahala Switchyards in Arizona.

E1-36 Section B.3.6 (page B-53, Table B-5) of the Draft EIR/EIS has been modified as follows:

Table B-5. Components of New Telecommunication Facilities

Facility	New Facility Components					
	Building	Tower/ Antenna	Power Supply	Generator/ Fuel Tanks	Air Conditioning System	Communications System
<u>Harquahala Switchyard</u>	<u>12-foot by 36-foot prefabricated building</u>	<u>110-foot self-supporting tubular steel tower</u>	<u>120/240-volt alternative current service direct current power system</u>		<u>2 air conditioning systems</u>	<u>1 microwave system and 1 SONET system</u>

E1-37 Section B.3.6.1 (page B-53, paragraph 2, last sentence) of the Draft EIR/EIS has been modified as follows:

It is estimated that the temporary construction area would occupy approximately ~~1~~0.125 acres and the permanent facility would occupy approximately ~~0.5~~0.125 acres.

E1-38 Please refer to Response E1-37.

E1-39 Section B.3.6.1 (page B-53, paragraph 3, line 2) of the Draft EIR/EIS has been modified as follows:

The Harquahala Mountain Peak Solar Observatory, an Historic Property listed on the National Register of Historic Places (NRHP), is located approximately ~~100-150~~ feet to the south of the proposed telecommunication site. Also located nearby is an existing Central Arizona Project (CAP) microwave facility and solar panels. SCE’s proposed telecommunication facility would be approximately 100 feet west of the solar observatory and approximately 35 feet ~~south~~ west of the existing CAP facility.

E1-40 Please refer to Response E1-39.

E1-41 Section B.3.6.2 (page B-54, paragraph 2, last line) of the Draft EIR/EIS has been modified as follows:

It is estimated that the temporary construction area would occupy approximately ~~1~~0.125 acres and the permanent facility would occupy approximately ~~0.25~~0.125 acres.

E1-42 Please refer to Response E1-41.

E1-43 Section B.3.6.3 (page B-54, paragraph 2, last line) of the Draft EIR/EIS has been modified as follows:

Conduits would be required between the telecommunications room and the 230 kV mechanical-electrical equipment room, 500 kV mechanical-electrical equipment room, OPGW termination point on the new 500 kV transmission tower, and OPGW termination point on the Buck Boulevard–Midpoint 230 kV transmission tower (this is an optional component of the Proposed Project that SCE may not construct).

E1-44 Figure B-19 (Section B.3.6, pages B-55) has been modified to reflect the smaller size of the proposed telecommunications facility on Harquahala Mountain.

E1-45 The spelling of the word “Mountain” has been corrected on Figure B-19. Please refer to Response E1-44.

E1-46 Section B.3.6.4 (page B-57, paragraph 4) of the Draft EIR/EIS has been modified in accordance with SCE’s comment as follows:

In addition, the Chuckwalla ~~and Cunningham~~ Communications ~~Sites~~ Site and Blythe Service Center would require installation of new Alcatel MDR-8000 microwave terminals and two new 10-foot microwave antennas on the existing microwave towers pointing towards Midpoint Station (this is an optional component of the Proposed Project that SCE may not construct).

E1-47 Please refer to Response E1-46.

E1-48 Section B.3.7.3 (page B-61, paragraph 2) of the Draft EIR/EIS has been modified as follows:

Between the San Bernardino Substation, and San Bernardino Junction, ~~and Vista Substation~~, access is available and no new tower construction is planned, therefore no new access roads would be required.

E1-49 Section B.3.7.4 (page B-62, last paragraph) of the Draft EIR/EIS has been modified in accordance with SCE’s comment as follows:

The proposed 230 kV modifications for the WOD system would require the construction of foundations for approximately ~~173~~ 186 structures.

E1-50 Section B.3.7.6 (page B-63, last paragraph, 1st sentence) of the Draft EIR/EIS has been modified as follows:

No construction of new towers or stringing of conductors would occur in Copper Bottom Pass; however, stringing for ~~conductors and~~ OPGW would be required.

E1-51 Section C.4.2.4.1 (page C-22, paragraph 1, line 3) of the Draft EIR/EIS has been corrected as follows:

The 11.8-mile-route would be ~~entirely primarily~~ on BLM land and on private land for 3 miles near its western end.

E1-52 Section D.2.1.1 (page D.2-3, paragraph 1, line 5) of the Draft EIR/EIS has been modified as follows:

This region of southwestern Arizona consists of mostly native desert habitats, including ~~pinyon juniper or~~ mixed shrub-scrub uplands, saguaro cactus forest, creosote-mesquite scrublands, xeroriparian, and riparian vegetation communities.

E1-53 Section D.2.1.1.1 (page D.2-4, paragraph 1, line 6) of the Draft EIR/EIS has been modified as follows:

~~Several~~ Many areas along the route of the Proposed Project also contain an ecotonal, or transitional zone between these two subdivisions of Sonoran Desert scrub.

E1-54 Section D.2.1.1.1 (page D.2-4, paragraph 2, line 5) of the Draft EIR/EIS has been modified as follows:

Common species include blue palo verde (*Parkinsonia florida*), mesquite (*Prosopis* spp.), catclaw acacia (*Acacia greggii*), and desert ironwood (*Olneya tesota*).

E1-55 Section D.2.1.1.1 (page D.2-5, paragraph 1) of the Draft EIR/EIS has been modified as follows:

Sonoran Riparian Deciduous Forest and Woodland. This vegetation community is only found ~~only along the Proposed Project route~~ along the Colorado River. The Sonoran Riparian Deciduous Forest and Woodland is a deciduous riparian community dominated usually either by velvet mesquite or Fremont cottonwood (*Populus fremontii*) and/or Goodding's willow (*Salix gooddingii*). Understory grasses are typically abundant. Typically perennial or near-perennial streams or springs are necessary to provide water for the trees, although this is not always the case for the mesquite series. This community is divided into the following two series, based on the dominant tree species: (1) Mesquite series or (2) Cottonwood-willow series. Historically, this community may have occurred in the vicinity of where the Proposed Project crosses the Colorado River. However, saltcedar (*Tamarix ramosissima*), an invasive non-native species, has invaded much of this community along the Colorado River. The vegetation where the ~~habitat that occurs in the area where the~~ Proposed Project alignment crosses the Colorado River is now degraded and is dominated by nearly 100% cover of saltcedar. ~~has been degraded by the invasion of saltcedar (*Tamarix* spp.), an invasive non-native species.~~

E1-56 Section D.2.1.1.1 (page D.2-5, paragraph 1, line 10) of the Draft EIR/EIS has been modified as follows:

Numerous dry washes occur within the valley bottoms that may support populations of desert trees and shrubs including blue palo verde (~~*Cercidium*~~ *Parkinsonia florida*), ironwood (*Olneya tesota*), honey mesquite (*Prosopis glandulosa*), white bursage, smoke-tree (*Cotinus coggygria*), and sweet bush (*Bebbia juncea*), as well as other upland plants typical of the surrounding habitats.

E1-57 Section D.2.1.1.4 (page D.2-41, paragraph 1, line 1) of the Draft EIR/EIS has been modified and the following bullet has been deleted:

- United States Fish and Wildlife Service (USFWS) Designated Critical Habitat for the razorback sucker
- ~~Cactus Ferruginous Pygmy owl Survey Zone 3~~

The following paragraphs have also been removed from Section D.2.1.1.4 as to reflect the change in Cactus Ferruginous Pygmy-owl status:

~~**Cactus Ferruginous Pygmy owl Survey Zone 3.** The portion of the Proposed Project within Maricopa County would be located within the designated Survey Zone 3 for the federally endangered and State WSCA cactus ferruginous pygmy owl (CFPO) as defined by the USFWS in the March 2000 *Recommended Guidance for Private Landowners Concerning the Cactus Ferruginous Pygmy owl* (USFWS 2000). CFPO Survey Zone 3 is defined as areas within the historic range of the pygmy owl with a low potential of occupancy. The cactus ferruginous pygmy owl (CFPO) is federally listed as endangered and is considered a Wildlife of Special Concern in Arizona (WSCA) by the Arizona Game and Fish Department (AGFD). On April 13, 2006, the USFWS announced that the CFPO would be removed from protection under the ESA effective on May 15, 2006. However, this species will still receive protection under the Migratory Bird Treaty Act (USFWS, 2006a).~~

~~The CFPO occurs from southern Arizona east to extreme southwestern Texas, and southward in Mexico to Guerrero, Nuevo Leon, and southern Tamaulipas (Oberholser, 1974, cited in Millsap and Johnson, 1988). In Arizona, breeding pairs recently have been found at Organ Pipe Cactus National Monument, in areas northwest of Tucson, north of the Tortolita Mountains, and in the Buenos Aires National Wildlife Refuge. The owl was formerly more widespread in Arizona, occurring as far north as New River (Johnson et al., 1999; Millsap and Johnson, 1988). Historically in Arizona, CFPOs were found in mesquite woodlands, cottonwood willow riparian forests, and less commonly in palo verde mixed cacti forest. However, most recent observations of this species are from habitats dominated by mesquite, palo verde, desert ironwood, and catclaw acacia. The most current USFWS data shows that the population is hovering around 20 individuals. These individuals are located in the following areas: Organ Pipe Cactus National Monument, the Altar Valley, northwest Tucson, south central Pinal County, and the Tohono O'odham Nation lands (USFWS, 2006b).~~

~~All portions of the Proposed Route for the DPV2 project that are located south of I-10 and within Maricopa County would fall within the USFWS recommended Survey Zone 3. This is a USFWS classification of CFPO habitat that includes areas within the historic range of the CFPO with a low potential of occupancy. However, the Proposed Route does not contain suitable CFPO habitat, as defined by the January 2000 USFWS protocol for the species. Habitat components (mesquites, palo verde, and columnar cacti) were observed but they did not occur with the same density and structure as defined by the January 2000 USFWS protocol for the species. Furthermore, only approximately 20 individuals are currently known to exist and these locations are 60 miles or greater from the eastern end of the Proposed Route. Therefore, CFPO surveys are not recommended for this project due to the lack of suitable habitat and the considerable distance of the Proposed Route to the nearest known current locations. Because the pygmy owl has a low potential of occurring within the project area, it is not addressed further in this document.~~

E1-58 Section D.2.6.1.1 (page D.2-114, Table D.2-9) of the Draft EIR/EIS has been modified as follows:

Table D.2-9. Habitat Type per Segment

Segment	Habitat Type
Palo Verde Valley (Colorado River to Midpoint Substation)	Cottonwood and willow riparian , Sonoran desert scrub, <u>Salt cedar riparian scrub</u>

E1-59 The discussion of potential impacts to the Arizona agave and Arizona cliff rose has been removed from Impact B-6 in Section D.2.6.1.6 (page D.2-120) as shown below:

In Arizona, ~~construction activities would result in potential impacts to two federally listed species, Arizona agave (*Agave arizonica*), which is listed as endangered for Maricopa County but is also proposed for delisting from the ESA and the Arizona cliff rose (*Purshia subintegra*).~~ The project may also remove other plant species protected by the Arizona Native Plant Law, including blue palo verde, foothill palo verde, velvet mesquite, desert ironwood, ocotillo, and various cacti (saguaro, chollas, barrel, hedgehog, beavertail, prickly pear, desert Christmas, and nipple) that occur within the Proposed Project route.

The Arizona agave and Arizona cliff rose were also removed from Table D.2-10 in Section D.2.6.1.6 (Threatened or Endangered Species):

Table D.2-10. Sensitive Plants with High Potential to Occur

Harquahala to Kofa National Wildlife Refuge	
Federal or State listed species	Arizona agave Arizona cliffrose

E1-60 The osprey species was observed foraging during the biological survey of the Harquahala to Kofa NWR segment (Section D.2.1.1.2). The CAP canal provides a source of prey for this species. In addition, the new transmission line towers will likely provide additional perching sites for this species. Therefore, osprey has not been removed from the Table D.2-11 (page D.2-124) of the Draft EIR/EIS as requested in this comment.

E1-61 Habitat for the Mohave fringe-toed lizard is known to occur within 5 miles of the Proposed Project and therefore suitable habitat could exist in the project area. Although the species normally occurs in sand dune areas and there would be no sand dunes within the project area between Kofa NWR and the Colorado River, the Mohave fringe-toed lizard can also occur along washes, which do exist in this segment. Therefore, no changes have been made to Table D.2-11 (page D.2-124) of the Draft EIR/EIS.

E1-62 Regarding the request to modify Table D.2-11, an assessment of the species present in the area was made based on evaluation of CNDDDB data. Seven USGS quadrangles in the Blythe area were reviewed, and three of these showed presence of one or more of the species in question. The Blythe Quad shows presence of three species on the list: Western yellow-billed cuckoo (California endangered), Sonoran yellow warbler (Species of special concern), and elf owl (California endangered). The Blythe Quad also shows presence of two additional species that were not mentioned in the comment [yellow-breasted chat (Species of special concern) and the Colorado River cotton rat (Species of special concern)].

E1-63 Section D.2.6.1.6 (page D.2-128, paragraph 1, line 1) was clarified to indicate that the Sonoran desert tortoise is listed in Arizona:

Reptiles. The Proposed Project area supports three listed reptiles including the Arizona state-listed Sonoran desert tortoise ~~(Arizona) and the~~, Coachella Valley fringe-toed lizard, and populations of tortoise in California.

E1-64 The paragraph following the bullets under paragraph 1 in Section D.2.6.1.6 (page D.2-132) indicates that Table D.2-5 (see Section D.2.1.1.3, Special Status Species Overview) identifies the listed species of bird that have a high or moderate potential to occur in the project area. The status of each species, whether it is state- or federally-listed, is also included in Table D.2-5. Therefore, a distinction between the state- and federally-listed species is not necessary in this section, and no change has been made.

E1-65 The commenter is correct that no sensitive amphibians have been found in the Arizona portion of the Proposed Project. However, SCE's Applicant Proposed Measure APM-16 in Table D.2-6 in Section D.2.5.2 (Applicant Proposed Measures) states that "Surveys - When access along the utility corridor already exists, pre-construction surveys for transmission lines should provide 100 percent coverage for any areas to be disturbed and within a 100 foot buffer around the areas of disturbance. When access along the utility corridor does not already exist, pre-construction surveys for transmission lines should follow standard protocol for linear projects." Therefore, the pre-construction surveys will occur in areas where they are determined to be necessary as part of the Proposed Project and the APMs.

E1-66 Mitigation Measure B-9d (Conduct pre-construction reptile surveys) in Section D.2.6.1.8 has been modified to include the Sonoran desert tortoise as follows:

B-9d Conduct pre-construction reptile surveys. Prior to construction, SCE shall conduct surveys in areas of suitable habitat for Sonoran desert tortoise, common chuckwalla, banded Gila monster, and desert rosy boa within 48 hours prior to the start of construction activities...

- During construction, if a common chuckwalla, banded Gila monster, and/or desert rosy boa occur on the project site, construction activities adjacent to the individual's location will be halted and the animal will be allowed to move away from the construction site. If the individual is not moving, a qualified biologist will relocate it to nearby suitable habitat outside the construction area. It shall be placed in the shade of a shrub. Also during construction, if a Sonoran desert tortoise occurs on the project site, construction activities adjacent to the individual's location will be halted and the Guidelines for Handling Sonoran Desert Tortoises Encountered During Construction Projects will be followed by qualified personnel.

E1-67 The DPV2 EIR/EIS is written in accordance with current BLM and Kofa NWR guidance and the stated preferences of these agencies that construction of the Proposed Project should occur outside of breeding and lambing periods for bighorn sheep. For instance, BLM Yuma District Resource Management Plan (RMP) and EIS (August 1995, pages 16, 24, 71, and 85, etc.) discusses closure of roads during lambing season (January 1 to June 30) and breeding season (January 15 to April 15). It should be noted that the BLM Yuma District RMP/EIS also states that exceptions can be made during the BLM permitting process. Therefore, no changes have been made to Mitigation Measures B-9f (Perform construction outside of breeding and lambing periods) in the Draft EIR/EIS.

- E1-68 Please refer to Response E1-67.
- E1-69 Impact B-14 has been modified in Section D.2.6.2 (Impacts of Transmission Line Operation) and throughout the Draft EIR/EIS document as follows:
- Impact B-14: Operation of the transmission line may result in electrocution of listed and/or protected bird species (Class III)***
- Section D.2.6.2 on page (D.2-173) of the Draft EIR/EIS has been modified to include a clarification on the collision hazard potential difference between shield wires and conductors:
- Collision rates generally increase in low light conditions, during inclement weather, such as rain or snow, during strong winds, and during panic flushes when birds are startled by a disturbance or are fleeing from danger. On a transmission line of this size, the conductors are normally visible but the earth or shield wires are not, thereby resulting in a higher collision hazard potential with shield wires than with conductors. In addition, collisions are more probable near wetlands, valleys that are bisected by power lines, and within narrow passes where power lines run perpendicular to flight paths.
- E1-70 The universal change throughout the document to “Eagletail” Mountains in Arizona has been noted but each separate change is not documented in the Final EIR/EIS. Section D.2.6.1.5 (Nesting and Migratory Birds) has been corrected as follows:
- Some of these areas include the Sonoran desert and coastal scrub communities that occur in Arizona and California; riparian drainages including the Colorado River, San Timoteo Creek, and San Gorgonio River; and the natural rock features such as cliffs and large rock outcrops associated with Saddle Mountain, Palo Verde Hills, Big Horn Mountains, and Eagletail Mountains in Arizona or the Chuckwalla Mountains in California.
- Impact B-5 (Construction activities during the breeding season would result in a potential loss of nesting birds) in Section D.2.7.2 (SCE Palo Verde Alternative) has been corrected as follows:
- These areas include native and non-native trees and shrubs and natural rock features such as cliffs and large rock outcrops associated with Saddle Mountain, Palo Verde Hills, Big Horn Mountains, and Eagletail Mountains.
- Impact B-5 (Construction activities during the breeding season would result in a potential loss of nesting birds) in Section D.2.7.3 (Harquahala Junction Switchyard Alternative) has been corrected as follows:
- These areas include native and non-native trees and shrubs and natural rock features such as cliffs and large rock outcrops associated with Saddle Mountain, Palo Verde Hills, Big Horn Mountains, and Eagletail Mountains.
- E1-71 See Response to E1-63.
- E1-72 The location of residential units around MP 80 and the generalization of the residences related to the scale of Figure D.4-1 is noted and Figure D.4-1 has been modified as requested in the comment. The corrected map is presented in this Final EIR/EIS.

E1-73 Figure D.4-1 has been modified as requested in the comment. The corrected map is presented in this Final EIR/EIS.

E1-74 Impact L-2 (Operation would result in permanent preclusion of land uses it traverses or adjacent land uses) in Draft EIR/EIS Section D.4.8.1, Operational Impacts for the SCE Harquahala-West Alternative has been modified from a Class I (significant) impact to a Class II impact (mitigable to less than significant) as follows:

Impact L-2: Operation would result in permanent preclusion of land uses it traverses or adjacent land uses (Class II)

...The corridor would physically divide land uses north of the utility corridor from land uses south of the corridor, causing an artificial division within this agricultural community that would permanently preclude the use of the corridor land for agricultural and rural residential uses. However, SCE has stated that the alternative transmission line would be constructed along section lines in order to avoid dividing rural residential subdivisions (SCE, 2006). In addition, the implementation of Mitigation Measure AG-4a (Locate transmission towers and pulling/splicing stations to avoid agricultural operations) would require transmission poles to be placed between agricultural fields with minimal disturbance to farming operations. Because the SCE Harquahala West Alternative would p~~ermanently~~ disruptions to existing land uses and would be potentially cause the loss of open space and agricultural land, this alternative would have a significant, but would be reduced to a less-than-significant level through implementation of Mitigation Measure AG-4a (Locate transmission towers and pulling/splicing stations to avoid agricultural operations) and unmitigable land use impact (Class II). No mitigation measures have been identified that would reduce the impacts associated with this preclusion of existing land uses. Refer to Section D.6.8.1, Agriculture, for detailed information on impacts to agricultural lands.

In addition Table D.4-17 in Section D.4.11 (Mitigation Monitoring, Compliance, and Reporting Table) presents the mitigation monitoring table for Land Use and has been modified to include implementation of Mitigation Measure AG-4a under Impact L-2.

Table D.4-17 Mitigation Monitoring Program – Land Use

IMPACT L-2 Operation would result in permanent preclusion of land uses it traverses or adjacent land uses. (Class II)

MITIGATION MEASURE **AG-4a: Locate transmission towers and pulling/splicing stations to avoid agricultural operations.** SCE shall site transmission towers and pulling/splicing stations in locations that minimize impacts to active agricultural operations. Specifically, SCE shall comply with the following measures when siting transmission towers and splicing/pulling stations within areas where active cultivated farmland would be removed through the presence of structures:

- SCE shall avoid orchards, vineyards, row crops, and furrow-irrigated crops where towers would interfere with irrigation and harvest activities.
- SCE shall avoid irrigation canals and ditches.
- SCE shall align towers adjacent to field boundaries and parallel to rows (if located in row crops), and shall avoid diagonal orientations and angular alignments within agricultural land.
- SCE shall match tower spans with existing DPV1 towers within agricultural land.
- SCE shall construct towers with heights and spacing to minimize safety hazards to aerial applicators flying in the Palo Verde Valley (CA);
- SCE shall consult with the Palo Verde Irrigation District (PVID) regarding tower placement to minimize disruption to PVID facilities;

SCE shall document and provide proof of compliance with the above listed items 90 days prior to the start of Proposed Project construction. This documentation shall be submitted to the CPUC and the BLM for review and approval prior to the start of construction, and reviewed with affected landowners during coordination presented in Mitigation Measure AG 1a (Establish agreement and coordinate construction activities with agricultural landowners).

Location Locations where 10 acres or more of Farmland is permanently removed.

Monitoring / Reporting Action CPUC/BLM monitors review submitted compliance documents

Effectiveness Criteria SCE has located towers and pulling/splicing stations in areas with least interference to agriculture; landowners have reviewed locations

Responsible Agency CPUC, BLM Phoenix, Yuma, and Palm Springs Field offices

Timing Ninety (90) days prior to the start of project construction

E1-75 The following sections have been modified in the EIR/EIS for the Devers-Harquahala segment in response to this comment:

- Project Description, Section B.3.3.1 (ROW)
- Land Use, Section D.4.2.1 (Harquahala to Kofa National Wildlife Refuge) under Environmental Setting for the Proposed Project – Devers-Harquahala
- Land Use, Section D.4.2.4 (Palo Verde Valley [Colorado River to Midpoint Substation]) under Environmental Setting for the Proposed Project – Devers-Harquahala
- Land Use, Section D.4.6.1 (Harquahala to Kofa National Wildlife Refuge) under Impact L-2 (Operation would result in permanent preclusion of land uses it traverses or adjacent land uses)

- Land Use, Section D.4.6.4 (Palo Verde Valley [Colorado River to Midpoint Substation]) under Impact L-2 (Operation would result in permanent preclusion of land uses it traverses or adjacent land uses)

For the Devers-Valley No. 2 Alternative, the following sections have been modified in the Final EIR/EIS in response to this comment:

- Appendix 1, Section 4.3.1 (Devers-Valley No. 2 Alternative) under Alternative Description
- Land Use, Section D.4.9.1 (Devers-Valley No. 2 Alternative) under Environmental Setting
- Land Use, Section D.4.9.1 under Impact L-2 (Operation would result in permanent preclusion of land uses it traverses or adjacent land uses).

E1-76 Section D.6.5.1 describes the significance criterion on which Impact AG-1 is based. According to the first criterion for Agriculture, impacts would be significant if the Project would convert Farmland (as shown on maps prepared pursuant to the DOC FMMP and the NRCS) to non-agricultural use. Although the SCE Palo Verde Alternative may not traverse an area that is actively cultivated, this alternative would cross important farmland areas that were identified by the NRCS (see Figure D.6-1). It was estimated that construction activities would temporarily convert an estimated 21.9 acres of Prime Farmland (as identified by the NRCS) to non-agricultural use, which would exceed the threshold set to determine the significance of temporary conversion of Farmland as discussed in Section D.6.5.1. No revisions are necessary.

E1-77 The following bullet has been added under Data Collection Methodology in Section D.7.1 (page D.7-2, paragraph 1):

- [Arizona State Office of Historic Preservation](#)

E1-78 Section D.7.1 (page D.7-2, paragraph 6) of the Draft EIR/EIS has been modified as follows:

Intensive pedestrian field surveys in Arizona were conducted [in 2003 and 2004](#) by [Sharon Bauer, Scott Wilcox, Glenda Luhnnow, Kelly Peoples, Jeff Robertson, Elizabeth Alter, Kris Dobschuetz, Yumi Yoshino, Torrey Cunningham, and Lisa Champagne \(Glenn Darrington, Ph.D. and Kris Dobschuetz et al. 2004\).](#) ~~in 2003.~~

E1-79 Section D.7.1 (page D.7-4) of the Draft EIR/EIS has modified the Arizona Findings Summary as follows:

Through field survey and archival research, EPG (Phoenix, AZ) identified [321](#) ~~221~~ cultural resources [previously recorded](#) in Arizona within one mile of the existing DPV1 corridor [[Dobschuetz et al. \(2004\); Luhnnow and Dickinson \(2004\); Luhnnow \(2004\); Dobschuetz \(2006\)](#)]; EPG recommended that 22 of these were eligible for inclusion on the National Register of Historic Places (NRHP). The eligibility of a property for listing on the NRHP may be on nation, State, or local significance. Properties eligible for listing must demonstrate importance in American history, architecture, archaeology, engineering, or cultural tradition. Criteria for eligibility can be found in Section D.7.5.1 of this document. NRHP eligibility must be determined by the federal lead agency (under NEPA) in consultation with the appropriate State Historic Preservation Officer (SHPO).

In some cases, NRHP eligibility was determined formally for archaeological sites within the existing DPV1 Project corridor. However, for the Proposed Project and project alternatives, NRHP eligibility has not been determined by the BLM or SHPO for the majority of known resources. Those determinations will be made formally if impacts to potentially significant resources cannot be avoided during project design. Therefore, this document offers NRHP recommendations for individual resources, based largely on surface observations, but does not make NRHP eligibility determinations.

Of the 22 sites recommended as NRHP-eligible, 15 were revisited by EPG in 2003, but only 7 eligible sites were found to be within or adjacent to the APE for the Proposed Project and all alternatives within Arizona and were revisited by EPG in 2003. In 2006 SWCA resurveyed an additional nine sites also located within or adjacent to the APE for the Proposed Project that were either not evaluated in previous surveys, or were recommended in previous surveys as eligible for listing on the NRHP. These sites were surveyed by SWCA and recommendations regarding eligibility are made in this EIR/EIS.

As detailed in later sections, many of the sites found in previous surveys have not been relocatable in more recent surveys. Of the sites that have been found, only two one recommended-eligible sites were as located within the Arizona APE of the tower sites, spur roads, telecommunications site and series capacitor for the Proposed Project. One This site is within the Harquahala to Kofa Segment of the pProposed pProject. The other National Register site is within the APE for the proposed Harquahala Mountain telecommunications facility. Another potentially eligible site within the APE of the Proposed Project could not be relocated.

Due to the changes in some of the Arizona sites, the potential effects of the Proposed Project and various project alternatives on resources that may be eligible for NRHP listing are summarized for Arizona in Table D.7-32 and have been modified as follows:

Table D.7-32. Potential Effects to Cultural Resources in Arizona

Resource	Description	Preliminary Eligibility Assessment (NRHP Criteria)	APE	New Tower	Access Through-road	Spur Road	Temporary Construction	Proposed Treatment
Potential Effects to Cultural Resources – Harquahala to Kofa National Wildlife Refuge								
AZ S:3:1	Solar Observatory	Listed (a)	Near					See below
AZ S:6:12	Rock Feature Site	Not Significant	Within	✓	-	-	-	No Effect
AZ S:6:21	Lithic Scatter	Not Significant	Within	✓				No Effect—Could not be Relocated
AZ S:7:1	Artifact Scatter	Not Significant	Within	✓				No Effect
AZ S:7:15	Lithic Scatter	Not Significant	Within	✓				No Effect
AZ S:8:1	Lithic Scatter	Significant (d)	Within several tower sites	✓	-	-	-	Avoidance or Data Recovery
AZ S:8:10	Lithic Scatter and Rock Rings (not relocated)	Not Significant	Within	✓	-	-	-	No Effect
AZ S:8:20	Lithic Scatter	Not Significant	Within	✓	-	-	-	No Effect
AZ S:8:17	Lithic Scatter, Rock Ring (not relocated)	Not Significant	Within	✓	-	-	-	No Effect. Could not be Relocated
Potential Effects to Cultural Resources – Harquahala Peak Communication Site								
AZ S:3:1 (ASM)	Harquahala Mountain Smithsonian Solar Observatory	Listed (a,c)	Near	-	-	-	-	Compatible design and interpretation
Potential Effects to Cultural Resources – SCE Palo Verde Alternative								
AZ T:9:12	Rock Rings	Significant (d) Insufficient Data	Undefined	?	?	?	?	Avoidance
AZ T:9:21	Temporary Camp	Significant (d)	Undefined	?	?	?	?	Avoidance
AZ T:9:64	Artifact Scatter	Significant (d) Insufficient Data	Undefined	?	?	?	?	Avoidance
AZ T:9:65	Farmstead Foundation	Significant (d)	Undefined	?	?	?	?	Avoidance

E1-80 Please refer to Response E1-79.

E1-81 Please refer to Response E1-79.

E1-82 Section D.7.1 is intended as a brief summary of the setting and focuses on potential project effects. Therefore, it addresses National Register-eligible sites — not all sites within the APE of the Proposed Project and alternatives. SWCA (the CPUC and BLM’s consultant) did not survey any of the alternatives that were carried forward in the Draft EIR/EIS, since they had been previously surveyed by EPG for the PEA.

E1-83 Section D.7.1 (page D.7-16) of the Draft EIR/EIS has been modified. The Harquahala to Kofa NWR description is now as follows:

A Class I records search of the Arizona general project location identified ~~67 56~~ documented archeological studies [within the a one-mile area \(Dobschuetz et al. 2004\)](#). Major studies used for the EIR/EIS include the studies done in 1972 (Kemrer et al.), 1977 (Stone), 1982 (Carrico and Quillen), and 2004 (Dobschuetz et al.) In previous surveys, 31 cultural resources were identified within or immediately adjacent to the transmission

line corridor for the Harquahala to Kofa National Wildlife Refuge segment of the Proposed Project. Seven of these sites were located within the APE for this transmission line segment. Another National Register site is located on Harquahala Mountain and is discussed separately, below (Harquahala Telecommunications Site).

Only one site, AZ S:8:1, ~~that was located within the APE and~~ may be eligible for listing on the NRHP was relocated within the APE. Site AZ S:8:1 is described as a large lithic scatter dispersed for 0.9 miles along the transmission corridor and within the footprint of four tower sites. It was first recorded in 1972 and was later revisited in 1982 and 2003. The site consists of rhyolite lithic debitage and was determined, in past studies, to be eligible for listing on the NRHP. Data recovery was performed on a portion of the site in 1979 and in 1982 both excavation and surface sample collection was conducted. Subsurface testing was conducted within the proposed tower locations and did not identify any subsurface remains. The site was revisited in 2003. A few surface artifacts were identified within two of the tower locations. These artifacts were similar to those collected and analyzed in 1982.

The other NRHP-eligible site previously recorded within the APE (AZ S:8:17), a lithic scatter and rock rings) was not relocated. Owing to the lack of data potential and/or loss of integrity, the other ~~five six~~ sites within the APE (AZ S:6:12 (rock feature site), AZ S:6:21 (lithic scatter), AZ S:7:1 (artifact scatter), AZ S:7:15 (lithic scatter), and AZ S:8:10 (lithic scatter and rock rings), ~~AZ S:8:17 (lithic scatter & rock rings), and AZ S:8:20 (lithic scatter)~~ appear to be ineligible for listing on the NRHP. Since these resources appear to be ineligible or non-existent, no further management of these sites would be recommended.

E1-84 Please refer to Response E1-83.

E1-85 Please refer to Response E1-83.

E1-86 The discussion of impacts at the Harquahala Telecommunications Site (Section D.7.2.1, Harquahala to Kofa National Wildlife Refuge) has been modified as follows:

It is estimated that the temporary construction area would occupy approximately one acre and the permanent facility would occupy an area 65 feet by 75 feet. ~~approximately 0.5 acres.~~

An intensive (Class III) cultural resource survey of the telecommunications site APE was completed by Dobschutz (2006). The Harquahala Peak Observatory and associated interpretive displays are within ~~100-200~~ feet of the proposed communications tower. ~~APE.~~

E1-87 Section D.7.2.2 (page D.7-17) of the Draft EIR/EIS has modified the Kofa NWR description as follows:

Previous archaeological surveys have identified ~~41 27~~ cultural resources within a one-mile area or immediately adjacent to the transmission line corridor for the Kofa National Wildlife Refuge segment of the Proposed Project (Dobschutz et al. 2004). One of Three of these sites, AZ S:5:15 (lithic scatter), ~~AZ R:8:52 (lithic scatter, rock ring & cleared circle), and AZ R:8:55 (artifact scatter, trails & rock ring),~~ were located within the APE for this segment; however, owing to the lack of data potential and/or loss

of integrity ~~it these appears~~ to be ineligible for listing on the NRHP. ~~In 1982 data recovery was conducted on sites AZ R:8:52 (lithic scatter, rock ring & cleared circle), AZ R:8:48 (temporary camp), and AZ R:8:55 (artifact scatter, trails & rock ring). Mapping, surface collection and excavation were undertaken at each of these sites. Therefore, Because these resources appear to be ineligible or no longer exist, no further management of thise sites would be recommended.~~

~~Two additional sites, AZ R:8:51 (lithic scatter & rock ring) and AZ S:5:2 (temporary camp & rock ring), were located within or adjacent to the general transmission corridor but were not within designated APEs. Project activities that do not have a designated APE such as construction or maintenance of the transmission line could occur in the vicinity of these sites. Both of these sites appear to be eligible for listing on the NRHP.~~

E1-88 Please refer to Response E1-87.

E1-89 Please refer to Response E1-87.

E1-90 Section D.7.2.3 (page D.7-18) of the Draft EIR/EIS has modified the Kofa NWR to Colorado River description as follows:

Previous archaeological surveys have identified ~~103 33~~ cultural resources within ~~a one-mile area or immediately adjacent to~~ along the transmission line corridor for the Kofa National Wildlife Refuge to Colorado River segment of the Proposed Project.

~~Four Three~~ of these sites, AZ R:7:49 ~~53 (artifact scatter)~~ Lithic Scatter, AZ R:8:37-7:54 (~~trail~~ Artifact Scatter), AZ R:8:44 (Lithic Scatter), and AZ R:87:60 4 (~~trail~~ Lithic Scatter), were located within the APE for this segment; however, owing to the lack of data potential and/or loss of integrity these appear to be ineligible for listing on the NRHP. ~~In 1982 data recovery was conducted on site AZ R:7:53 in which mapping, surface collection and excavation were undertaken.~~ Because these resources appear to be ineligible or no longer exist, no further management of these sites would be recommended.

~~Four sites, AZ R:7:66 (temporary camp multicomponent site with prehistoric ceramics, historical structure, and 3 rock cairns), AZ R:7:61 (temporary camp & historical scatter), AZ R:8:42 (lithic scatter), and AZ R:8:49 (temporary camp), were located within or adjacent to the general transmission corridor but were not within designated APEs. These are included because project activities that do not have a designated APE such as construction or maintenance of the transmission line could occur in the vicinity of these sites.~~

E1-91 Please refer to Response E1-90.

E1-92 Section D.7.4 (page D.7-30) of the Draft EIR/EIS has been modified with the following paragraph added to the State, Arizona section:

The Arizona Antiquities Act of 1960 (as amended) contains regulations designed to identify and protect significant archaeological resources on property owned or controlled by the state. Any organization, institution or person entering onto state, county, or municipal land to conduct archaeological or paleontological survey, testing, excavation, or monitoring must apply (and obtain) a permit from the Arizona State Museum

(ASM). The Arizona State Historic Preservation Act of 1982 contains regulations designed to identify and protect significant resources on property owned or controlled by the State.

E1-93 Table D.7-5 has been modified as shown below. Please refer to Response E1-79 for updates to Table D.7-32 (Potential Effects to Cultural Resources in Arizona):

Table D.7-5. Potential Effects to Cultural Resources – Harquahala to Kofa National Wildlife Refuge

Resource	Description	Preliminary Eligibility Assessment (NRHP Criteria)	APE	New Tower	Access Through-road	Spur Road	Temporary Construction	Proposed Treatment
<u>AZ S:3:1 (ASM)</u>	<u>Harquahala Mountain Smithsonian Solar Observatory District</u>	<u>Listed (a and d)</u>	<u>Within</u>	-	-	-	✓	<u>See Table D.7-6</u>
<u>AZ S:6:12 (ASM)</u>	Rock Feature Site	Not Significant	Within	✓	-	-	-	<u>None-No Effect</u>
<u>AZ S:6:21 (ASM)</u>	<u>Lithic Scatter</u>	<u>Not Significant</u>	<u>Within</u>	✓	-	-	-	<u>None. Could not be relocated.</u>
<u>AZ S:7:1 (ASM)</u>	<u>Artifact Scatter</u>	<u>Not Significant</u>	<u>Within</u>	✓	-	-	-	<u>None</u>
<u>AZ S:7:15 (ASM)</u>	<u>Lithic Scatter</u>	<u>Not Significant</u>	<u>Within</u>	✓	-	-	-	<u>None</u>
<u>AZ S:8:1 (ASM)</u>	Lithic Scatter	Significant (d)	Within several tower sites	✓	-	-	-	Avoidance or Data Recovery
<u>AZ S:8:10 (ASM)</u>	Lithic Scatter and Rock Rings (not relocated)	Not Significant	Within	✓	-	-	-	<u>None-No Effect</u>
<u>AZ S:8:20 (ASM)</u>	<u>Lithic Scatter</u>	<u>Not Significant</u>	<u>Within</u>	✓	-	-	-	<u>No Effect</u>
<u>AZ S:8:17 (ASM)</u>	Lithic Scatter, Rock Ring (not relocated)	<u>Not Significant (d)</u>	Within	✓	-	-	-	<u>None-No Effect</u> <u>Could not be relocated</u>

E1-94 Table D.7-5 has been modified (see Response E1-93), however, it should be noted that if the site (AZ S:8:17) cannot be relocated after further effort, it would not be NRHP-eligible. Please refer to Response E1-79 for updates to Table D.7-32 (Potential Effects to Cultural Resources in Arizona):

E1-95 Table D.7-6 in Section D.7.6.1 (Harquahala to Kofa National Wildlife Refuge – Arizona) under Impact C-1 (Construction of the project could cause an adverse change to known historic properties) has been modified as follows:

Table D.7-6. Potential Effects to Cultural Resources – Harquahala Peak Communication Site

Resource	Description	Preliminary Eligibility Assessment (NRHP Criteria)	APE	New Tower	Access Through-road	Spur Road	Temporary Construction	Proposed Treatment
AZ S:3:1 (ASM)	Harquahala Mountain Smithsonian Solar Observatory <u>District</u>	Listed (a)	<u>Within-Near</u>	-	-	-	-	Redesign (compatible design and interpretation), relocation, consolidation with CAP facility, or interpretive mitigation

E1-96 Section D.7.8.2 (page D.7-92, paragraph 1) of the Draft EIR/EIS has been modified as follows:

Site AZ T:9:12 (rock rings) was recommended as eligible in previous surveys; ~~however, surveyors in 2004 were hesitant to make this recommendation.~~

E1-97 Table D.7-24 in Section D.7.8.2 has been modified as follows for the SCE Palo Verde Alternative and please refer to Response E1-79 for updates to Table D.7-32 (Potential Effects to Cultural Resources in Arizona):

Table D.7-24. Potential Effects to Cultural Resources – SCE Palo Verde Alternative

Resource	Description	Preliminary Eligibility Assessment (NRHP Criteria)	APE	New Tower	Access Through-road	Stub Road	Temporary Construction	Proposed Treatment
AZ T:9:12	Rock Rings	<u>Significant (d)</u> <u>Insufficient Data</u>	Undefined	?	?	?	?	Avoidance
AZ T:9:21	Temporary Camp	Significant (d)	Undefined	?	?	?	?	Avoidance
AZ T:9:64	Artifact Scatter	<u>Significant (d)</u> <u>Insufficient Data</u>	Undefined	?	?	?	?	Avoidance
AZ T:9:65	Farmstead Foundation	Significant (d)	Undefined	?	?	?	?	Avoidance

E1-98 Section D.10.11.1 (page D.10-27, paragraph 1, line 9) of the Draft EIR/EIS has been modified as follows:

In the developed areas of the Devers-Harquahala section of the Proposed Project there are a number of additional existing electric transmission lines.

E1-99 In Table D.10-3 in Section D.10.11.1 (page D.10-28, paragraph 1, line 9) of the Draft EIR/EIS the following reference has been deleted:

~~Source: Application for CPCN, Appendix B, Field Management~~

E1-100 Section D.10.11.2 (page D.10-32, paragraph 1) of the Draft EIR/EIS has been modified as follows:

Interference with ~~typical~~ cathode ray tube (CRT) type computer monitors can be detected at magnetic field levels of 10 mG and above, while large screen or high-resolution CRT monitors can be susceptible to interference at levels as low as 5 mG.

E1-101 Section D.10.11.2 (page D.10-32, paragraph 2) of the Draft EIR/EIS has been modified as follows:

The most common electronic equipment that can be susceptible to magnetic field interference is probably CRT type computer monitors....Possible solutions to this problem include: relocation of the monitor, use of magnetic shield enclosures, software programs, and replacement of ~~cathode ray tube~~CRT monitors with liquid crystal displays that are not susceptible to magnetic field interference.

E1-102 Section D.10.11.2 (page D.10-32, paragraph 1) of the Draft EIR/EIS has been modified as follows:

When a person or animal comes in contact with a conductive object a perceptible current or small secondary electric shock may occur. Secondary These small electric shocks cause no physiological harm; however, they may present a nuisance.

E1-103 The generally accepted definition for Extremely Low Frequency (ELF) fields is frequencies up to 300 Hz. This is consistent with the definition used by the World Health Organization in its EMF project, as well as by other publications. Including higher frequencies (up to 3,000 Hz) is outside of the area of discussion related to power line frequencies which are 50-60 Hz, and therefore, no change has been made to the Draft EIR/EIS.

E1-104 Section D.10.11.3 (page D.10-35, paragraph 6) of the Draft EIR/EIS has been modified as follows:

“Possibly carcinogenic to humans” is a classification used to denote an agent for which there is limited evidence ~~for-of~~ carcinogenicity in humans and less than sufficient evidence for of carcinogenicity in experimental animals.

E1-105 Section D.10.11.3 (page D.10-35, paragraph 1) of the Draft EIR/EIS has been modified as follows:

While the results of the DHS report indicate these scientists believe that EMF can cause some degree of increased risk for certain health problems, the report did not quantify the degree of risk or make any specific recommendations to the CPUC.

E1-106 Section D.10.11.3 (page D.10-35, paragraph 1) of the Draft EIR/EIS has been modified as follows:

This would occur because the project combines several existing circuits that are currently on separate structures on to double-circuit transmission line structures and optimally arranges the line phases.

E1-107 Section D.10.11.4 (page D.10-53, paragraph 2, bullet 6) of the Draft EIR/EIS has been modified as follows:

- **Devers–San Bernardino Junction.** Locate ~~less~~-more loaded 230 kV lines furthest from Beaumont High School (no-cost magnetic Field Reduction Measure)

E1-108 During preparation of the Draft EIR/EIS, EIR/EIS preparers had only an old version of SCE’s “EMF Design Guidelines for Electrical Facilities.” The correct version of the document was presented in Appendix 6 of the EIR/EIS, and the text changes illustrated in Responses E1-108 through E1-110 result from the making the EIR/EIS text consistent with the current version. Section D.10.11.4, SCE’s Proposed EMF Mitigation, of the Draft EIR/EIS has been modified as follows:

SCE’s “EMF Design Guidelines for Electrical Facilities” (see Appendix 6) include the following methods that may be available to reduce the magnetic field strength levels from electric power lines:

- Increase distance from the lines
- Reduce conductor (phase) spacing
- Optimize phasing in a multi-circuit rights-of-way corridor
- Convert single-phase to split-phase circuits
- ~~Reduce current in the line(s)~~
- ~~Shielding or active cancellation~~
- ~~Undergrounding~~

SCE's EMF mitigation strategy is based on the following:

- ~~Determine the number and size of areas to consider for EMF reduction~~
- ~~Prioritize areas based on public input~~
- ~~Cost of the reduction techniques determines the number of areas that can be mitigated~~
- ~~Low cost measures must be applied equitably~~
- ~~Total cost of mitigation should not exceed 4% of the total cost of the project~~
- ~~Total field reduction must be 15% or greater~~
- ~~The solution should not downgrade reliability or operating characteristics and should not create a hazard to maintenance personnel or the public.~~

Design and construction of electric power system must comply with all applicable federal, state and local regulation, safety codes and SCE standards. Additional EMF mitigation options based on CPUC Decision 93-11-013 must be consistent with these requirements. We utilize 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 after “No-Cost”. 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 little or 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:

- State Parks.
- U.S. Forest Service.
- U.S. Bureau of Land Management.
- Formally designated “open space.”

E1-109 Please refer to Response E1-108.

E1-110 Please refer to Response E1-108.

E1-111 Section D.10.11.4, SCE’s Proposed EMF Mitigation (page D.10-53), of the Draft EIR/EIS has been modified as follows:

In the case of the Proposed Project SCE has incorporated an optimized phase configuration for the Devers to Harquahala 500 kV segment, and optimized the phase configurations for the multiple 230 kV and 66 kV circuits in the West of Devers segments as a no-cost and low-cost design measure to mitigate EMF levels.

E1-112 Section D.10.11.4, SCE’s Proposed EMF Mitigation (page D.10-54), of the Draft EIR/EIS has been modified as follows:

In the vicinity of Beaumont High School in the West of Devers segment SCE proposes locating less more loaded 230 kV line furthest from the school as a no-cost EMF reduction measure.

E1-113 Appendix 1 Section 1.3.2 (page Ap.1-4, last 2 bullets) of the Draft EIR/EIS has been modified as follows:

- Construction Upgrade of a 500 kV shunt line reactor bank and associated disconnect switches within Devers Substation
- Installation Upgrade of Special Protection Scheme (SPS) relays at the Devers, Padua, and Vista Substations

E1-114 Appendix 1 Section 4.2.9.3 (page Ap.1-71, paragraph 1) of the Draft EIR/EIS has been modified as follows for the Alligator Rock–South of I-10 Frontage Alternative:

Alternative Length and Ground Disturbance. The Alligator Rock–South of I-10 Frontage Alternative would be ~~0.45~~0.57 miles longer than proposed route along a new transmission corridor,...

E1-115 Appendix 1 Section 4.2.9.3 (page Ap.1-71, paragraph 4) of the Draft EIR/EIS has been modified as follows for the Alligator Rock–South of I-10 Frontage Alternative:

RETAINED FOR ANALYSIS. This alternative would be feasible (if not constructed in addition to ~~DPV2-DSWTP~~) and meets project objectives.

E1-116 Because the tower height data was not available in electronic format, the tower heights listed in Appendix 3, Table 1 (Existing Tower Heights along the Devers-Harquahala Alignment – Line 1) were taken from the original DPV2 engineering drawings provided by SCE to the CPUC and BLM. Please refer to Response A8-9.

E1-117 The headings for Appendix 3, Table 3 of the Draft EIR/EIS have been modified as follows:

Table 3. Information for Structures in the Devers–San Bernardino and Devers-Vista Alignments

DEVERS-SAN BERNARDINO VISTA #1 & #2 (DOUBLE-CIRCUIT LINE ON SOUTHERN <u>NORTHERN</u> SIDE OF THE ROW)	DEVERS-VISTA SAN BERNARDINO #1 & #2 (DOUBLE-CIRCUIT LINE ON NORTHERN <u>SOUTHERN</u> SIDE OF THE ROW)
San Bernardino Junction – Line Continues <u>West to Vista Substation</u> North to San Bernardino Substation	San Bernardino Junction – Line Continues <u>North to San Bernardino</u> Substation West to Vista Substation

E1-118 Sheet 1 of 39 in Appendix 10 of the Draft EIR/EIS has been modified to show the Proposed Project as being on north side of the existing Harquahala-Hassayampa line. The corrected map is presented in this Final EIR/EIS.

E1-119 Please see Response E1-117.