

**Southern California Edison's West of Devers Upgrade Project**  
**Draft Environmental Impact Report / Environmental Impact Statement Comment Table**  
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	Class Management Objectives. The overall visual impact would be adverse due to the substantial visual contrast associated with the construction activities; however, with implementation of Mitigation Measures VR-1a (Screen construction activities from view) and VR-7a (Minimize night lighting at project facilities), this impact would be less than significant (Class II).	
D.18-61	<p><b>General Comment identifying issues associated with CPUC Preferred Alternative</b></p> <p><b>Impact VR-8: Long-term presence of the project would result in landscape changes that degrade existing visual character or quality (Class I, III, or IV depending on location)</b></p> <p>The long-term presence of the Proposed Project would result in various levels of perceived landscape changes ranging from Significant and Unmitigable (Class I) to Less Than Significant (Class III) to Beneficial (Class IV), depending on the location:</p> <p><input type="checkbox"/> <b>Significant and Unmitigable (Class I)</b> visual impacts would occur for the Proposed Project in the following locations:</p> <p>(a) Segment 4 for approximately 16 percent of the residences on the south side of the ROW between Palmer Avenue and Mockingbird Lane.</p> <p>(b) Segment 5 when viewed from residences on North Hathaway Street, North Allen Street, North Evans Street, and North Cherry Street in eastern Banning.</p> <p>(c) Segment 6 when viewed from several residences along the north sides of Amethyst Drive and Haugen-Lehmann Way in the central portion of the community of Whitewater.</p> <p>(d) The Subtransmission Line Route when viewed from the Cottage Lane residential subdivision on Iowa Street and Orange Avenue in the City of Redlands.</p> <p>In all cases, Mitigation Measures VR-8a (Minimize visual contrast in project design) and VR-9a (Treat structure surfaces) are required to reduce the severity of adverse visual impacts, though they would remain significant. These impacts would be less than significant with implementation of the Tower Relocation Alternative and the Iowa Street 66 kV Underground Alternative, as discussed in Sections D.18.4.1 and D.18.4.2, respectively.</p>	No tangible evidence has been presented in the analysis to support the conclusions that have been made regarding the significant and unmitigable impacts labeled a, b, and c.
D.18-61 through 62	<p><b>Impact VR-8C: Long-term presence of the project would result in landscape changes or new sources of light and glare that degrade existing visual character or quality (Class I or III depending on location) [For connected actions]</b></p> <p>For connected actions, their long-term presence would result in various levels of perceived landscape changes ranging from Significant and Unmitigable (Class I) to Less Than Significant (Class III), depending on location...</p> <p>In all cases, Mitigation Measures VR-8a (Minimize visual contrast in project design) and VR-9a (Treat structure surfaces) are required to reduce the severity of adverse visual impacts, though they would remain significant...</p> <p>Because NEPA requires implementation of feasible mitigation for impacts regardless of severity, Mitigation Measures VR-8a (Minimize visual contrast in project design) and VR-9a (Treat structure surfaces) would further reduce the adverse visual effects.</p>	The DEIR should clarify that the potential mitigation measures referenced for connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.
D.18-68	D.18.4.3 Phased Build Alternative	As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional

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through 69	<p>Impact VR-1: Construction would result in adverse visual effects due to the presence of equipment, vehicles, materials, and workforce</p> <p>Impact VR-2: Construction would result in visual contrast due to vegetation removal</p> <p>Impact VR-3: Construction would result in visual contrast associated with retaining walls, land scarring, and establishment of graveled surfaces</p> <p>Impact VR-4: Construction could result in visual contrast associated with in-line views of retaining walls and land scars</p> <p>Impact VR-5: Construction could result in visual contrast associated with the marking of natural features</p> <p>Impact VR-6: Construction could result in visual contrast associated with fugitive dust, waste, and trash</p> <p>Impact VR-7: Construction could result in the use of night lighting or installation of reflective surfaces, which could cause undesirable night light and glare effects</p>	<p>visual impact analysis. The additional disturbance areas and the increased duration could result in additional visual impacts beyond those analyzed for the Phased Build Alternative in the document and could be greater than those identified for the Proposed Project.</p>
D.18-70	<p><b><i>Impact VR-6: Construction could result in visual contrast associated with fugitive dust, waste, and trash</i></b></p> <p>Grading activities for the construction of specific sites, access roads, and spur roads have the potential to generate dust clouds, creating visual contrast that can substantially degrade the quality of a site. Implementation of Mitigation Measure AQ-1a (Control fugitive dust; see Section D.3, Air Quality) can reduce this impact. Also, during construction, there is the potential for trash and food-related waste to be discarded inappropriately at construction sites and then be transported by wind and/or animals across the landscape, resulting in additional visual contrast and degradation of landscape quality and character... However, these adverse effects would be less severe than in the Proposed Project because the existing double-circuit structures would be retained and reconducted rather than replaced.</p>	<p>The Phased Build Alternative actually results in greater environmental impacts than the Proposed Project because it will force multiple rounds of construction activities, possibly in short succession, prolonging the duration of noise and air pollutant exposure while increasing land disturbance and associated impacts. Please see additional comments provided in SCE's cover letter.</p>
D.18-71	<p><b>General Comment identifying issues associated with CPUC Preferred Alternative</b></p> <p><b><i>Impact VR-8: Long-term presence of the project would result in landscape changes that degrade existing visual character or quality</i></b></p> <p>The Phased Build Alternative would result in permanent adverse effects related to visual change perceived from sensitive viewing locations including adjacent residences, local roadways, and nearby recreation areas and facilities. The perceived visual change would be associated with new towers, conductors, and FAA hazard markers. The permanent visual changes in this alternative would be substantially reduced due to the retention of the existing set of double-circuit towers.</p> <p>For some portions of the Proposed Project, the structures and/or conductors would appear immediately adjacent to residential property lines. As a result, the increased visual contrast, structure prominence, and view blockage associated with the close proximity of the structure pairs would result in a Moderate to High degree of visual change, which would constitute a substantial visual effect under the Proposed Project.</p> <p>In contrast, the Phased Build Alternative would produce a less severe visual impact (compared to the Proposed Project) by retaining the set of existing double-circuit structures near the center of the ROW and constructing one new set of double-circuit structures that generally would be farther from the edge of the ROW (and in all cases no closer to the edge of the ROW) than the comparable Proposed Project</p>	<p>No tangible evidence is provided to support the assertions that the Phased Build Alternative would produce a less severe visual impact than the proposed project.</p>



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D.20-19	After implementation of the Proposed Project, conditions in the ROW with regard to wildfire risks would not be significantly changed from existing conditions. Towers and conductors would still be present in approximately the same locations. SCE and fire agencies would continue to follow existing procedures and regulations for managing wildfire risk. No mitigation is required. The impact would be less than significant (Class III).	For clarification, please make the following revisions:  After implementation of the Proposed Project, conditions in the ROW with regard to wildfire risks would not be significantly changed from existing conditions. However, the Proposed Project would reduce the number of structures within the corridor. Towers and conductors would still be present in approximately the same locations. SCE and fire agencies would continue to follow existing procedures and regulations for managing wildfire risk. No mitigation is required. The impact would be less than significant (Class III).
D.20-19	<b>Impact WF-3: The presence of the project would create new obstructions to fire suppression efforts (Class III)</b>  With implementation of the Proposed Project, structure and conductor heights in the ROW and safety distances from the transmission line would increase nominally. This would not be a significant change from existing conditions. SCE and fire agencies would continue to follow existing procedures and regulations for conducting and managing wildfire suppression. No mitigation is required. The impact would be less than significant (Class III).	The Proposed Project would reduce the number of towers, which should be noted in the text. The presence of the project can also provide benefit to fire suppression efforts; please add the following language:  <u>The Proposed Project would reduce the number of towers. Utility facilities can also assist initial attack and containment in the event of a fire in the vicinity of a line. Access roads to structures can also provide fire crews access to the area and be used as potential fire breaks.</u>
D.20-19	<b>Impact WF-3: The presence of the project would create new obstructions to fire suppression efforts (Class III)</b> For connected actions in the Desert Center and Blythe areas, gen-tie lines would be installed; however, these not as tall as high-voltage transmission lines. Also, the areas of the connected actions are sparsely vegetated, reducing fire risk. During fire suppression activity, pilots and ground crews are advised of the location of lines. Agencies would follow existing procedures for conducting and managing wildfire suppression. These would ensure that this impact is less than significant (Class III).	The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.
D.20-20	<b>Impact WF-4: Construction or maintenance activities would result in a vegetation fuel mix that increases ignition potential and rate of fire spread (Class II)</b> For connected actions, approving agencies are expected to require weed management and abatement programs to address this impact. These measures would ensure that this impact is less than significant (Class II).	The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.
D.20-24	D.20.4.3 Phased Build Alternative Impact WF-1: Construction or maintenance activities would increase the probability of a wildland fire Impact WF-2: The presence of overhead transmission lines would increase the probability of a wildland fire Impact WF-3: The presence of the project would create new obstructions to fire suppression efforts Impact WF-4: Construction or maintenance activities would result in a vegetation fuel mix that increases ignition potential and rate of fire spread	As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional study and associated additional impact analysis. The additional disturbance areas and the increased duration could result in additional wildland fire impacts beyond those analyzed for the PBA in the document and could be greater than those identified for the Proposed Project.



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ELECTRICAL INTERFERENCE AND SAFETY		
D.21-1	<p>This section describes certain effects that are unique to public safety in the vicinity of electrical transmission, including electrical interference and hazards. Please see EIR/EIS Section B.5 for information on electric and magnetic fields (EMF). The following discussions address existing environmental conditions in the affected area, identify and analyze environmental impacts, and recommend measures to reduce or avoid adverse impacts anticipated from project construction and operation. In addition, existing laws and regulations relevant to electrical interference and safety are described. In some cases, compliance with these existing laws and regulations would serve to reduce or avoid certain impacts that might other-wise occur with the implementation of the project. Section D.21.1 presents the affected environment for Electrical Interference and Safety. Relevant regulations and standards are summarized in Section D.21.2. Sections D.21.3 through D.21.5 describe the impacts of the Proposed Project and the alter-natives. Section D.21.6 presents the mitigation measures and mitigation monitoring requirements, and D.21.7 lists references cited.</p>	<p>As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:</p> <p>This section describes certain <u>potential</u> effects that are unique to public safety in the vicinity of electrical transmission, including electrical interference and hazards. Please see EIR/EIS Section B.5 for information on electric and magnetic fields (EMF). The following discussions address existing environmental conditions in the affected area, identify and analyze environmental impacts, and recommend measures to reduce or avoid <u>potential</u> adverse impacts anticipated from project construction and operation. In addition, existing laws and regulations relevant to electrical interference and safety are described. In some cases, compliance with these existing laws and regulations would serve to reduce or avoid certain impacts that might other-wise occur with the implementation of the project. Section D.21.1 presents the affected environment for <u>potential</u> Electrical Interference and Safety. Relevant regulations and standards are summarized in Section D.21.2. Sections D.21.3 through D.21.5 describe the impacts of the Proposed Project and the alter-natives. Section D.21.6 presents the mitigation measures and mitigation monitoring requirements, and D.21.7 lists references cited.</p>
D.21-1	<p>Electric fields from power lines do not typically pose interference problems for electronic equipment in businesses since the equipment is shielded by buildings and walls. However, magnetic fields can penetrate buildings and walls, thereby interacting with electronic equipment. Depending upon the sensitivity of equipment, the magnetic fields have been found to interfere with electric equipment operation...</p>	<p>As there is no evidence that the existing or future magnetic fields will interact with electronic equipment please make the following revisions:</p> <p>Electric fields from power lines do not typically pose interference problems for electronic equipment in businesses since the equipment is shielded by buildings and walls. However, magnetic fields can penetrate buildings and walls, thereby <u>potentially</u> interacting with electronic equipment. Depending upon the sensitivity of equipment, the magnetic fields have been found to interfere with electric equipment operation...</p>
D.21-2	<p>The most common electronic equipment that can be susceptible to magnetic field interference is older CRT televisions or computer monitors. Magnetic field interference results in disturbances to the image displayed on the monitor, often described as screen distortion, "jitter," or other visual defects. In most cases it is annoying, and at its worst, it can prevent use of the monitor. This type of interference is a recognized problem in the video monitor industry. As a result, there are manufacturers who specialize in monitor interference solutions and shielding equipment. Possible solutions to this problem include: relocation of the monitor, use of magnetic shield enclosures, software programs, and replacement of CRT monitors with current technology displays that are not susceptible to magnetic field interference.</p>	<p>As there is no evidence that existing or future magnetic fields will interfere with electronic devices please make the following revisions:</p> <p>The most common electronic equipment that can be susceptible to magnetic field interference is older CRT televisions or computer monitors. <u>Potential</u> magnetic field interference results in disturbances to the image displayed on the monitor, often described as screen distortion, "jitter," or other visual defects. In most cases it is annoying, and at its worst, it can prevent use of the monitor. This type of interference is a recognized problem in the video monitor industry. As a result, there are manufacturers who specialize in monitor interference solutions and shielding equipment. Possible solutions to this <u>potential</u> problem include: relocation of the monitor, use of magnetic shield enclosures, software programs, and replacement of CRT monitors with current technology displays that are not susceptible to magnetic field interference.</p>
D.21-2	<p>Power line fields can induce voltages and currents on conductive objects, such as metal roofs or buildings, fences, and vehicles. Transmission lines are designed to limit the short circuit current, from conductive items beneath the line, to a safe level (less than 5 milliampere). When a person or animal comes in contact with a conductive object, a perceptible current or small electric shock may occur. These small electric shocks cause no physiological harm; however, they may present a nuisance.</p>	<p>To clarify that the text is address conductive materials, please make the following revisions:</p> <p>Power line fields can induce voltages and currents on conductive objects, such as metal roofs or buildings, <u>metal</u> fences, and vehicles. Transmission lines are designed to limit the short circuit current, from conductive items beneath the line, to a safe level (less than 5 milliampere). When a person or animal comes in contact with a conductive object, a perceptible current or small electric shock may occur. These small electric shocks cause no physiological harm; however, they may present a nuisance.</p>



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D.21-2	The connected solar projects would be located in rural or remote areas and would interconnect to existing substations. The lines connecting the generators to the substations (gen-tie lines) would be in existing transmission line corridors or require new corridors. The effect in terms of electrical interference and safety would be similar in nature to the Proposed Project. However, the connected action projects are in remote or rural areas and the population in the vicinity of these lines would be low.	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:  The connected solar projects would be located in rural or remote areas and would interconnect to existing substations. The lines connecting the generators to the substations (gen-tie lines) would be in existing transmission line corridors or require new corridors. The effect in terms of <u>potential</u> electrical interference and safety <del>would</del> <u>could</u> be similar in nature to the Proposed Project. However, the connected action projects are in remote or rural areas and the population in the vicinity of these lines would be low.
D.21-3	The impact assessment for electrical interference and hazards was conducted through a review of the change in power line field strength in the environment that would occur due to the construction and operation of the project. Within the ROW, the proposed transmission line would be the predominant source of electrical interference and hazards. Further, the area within the transmission line ROW is within the control of SCE with regard to development land use restrictions and public access. In areas outside of the ROW, and as the distance from the transmission line increases, there may be other sources of electrical interference and hazards not associated with the project that affect the level of electrical interference. Therefore, the edge of the transmission line ROW was adopted as the point of reference for assessing Project impacts with respect to electrical interference and hazards.	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:  The impact assessment for <u>potential</u> electrical interference and hazards was conducted through a review of the change in power line field strength in the environment that would occur due to the construction and operation of the project. Within the ROW, the proposed transmission line would be the predominant source of <u>potential</u> electrical interference and hazards. Further, the area within the transmission line ROW is within the control of SCE with regard to development land use restrictions and public access. In areas outside of the ROW, and as the distance from the transmission line increases, there may be other sources of <u>potential</u> electrical interference and hazards not associated with the project that affect the level of <u>potential</u> electrical interference. Therefore, the edge of the transmission line ROW was adopted as the point of reference for assessing Project impacts with respect to <u>potential</u> electrical interference and hazards.
D.21-4	D.21.3.2 CEQA Significance Criteria The Environmental Checklist Form in Appendix G of the State CEQA Guidelines does not provide any significance criteria related to electrical hazards and interference. CEQA significance determinations for electrical interference and safety are made based on reasonably assumed potential impacts, as described below. For purposes of the CEQA analysis for this Project, an impact would be considered significant and require additional mitigation if Project construction or if maintenance of Project facilities during Project operations would: — Create interference with radio, television, communications, or electronic equipment. — Create hazards to the public through Project-induced currents or shocks. — Create interference with cardiac pacemakers.	Significance criteria not found in the California Environmental Quality Act (CEQA) guidelines are not appropriate for inclusion in an analysis of CEQA Significance Criteria. As such, please remove the following:  <del>— Create interference with radio, television, communications, or electronic equipment.</del> <del>— Create hazards to the public through Project-induced currents or shocks.</del> <del>— Create interference with cardiac pacemakers.</del>
D.21-4	SCE proposed no Applicant Proposed Measures related to electrical interference and hazards.	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revision:  SCE proposed no Applicant Proposed Measures related to <u>potential</u> electrical interference and hazards.
D.21-4	This section presents discussion of impacts related to electrical interference and safety, and mitigation measures for the West of Devers Upgrade Project.	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revision:  This section presents discussion of impacts related to <u>potential</u> electrical interference and safety, and mitigation measures for the West of Devers Upgrade Project.



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D.21-4	The Proposed Project would cause changes in power line field strength as the locations of energized conductors would change during construction and in the final configuration of the transmission lines after construction is complete. These changes in field strength at the edge of the ROW could cause the following types of electrical interference and hazards.	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revision:  The Proposed Project would cause changes in power line field strength as the locations of energized conductors would change during construction and in the final configuration of the transmission lines after construction is complete. These changes in field strength at the edge of the ROW could cause the following types of <u>potential</u> electrical interference and hazards.
D.21-4	Corona or gap discharges related to high frequency radio and television interference impacts are dependent upon several factors, including the strength of broadcast signals and are anticipated to be very localized, if it were to occur. Individual sources of adverse radio/television interference impacts can be located and corrected on power lines. Conversely, magnetic field interference with electronic equipment, such as older CRT monitors, can be corrected through the use of software, shielding, or changes at the monitor location. Mitigation Measures EIS-1a and EIS-1b would limit interference by reducing corona discharges from the energized conductor and by addressing loose connections that result in gap discharges.	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards or that corona will be an issue, please make the following revisions:  Corona or gap discharges related to high frequency radio and television interference impacts are dependent upon several factors, including the strength of broadcast signals and are anticipated to be very localized, if it were to occur. Individual sources of <u>potential</u> adverse radio/television interference impacts can be located and corrected on power lines. Conversely, <u>potential</u> magnetic field interference with electronic equipment, such as older CRT monitors, can be corrected through the use of software, shielding, or changes at the monitor location. Mitigation Measures EIS-1a and EIS-1b would limit interference by reducing corona discharges from the energized conductor and by addressing loose connections that result in gap discharges.
D.20-5	<b>EIS-2a Implement grounding measures.</b> As part of the siting and construction process, SCE shall identify objects (such as fences, metal buildings, and pipelines) within and near the right-of-way that have the potential for induced voltages and shall implement electrical grounding of metallic objects in accordance with SCE's standards. The identification of objects shall document the threshold electric field strength and metallic object size at which grounding becomes necessary.	Please make the following clarifying revisions:  <b>EIS-2a Implement grounding measures.</b> As part of the siting and construction process, SCE shall identify objects (such as <u>metal</u> fences, metal buildings, and <u>metal</u> pipelines) within and near the right-of-way that have the potential for induced voltages and shall implement electrical grounding of metallic objects in accordance with SCE's standards. The identification of objects shall document the threshold electric field strength and metallic object size at which grounding becomes necessary.
D.21-5	The Proposed Project's direct and indirect impacts to electrical interference with radio, television, communications, or electronic equipment during O&M would be minimized or avoided through the implementation of Mitigation Measures EIS-1a and EIS-1b, presented below. Mitigation Measure EIS-1a (Limit the conductor surface gradient) ensures reduction of the conductor surface gradient in accordance with the IEEE Radio Noise Design Guide. In addition, Mitigation Measure EIS-1b (Document and resolve electronic interference complaints) ensures complaints regarding electronic interference would be logged and resolved to the extent feasible.	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revision:  The Proposed Project's direct and indirect impacts to <u>potential</u> electrical interference with radio, television, communications, or electronic equipment during O&M would be minimized or avoided through the implementation of Mitigation Measures EIS-1a and EIS-1b, presented below. Mitigation Measure EIS-1a (Limit the conductor surface gradient) ensures reduction of the conductor surface gradient in accordance with the IEEE Radio Noise Design Guide. In addition, Mitigation Measure EIS-1b (Document and resolve electronic interference complaints) ensures complaints regarding electronic interference would be logged and resolved to the extent feasible.
D.21-5	<b>EIS-2a Implement grounding measures.</b> As part of the siting and construction process, SCE shall identify objects (such as fences, metal buildings, and pipelines) within and near the right-of-way that have the potential for induced voltages and shall implement electrical grounding of metallic objects in accordance with SCE's standards. The identification of objects shall document the threshold electric field strength and metallic object size at which grounding becomes necessary.	To clarify that the text addresses conductive materials, please make the following revisions:  <b>EIS-2a Implement grounding measures.</b> As part of the siting and construction process, SCE shall identify objects (such as <u>metal</u> fences, metal buildings, and <u>metal</u> pipelines) within and near the right-of-way that have the potential for induced voltages and shall implement electrical grounding of metallic objects in accordance with SCE's standards. The identification of objects shall document the threshold electric field strength and metallic object size at which grounding becomes necessary.
D.21-6	The impacts of the connected solar projects in terms of electrical interference and safety would be similar to those described for the Proposed Project. The impacts would be created by the gen-tie lines connecting the solar projects to SCE substations. Because of the remote location of the solar projects, the potentially affected population would be small.	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:  The impacts of the connected solar projects in terms of <u>potential</u> electrical interference and safety <del>would</del> <u>could</u> be similar to those described for the Proposed Project. The <u>potential</u> impacts would be created by the gen-tie lines connecting the solar projects to SCE substations. Because of the remote location of the solar projects, the potentially affected population would be small.



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D.21-6	This impact would be similar to the Proposed Project, but reduced in severity due to the short length and remote location of the gen-tie lines.	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:  The <u>potential</u> impact <del>would</del> <u>could</u> be similar to the Proposed Project, but reduced in severity due to the short length and remote location of the gen-tie lines.
D.21-6	This impact would be similar to the Proposed Project, but reduced in severity due to the short length and remote location of the gen-tie lines.	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:  The <u>potential</u> impact <del>would</del> <u>could</u> be similar to the Proposed Project, but reduced in severity due to the short length and remote location of the gen-tie lines.
D.21-6 through 7	<b>Impact EIS-1: Project could create interference with radio, television, communications, or electronic equipment (Class II)</b> For the connected solar projects, gen-tie lines would be required to comply with existing industry stand-ards. While the facilities would be in remote locations, implementation of mitigation similar to Mitiga-tion Measures EIS-1a and EIS-1b would ensure that the impact is less than significant (Class II).	The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.
D.21-7	The function of some pacemakers could be altered by exposure to electric fields that would be generated in the immediate vicinity of the project. As described above, electrical interference with modern cardiac pacemakers is not a substantial threat to public health because most modern pacemakers are designed to revert to a fixed-rate pacing mode, which is life-sustaining. This impact would be less than significant for both the Proposed Project and for gen-tie lines associated with the connected solar projects. No mitigation is required (Class III).	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revision:  The function of some pacemakers could be <u>potentially</u> altered by exposure to electric fields that would be gene-rated in the immediate vicinity of the project. As described above, electrical interference with modern cardiac pacemakers is not a substantial threat to public health because most modern pacemakers are designed to revert to a fixed-rate pacing mode, which is life-sustaining. This <u>potential</u> impact would be less than significant for both the Proposed Project and for gen-tie lines associated with the connected solar projects. No mitigation is required (Class III).
D.21-7	<b>Impact EIS-2: Project-induced currents or shocks would create hazards to the public (Class II)</b> Gen-tie lines for the solar projects would be required to comply with existing industry standards. While the facilities would be in remote locations, implementation of mitigation similar to Mitigation Measure EIS-2a would ensure that the impact is less than significant (Class II).	The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

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D.21-6 through D.21-7	<p>Corona or gap discharges related to transmission line operation could cause localized and temporary disruptions to radio, television, communications, or electronic equipment. Mitigation Measure EIS-1a (Limit the conductor surface gradient) would require SCE to limit the conductor surface gradient in accordance with the IEEE Radio Noise Design Guide, which would minimize disruptions to radio, television, communications, or electrical equipment. Mitigation Measure EIS-1b (Document and resolve electronic interference complaints) would require SCE to respond to, document, and resolve interference complaints related to corona or gap discharges after energizing the transmission line. With implementation of these mitigation measures, this impact would be less than significant (Class II).</p> <p>For the connected solar projects, gen-tie lines would be required to comply with existing industry standards. While the facilities would be in remote locations, implementation of mitigation similar to Mitigation Measures EIS-1a and EIS-1b would ensure that the impact is less than significant (Class II).</p>	<p>As there is no evidence that proposed transmission lines will introduce adverse impacts from corona discharge, please make the following revisions:</p> <p>Corona or gap discharges related to transmission line operation could <u>potentially</u> cause localized and temporary disruptions to radio, television, communications, or electronic equipment. Mitigation Measure EIS-1a (Limit the conductor surface gradient) would require SCE to limit the conductor surface gradient in accordance with the IEEE Radio Noise Design Guide, which would minimize <u>potential</u> disruptions to radio, television, communications, or electrical equipment. Mitigation Measure EIS-1b (Document and resolve electronic interference complaints) would require SCE to respond to, document, and resolve <u>potential</u> interference complaints related to corona or gap discharges after energizing the transmission line. With implementation of these mitigation measures, this <u>potential</u> impact would be less than significant (Class II).</p> <p>For the connected solar projects, gen-tie lines would be required to comply with existing industry standards. While the facilities would be in remote locations, implementation of mitigation similar to Mitigation Measures EIS-1a and EIS-1b would ensure that the <u>potential</u> impact is less than significant (Class II).</p>
D.21-7	<p>After the gen-tie lines are energized, the public could be exposed to potential hazards, including shock, through induced currents on conducting objects near the transmission line. Mitigation Measure EIS-2a (Implement grounding measures) would reduce the potential for this adverse impact through the provision of a conductive path to ground thereby avoiding a buildup of electrical potential that could discharge as an electrical shock. With implementation of mitigation, this impact would be less than significant (Class II).</p> <p>Gen-tie lines for the solar projects would be required to comply with existing industry standards. While the facilities would be in remote locations, implementation of mitigation similar to Mitigation Measure EIS-2a would ensure that the impact is less than significant (Class II).</p>	<p>As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:</p> <p>After the gen-tie lines are energized, the public could be exposed to potential hazards, including shock, through induced currents on conducting objects near the transmission line. Mitigation Measure EIS-2a (Implement grounding measures) would reduce the potential for this adverse impact through the provision of a conductive path to ground thereby avoiding a buildup of electrical potential that could discharge as an electrical shock. With implementation of mitigation, this <u>potential</u> impact would be less than significant (Class II).</p> <p>Gen-tie lines for the solar projects would be required to comply with existing industry standards. While the facilities would be in remote locations, implementation of mitigation similar to Mitigation Measure EIS-2a would ensure that the <u>potential</u> impact is less than significant (Class II).</p>
D.21-7	<p>Three alternatives are considered in this section; all of these alternatives would be located within the existing WOD ROW. The No Project/No Action Alternative is evaluated in Section D.21.5. Alternatives are described in detail in Appendix 5 (Alternatives Screening Report) and are summarized in Section C.</p> <p>Electrical interference and safety within the ROW is described in Section D.21.1.1 above; the description of the environmental setting would apply equally to the alternatives.</p>	<p>As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revision:</p> <p>Three alternatives are considered in this section; all of these alternatives would be located within the existing WOD ROW. The No Project/No Action Alternative is evaluated in Section D.21.5. Alternatives are described in detail in Appendix 5 (Alternatives Screening Report) and are summarized in Section C.</p> <p><u>Potential</u> Electrical interference and safety within the ROW is described in Section D.21.1.1 above; the description of the environmental setting would apply equally to the alternatives.</p>



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D.21-7	<p>The Tower Relocation Alternative would locate certain transmission structures in Segments 4 and 6 farther from existing homes than would be the case under the Proposed Project.</p> <p>Three impacts related to electrical interference and safety were identified for the Proposed Project. These impacts also would apply to the Tower Relocation Alternative, which overall would be the same as the Proposed Project, with the exception of the relocated transmission towers that are described above and in Appendix 5. The full text of all mitigation measures referenced in this section is presented in Section D.21.3.3, except where otherwise noted.</p>	<p>As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:</p> <p>The Tower Relocation Alternative would locate certain transmission structures in Segments 4 and 6 farther from existing homes than would be the case under the Proposed Project.</p> <p>Three <u>potential</u> impacts related to electrical interference and safety were identified for the Proposed Project. These <u>potential</u> impacts also would apply to the Tower Relocation Alternative, which overall would be the same as the Proposed Project, with the exception of the relocated transmission towers that are described above and in Appendix 5. The full text of all mitigation measures referenced in this section is presented in Section D.21.3.3, except where otherwise noted.</p>
D.21-8	<p>The minor adjustment to the location of these towers would not differ from the Proposed Project's minor risk of interference with cardiac pacemakers. No mitigation is proposed.</p>	<p>As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revision:</p> <p>The minor adjustment to the location of these towers would not differ from the Proposed Project's minor <u>potential</u> risk of interference with cardiac pacemakers. No mitigation is proposed.</p>
D.21-8	<p>The CEQA significance determination for each electrical interference and safety impact in this alternative is presented below.</p>	<p>As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revision:</p> <p>The CEQA significance determination for each <u>potential</u> electrical interference and safety impact in this alternative is presented below.</p>
D.21-8	<p>In general, the relocated towers would be moved approximately 50 feet farther from the southern edge of the ROW. Relocating towers in the identified project segments would shift the transmission line slightly farther from the edge of the ROW. This nominal change in distance is not expected to substantially alter (increase or decrease) the effects of the transmission line with regard to electric interference, although the risk of electric interference would be reduced very slightly for the nearest residents. Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints) would limit interference by reducing corona discharges from the energized conductor and by addressing loose connections that result in gap discharges.</p>	<p>As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:</p> <p>In general, the relocated towers would be moved approximately 50 feet farther from the southern edge of the ROW. Relocating towers in the identified project segments would shift the transmission line slightly farther from the edge of the ROW. This nominal change in distance is not expected to substantially alter (increase or decrease) the effects of the transmission line with regard to <u>potential</u> electric interference, although the risk of <u>potential</u> electric interference would be reduced very slightly for the nearest residents. Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints) would limit <u>potential</u> interference by reducing corona discharges from the energized conductor and by addressing loose connections that result in gap discharges.</p>
D.21-8	<p>Corona or gap discharges related to transmission line operation could cause localized and temporary disruptions to radio, television, communications, or electronic equipment. With implementation of Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints), this impact would be less than significant (Class II).</p>	<p>As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:</p> <p>Corona or gap discharges related to transmission line operation could <u>potentially</u> cause localized and temporary disruptions to radio, television, communications, or electronic equipment. With implementation of Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints), this <u>potential</u> impact would be less than significant (Class II).</p>



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D.21-8	After the transmission line is energized, the public could be exposed to potential hazards, including shock, through induced currents on conducting objects near the transmission line. With implementation of Mitigation Measure EIS-2a (Implement grounding measures), this impact would be less than significant (Class II).	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:  After the transmission line is energized, the public could be exposed to potential hazards, including shock, through induced currents on conducting objects near the transmission line. With implementation of Mitigation Measure EIS-2a (Implement grounding measures), this <u>potential</u> impact would be less than significant (Class II).
D.21-8	The function of some pacemakers could be altered by exposure to electric fields that would be generated in the immediate vicinity of the project. As described above, electrical interference with modern cardiac pacemakers is not a substantial threat to public health because most modern pacemakers are designed to revert to a fixed-rate pacing mode, which is life-sustaining. This impact would be less than significant. No mitigation is required (Class III).	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:  The function of some pacemakers could <u>potentially</u> be altered by exposure to electric fields that would be generated in the immediate vicinity of the project. As described above, <u>potential</u> electrical interference with modern cardiac pacemakers is not a substantial threat to public health because most modern pacemakers are designed to revert to a fixed-rate pacing mode, which is life-sustaining. This <u>potential</u> impact would be less than significant. No mitigation is required (Class III).
D.21-9	The Iowa Street 66 kV Underground Alternative would place a 1,600-foot segment of subtransmission line underground, rather than overhead.  Three impacts were identified under the Proposed Project for electrical interference and safety. These impacts also would apply to the Iowa Street 66 kV Underground Alternative, which overall would be the same as the Proposed Project, with the exception of the underground portion of the subtransmission line that is described above and in Appendix 5. The full text of all mitigation measures referenced in this section is presented in Section D.21.3.3, except where otherwise noted.	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:  The Iowa Street 66 kV Underground Alternative would place a 1,600-foot segment of subtransmission line underground, rather than overhead.  Three <u>potential</u> impacts were identified under the Proposed Project for electrical interference and safety. These <u>potential</u> impacts also would apply to the Iowa Street 66 kV Underground Alternative, which overall would be the same as the Proposed Project, with the exception of the underground portion of the subtransmission line that is described above and in Appendix 5. The full text of all mitigation measures referenced in this section is presented in Section D.21.3.3, except where otherwise noted.
D.21-9	This alternative would place a 1,600-foot segment of 66 kV subtransmission line underground instead of on overhead poles. This short underground segment would decrease slightly the effects of the transmission line with regard to electric interference for the nearest residents. Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints) would limit interference by reducing corona discharges from the energized conductor and by addressing loose connections that result in gap discharges.	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revision:  This alternative would place a 1,600-foot segment of 66 kV subtransmission line underground instead of on overhead poles. This short underground segment would decrease slightly the effects of the transmission line with regard to <u>potential</u> electric interference for the nearest residents. Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints) would limit the <u>potential</u> interference by reducing corona discharges from the energized conductor and by addressing loose connections that result in gap discharges.
D.21-9	This short underground segment would decrease slightly the Proposed Project's risk to the public through project-induced currents or shocks, because the conductors in this area would be underground and not accessible. There would be transition structures at the north and south ends of the underground segment, and these facilities would still have the potential to create shock hazards. With implementation of Mitigation Measure EIS-2a (Implement grounding measures), this impact would be less than significant (Class II).	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:  This short underground segment would decrease slightly the Proposed Project's <u>potential</u> risk to the public through project-induced currents or shocks, because the conductors in this area would be underground and not accessible. There would be transition structures at the north and south ends of the underground segment, and these facilities would still have the potential to create shock hazards. With implementation of Mitigation Measure EIS-2a (Implement grounding measures), this <u>potential</u> impact would be less than significant (Class II).