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*Devers-Palo Verde No. 2 Transmission Line Project*

# Project Refinements

August 2010

Prepared by



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# Acronyms and Abbreviations

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ACEC	Area of Critical Environmental Concern
APE	Area of Potential Effect
APM	Applicant Proposed Measure
BLM	U.S. Bureau of Land Management
CAISO	California Independent System Operators
CEQA	California Environmental Quality Act
CPUC	California Public Utilities Commission
CRS	Colorado River Switchyard
CR-D	Colorado River Switchyard to Devers Substation line
DPV1	Devers-Palo Verde No. 1 Transmission Line
DPV2	Devers-Palo Verde No. 2 Transmission Line
DSW	Desert Southwest Transmission Line Alternative
DV1	Devers to Valley No. 1 Transmission Line
DV2	Devers to Valley No. 2 Transmission Line
EIR/EIS	Environmental Impact Report/Environmental Impact Statement
EMF	Electric & Magnetic Fields
FAA	Federal Aviation Administration
kV	kilovolt
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NRHP	National Register of Historic Places
OPGW	Optical Ground Wire
Project	Devers-Palo Verde No. 2 Transmission Line Project
SCE	Southern California Edison

SPS	Special Protection System
SVC	Static VAR (Volt-Ampere Reactive) Compensator
TCP	Traditional Cultural Property
VRM	Visual Resource Management

# 1.0 Introduction

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84 The purpose of this document is to describe refinements that have occurred to the  
85 Devers-Palo Verde No. 2 Transmission Line Project (DPV2 or Project) since the Final  
86 Environmental Impact Report/Environmental Impact Statement (Final EIR/EIS) for the  
87 Project was certified by the California Public Utilities Commission (CPUC) in 2007 and  
88 subsequently modified as a California-only project by the CPUC (contingent upon CAISO  
89 approval) in 2009.

## 90 1.1 EIR/EIS Background

91 The DPV2 project originally proposed and described in the EIR/EIS was a 230-mile, 500  
92 kilovolt (kV) electric transmission line between SCE's existing Devers Substation in  
93 California and Harquahala Generating Substation in Arizona (referred to as "Devers-  
94 Harquahala" or D-H) and included the replacement of an approximately 48-mile 230 kV  
95 transmission line in California (referred to as "West of Devers" upgrades). The DPV2 project  
96 included the two transmission line elements, a new Midpoint Substation, several substation  
97 upgrades, other ancillary facilities, and a telecommunications system. The Final EIR/EIS  
98 was completed in October 2006.

99 The California alternatives in the DPV2 Final EIR/EIS included the Desert Southwest  
100 Transmission Project Alternative and the Devers-Valley No. 2 Alternative (DV2).

101 The Desert Southwest Transmission Line Project Alternative (DSW) would have replaced an  
102 approximately 118-mile-long segment of the DPV2 in a parallel right-of-way. The Desert  
103 Southwest Transmission Line Alternative included a new substation in the Blythe area that  
104 is also called the Midpoint Substation; however, the actual location of this DSW Midpoint  
105 Substation differs from the DPV2 Midpoint Substation. The DSW Midpoint Substation  
106 location was approximately five miles northwest of Southern California Edison's (SCE's)  
107 originally proposed Midpoint Substation location for DPV2. Greater details for the DSW  
108 Midpoint Substation site are provided in the 2005 Final EIS/EIR for the Desert Southwest  
109 Transmission Line Project (Imperial Irrigation District, 2005). The DPV2 Final EIR/EIS  
110 identified the two Midpoint Substation as environmentally equivalent and stated that either  
111 Midpoint Substation location is environmentally superior/preferable.

112 DV2 would create a second 500 kV transmission line from the Devers Substation to the  
113 existing Valley Substation, and was identified as an alternative to the West of Devers  
114 transmission line upgrades. This alternative would traverse a small portion of the San  
115 Bernardino National Forest.

116 The DPV2 Final EIR/EIS was certified by the CPUC on January 25, 2007, and as part of its  
117 granting of the Certificate of Public Convenience and Necessity via D.07-01-040, the CPUC  
118 approved the use of the DV2 alternative rather than the West of Devers upgrades. Following  
119 the CPUC's approval of DPV2 on June 6, 2007, the Arizona Corporation Commission denied  
120 SCE approval to construct the Arizona portion of the Project via D.69638. Subsequently, on

121 November 20, 2009, via D.09-11-007, the CPUC granted modification of D.07-01-040 and  
122 authorized construction of the California (only) portion of the Project (including either the  
123 DPV2 or the DSW Midpoint Substation location), conditioned on subsequent approval from  
124 the California Independent System Operator.

## 125 1.2 Need for Refinements and Current DPV2 Project

126 Following the approval of the California-only portion of the DPV2 project, more detailed  
127 engineering has occurred, and continues to occur, on various elements of the project. The  
128 overall DPV2 project is essentially the same as what was approved by the CPUC, with  
129 additional refinements to several project elements, specifically:

- 130 1) Construction yards.
  - 131 ▪ Yards that differ in size and location are needed to accommodate construction of
  - 132 DPV2.
- 133 2) Colorado River Switchyard (CRS, formerly referred to as the Midpoint Substation)  
134 refinements and related activities.
  - 135 ▪ Footprint location adjustments will occur for engineering purposes.
  - 136 ▪ Related activities are clarified.
- 137 3) Telecommunication system details.
  - 138 ▪ A telecommunications link between the CRS and the existing Blythe Service Center
  - 139 is needed because only the California portion of the Project was approved.
- 140 4) Tower heights.
  - 141 ▪ Tower height adjustments are needed to accommodate terrain and meet current
  - 142 conductor clearance requirements.
- 143 5) Minor DV1 relocation in the Cabazon area.
  - 144 ▪ Minor DV1 relocation is needed to route DV1 through land owned by SCE.
- 145 6) Clarification of improvements to the Valley Substation.
  - 146 ▪ Clarification is needed to update the Final EIR/EIS with language in the Draft
  - 147 EIR/EIS (information regarding the Valley Substation upgrades was not included in
  - 148 the Final EIR/EIS).

149  
150 Figure 1: Project Overview Map shows the current project and locations of the various  
151 project elements.

152

## 2.0 DPV2 Refinements and Comparison

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153 This section describes the project elements that were approved by the CPUC in 2009,  
154 refinements that have been made to the DPV2 project since the approval, and provides a  
155 comparison of the information in the Final EIR/EIS and the anticipated effects of the  
156 refinements.

### 157 2.1 Construction Yards

#### 158 2.1.1 Approved Project Elements – Construction Yards

159 The DPV2 Final EIR/EIS described the establishment of approximately seven temporary  
160 construction yards located at strategic points along the route within both Arizona (three  
161 yards) and California (four yards) for the Devers-Harquahala 500 kV transmission line  
162 ending at Devers Substation. Each yard would be three to 10 acres in size, depending on  
163 land availability and intended use.

164 The following temporary construction yard locations for the Devers-Harquahala 500 kV  
165 Segment were described in the Final EIR/EIS:

- 166 • **Palm Springs (Devers) Yard.** West side of Diablo Road at Devers Substation, California.  
167 5.9 acres (270 by 935 feet). Area consists of two fenced areas and one unfenced area.
- 168 • **Indio Yard.** East side of Dillon Road, 300 feet north of Fargo Canyon Road, 1,500 feet  
169 north of the existing Devers–Palo Verde No. 1 (DPV1) 500 kV line, California. 3.2 acres  
170 (250 by 550 feet). Area is fenced and lighted.
- 171 • **Desert Center Yard.** 1,000 feet northwest of the intersection of Rice Road and Ragsdale  
172 Road, California. 3.2 acres (250 by 550 feet). Area is fenced and being used by current  
173 owner for miscellaneous storage.
- 174 • **Blythe Yard.** North side of Hobson Way, one mile west of Neighbors Boulevard, on the  
175 west side of Blythe Substation, California. 3.2 acres (250 by 550 feet). Area is fenced and  
176 currently contains miscellaneous pipe and steel.

177 The Final EIR/EIS also included three construction yards in Arizona, as follows:

- 178 • **Quartzsite Yard.** 1,000 feet north of the intersection of Quartzsite Road and Main Street,  
179 Arizona. Five acres estimated. Area is being used for overflow recreational vehicle  
180 parking.
- 181 • **Vicksburg Yard.** South of a fuel station on the south side of Interstate 10, Arizona.  
182 Five acres estimated. Original fencing has been removed and property is abandoned.
- 183 • **Tonopah Yard.** Northwest of the intersection of West Indian School Road and North  
184 411th Avenue, Arizona. Some development has occurred on the original property used  
185 for Devers–Palo Verde 1 Project.

186 The Final EIR/EIS described the construction yards as follows:

187 Each yard would be used as a reporting location for workers, and for vehicle and  
188 equipment parking and material storage. The yards would have offices for  
189 supervisory and clerical personnel. Normal maintenance of construction equipment  
190 would be conducted at these yards. The maximum number of workers reporting to  
191 any one yard is not expected to exceed 144 at any one time. Each yard would be  
192 three to 10 acres in extent, depending on land availability and intended use.

193 During construction, existing concrete supply facilities would be used where  
194 feasible. If no concrete supply facilities exist in certain areas, a temporary concrete  
195 batch plant would be set up. If necessary, approximately two acres of property  
196 would be sub-partitioned from the marshalling area of the Desert Center yard for a  
197 temporary concrete batch plant. Equipment would include a central mixer unit  
198 (drum type); three silos for injecting concrete additives, fly ash, and cement; a water  
199 tank; portable pumps; a pneumatic injector; and a loader for handling concrete  
200 additives not in the silos. Dust emissions would be controlled by watering the area  
201 and by sealing the silos and transferring the fine particulates pneumatically between  
202 the silos and the mixers.

203 As described in the Final EIR/EIS, for construction of the 230 kV West of Devers upgrades,  
204 additional construction yards were expected at existing facilities such as Devers, Mira Loma,  
205 Vista, and San Bernardino Substations, as well as Etiwanda Generating Station. If it were  
206 determined that the land available at these SCE-owned properties was either unavailable  
207 because of competing projects or was insufficient, up to two additional yards might be  
208 required, each with approximately three to 10 acres. This information is also presumed to  
209 apply to the Devers-Valley No. 2 Alternative in the Final EIR/EIS, which was approved and  
210 selected in lieu of the West of Devers upgrades.

## 211 2.1.2 Construction Yard Refinements

212 As a result of the project changes (selection of the DV2 Alternative as well as inadequate  
213 sizing and/or unavailability of the previously planned construction yard locations), seven  
214 new construction yards are now planned. The new yards are as follows (Figure 2:  
215 Construction Yard Overview Map shows the locations of the new yards and the previously  
216 approved yards in California):

- 217 • **Palm Springs (Devers) Yard.** An approximately 11.5 acre area on the east side of Devers  
218 Substation on existing SCE property (see Figure 3a). The site is currently undeveloped.
- 219 • **Desert Center Yard 1.** An approximately 5.5-acre site located northwest of the  
220 intersection of Rice Road and Ragsdale Road (see Figure 3b). This site is currently  
221 vacant, fenced and has been previously covered with gravel and used for storage.
- 222 • **Desert Center Yard 2.** An approximately 11.5 acre site located east of the intersection of  
223 Rice Road and Ragsdale Road (between Ragsdale Road and the I-10 freeway, see Figure  
224 3b), which could be used for material storage and to accommodate a batch plant, as  
225 discussed in the Final EIR/EIS. The site is currently undeveloped.

- 226 • **Chiriaco Summit Yard.** An approximately 11.4-acre yard located on the south side of  
227 the Chiriaco Summit Airport (see Figure 3c). The site is currently undeveloped.
- 228 • **Blythe Yard.** An approximately 10-acre yard located north of Hobson Way and south of  
229 Blythe Airport (see Figure 3d). The site is vacant and has been previously  
230 disturbed/graveled.
- 231 • **Highland Springs Yard.** An approximately 6-acre yard located along Highland Springs  
232 Avenue (see Figure 3e). The site is currently used for cattle grazing. Roadbase would be  
233 applied to the existing access road, which is outside of the yard.
- 234 • **Valley Yard.** An approximately 10-acre yard located adjacent to and south of SCE's  
235 Valley Substation along the north side of Matthews Road (see Figure 3f). The site is  
236 currently vacant and undeveloped. The location of this yard will change due to a recent  
237 discovery of Stephen's kangaroo rat at the site.

### 238 **Overflow Yard at the Devers Substation**

239 Additional storage of tower steel will be needed as overflow storage for the Devers Yard  
240 discussed above. For the overflow yard, an approximately 5-acre area of the existing Devers  
241 Substation would be used for temporary storage of steel. The area is currently covered by  
242 station specification quality rock within the existing fenced footprint of the Station. Access  
243 to the overflow yard would be provided through the Devers Substation via an existing gate  
244 from Diablo Road. This overflow yard would not result in soil or ground disturbances.

245

### 246 **Helicopter Assembly Yards**

247 Approximately seven yards are currently planned to support helicopter assembly of towers  
248 where tower sites have no road access and are restricted by terrain. The specific locations of  
249 these yards are preliminary, are still currently under review, and could be subject to further  
250 refinement and subsequent CPUC coordination. However, the preliminary helicopter yard  
251 locations are shown in Figure 4.

## 252 **2.1.3 Environmental Effects**

### 253 **Final EIR/EIS Discussion**

254 The Final EIR/EIS evaluated potential impacts from the development and use of the  
255 construction yards. The resource areas potentially affected by the construction yards are as  
256 follows:

257 **Air Quality.** Construction activity, including construction yard activity, would generate  
258 dust and exhaust emissions.

259 **Biological.** Ground-disturbing activity, including grading of new access roads,  
260 transportation, maintenance of construction equipment and supplies, staging area and  
261 material yard preparation and use, and use or improvement of existing access roads have  
262 the potential to disturb the vegetation communities.

263 **Cultural and Paleontological Resources.** Construction and use of the yards could cause an  
264 adverse change to known historic properties. Construction and use of the yards could cause

265 an adverse change to unknown significant buried prehistoric and historical archaeological  
266 sites or buried Native American human remains.

267 **Visual Resources.** Construction and use of the yards could cause adverse effects to visual  
268 resources resulting from short-term visibility of construction activities, equipment, and  
269 night lighting.

270 **Noise.** Noise from the construction and use of the yards could disturb sensitive receptors or  
271 violate local rules, standards, and/or ordinances.

272 **Safety.** Construction and use of the yards could cause soil contamination as a result of  
273 improper handling and/or storage of hazardous materials.

#### 274 Comparison of Potential Construction Yard Refinement Effects

275 Effects from the proposed construction yard activities are anticipated to be consistent with  
276 the Final EIR/EIS construction yard effects discussion.

277 The locations currently proposed for the construction yards are similar to those previously  
278 proposed in California relative to surrounding conditions, neighboring land uses, locations,  
279 and operations. Most of the proposed locations have been previously disturbed and are not  
280 located close to sensitive receptors or other visual sensitivities. Where vacant land is  
281 contemplated, biological and archaeological surveys have been conducted to ensure that  
282 potential impacts beyond those already contemplated for the project do not occur. Because  
283 potential impacts of the current construction yard locations would be similar to those  
284 associated with the previously approved locations, they would be similarly mitigated by  
285 applicant proposed measures (APMs) and/or mitigation measures already applied to the  
286 project through the Final EIR/EIS. The temporary nature of the construction yards further  
287 minimizes the potential for impacts associated with this component of the project. A  
288 detailed comparison for each yard is provided in the following text.

289 **Palm Springs (Devers) Yard.** The proposed Devers yard is approximately 11.5 acres  
290 adjacent to the east side of the Devers Substation, north of Powerline Road. This yard would  
291 replace the approved Palm Springs Yard, which was described as two fenced areas and one  
292 unfenced area west of Diablo Road at Devers Substation. Both the approved and proposed  
293 yard locations are in close proximity to Devers Substation, and potential impacts and  
294 mitigation would be almost identical. No new significant or more severe impacts than  
295 discussed in the Final EIR/EIS are anticipated.

296 **Desert Center Yards.** Two yards (DC-1 and DC-2) with a combined total of approximately  
297 16 acres would be located in Desert Center. DC-1, located northwest of the intersection of  
298 Rice Road and Ragsdale Road, is fenced and has recently been used/disturbed for a similar  
299 purpose as is proposed here. DC-2 is located between Ragsdale Road and the I-10 freeway,  
300 east of Rice Road. DC-2 may include a concrete batch plant. The proposed Desert Center  
301 Yards would replace the approved Desert Center Yard, which was to be located 1,000 feet  
302 northwest of the intersection of Rice Road and Ragsdale Road. The approved yard and  
303 proposed DC-1 yard would be nearly identical in location. The DC-2 yard is adjacent to the  
304 I-10 freeway. The approved and proposed yard areas are in close proximity to each other.  
305 As noted previously, a batch plant was already contemplated at the approved Desert Center  
306 Yard. Therefore, potential impacts and mitigation for those impacts would be similar for the

307 approved and proposed yards. No new significant or more severe impacts than discussed in  
308 the Final EIR/EIS are anticipated.

309 **Chiriaco Summit Yard.** The proposed Chiriaco Summit Yard consists of approximately 11.4  
310 acres located directly southeast of Chiriaco Summit Airport and adjacent to an existing  
311 substation. This area is vacant and currently fenced. The proposed Chiriaco Summit Yard  
312 would replace the approved Indio Yard, which consisted of 3.2 acres on the east side of  
313 Dillon Road north of Fargo Canyon Road. The Indio Yard was considered too small for the  
314 current project needs. Although in slightly different geographic areas, both the approved  
315 and proposed locations are removed from sensitive receptors. Potential impacts and  
316 mitigation would be similar and no new significant or more severe impacts than discussed  
317 in the Final EIR/EIS are anticipated.

318 **Blythe Yard.** The proposed Blythe Yard consists of approximately 10 acres located north of  
319 Hobson Way, west of Neighbors Boulevard and south of the Blythe Airport. The proposed  
320 location is fenced with temporary power available and has been previously used/disturbed  
321 for a similar purpose as is proposed here. The approved Blythe Yard, comprising 3.2 acres  
322 located on the west side of Blythe Substation, is currently being used by the owner and is  
323 therefore unavailable. Potential impacts presented by the approved and proposed locations  
324 would be similar. No new significant or more severe impacts than discussed in the Final  
325 EIR/EIS are anticipated.

326 **Highland Springs Yard.** This yard would be approximately 6 acres located on the east side  
327 of Highland Springs Avenue, just over one mile north of the I-10, within an existing SCE  
328 right-of-way. Potential impacts would be similar to those presented by approved project  
329 yards and would be adequately addressed via implementation of existing mitigation  
330 measures. As with the Valley Yard, the Final EIR/EIS discussed that additional yards west  
331 of Devers Substation might be needed. To ensure that no new significant impacts would  
332 result from this location, the yard has been located a minimum of 500 feet east of Highland  
333 Springs Avenue to provide added noise and visual separation between this yard and  
334 residences on the west side of Highland Springs Avenue. Other potential impacts associated  
335 with a new yard in this area are similar to those anticipated in conjunction with approved  
336 yards, and would be addressed by existing mitigation and APMs. No new significant or  
337 more severe impacts than discussed in the Final EIR/EIS are anticipated.

338 **Valley Yard.** The proposed Valley Yard is approximately 10 acres of vacant land located  
339 between the existing Valley Substation and Matthews Road in the City of Menifee. With the  
340 selection of the DV2 Alternative instead of the West of Devers segment of the project, a  
341 construction yard near the Valley Substation, which is the termination point for DV2, is  
342 needed. Because the Final EIR/EIS identifies the possibility that additional yards might be  
343 required west of Devers, the Valley Yard is consistent with the approved project. However,  
344 SCE has recently identified the presence of Stephen's kangaroo rat on this site (via a  
345 trapping survey consistent with mitigation measure MM B-7f), and is in the process of  
346 finding a different location for the Valley Yard without sensitive biological resources,  
347 consistent with MM B-7f and APM B-39 (which require avoidance of Stephen's kangaroo rat  
348 habitat). Once a suitable replacement location for the Valley Yard is identified and resource  
349 evaluations confirm that no biological or cultural resource impacts would be adversely  
350 affected, SCE will submit additional information to the CPUC on the new Valley Yard  
351 location, for approval.

## 352 2.2 Colorado River Switchyard

### 353 2.2.1 Approved Project Element – Midpoint Substation

354 In the DPV2 Final EIR/EIS, the CPUC identified both the DPV2 Midpoint Substation and  
355 the DSW Midpoint Substation as environmentally equivalent. In Decision D. 09-11-007  
356 (CPUC, 2009), the CPUC approved either substation location, and determined that  
357 construction of the Midpoint Substation does not trigger the need for additional CEQA  
358 review. The Midpoint-Desert Southwest Substation site was ultimately selected by SCE as  
359 the location for the CRS. The approved site is located in the southeastern portion of APN  
360 No. 879-080-025, which is shown in Figure 5: Colorado River Switchyard Layout (similar to  
361 Figure 2-3 of the Final EIS/EIR for the Desert Southwest Transmission Line Project). The  
362 Final EIS/EIR for the Desert Southwest Transmission Line Project discussed that existing  
363 maintenance roads to the Palo Verde-Devers 500 kV Transmission Line would be used to  
364 provide access to the proposed Midpoint Substation/Switching Station site, and that certain  
365 road improvements will be required to allow passage of construction vehicles and heavy  
366 equipment (Imperial Irrigation District, 2005).

367 As approved and discussed in the DPV2 Final EIR/EIS, the DPV2 Midpoint Substation  
368 includes buses, circuit breakers, disconnect switches, 108-foot-high dead-end structures, and  
369 outdoor night lighting to illuminate the switchrack when manually switched on. A block  
370 diagram of the substation and its main elements is shown in Figure B-18 of the DPV2 Final  
371 EIR/EIS.

### 372 2.2.2 Colorado River Switchyard Refinements

#### 373 Minor Shift in Footprint Location

374 The CRS site is a 44-acre site (1,000 feet by 1,900 feet) located in the southeast corner of APN  
375 No. 879-080-025 (see Figure 5: Colorado River Switchyard Layout). When final engineering  
376 is completed, the final location of the switchyard site may shift slightly to the west or north,  
377 or be reoriented to accommodate large generator interconnections. Any shift in the site  
378 location would be restricted to the immediate vicinity of the site proposed for the DSW  
379 Midpoint Substation, would be surveyed for biological and cultural resources, and would  
380 comply with applicable mitigation measures and APMs.

#### 381 Temporary Staging Area

382 A 10-acre temporary staging area adjacent to the CRS site will be required to facilitate  
383 construction of the switchyard. This represents an increase in the substation staging area  
384 size from the five-acre area that was that described in the DPV2 Final EIR/EIS. The staging  
385 area would be accessible from the existing access road along the switchyard site, but the  
386 final location could still shift and will be determined as a more detailed switchyard design is  
387 developed.

#### 388 Distribution (Station Light and Power)

389 Although not specifically described in the Final EIR/EIS, power to operate the substation is  
390 inherent in the Project. A distribution line for station light and power would be extended  
391 from an existing 33 kV line (located approximately one mile north of the CRS site along an

392 existing east-west access road that extends from Blythe Way (to the east). Extension of this  
393 existing 33 kV line to the site would require installation of approximately 15-20 new wood  
394 poles and about 2,500 feet of new conductor (between the existing line and the CRS to the  
395 south). Access to the poles would be created as the poles are installed by utility vehicles as  
396 they progress along the route. The access way would not be graded (drive and crush only),  
397 but would remain following line installation for future inspection and maintenance. The  
398 new poles would disturb approximately 0.01 acre (roughly 25 square feet) per pole. The  
399 exact alignment would be determined during final substation design. Figure 6: Proposed  
400 Distribution and Telecom, shows a north-south corridor extending north of the site, which  
401 represents the general location of the distribution power line extension.

#### 402 Access Road Improvements

403 An existing unimproved access road (approximately 13 feet wide) lies between the site and  
404 Wiley Wells Road along the DPV1 line. This access road section is approximately 25,000 feet  
405 long. This access road would serve as the substation entrance road and would be improved  
406 to a full 24-foot width with a two-foot-wide shoulder on each side, for a total width of  
407 approximately 30 feet, including allowances for side slopes and surface runoff control. As a  
408 note, the DPV2 Final EIR/EIS evaluated the impacts of a new permanent 24-foot-wide, two-  
409 lane access road between an existing paved road and the DPV2 Midpoint Substation site—a  
410 distance of approximately three miles.

411 Widening and improving the access road would include compacting subsurface soils and  
412 placing a four-inch-thick layer of asphalt concrete over a six-inch-thick layer of compacted  
413 aggregate road-base. Given that the existing access road between Wiley Wells Road and the  
414 CRS site is currently disturbed, the road improvements would result in approximately 9.8  
415 acres of additional permanent disturbance.

#### 416 2.2.3 Environment Effects – CRS Refinements

417 The anticipated impacts of the CRS refinements are compared against the impacts discussed  
418 in the DPV2 Final EIR/EIS.

419 The CRS refinements described above are not considered substantial project changes that  
420 could result in new significant environmental effects or a substantial increase in the severity  
421 of previously identified significant effects discussed in previously certified California  
422 Environmental Quality Act (CEQA)/National Environmental Policy Act (NEPA)  
423 documents. The refinements are not expected to affect the resource areas below because  
424 they are not substantive or because sensitive resources are not present or nearby:

- 425 D.3 Visual Resources (refinements are in a Class III area)
- 426 D.5 Wilderness and Recreation (no changes that could affect wilderness or recreation  
427 areas)
- 428 D.8 Noise (no changes that could expose sensitive receptors to construction or  
429 operational noise)
- 430 D.9 Transportation and Traffic (no changes that could result in new traffic impacts)
- 431 D.10 Public Health and Safety (No radio interference, induced currents and shock  
432 hazards, pacemaker effects, wind, earthquake or fire hazards are associated with

- 433 CRS refinements. But improper handling of hazardous materials during  
434 construction is addressed.)
- 435 D.11 Air Quality (no substantive changes that could affect air quality significance  
436 determinations under the Mojave Desert Air Quality Management District)
- 437 D.13: Geology, Soil, and Mineral Resources (no substantive changes that could result in  
438 new or more severe geology and soils impacts)
- 439 D.14 Socioeconomics (no changes that could affect population, housing, employment,  
440 utilities, or solid waste facilities)

441 However, further impact comparisons are provided for the following resource areas:

- 442 D.2 Biological Resources
- 443 D.4 Land Use
- 444 D.6 Agricultural Resources
- 445 D.7 Cultural and Paleontological Resources
- 446 D.10 Public Health and Safety (No radio interference, induced currents and shock  
447 hazards, pacemaker effects, wind, earthquake or fire hazards are associated with  
448 CRS refinements. But improper handling of hazardous materials during  
449 construction is addressed.)
- 450 D.12 Hydrology and Water Quality

#### 451 Biological Resources

452 **Final EIR/EIS Discussion.** The Final EIR/EIS evaluated the anticipated impacts to  
453 biological resources for the Midpoint Substation as part of the project (approximately 10  
454 miles southwest of Blythe), and a second Midpoint substation as part of the Desert  
455 Southwest Transmission Project Alternative (approximately 11 miles west of Blythe and  
456 five miles northwest of the DPV2 Midpoint substation). The DPV2 Final EIR/EIS analysis  
457 determined that use of either site would result in potentially significant impacts to  
458 biological resources (native vegetation, noxious weeds, nesting birds, desert tortoise,  
459 sensitive plant habitats, sensitive wildlife habitats, and jurisdictional waters); however,  
460 those impacts would be mitigated to less than significant levels through implementation of  
461 numerous mitigation measures (B-1a, B-2a, B-2b, B-5a, B-7b, B-7c, B-8a, B-9b, B-9c, B-9d,  
462 B-9e, B-9g, B-9h).

463 For both the DPV2 Midpoint Substation and the DSW Midpoint Substation, the same  
464 mitigation measures would apply and be equally effective in mitigating potential impacts,  
465 even though the two Midpoint Substation sites are located approximately five miles apart.  
466 This is because the two sites are characterized by similar habitats and species, and shifting  
467 from one location to the other has minimal, if any, difference in impacts to biological  
468 resources and the applicable APMs and mitigation measures. For these reasons, the Final  
469 EIR/EIS determined (which was reiterated in Decision D.07-01-040) that both the DPV2  
470 Midpoint Substation location and the Desert Southwest Midpoint Substation location are  
471 equally environmentally superior/preferable.

472 **Comparison of Potential CRS Refinement Effects.** The minor shift in the footprint location  
473 of the CRS, the extension of a distribution line to the CRS (for station light and power), a  
474 widened and improved access road (from Wiley Wells Road), and larger staging area would

475 result in impacts to biological resources. However, such impacts would be consistent with  
476 the impacts evaluated in the Final EIR/EIS because the refinements are consistent with the  
477 project features evaluated in the Final EIR/EIS and because they would affect the same  
478 general area and biological resources. In addition, because the same mitigation measures  
479 (including measures that apply to access roads) would be applied and would reduce  
480 potential impacts to biological resources from the CRS refinements, impacts to biological  
481 resources would be of the same type and intensity (less than significant after mitigation) as  
482 discussed in the Final EIR/EIS. In addition, SCE biologists have surveyed the refinement  
483 areas and have coordinated with the U.S. Bureau of Land Management (BLM) , U.S. Fish  
484 and Wildlife Service (USFWS), and the California Department of Fish and Game (CDFG) on  
485 the affected areas. The subsequent Federal Endangered Species Act Section 7 consultation  
486 (resulting in a project-specific Biological Opinion) and State Endangered Species Act Section  
487 2080.1 consistency review would include the analysis, affects, and mitigation for the these  
488 CRS refinements. As a consequence, the CRS refinements would not result in new  
489 significant impacts or greater intensity of impacts.

#### 490 Land Use

491 **Final EIR/EIS Discussion.** Chapter 2 of the Final EIR/EIS described the placement and  
492 removal of guard structures along the transmission lines, which are comprised of wooden  
493 poles similar to those that would be required for the extension of the existing distribution  
494 line. The Final EIR discussed land use impacts associated with primary Project structures  
495 such as towers, and stated that placement of additional towers requires acquisition and  
496 disturbance of small amounts of additional land area to accommodate the footprint of the  
497 towers and access roads. Although the Project would require acquisition of a small amount  
498 of existing land, the affected land uses would not be substantially disrupted. The Final  
499 EIR/EIS concluded that land use impacts and land acquisition would result in adverse, but  
500 less than significant impacts.

501 **Comparison of Potential CRS Refinement Effects.** The Final EIR/EIS discussed the  
502 potential for right-of-way acquisition for the primary transmission lines and project  
503 elements. The acquisition of a band of right-of-way or easement for the extension of the  
504 distribution power line from the parcels to the north of the CRS (APN 879-080-016, 879-080-  
505 017, and 818-222-019) would be of a smaller scale (much smaller width) than the remaining  
506 right-of-way acquisitions for the towers and transmission line. The majority of project right-  
507 of-ways have been in place for over 20 years, and very little additional right-of-way is  
508 required. In addition, consistent with the Final EIR/EIS, the additional right-of-way for the  
509 distribution line extension represents a small amount of right-of-way that is not expected to  
510 disrupt land uses.

#### 511 Agricultural Resources

512 **Final EIR/EIS Discussion.** The Final EIR/EIS identified the selected CRS site (Midpoint  
513 Substation in the Desert Southwest Transmission Project Alternative) as being in an area not  
514 mapped for important farmland (D.6-46). The Final EIR/EIS identified an impact to  
515 agricultural resources based on the placement of towers (and pulling/splicing of  
516 transmission lines) in the agricultural areas around Blythe, for the section of transmission  
517 line east of the Midpoint Substation (between the Midpoint Substation and the Colorado  
518 River).

519 **Comparison of Potential CRS Refinement Effects.** The shift in the footprint of the CRS,  
520 access road improvements, distribution line extension, and expanded staging area would  
521 not result in new or more severe impacts to agricultural resources than described in the  
522 Final EIR/EIS because no such resources are in the area.

### 523 Cultural and Paleontological Resources

524 **Final EIR/EIS Discussion.** The Final EIR/EIS identified a potential for significant impacts  
525 (from ground-disturbing activities) to known and unknown historic properties and  
526 archaeological resources. The Final EIR/EIS also stated that adverse effects to individual  
527 sites cannot be precisely identified for all project areas until the final route is selected,  
528 specific tower locations are determined, detailed engineering plans for all project roads and  
529 facilities are completed, and final National Register of Historic Places (NRHP) eligibility of  
530 cultural resources has been assessed. The Final EIR/EIS also stated that in many cases,  
531 direct impacts may be avoided through minor design modifications and project effects  
532 would be reduced to a less than significant level (Class II) by avoidance and protection  
533 measures listed in Mitigation Measures C-1a (Inventory and evaluate cultural resources in  
534 Final Area of Potential Effect [APE]) and C-1b (Avoid and protect potentially significant  
535 resources). In addition, if cultural resources are identified through additional surveys or  
536 construction activities, then Mitigation Measures C-1c (Develop and implement Historic  
537 Properties Treatment Plan), C-1d (Conduct data recovery to reduce adverse effects), C-1e  
538 (Monitor construction), and C-1f (Train construction personnel), were required to be  
539 implemented by the Applicant to facilitate discovery, evaluation, and treatment of unknown  
540 buried prehistoric and historical archaeological sites.

541 The Final EIR also stated that if direct impacts to NRHP properties eligible under Criterion  
542 d (significant data potential) are unavoidable, mitigation through data recovery would  
543 reduce impacts, but, under the National Historic Protection Act (NHPA) regulations, effects  
544 would still be considered adverse (Class I). Likewise, for properties eligible for the NRHP  
545 under Criteria a, b, or c, data recovery could not reduce impacts to a less than significant  
546 level (Class I) and effects would be considered adverse. Further, potential impacts to  
547 archaeological resources are identified because unanticipated sites, features, and/or  
548 artifacts, and potentially Native American human remains or sacred features could be  
549 discovered as a result of construction, and those are determined to be potentially significant.

550 The Final EIR/EIS applied mitigation measures MM C-1a to MM C-1f and MM C-2a, but  
551 concluded that if direct impacts to NRHP properties eligible under Criterion d (significant  
552 data potential) are unavoidable, mitigation through data recovery would reduce impacts,  
553 but under the NHPA regulations, effects would still be considered adverse (Class I).  
554 Likewise, for properties eligible for the NRHP under Criteria a, b, or c data recovery could  
555 not reduce impacts to a less than significant level (Class I) and effects are considered  
556 adverse.

557 The Final EIR/EIS stated that the BLM, as the Federal Lead Agency under NEPA, has  
558 initiated required government-to-government consultation with appropriate Native  
559 American groups and notification to other public groups regarding project effects on  
560 traditional cultural values, and that this consultation will determine whether there are  
561 Traditional Cultural Properties (TCPs) along this alternative to the Project that could be  
562 affected and the significance of any project effects. Implementation of Mitigation Measure

563 C-3a (Complete consultation with Native American and other Traditional Groups) should  
564 reduce impacts to TCPs to a level that is less than significant (Class II).

565 **Comparison of Potential CRS Refinement Effects.** The minor shift in the footprint location  
566 of the CRS, the extension of a distribution line to the CRS (for station light and power), an  
567 expanded laydown area, and a widened and improved access road (from Wiley Wells Road)  
568 to the site could result in impacts to cultural resources if such resources are present within  
569 the area of disturbance. However, these refinements are consistent with the project features  
570 evaluated in the Final EIR/EIS in that they would affect the same general area, and could  
571 similarly affect unknown archaeological resources. The same mitigation identified in the  
572 Final EIR/EIS would apply, as would the same impact determinations. These project  
573 refinements related to the CRS would not affect known historic properties.

574 Similarly, for the CRS refinements, applicable mitigation that would occur for  
575 paleontological resources, as described in the Final EIR/EIS, would be implemented. As a  
576 consequence, the CRS refinements would not result in new significant impacts or greater  
577 intensity of impacts to paleontological resources than identified in the Final EIR/EIS.

#### 578 Public Health and Safety

579 **Final EIR/EIS Discussion.** The Final EIR/EIS identified the potential for the soil  
580 contamination from improper handling and/or storage of hazardous materials during  
581 construction, and applied mitigation measures P-1a through P-1d to mitigate potential  
582 impacts to a less than significant level.

583 **Comparison of Potential CRS Refinement Effects.** The CRS refinements are consistent with  
584 the project elements described in the Final EIR/EIS, in that the same mitigation measures  
585 and impact determination would apply to the refinements. Therefore, the CRS refinements  
586 would not result in new or more severe impacts than described in the Final EIR/EIS.

587 **Final EIR/EIS Discussion.** The Final EIR/EIS stated that soil contamination could result  
588 from accidental spills or releases of hazardous materials at the proposed Midpoint  
589 Substation during facility operations, which could potentially result in exposure of facility  
590 and maintenance workers and the public to hazardous materials. The Final EIR/EIS applied  
591 Mitigation Measure P-4a to reduce potential impacts to workers and the public to less than  
592 significant levels (Class II).

593 **Comparison of Potential CRS Refinement Effects.** Shifting of the CRS footprint and using  
594 a larger staging area than described in the Final EIR/EIS would not affect the EIR/EIS'  
595 impact determination, and neither would other CRS refinements. Therefore, the CRS  
596 refinements are consistent with the project elements and impacts described in the Final  
597 EIR/EIS, and would not result in new or more severe impacts than described in the Final  
598 EIR/EIS.

#### 599 Hydrology and Water Quality

600 **Final EIR/EIS Discussion.** The Final EIR/EIS identified the potential for hazardous  
601 materials spills during construction to affect water quality. The Final EIR/EIS applied  
602 mitigation measures P-1a through P-1d to reduce potential impacts to a less than significant  
603 level.

604 The Final EIR/EIS also identified the potential for accidental release of oil associated with  
605 the Midpoint Substation to significantly affect surface or groundwater quality. However, the  
606 Final EIR/EIS applied mitigation measure P-4a to reduce such impacts to a less than  
607 significant level.

608 **Comparison of Potential CRS Refinement Effects.** Regarding the potential for hazardous  
609 material spills during construction to affect water quality, the CRS refinements are  
610 consistent with the project elements described in the Final EIR/EIS, and the same APMs and  
611 mitigation measures would apply to the refinements. Therefore, the CRS refinements would  
612 not result in new or more severe impacts than described in the Final EIR/EIS.

613 Although the CRS footprint would shift locations, this would not affect the potential for oil  
614 spills from equipment at the CRS. No other CRS refinement would have the potential to  
615 result in oil spills. Therefore, the CRS refinements would not result in new or more severe  
616 impacts than described in the Final EIR/EIS.

## 617 2.3 Telecommunication System Refinements

### 618 2.3.1 Approved Project Element – Telecommunication System

619 As approved and as described in the DPV2 Final EIR/EIS (CPUC, 2006), new  
620 telecommunications facilities are required to increase reliability of the microwave system  
621 between SCE and Arizona Public Service, and to provide back-up telecommunication  
622 services for the 500 kV transmission line. The new telecommunication facilities were listed  
623 in Table B-5 of the Final EIR/EIS, and include two fiber optic systems from the Midpoint  
624 Substation.

625 Specific to the Midpoint Substation, the Final EIR/EIS states that a new telecommunications  
626 facility will be installed at the Midpoint Substation site to provide microwave and fiber  
627 optic communications needed for the protective relaying and special protection system  
628 (SPS); this includes a mechanical equipment room and a telecommunications room. Three  
629 new microwave paths are included and require a microwave tower onsite. The approved  
630 project includes two fiber optic systems at the Midpoint Substation.

### 631 2.3.2 Telecommunication System Refinements

632 Two telecommunication (telecom) lines would extend from the CRS, one to the southeast  
633 and the second to the north and east. Although consistent with the Final EIR/EIS, the  
634 refinements described here provide more detailed information than was included in the  
635 Final EIR/EIS. These routes are preliminary and may change as field surveys occur and the  
636 design of the telecommunication system progresses. With the approval of the California-  
637 only portion of the project, there is a need to provide a telecom link between the CRS and  
638 the existing Blythe Service Center.

639 The southeast telecom line would extend from the CRS for about 5.5 miles along the existing  
640 DPV1 towers to approximately Tower M123-T1 where it would transition to new and  
641 existing poles located along an existing east-west patrol road. It would then be routed to the  
642 bottom of the mesa and along existing streets in the Palo Verde Valley to the Blythe Service  
643 Center (approximately 14 miles).

644 The portion of the southeast telecom line along the existing DPV1 towers would be OPGW,  
645 and the remaining line to be installed on wood poles (new and existing) would be fiber optic  
646 cable. The OPGW would be installed utilizing pulling/splicing sites along the DPV1 right-  
647 of-way. For the portion of the southeast telecom line east of the DPV1 right-of-way, wood  
648 poles would be installed from the DPV1 right-of-way (about five miles southeast of the  
649 substation site) until existing poles can be utilized. The detailed alignment of the  
650 southeastern telecom line will be defined during more detailed engineering. The total  
651 disturbance area is not expected to exceed about 0.06 acre (approximately 100 poles at 25  
652 square feet each).

653 The northern telecom line from the CRS would connect with the Buck Substation located to  
654 the northeast of the CRS. Two options are available for this telecom line. Under Option 1,  
655 the fiber optic line would be installed on the same poles as the 33 kV line extension  
656 (distribution power line extension) that would be extended to the CRS (from the north). The  
657 telecom line would then be installed on existing poles (along an existing access road, Blythe  
658 Way, north across I-10 to Hobson Way) to the Buck Substation. Several locations would be  
659 installed in underground conduit along the existing roadways. This option would not  
660 require new poles or additional ground disturbances to undisturbed areas. This is the  
661 preferred option for the northern telecom line from the CRS.

662 Under Option 2, the telecom line would extend from the CRS as OPGW along the existing  
663 DPV1 towers to Wiley Wells Road, as fiber optic line on existing poles along Wiley Wells  
664 Road to the north, and eastward on existing poles along the existing east-west access road  
665 (Blythe Way extended). The fiber optic line would then follow the same route east and north  
666 to the Buck Substation, as described for Option 1. For installation of the OPGW,  
667 approximately two pulling/splicing sites would be required along the existing right-of-way  
668 between CRS and Wiley Wells Road. Minor underground conduit would be installed  
669 between the OPGW tower and the existing wood poles along Wiley Wells Road.

### 670 2.3.3 Environment Effects – Telecommunication System Refinements

671 The telecommunications refinements are not expected to affect the majority of resource  
672 areas because they are not substantive or because sensitive resources are not present or  
673 nearby. However, further impact comparisons are provided for the biological, agricultural,  
674 and cultural resources, as well as public health and safety.

#### 675 Biological Resources

676 **Final EIR/EIS Discussion.** The Final EIR/EIS evaluated the anticipated impacts to  
677 biological resources for the transmission line and other project elements, and determined  
678 that they would result in potentially significant impacts to biological resources (native  
679 vegetation, noxious weeds, nesting birds, desert tortoise, sensitive plant habitats, sensitive  
680 wildlife habitats, and jurisdictional waters); however, those impacts would be mitigated to  
681 less than significant levels through implementation of numerous mitigation measures (B-1a,  
682 B-2a, B-2b, B-5a, B-7b, B-7c, B-8a, B-9b, B-9c, B-9d, B-9e, B-9g, B-9h). The proposed telecom  
683 lines from the CRS would result in lower levels of impacts to biological resources than the  
684 transmission lines and other project elements due to the relatively small level of physical  
685 disturbances associated with the telecom lines.

686 **Comparison of Potential Telecommunication System Refinement Effects.** The  
687 telecommunication lines would result in impacts to biological resources. However, such  
688 impacts would be consistent with the impacts evaluated in the Final EIR/EIS because they  
689 are consistent with the project features evaluated in the Final EIR/EIS and because they  
690 would affect the same general area and biological resources. In addition, because the same  
691 mitigation measures would be applied and would reduce potential impacts to biological  
692 resources, impacts to biological resources would be of the same type and intensity (less than  
693 significant after mitigation) as discussed in the EIR/EIS. In addition, SCE biologists have  
694 coordinated with the U.S. Bureau of Land Management (BLM) regarding the potentially  
695 affected areas. The subsequent Biological Opinion would include the disturbance areas  
696 associated with the telecommunication lines. As a consequence, the telecommunication  
697 refinements would not result in new significant impacts or greater intensity of impacts.

#### 698 Agricultural Resources

699 **Final EIR/EIS Discussion.** The Final EIR/EIS identified an impact to agricultural resources  
700 based on the placement of towers (and pulling/splicing of transmission lines) in the  
701 agricultural areas around Blythe for the section of transmission line east of the Midpoint  
702 Substation (between the Midpoint Substation and the Colorado River).

703 **Comparison of Potential Telecommunication System Refinement Effects.** The northern  
704 telecom route options would not result in new or more severe impacts to agricultural  
705 resources than described in the Final EIR/EIS because no such resources are in the area.

706 Although the telecom line (Southeast Line) between the CRS and the Blythe Service Center  
707 would traverse the same general area as described in the Final EIR/EIS, this telecom line  
708 would not be placed on new towers on agricultural lands. Rather, new wood poles would  
709 be installed within or along the existing street rights-of-way, and the line would be placed  
710 on these new poles and on existing poles along existing streets or roads among the  
711 agricultural areas south of Blythe. Line installation would occur from the pole locations  
712 within the existing right-of-ways and would also not affect agricultural lands. Therefore, the  
713 telecom refinements would not affect agricultural lands and would not result in new  
714 significant impacts or a greater intensity of impacts to such resources, than described in the  
715 certified Final EIR/EIS.

#### 716 Cultural and Paleontological Resources

717 **Final EIR/EIS Discussion.** The same general cultural resources impact discussions in the  
718 Final EIR/EIS described in Section 2.2.3 above also apply to the telecommunication system.

719 **Comparison of Potential Telecommunication System Refinement Effects.** The  
720 telecommunication lines extending from the CRS could result in impacts to cultural  
721 resources if such resources are present within the area of disturbance. However, these  
722 refinements are consistent with the project features evaluated in the Final EIR/EIS in that  
723 they would affect the same general area, and could similarly affect cultural resources. The  
724 telecom line alignment could be further refined based on compliance with applicable  
725 mitigation measures. The same mitigation identified in the Final EIR/EIS would apply, as  
726 would the same impact determinations. Similarly, applicable mitigation that would occur  
727 for paleontological resources, as described in the Final EIR/EIS, would be implemented. As  
728 a consequence, the telecommunication line refinements would not result in new significant

729 impacts or greater intensity of impacts to paleontological resources than identified in the  
730 Final EIR/EIS.

### 731 **Public Health and Safety**

732 **Final EIR/EIS Discussion.** The Final EIR/EIS identified the potential for health hazards  
733 associated with potential exposure of construction workers and the public to contaminated  
734 soil and/or groundwater (pesticide and herbicide contaminants) in agricultural areas, and  
735 applied APM W-3, APM W-11, and mitigation measure P-2a to reduce impacts to a less than  
736 significant level.

737 **Comparison of Potential Telecommunication System Refinement Effects.** The southeast  
738 telecommunication line has the potential for similar public health and safety impacts  
739 (worker exposure to pesticides) related to the installation of wood poles for the  
740 telecommunication line along roadways in the Palo Verde Valley. For this section of the  
741 telecommunication line, a similar potential impact exists as described in the Final EIR/EIS,  
742 and the same APMs and mitigation measures would apply. The telecommunication  
743 refinements are consistent with the project elements and impacts described in the Final  
744 EIR/EIS, and therefore would not result in new or more severe impacts than described in  
745 the Final EIR/EIS.

## 746 **2.4 Transmission Line Towers – Increased Tower Heights**

### 747 **2.4.1 Approved Project Elements – Tower Heights**

748 As approved and described in the DPV2 Final EIR/EIS, approximately 389 towers would be  
749 constructed between the Devers Substation and the Colorado River Substation, with the  
750 majority of the towers being single-circuit lattice steel towers. The single-circuit lattice steel  
751 tower heights analyzed in the DPV2 Final EIR/EIS for both the California portion (Colorado  
752 River to Devers Transmission Line or CR-D) of the Devers-Harquahala transmission line,  
753 and the DV2 Alternative towers were based, in part, on a typical height of approximately  
754 150 feet tall. Table 1 (Tower Heights Table) in Appendix 3 of the Final EIR/EIS showed the  
755 proposed tower heights along the Project route. The tower structures ranged from  
756 approximately 95 to 221 feet tall. The heights were expected to vary depending upon the  
757 specific terrain, span length, presence of other facilities, topography, or other features that  
758 the transmission line could cross. For the 42-mile DV2 Alternative line, which will connect  
759 the existing Devers Substation near Palm Springs, California, to the existing Valley  
760 Substation n Menifee, California, two types of transmission towers would be constructed:  
761 lattice steel towers, and tetra-steel towers. As approved and as described in the DPV2 Final  
762 EIR/EIS, approximately 131 towers constructed for this line would be single-circuit lattice  
763 steel towers and approximately 12 towers would be single-circuit tetra-steel towers. The  
764 steel lattice towers would be typically 150 feet tall and the tetra-steel towers would typically  
765 be 128 feet tall.

766 The heights of the structures would vary depending upon the specific terrain, span length,  
767 presence of other facilities, topography, or other features that the transmission line may  
768 cross, such as rivers, roads, highways, railroads, telephone lines, and other power  
769 transmission and distribution lines.

770 The new towers would generally be aligned horizontally with the existing towers as much  
771 as feasible. The Final EIR/EIS also acknowledged that the tower heights could increase due  
772 to technical requirements. The tower spacing may not correspond exactly to the DPV1  
773 structures in order to provide adequate conductor ground clearance. Minimum conductor  
774 height must be at least 35 feet above the ground for the 500 kV line.

775 Furthermore, as stated in the Proponent’s Environmental Assessment, “the ISO has  
776 specified that the capacity of the line be 2,700 amps under normal conditions and  
777 3,600 amps under emergency conditions, based on a 275 degree conductor temperature. This  
778 capacity rating is an increase from the 1988 DPV2 capacity rating. This new capacity rating  
779 often necessitates that the heights of some of the proposed towers be slightly taller, and in  
780 some locations tower spacing may not correspond to the adjacent DPV1 structures, to  
781 provide adequate ground clearance” (Proponent’s Environmental Assessment, p. 6-31  
782 [CPUC, 2006]).

783 In the Final Decision for the DPV2 (07-01-040), the CPUC evaluated the use of taller towers  
784 to reduce EMF near the right-of-way where residences are located nearby. Specifically, the  
785 CPUC examined increasing tower and conductor heights by an estimated 20 feet to reduce  
786 magnetic fields (consistent with the CPUC’s guidance in D.06-01-042 for low-cost EMF  
787 mitigation). The CPUC determined that the increase in tower and conductor heights (by  
788 approximately 20 feet on a 150-foot tower) would be unnoticeable to most observers (07-01-  
789 040, page 88).

#### 790 2.4.2 Tower Height Refinements

791 The new towers would generally be aligned horizontally with the existing towers where  
792 feasible. Since D.09-11-007, SCE has made changes to the tower heights to reflect current  
793 GO95 conductor clearance requirements at the higher ISO conductor temperature (of 275  
794 degrees instead of the former 215 degrees). As a consequence, the heights of some towers  
795 will be slightly taller than the adjacent DPV1 towers (some will also be lower than existing  
796 DPV1 towers due to terrain or other considerations. Also, the tower spacing may not  
797 correspond to the DPV1 structures to provide adequate conductor ground clearance. The  
798 minimum conductor height would be at least 35 feet above the ground for the 500 kV lines.

799 Based on in-field tower walks (for detailed tower siting) and recent engineering design of  
800 the towers (including conductor clearance based on higher ISO conductor temperature), the  
801 new CR-D towers are projected at an average height of 152 feet, and range from 89 feet to  
802 236 feet tall. For comparison, the existing DPV1 towers are an average of 136 feet tall and  
803 range from 84 feet to 236 feet tall.

804 The new DV2 towers are projected to average approximately 148 feet tall, and range in  
805 height from 85 feet to 278 feet, as compared to the existing DV1 towers, which average 132  
806 feet tall, and range in height from 79 feet to 278 feet. While there is an overall increase in  
807 average tower height, each tower height differs compared to the existing towers based on  
808 engineering requirements, tower site constraints, terrain/topography, and current clearance  
809 requirements based on a higher ISO conductor temperature (of 275 degrees instead of the  
810 former 215 degrees).

### 811 2.4.3 Environmental Effects – Tower Height Refinements

812 As analyzed in the DPV2 Final EIR/EIS (Section D), 13 environmental resource areas were  
813 discussed. Of the 13 resource sections, six did not address impacts from tower heights.  
814 Those environmental resource areas include: (1) D.7 Cultural Resources, (2) D.8 Noise, (3)  
815 D.11 Air Quality, (4) D.12 Hydrology and Water Quality, (5) D.13 Geology, Soil and Mineral  
816 Resources, and (6) D.14 Socioeconomics. Based on the revised tower heights described  
817 above, impacts to these six environmental resource areas will not change.

818 Four sections within the Final EIR/EIS [(1) D.2 Biological Resources, (2) D.4 Land Use and  
819 Planning, (3) D.6 Agriculture, and (4) D.10 Public Health and Safety] did not address tower  
820 heights specifically, nor was there an impact associated with tower heights in these sections.  
821 Each of these sections did however reference a mitigation measure or APM related to  
822 towers. These measures would apply to the project regardless of increases in tower heights.  
823 The measures include AG-4a: Locate transmission towers and pulling splicing stations to  
824 avoid agricultural operations, and APM V-9: Towers would be located adjacent to existing  
825 structures where feasible. Based on the changes in the tower heights described above,  
826 impacts to these four environmental resource areas would not change and no additional  
827 mitigation measures are necessary.

828 Further impact comparisons are provided for the following resource areas:

829 D.3 Visual Resources

830 D.4 Wilderness and Recreation

831 D.8 Transportation and Traffic

#### 832 Visual Resources

833 **Final EIR/EIS Discussion.** As discussed within Section D.3 Visual Resources of the Final  
834 EIR/EIS, the study area was defined by numerous viewpoints from which the Project would  
835 be seen. The viewshed was extensive given the relative openness of much of the landscape,  
836 the height of the proposed structures, and the availability of viewing opportunities from  
837 travel routes, recreational use areas, and nearby residential and commercial areas.

838 In general, the Visual Resources technical approach was differentiated according to:  
839 (1) federal lands administered by the BLM, and (2) other federal (non-BLM), non-federal  
840 public and private lands. The technical approach for that portion of the project where lands  
841 are subject to administration by the BLM was based on the BLM's Visual Resource  
842 Management (VRM) system. This is a system that BLM requires for use on BLM  
843 administered lands (located primarily along the eastern portion of the Project) but cannot be  
844 applied to non-BLM lands because the designations of Visual Resource Management  
845 (VRM) classes needed to apply this system do not exist. The non-BLM portions of the project  
846 were analyzed using the Visual Sensitivity-Visual Change system developed by the CPUC's  
847 visual resources consultant.

848 Detailed visual impact analyses were conducted at key viewpoints and the necessary photo-  
849 documentation was obtained to serve as the foundation for photosimulations of the project  
850 features. The photosimulations served as valuable tools in the evaluation of anticipated  
851 project effects. The viewpoints that were analyzed for the Project include Chuckwalla Valley  
852 (BLM land), Alligator Rock Area of Critical Environmental Concern (ACEC) (BLM land),

853 Orocopia Mountains (BLM land), Cottonwood Springs Road/Joshua Tree National Park  
854 (BLM land), views from residential development of I-10 from the Terra Lago residential and  
855 Golf Development (non-BLM), views from the Coachella Valley Preserve (BLM land), San  
856 Jacinto and Santa Rosa Mountains (BLM land), views from the Snow Creek Village  
857 residential community (non-BLM), views from state-designated scenic highway SR243 (non-  
858 BLM), views from Mapes Road (non-BLM), views from the residential community of  
859 Cabazon (non-BLM), Potrero ACEC (BLM land), and views from the San Bernardino  
860 National Forest (non-BLM).

861 In summary, the Final EIR/EIS made two impact determinations for visual resources related  
862 to tower heights. The first impact determination is less than significant (Class III), because  
863 the towers would be of similar scale and design and would be paired to existing towers.  
864 Many of the viewpoints between the Devers Substation and the Colorado River are within  
865 BLM land and are ranked with a VRM Class III objective. Although the towers would  
866 increase the structural complexity and industrial character of the area, this change would  
867 not dominate the views from the casual observer, which is consistent with BLM VRM  
868 Class III objective. Although this would increase the structural complexity and industrial  
869 character of the area, the overall visual impact to the casual observer would be low-to  
870 moderate. While the impacts would be less than significant, mitigation was recommended  
871 under NEPA. With implementation of recommended Mitigation Measure V-3a, many of  
872 these impacts would be reduced.

873 The second impact determination to visual resources from tower heights is significant,  
874 which cannot be mitigated to a level that is less than significant (Class I). This determination  
875 was made for all of the viewpoints along the Devers Valley No. 2 Alternative, and the  
876 viewpoint near the Alligator Rock ACEC. Although the additional towers would appear  
877 similar in design and scale to that of the existing towers, the additional skylining, view  
878 blockage, and increased structural prominence would result in a moderate or moderate-to-  
879 high degree of visual contrast because of the proximity of the towers to the viewpoints.  
880 Even with implementation of mitigation measures V-40a, V-40b, and V-40c recommended to  
881 lessen visual impacts, impacts are still significant and unavoidable (Class I).

882 **Comparison of Potential Tower Heights Refinement Effects.** Section D.3 of the Final  
883 EIR/EIS identified Class I visual resource impacts along various viewpoints in sensitive  
884 areas, based on high visual exposure of the towers from several of the viewpoints listed  
885 above. The Class I impact was a result of the towers that introduced a moderate degree of  
886 visual contrast in close proximity to the sensitive viewpoints analyzed. With increased  
887 tower heights, the findings of significant project impacts in these areas would remain  
888 unchanged.

889 For the Class III visual resource impacts, the increase of tower heights described above will  
890 remain unnoticeable to most viewers according to the CPUC's statement in the Final  
891 Decision. Therefore, the increases in tower heights of approximately 20 feet (tower height  
892 refinements) would not represent significant changes from the Project analyzed in the Final  
893 EIR/EIS.

894 For tower height refinements greater than 20 feet in Class III areas as identified in the Final  
895 EIR/EIS, significant visual resource impacts are not anticipated due to the still relatively  
896 small and incremental change in tower height, the effects of terrain or topography, and the

897 relatively low visual sensitivity of the BLM VRM Class III areas. In the areas with BLM VRM  
898 Class III designations, a moderate degree of visual change is allowed that may attract  
899 attention, just so long as it does not dominate the view of the casual observer. The increased  
900 tower heights would not change the overall visual impact determination because they  
901 would be consistent with the moderate degree of visual contrast allowed within these Class  
902 III areas (low visual sensitivity). The Final EIR/EIS imposed Visual Resource mitigation  
903 measures V-3a, V-40a, V-40b, V-40c, and AG-4a on the project in these areas of less than  
904 significant impact to provide for further reduction of impacts, and these measures will  
905 continue to be imposed.

#### 906 Wilderness and Recreation

907 **Final EIR/EIS Discussion.** Impacts from tower heights were evaluated in Section D.5  
908 (Wilderness and Recreation) and Section D.3 (Visual Resources) of the Final EIR/EIS. As  
909 discussed in Section D.5, the new transmission line would increase the structural complexity  
910 and industrial character visible from the several access roads within the Alligator Rock  
911 ACEC and Coachella Valley Fringe-Toed Lizard ACEC. Overall, development and  
912 operation of the project would change the character of the ACECs and would significantly  
913 diminish their recreational value. Impacts to the Alligator Rock, Coachella Valley Fringe-  
914 Toed Lizard ACEC and Chuckwalla Valley Dune Thicket ACECs would be significant and  
915 unmitigable (Class I). No mitigation measures were identified that would reduce the  
916 industrial development of the Project across the Alligator Rock and Chuckwalla Valley  
917 Dune Thicket ACECs. The impacts from towers are considered significant, even with  
918 implementation of other mitigation measures.

919 **Comparison of Potential Tower Heights Refinement Effects.** The impacts evaluated in the  
920 Final EIR/EIS are based on adding a new transmission line parallel to the existing DPV1  
921 transmission line to the setting. Increasing the tower heights of DPV2 in the wilderness and  
922 recreation areas identified in the Final EIR/EIS sensitive would result in the same types of  
923 impacts as identified in the Final EIR/EIS, and would thus not change the significance level.

#### 924 Transportation and Traffic

925 **Final EIR/EIS Discussion.** The DPV2 Final EIR/EIS discussed that the presence of large  
926 cranes and new towers could potentially affect aviation activities associated with airports in  
927 the vicinity, if they were to extend more than the approved height above the ground surface  
928 (158 feet). However, pursuant to Federal Aviation Administration (FAA) guidelines, SCE  
929 would be required to submit FAA Form 7460-1, Notice of Proposed Construction or  
930 Alteration, to the Manager of the FAA Air Traffic Division for review and approval of the  
931 project. Adherence to FAA guidelines would insure that construction and operation of the  
932 Project would not cause a significant impact to aviation activities (Class III).

933 **Comparison of Potential Tower Heights Refinement Effects.** The increase in tower heights  
934 would not create new significant effects from those identified in the Final EIR/EIS, and the  
935 same FAA review would apply. Consistent with the Final EIR/EIS, adherence to FAA  
936 guidelines would ensure that construction and operation of the tower height refinements  
937 would not cause a significant impact to aviation activities. Therefore, the tower height  
938 refinements would not result in new or more severe impacts to aviation activities than  
939 previously evaluated in the DPV2 Final EIR/EIS.

## 940 2.5 Devers to Valley No. 1 Transmission Line Relocation

941 The DV2 Alternative would be located parallel to and south of the existing DV1.

### 942 2.5.1 Approved Project Elements – Minor DV1 Relocation

943 The Final EIR/EIS stated that there could be tower improvements to the existing DV1 line.  
944 The Devers-Valley No. 2 Alternative described in the Final EIR/EIS included two options  
945 for transmission tower siting near the existing Devers-Valley Tower DV-59.

946 Option 1 would be to continue parallel to the existing DV1 transmission line, with the new  
947 DV2 tower installed approximately 130 feet south of the existing Tower DV-59.

948 Option 2, the current design plan, would require the removal of an existing DV1 tower  
949 (Tower DV-59, located at the southern end of Orange Street) in order to re-route the existing  
950 Devers – Valley No. 1 and No. 2 lines approximately 500 feet to the north.

### 951 2.5.2 Tower Refinements for Minor DV1 Relocation (Cabazon Relocation)

952 The DV2 line will be routed to the north of the NW ¼ of NE ¼ of Section 20 to land owned  
953 by SCE, consistent with Option 2 described in the Final EIR/EIS. Because DV2 is located to  
954 the south of the existing DV1 transmission line, the routing of DV2 north of and around this  
955 property would require crossing the existing DV1 line. Due to clearance requirements, the  
956 existing DV1 line will therefore also be rerouted north around this properties to other  
957 property owned by SCE.

958 The rerouting of DV1 in this area would require the removal of three existing towers along  
959 the DV1 line (instead of the one tower described in the Final EIR/EIS) and installation of  
960 four new dead end structures (See Figure 5: Cabazon Relocations [DV1]). Associated pulling  
961 stations would also be required.

### 962 2.5.3 Environmental Effects – Minor DV1 Relocation

963 The removal of three existing DV1 towers and construction of four new DV1 towers  
964 approximately 500 feet to the north is not considered to be a substantial project change that  
965 could result in new significant environmental effects or a substantial increase in the severity  
966 of previously identified significant effects because they represent minor changes in locations  
967 of the types of structures and construction disturbances already evaluated for the project.  
968 With the possible exception of biological resources and cultural resources, which could have  
969 site specific concerns, this refinement is not expected to substantively affect the impact  
970 determination for any resource area described in the Final EIR/EIS because the new tower  
971 locations would be in a similar setting just 500 feet to the north and would occur on existing  
972 SCE-owned property.

### 973 Biological Resources

974 **Final EIR/EIS Discussion.** The Final EIR/EIS evaluated the anticipated impacts to  
975 biological resources along the Devers-Valley No. 2 Alternative and applied mitigation (B-1a,  
976 B-2b, B-5a, B-6a, B-7b, B-7c, B-7e, B-7f, B-8a, B-9a, B-9b, B-9d, B-9e, B-9f, B-9h, B-13a, B-13b,  
977 B-15a, B-16a, and B-18a) to reduce impacts to below a level of significance.

978 **Comparison of Potential Effects of the Tower Refinements to Relocated DV1.** Because the  
979 new tower locations would be located in the same immediate area as the existing towers  
980 and the future DV2 line, no change in impact determination is expected, and applicable  
981 mitigation is expected to reduce potential impacts to biological resources to below a level of  
982 significance. In addition, the tower siting process for these refinements have recently been  
983 completed and reviewed by SCE biologists. Based on this detailed review of biological  
984 resources, the four new DV1 towers required to accomplish this minor relocation  
985 (compared to the one new tower described in the Final EIR/EIS for this work) are not  
986 expected to result in new significant impacts or more severe impacts than previously  
987 discussed.

988 Applicable mitigation for the DV1 refinements that would occur for biological resources, as  
989 described in the Final EIR/EIS, would be implemented. As a consequence, the DV1  
990 refinements would not result in new significant impacts or greater intensity of impacts to  
991 biological resources than identified in the Final EIR/EIS.

#### 992 Cultural and Paleontological Resources

993 **Final EIR/EIS Discussion.** The DPV2 Final EIR/EIS stated that NRHP-eligible sites may be  
994 identified when additional intensive surveys are completed following final project design,  
995 and that unavoidable direct impacts may occur to known archaeological resources within  
996 and in the vicinity of the project area during construction. Adverse effects to individual sites  
997 cannot be precisely identified for all project areas until the final route is selected, specific  
998 tower locations are determined, detailed engineering plans for all project roads and facilities  
999 are completed, and final NRHP eligibility of cultural resources has been assessed. The DPV2  
1000 Final EIR/EIS also stated that in many cases, direct impacts may be avoided through minor  
1001 design modifications and project effects would be reduced to a less than significant level  
1002 (Class II) by the avoidance and protection measures listed in Mitigation Measures C-1a  
1003 (Inventory and evaluate cultural resources in Final APE) and C-1b (Avoid and protect  
1004 potentially significant resources). In addition, if cultural resources are identified through  
1005 additional surveys or construction activities, then Mitigation Measures C-1c (Develop and  
1006 implement Historic Properties Treatment Plan), C-1d (Conduct data recovery to reduce  
1007 adverse effects), C-1e (Monitor construction), and C-1f (Train construction personnel) shall  
1008 be implemented.

1009 The DPV2 Final EIR/EIS also discloses that if direct impacts to NRHP properties eligible  
1010 under Criterion d (significant data potential) are unavoidable, mitigation through data  
1011 recovery would reduce impacts, but, under the NHPA regulations, effects would still be  
1012 considered adverse (Class I). Likewise, for properties eligible for the NRHP under Criteria a,  
1013 b, or c data recovery could not reduce impacts to a less than significant level (Class I) and  
1014 effects would be considered adverse. Further, potential impacts to archaeological resources  
1015 are identified because unanticipated sites, features, and/or artifacts, and potentially Native  
1016 American human remains or sacred features could be discovered as a result of construction,  
1017 and those are determined to be potentially significant.

1018 The Final EIR/EIS applied mitigation measures MM C-1a to MM C-1f and MM C-2a, but  
1019 concluded that if direct impacts to NRHP properties eligible under Criterion d (significant  
1020 data potential) are unavoidable, mitigation through data recovery would reduce impacts,  
1021 but under the NHPA regulations, effects would still be considered adverse (Class I).

1022 Likewise, for properties eligible for the NRHP under Criteria a, b, or c data recovery could  
1023 not reduce impacts to a less than significant level (Class I) and effects are considered  
1024 adverse.

1025 **Comparison of Potential Effects of Tower Refinements to Relocated DV1.** The removal of  
1026 existing towers and construction of new towers along DV1 for this minor relocation could  
1027 result in impacts to cultural resources (if such resources are present along the area of  
1028 disturbance).

1029 Because the Final EIR/EIS discloses the potential for both Class I and Class II impacts to  
1030 cultural resources, cultural impacts of the tower refinements to relocate DV1 would be of  
1031 the same type and intensity as discussed in the Final EIR/EIS. The same mitigation  
1032 measures (as the Project) would be applied to reduce potential impacts to unknown cultural  
1033 resources from these tower refinements, and no changes in significance determinations to  
1034 cultural resources would occur.

1035 Similarly, applicable mitigation for the DV1 relocation refinements that would occur for  
1036 paleontological resources, as described in the Final EIR/EIS, would be implemented. As a  
1037 consequence, these refinements would not result in new significant impacts or greater  
1038 intensity of impacts to paleontological resources than identified in the Final EIR/EIS. It  
1039 should be noted that these tower refinements would occur in an area with low sensitivity  
1040 for paleontological resources.

## 1041 2.6 Substation Clarifications

### 1042 2.6.1 Approved Project Element – Substation Expansion and Upgrades

1043 **Valley Substation Upgrades.** As described in the Draft EIR/EIS for the DPV2 transmission  
1044 line project, upgrades to the Valley Substation would disturb 16 acres of the substation, and  
1045 would include a 500 kV SVC, a terminating tower (up to 180 feet high), fence and western  
1046 property line relocation, and 2 acres for a temporary lay down area to support construction.  
1047 The Final EIR/EIS did not address the Valley Substation upgrades.

### 1048 2.6.2 Substation Clarifications

1049 **Valley Substation Upgrades.** Upgrades to the Valley Substation, consistent with those  
1050 described in the Draft EIR/EIS, will be made as part of the project.

### 1051 2.6.3 Environmental Effects – Substation Clarifications

1052 **Valley Substation Upgrades.** Because the Draft EIR/EIS includes the description of the  
1053 Valley Substation Upgrades, the associated impacts were evaluated and discussed in the  
1054 Draft EIR/EIS. Although the Final EIR/EIS did not address the Valley Substation Upgrades  
1055 in the Project Description, the underlying environmental analysis should not be affected.  
1056 Based on this, the clarification that the Valley Substation Upgrades are indeed part of the  
1057 Project does not result in new or more severe impacts than discussed in the CEQA/NEPA  
1058 process.

1059 **2.6.4 Other Refinements**

1060 Other project refinements may occur and would be coordinated with the CPUC at a future  
1061 time.

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1119 Insert Figure 1: Project Overview Map

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1134 Insert Figure 2: Construction Yard Overview Map

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1141 Insert Figures 3a – 3f: Construction Yards (Approved and Current)

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1148    Insert Figure 4: Helicopter Yards

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1154    Insert Figure 5: Colorado River Switchyard Layout

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1169    Insert Figure 6: Proposed Distribution and Telecom Refinements

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1184    Insert Figure 7: Cabazon Relocation (DV1)

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