

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA**

In the Matter of the Application of SOUTHERN )  
CALIFORNIA EDISON COMPANY (U 338-E) ) A.13-10-XXX  
for a Certificate of Public Convenience and )  
Necessity for the West of Devers Upgrade Project )  
and for an Interim Decision Approving the )  
Proposed Transaction between Southern )  
California Edison and Morongo Transmission )  
LLC )

---

**PROPONENT'S ENVIRONMENTAL ASSESSMENT (PEA)  
IN THE WEST OF DEVERS UPGRADE PROJECT**

**VOLUME 4 OF 7**

<p>This PEA is being filed separately from the Application and is being submitted as an Archival DVD and CD-ROM</p>
---

JENNIFER HASBROUCK  
BETH GAYLORD  
GARY CHEN  
LAURA RENGER

Attorneys for  
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770  
Telephone: (626) 302-6984  
Facsimile: (626) 302-1926  
E-mail: [laura.renger@sce.com](mailto:laura.renger@sce.com)

## 5.0 COMPARISON OF ALTERNATIVES

This section compares the environmental impacts of the alternatives. California Environmental Quality Act (CEQA) Guidelines (Section 15126.6(d)) require that an environmental impact report include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project. Section 1502.14(b) of the Council on Environmental Quality (CEQ) regulations requires, “substantial treatment of each alternative considered in detail including the proposed action.”

The Project Objectives, developed in Section 1.4, Basic Objectives, are as follows:

1. Allow SCE to meet its obligation to integrate and fully deliver the output of new generation projects located in the Blythe and Desert Center areas that have requested to interconnect to the electrical transmission grid.
2. Consistent with prudent transmission planning, maximize the use of existing transmission line rights-of-way to the extent practicable.
3. Meet project need while minimizing environmental impacts.
4. Facilitate progress toward achieving California’s Renewables Portfolio Standard (RPS) goals in a timely and cost-effective manner by SCE and other California utilities.
5. Comply with applicable reliability planning criteria required by North American Electric Reliability Corporation (NERC), Western Electricity Coordinating Council (WECC), and the California Independent System Operator (CAISO); and design and construct the project in conformance with SCE’s approved engineering, design, and construction standards for substation, transmission, subtransmission, and distribution system projects.
6. Construct facilities in a timely and cost-effective manner by minimizing service interruptions to the extent practicable.

These objectives guide in developing a range of reasonable alternatives to the Proposed Project, or to the location of the Proposed Project, which would feasibly attain most of the basic objectives. The Alternative Project would satisfy the project objectives, while the No Project Alternative would not.

General Order No. 131-D requires that an Application for a Permit to Construct include the “[r]easons for adoption of the power line route or substation location selected, including comparison with alternative routes or locations, including the advantages and disadvantages of each.” Table 5.1, Comparison of Alternatives, compares the Proposed Project, the Alternative Project, and the No Project Alternative, by CEQA resource category.

As described in Chapter 4.0, Environmental Impact Assessment, with the implementation of Applicant Proposed Measures (APMs), impacts from the Proposed Project would be

less than significant for all potential impacts except for Air Quality and Noise. . The Proposed Project would have construction-related emissions of CO, ROG, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> that would remain significant even with the adoption of APMs. The use of helicopters to conduct short-term construction activities for the Proposed Project would result in a potential significant and unavoidable impact for noise-sensitive uses in the cities of Banning and Calimesa. APM NOISE-1 would be implemented to reduce noise impacts related to helicopter use; however, the impacts would remain significant after mitigation in the cities of Banning and Calimesa.

## 5.1 Alternative Evaluation Methodology

As described in Chapter 1.0, Purpose and Need, capacity constraints with the existing West of Devers (WOD) transmission lines limit Southern California Edison's (SCE's) ability to fully deliver electricity from new and planned renewable and non-renewable generation facilities in the Blythe and Desert Center areas. The Proposed Project is needed to facilitate the full deliverability of new electric generation resources being developed in eastern Riverside County.

Consistent with prudent transmission planning and the Garamendi Principles (defined in Chapter 1.0, Purpose and Need), SCE designed the Proposed Project to maximize use of the existing right-of-way (ROW) to the extent practicable to minimize environmental impacts and reduce costs.<sup>1</sup>

When considering potential alternative routes to the Proposed Project in accordance with CEQA and the National Environmental Policy Act (NEPA), SCE evaluated whether acquiring and developing new ROW would avoid or substantially lessen environmental impacts associated with the Proposed Project while meeting most of the Project Objectives. SCE considered existing geographic and technical constraints that limited the potential range of feasible and environmentally beneficial alternative routes. For example, between Devers and Vista substations, the line route must traverse or avoid a variety of sensitive resources and existing uses, such as the San Jacinto Wilderness to the south, the San Gorgonio Wilderness to the north, lands managed by the Bureau of Land Management (BLM), land within the Morongo Band of Mission Indians (Morongo) Reservation, areas covered by the Coachella Valley Multi-Species Habitat Conservation Plan (CVMSHCP), areas covered by the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), Interstate 10, the Banning Airport Influence Area, and a complex mix of existing development within the cities of Banning, Beaumont, Calimesa, Colton, Grand Terrace, Loma Linda, Palm Springs, Rancho Cucamonga, Redlands, San Bernardino, Yucaipa, and unincorporated areas of San Bernardino and Riverside Counties, among other uses and resources.

---

<sup>1</sup> See Chapter 1, Section 1.4, Project Objective No. 2 ("Consistent with prudent transmission planning, maximize the use of existing transmission line rights-of-way to the extent practicable"); Project Objective No. 3 ("Meet project need while **minimizing** environmental impacts") (emphasis added); and Project Objective No. 6 ("Construct facilities in a timely and cost-effective manner by minimizing service interruptions to the extent practicable").

## 5.2 Alternatives to the Proposed Project

### 5.2.1 Alternative Project

Within the Morongo Reservation land, the Proposed Project would require developing an approximately 3-mile segment of new ROW pursuant to an agreement between SCE and the Morongo. The agreement gives the Morongo the right to select a new route for a portion of the existing corridor on Reservation land generally located west of Malki Road and extending to the westernmost boundary of the Reservation near a rock, sand, and base material quarry in the City of Banning.

The 220 kV Line Route Alternative 2 (Alternative Project) would depart from the existing utility corridor west of Malki Road on Morongo Reservation land (see Figure 2-1, Proposed and Alternative Transmission Line Routes) and continue westerly from the existing corridor nearly to the western edge of the Morongo Reservation boundary, then proceed northerly to rejoin the existing utility corridor immediately west of the Morongo Reservation at North Hathaway Street. This portion of the Alternative Project would be approximately 0.13 mile longer than the Proposed Project.

The Alternative Project would be approximately 3,500 feet from the Banning Airport. This alternative would transect the FAR Part 77 Horizontal Surface for the Banning Airport. Due to the proximity of the Alternative Project to this airport and associated FAA clearance requirements, this alternative may only be feasible with the closure of the Banning Airport. Therefore, the Alternative Project would result in significant impacts as a result of substantial aviation safety risks, and would be considered infeasible.

### 5.2.2 No Project Alternative

The No Project Alternative would not develop the Proposed Project. Existing conditions would remain in place. SCE would continue the use of the existing 220 kV transmission lines, 66 kV subtransmission lines, telecommunications lines, and access roads. The 66 kV subtransmission lines would not be relocated, and the new approximately 3-mile segment on Morongo Reservation land would not be developed. The No Project Alternative would not meet any of the Project Objectives.

### 5.2.3 Alternatives Comparison Summary

The Alternative Project has similar physical and locational characteristics with the Proposed Project, with the exception of the 3-mile segment on the Morongo Reservation. In most cases, construction and operation impacts of the Alternative Project would be identical or similar to those identified for the Proposed Project in Chapter 4, Environmental Impact Assessment, of this PEA. The substation modifications, 66 kV subtransmission line routes, telecommunications lines routes, 12 kV distribution line relocation, and staging yards would be the same for both the Proposed Project and the Alternative Project.

The main differences between the Proposed Project and the Alternative Project are related to the location of the proposed transmission infrastructure on an alignment that is south of the proposed relocation. The Alternative is approximately 0.13 mile longer than the proposed route. It is farther from the Central Morongo Community Area, and closer to the Banning Airport.

### 5.3 Environmental Impacts

As described in Chapter 4.0, Environmental Impact Assessment, the Proposed Project would have significant impacts to air quality (See Section 4.3, Air Quality) and significant noise impacts in the City of Calimesa and Banning (See Section 4.12, Noise). All other impacts would be less than significant. The Alternative Project would not avoid the environmental impacts related to air quality associated with the Proposed Project.

Air Quality impacts of the Alternative Project would be similar to those of the Proposed Project because the construction activity would be almost the same and because both would be subject to the same regulations and emissions standards. Construction and operation of the Alternative Project would have similar impacts as the Proposed Project. Construction impacts would be potentially significant and operation impacts would be less than significant. Both the Proposed Project and the Alternative Project would exceed SCAQMD's emissions thresholds for CO, ROG, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. The No Project Alternative would not include construction and, thus, would not have construction-related emissions impacts. Operation impacts of the No Project Alternative would be minimal and the same as current conditions. The No Project Alternative would not result in any impacts to air quality.

**Table 5.1: Comparison of Alternatives**

Resource Area	Impact Level		
	Proposed Project	Alternative Project	No Project
<b>Aesthetics</b>	Less than Significant	Similar to the Proposed Project	Less than the Proposed Project
<b>Agriculture and Forestry Resources</b>	Less than Significant	Similar to the Proposed Project	Less than the Proposed Project
<b>Air Quality</b>	Significant and unavoidable (construction)	Slightly greater as route is slightly longer than the Proposed Project (resulting in minimal increase of construction activity); significant and unavoidable (construction)	Less than the Proposed Project (less than significant)
<b>Biological Resources</b>	Less than significant	Similar to the Proposed Project	Less than the Proposed Project
<b>Cultural Resources</b>	Less than significant	Similar to the Proposed Project	Less than the Proposed Project
<b>Geology and Soils</b>	Less than significant	Similar to the Proposed Project	Less than the Proposed Project
<b>Greenhouse gas Emissions</b>	Less than Significant	Route is slightly longer than the Proposed Project (resulting in minimal increase of construction activity), but impacts would still be less than significant	Less than the Proposed Project
<b>Hazards and Hazardous Materials</b>	Less than significant	Greater than the Proposed Project as the Alternative Project passes through the Banning Airport's FAR Part 77 Horizontal Surface; significant and unavoidable	Less than the Proposed Project
<b>Hydrology and Water Quality</b>	Less than significant	Similar to the Proposed Project	Less than the Proposed Project
<b>Land Use and Planning</b>	Less than Significant	Similar to the Proposed Project	Less than the Proposed Project
<b>Mineral Resources</b>	Less than Significant	Similar to the Proposed Project	Less than the Proposed Project
<b>Noise</b>	Less than significant	Similar to the Proposed Project	Less than the Proposed Project

**Table 5.1: Comparison of Alternatives**

Resource Area	Impact Level		
	Proposed Project	Alternative Project	No Project
<b>Socioeconomics, Population and Housing, and Environmental Justice</b>	Less than significant	Similar to the Proposed Project	Less than the Proposed Project
<b>Public Services</b>	Less than Significant	Similar to the Proposed Project	Less than the Proposed Project
<b>Recreation</b>	Less than significant	Similar to the Proposed Project	Less than the Proposed Project
<b>Transportation and Traffic</b>	Less than Significant	Route is slightly longer than the Proposed Project (resulting in minimal increase of construction activity), but impacts would be still less than significant	Less than the Proposed Project
<b>Utilities and Service Systems</b>	Less than Significant	Similar to the Proposed Project	Less than the Proposed Project