

Comment Set E5  
Southern California Edison Company

Global Comments the Visual Resources Analysis of the Devers-Palo Verde No. 2  
Transmission Line EIS/EIR

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Issues Related to Application of the BLM Visual Resource Management (VRM)  
Methodology

For the portions of the project area that fall under the jurisdiction of the Bureau of Land Management, the Visual Resources Analysis was conducted using the BLM’s Visual Resource Management (VRM) system, which provides the basis for determining the project’s visual resources impacts in the context of the National Environmental Policy Act (NEPA). On pages D.3-3 through D.3-5, the DEIR/DEIS provides a brief explanation of the VRM system.

A key issue that the discussion of the BLM VRM system does not explain in explicit terms is that to evaluate impacts using this system, it is essential to know the Visual Resource Management Classes that the BLM has assigned to each area through which the transmission line would pass. On page D.3-5 there is an indication that the BLM has not yet assigned VRM classes to the BLM lands in California that lie between the Coachella Valley and the Arizona border. In the absence of BLM-assigned VRM classes for these lands, it appears that those responsible for preparing the Visual Resources analysis for the DEIR/DEIS developed their own VRM classifications for these lands and that these classifications were used to provide a basis for completing the impact analysis using the BLM system. The DEIR/DEIS text refers to the VRM classifications that the EIS/EIR team developed on its own as “Interim VRM Classes”. The use of the term “Interim VRM Classes” is misleading because it does not communicate the fact that these “interim” classifications are unofficial classifications that were not developed by BLM staff and were not vetted by the BLM’s planning and review process. Because the “interim” classifications used in the EIS/EIR analysis were not developed or adopted by the BLM, it would be better for them to be labeled as “Unofficial Assessments of Potential VRM Class Designations” to underscore the fact that these are not the BLM’s determinations.

The text indicates that Appendix VR-2 contains the Scenic Quality Field Inventories that authors of this chapter used to rate the existing scenic qualities of the landscapes in the area for which the Unofficial Assessments of Potential VRM Scenic Class Designations were created, and that Appendix VR-3 contains the VRM Class matrices that relate Scenic Quality Classes to the VRM classes that were assigned. Unfortunately, these two appendixes were not included in the EIR. As a consequence there is no way of determining the details of the methods used in developing the Unofficial Assessments of the VR Scenic Class Designations, whether the individuals who conducted the analyses had been trained by the BLM in using this method, and whether BLM landscape architects had been provided with the opportunity to review the results. In addition, there is no way of making an independent check of the analyses to determine whether the conclusions are sound. Because the information needed to verify the Unofficial Assessments of Potential VRM Classifications is

E5-1

## Comment Set E5, cont. Southern California Edison Company

missing, the determinations of NEPA impact based on use of these unofficial assessments can be called into question. It is essential that the material said to be in Appendices VR-2 and VR-3 be made available so that it can be given a close review, and adjustments made in the final assessments if required.

E5-1 cont.

### Issues Related to the Visual Sensitivity-Visual Change Methodology

For non-BLM lands, the analysis relies on a “Visual Sensitivity-Visual Change” (VS-VC) methodology. This methodology is described to some degree on pages D.3-5 –D.3-6 and D.3-54 – D.3-56. These descriptions make no reference to the origins of this methodology and do not explain how it relates to the standard approaches to visual impact assessment that have been adopted by public agencies and/or that are in widespread professional use. The VS-VC method appears to be unique to the consultant who prepared this chapter of the DEIR/DEIS.

E5-2

The explanation of the VS-VC methodology is not complete, and there are a number of significant issues related to the way it is structured and has been applied:

### *Relationship to the Requirements of the California Environmental Quality Act*

The VS-VC method is not structured in a way that provides ready answers to the questions that Appendix G of the California Environmental Quality Act Guidelines poses to determine the significance of visual impacts. These questions are: “Would the project:

E5-3

1. Have a substantial adverse effect on a scenic vista?
2. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
3. Substantially degrade the existing visual character or quality of the site and its surroundings?
4. Create a new source of substantial light and glare that would adversely affect day or nighttime views in the area?”<sup>1</sup>

It should be noted that in presenting the CEQA significance criteria in Section D.3.5.2 on page D.3-55, the DEIRS/DEIS Visual Resources chapter takes substantial liberties in paraphrasing these questions, and in adding interpretations which are not part of the original text. These substantial modifications to the original questions are not flagged in a way that makes it possible for the reader to distinguish between what the guidelines actually say and how the author of the chapter has chosen to interpret them. It should also be noted that the author of this section adds three additional significance criteria to the four that are loosely based on the questions in the CEQA Guidelines. The origin of these additional criteria is not stated. For the sake of accuracy and consistency with CEQA, section D.3.5.2 should be rewritten in a way that is true to the CEQA Guidelines, and which references the source of every significance threshold that is presented.

For most projects, the most important of CEQA aesthetic impact significance questions is the third one, which asks whether a substantial degradation of the existing visual character or

E5-4

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<sup>1</sup> California Environmental Quality Act Guidelines, Appendix G, Final Text, October 26, 1998, p.4.

Comment Set E5, cont.  
Southern California Edison Company

quality of the site and its surroundings would occur. A close look at the VS-VC method reveals that it does not provide a direct means for developing the complete answer to this question. For example, it does not provide a category that specifically accounts for the existing character of the project setting and does not include a variable that measures the change in character that would result from development of the project. The failure to properly account for the setting's existing character has serious implications because for much of the proposed route, the existing Devers-Palo Verde 1 transmission line is a well-established part of the existing landscape's character, and the role of this facility in determining the landscape's existing character is not properly taken into account. As a consequence in the impact assessment phase, the VS-VC system does not provide proper recognition of the fact that the proposed project's effect in the areas where the new transmission line would parallel the existing transmission line would be to create an incremental change in the existing landscape character, rather than a wholesale change.

E5-4 cont.

The VS-VC analytical outcome, "impact significance" is not clearly defined and does not appear to have been developed in a rigorous way that makes it meaningful in relationship to the need of the key CEQA guideline question to determine whether a project will "...substantially degrade the existing visual character or quality of the site and its surroundings". The VS-VC process determines impact significance by combining a "high", "moderate to high", "moderate", "low to moderate" or "low" rating of "Overall Visual Sensitivity" with a "high", "moderate to high", "moderate", "low to moderate" or "low" level of "Overall Visual Change". The logic of how the two sets of ratings are combined is not explained, and there is no definition of how the combined levels of sensitivity and visual change are believed to create "substantial degradation" and thus constitute a "significant" visual impact.

E5-5

Table D.3-7 entitled "Visual Sensitivity-Visual Change Guidance for Review of Impact Significance" appears to provide a framework for determining the VS-VC impact findings (page D.3-56). The text provides no indication of whether this framework was developed specifically for purposes of the Devers-Palo Verde No.2 Transmission Line Project DEIR/DEIS visual impact analysis. Because no information is provided on where this table came from and what it is based on, it is not at all evident what the assumptions are that are built into this table and the extent to which they have any real-world validity. According to Table D.3-1, a clear case of significant visual impact requires a rating of at least a "high" rating of one and a "moderate to high" rating of the other overall rankings. It should be noted that, of the six significant visual impacts identified in the DEIR/DEIS through application of the SC-VC methodology, none meet these criteria.

The DEIR/DEIS also asserts that "for a visual impact to be considered significant, two conditions generally exist: 1) the existing landscape is of reasonably high quality and is relatively valued by viewers and 2) the perceived incompatibility of one or more Proposed Project elements or characteristics tends toward the high extreme, leading to a substantial reduction in visual quality" (D.3-56). Based on this statement, the DEIR/DEIS fails to make a clear case for finding significant visual impacts as defined by CEQA. Table D.3-7, which the VS-VC method uses to identify impact significance considers "overall visual change" rather than the more specific questions that CEQA poses about the degree of degradation of existing levels of visual character and visual quality.

## Comment Set E5, cont. Southern California Edison Company

### *Relationship to the Requirements of the National Environmental Policy Act (NEPA)*

The VS-VC method was applied to assess project impacts in the KOFA National Wildlife Refuge, an area under Federal jurisdiction, where impacts must be evaluated in terms related to the provisions of the National Environmental Policy Act (NEPA). The description of the VS-VC method on pages D3-5 - D.3-6 and D.3-53 - D.3-56 does not identify the relationship between the requirements of NEPA and the variables the VS-VC method considers and the outcome variables it generates.

E5-6

In the discussions of the use of the BLM's VRM methodology for assessment of impacts on BLM lands and the VS-VC method for evaluation of impacts on Federal lands not under the BLM's jurisdiction (i.e. the KOFA National Wildlife Refuge), there is no mention of the fact that NEPA does not call for a determination of impact significance. In addition, no rationale is provided for why the analysis came to conclusions regarding the significance of project visual resources impacts on these Federal lands, and how the significance criteria that were applied relate to NEPA's language regarding project aesthetic effects.

### *Problems With Definition and Treatment of Individual Variables*

In addition to the questionable aspects of the VS-VC method's overall analytical framework described above, there are serious problems with the way it defines and treats the individual variables which are aggregated to develop the DEIR/DEIS assessments of "visual sensitivity" and "visual change".

E5-7

A fundamental problem is that the visual analysis procedure is not well documented. It is difficult to clearly understand what the procedure is actually determining, how the variables are rated, and what the ratings mean. Clear information is not provided that would make it possible to understand what criteria are used in assigning ratings in each rating category, how the ratings are combined, why the variables are combined in the way they are, how the combinations are translated into outcomes, and what those outcomes actually mean.

One example is the variable titled "viewer concern." In justifying the ratings of "viewer concern" the VS-VC method assigns, the analysis makes highly speculative statements about what viewers would expect to see in a particular landscape setting and how they would perceive project-related changes. No data such as landscape perception studies carried out in comparable situations or surveys of residents and roadway travelers in the project area has been provided to support these assertions, and no reference is made to interviews with local land managers that would provide even an anecdotal basis for making these assertions. In the absence of supporting data, the ratings made using this variable are questionable.

A further example of a problematic variable is "view blockage." In its formulation of the project's view blockage effects, the DEIR/DEIS asserts in many places the proposed project's lattice steel towers would create blockage of views toward background mountains and sky. Given that lattice steel towers are not solid structures and that it is possible to essentially see through them, it does not appear to be entirely correct to indicate that they create view blockage. They may interfere with some views, but interference is not the same as blockage. In a number of cases, "moderate to high" levels of "blockage" have been indicated, and these levels of "blockage" have fed into conclusions that overall visual change would be "moderate to high", leading to conclusions that impacts would be significant.

Comment Set E5, cont.  
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In some cases, the language used in characterizing the existing environment and the changes that would be brought about by the project is inaccurate or misleading. For example, throughout the analysis, the existing Devers-Palo Verde 1 line and the proposed Devers-Palo Verde 2 line are referred to as “industrial” features. The use of this term for an electric transmission line is not justified, and creates an inaccurate impression of their character and appearance. The term “industrial” is most often used to refer to facilities that involve manufacturing, creation of localized pollution, generation of truck traffic. The existing and proposed transmission lines have none of these characteristics.

E5-7 cont.

**Issues Related to the Visual Simulations**

The visual resources analysis submitted as a part of Southern California Edison’s Proponents Environmental Assessment (PEA) included a comprehensive set of simulations of representative views of the project. These simulations were prepared using systematic methods to assure a high level of accuracy. We note that none of the simulations prepared for the PEA have been used or referred to in the DEIR/DEIS. Instead, an entirely new set of simulations was prepared. Curiously, there is no review or evaluation of the simulations submitted with the PEA, and no rationale is presented as to why it was necessary to reject the PEA simulations and replace them with new ones.

E5-8

The DEIR/DEIS contains no explanation of the methods, techniques and assumptions employed to produce the new simulations used as the basis for its analysis. Provision of such an explanation is standard professional practice and is essential for providing a basis for assessing the validity of the simulations. For example, the type of camera equipment and focal length of the lens used to shoot the simulation photos is not provided. What lens (focal length) was used to shoot the simulation photos? Do all of the simulation photographs portray the same horizontal angle of view? Have any of the existing condition photos or simulation images been cropped, changing the effective focal length from 50 mm? It appears that the images used for Figures 3-25A and 3-25B may have been cropped, creating the suspicion that other images may have been cropped as well. Maintaining the equivalency of an image taken with a 50 mm lens is essential, because there is professional agreement that images taken with a 50 mm lens are equivalent to what is seen by the human eye. Assurance is needed that the equivalent of a 50 mm focal length has been maintained in all the existing condition and project simulation views. Changing the effective focal length by cropping makes the objects appear larger and more visually prominent in the scene than they really are. Information describing the specific technical procedures such as computer modeling or rendering techniques is not provided. What procedures were employed to verify the accuracy of the simulation images in terms of the location, scale, and height of the project components? Information describing the technical data and assumptions that provide the technical basis for the simulations is also lacking. What engineering data such as dimensions for each of the project components was employed as the basis for the DEIR/DEIS simulation images? The omission of this critical information makes it difficult for DDEIR/DEIS readers and reviewers to assess the validity and accuracy of the simulations and of the analysis of impacts based on interpretation of them.

Comment Set E5, cont.  
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**DPV2 PROJECT DEIR/DEIS  
 SECOND SCE SET OF COMMENTS  
 VISUAL RESOURCES COMMENTS AND ISSUES-AUGUST 2006**

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve
1	Visual Resources	ES-38  Table ES-1, page ES-70	Line 7  Item V-7	The 2/79 EIS for DPV1 identifies low visual impacts in the KOFA. This rating was made for the case when there was no other line in the scene. The existence of the DPV1 line mitigates visual impacts associated with DPV2 to a point certainly less than significant . Also, refer to comments related to Section D.3.6.2	Change the KOFA visual impact level to less than significant.
2		3-1	13-14 and  14-29	In the VS-VC method, as stated, “the study area for the visual resource analysis was defined by the numerous viewpoints from which the Proposed Project would be seen”. This suggests visual impacts associated with the proposed project can be determined by studying only selective Key View Points (KVPs) and assigning those conditions and impacts along other segments of the route (e.g., Key Viewpoint 4 – Crystal Hill Road was used to characterize impacts for the entire Kofa NWR). Through this approach, the impacts may be either over- or underestimated for the broader project area, and the identification of mitigation, while specific to one view point, is then generalized for entire areas.	A consistent baseline of landscape conditions including visual quality, viewer sensitivity, and contrast, should be developed along the entire route and used to characterize project wide impacts.

E5-9

E5-10

NOTE: A = Comment accepted  
 R = Comment rejected  
 M = Comment modified

Comment Set E5, cont.  
 Southern California Edison Company

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve
3		D.3-2 through 3-5	2-4  1-2	As stated, "(in) general, the Visual Resources technical approach was differentiated according to (1) federal lands administered by the United States Department of Interior Bureau of Land Management (BLM), and (2) other federal (non-BLM), non-federal public and private lands". While the BLM and Visual Sensitivity-Visual Change (VS-VC) methods are similar, the differences in their approaches include an inventory and analysis (viewpoint driven using the VS-VC system, see comment V2) that are based on jurisdictional boundaries, rather than landscape settings. For instance, the landscape immediately adjacent to BLM land, while similar in appearance, context, and use is being characterized and evaluated using a different set of criteria. This has resulted in inconsistencies in the overall methodology for visual resource analysis of the project.	Consistent methodologies should be used that reflect the landscape setting and applied within that setting, in order to maintain consistency in the characterization of the affected environment and impact assessment.

E5-11

NOTE: A = Comment accepted  
 R = Comment rejected  
 M = Comment modified



Comment Set E5, cont.  
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Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve
5		3-39, 3-76  Appendix VR-1 Tables	Kofa NWR And "Impact V-7"	<p>The introduction of the DPV2 line results in a low level of visual contrast, and is located within an existing utility corridor in this area. The use of similar structures, matching of tower placement, and use of existing access (limited if any changes to landform, and minimal vegetation clearing) along with other mitigation measures should effectively limit the impacts to a less than significant level on the Kofa NWR.</p> <p>Without additional information regarding the individual ratings leading to the overall designations of Visual Sensitivity and Visual Change, the reasons for this discrepancy cannot be determined by the reader. In particular, the conditions/ratings for view blockage (e.g., moderate vs. moderate-high, etc.) should be provided to determine how these levels were assigned, as they appear to be responsible for the elevated level of visual impact for the Kofa NWR. At this location, view blockage is stated as being moderate to high in the text, however as shown on Figure D.3-5A/5B the total amount of sky and mountains obscured in the view as a result of the proposed project appears minimal.</p> <p>(continued on following page)</p>	<p>Provide quantitative information regarding the assignment of levels used to assess the components and results of Visual Sensitivity and Overall Visual Change analysis. Revise the impact assessment to correct the inconsistencies in assessment of visual change; i.e., the resulting impact is less than significant.</p> <p>The contrast levels should specifically be re-examined based on the Key Viewpoint Simulation (Figure D.3-5A/5B) in which the structures are identically matched (form, line, color, texture), and there is no visible change depicted for landform and vegetation modifications associated with the proposed line. The result is a low/weak contrast level, thereby reducing impacts to a level below significance.</p>

E5-13

NOTE: A = Comment accepted  
 R = Comment rejected  
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Comment Set E5, cont.  
 Southern California Edison Company

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve
6			Kofa NWR And "Impact V-7"	Without additional information regarding the individual ratings leading to the overall designations of Visual Sensitivity and Visual Change, the reasons for this discrepancy cannot be determined by the reader. In particular, the conditions/ratings for view blockage (e.g., moderate vs. moderate-high, etc.) should be provided to determine how these levels were assigned, as they appear to be responsible for the elevated level of visual impact for the Kofa NWR. At this location, view blockage is stated as being moderate to high in the text, however as shown on Figure D.3-5A /5B the total amount of sky and mountains obscured in the view as a result of the proposed project appears minimal.	

E5-14

NOTE: A = Comment accepted  
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Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve
7		D.3-39, D.3-63- D.3-64	Kofa NWR	<p>It's not clear whether the Management Plan and EA contain discussion of "Objective 1: Preservation of Wilderness Values" that make this objective's context and parameters for implementation more clear.</p> <p>The references to the project's effects in increasing "industrial character" and "view blockage" are prejudicial and not supportable.</p> <p>The analysis on page 39 suggests that the construction of new or the use of existing access and spur roads may result in increased land scarring. Little real analysis is provided to support this assertion. The effects of mitigation measures in reducing the visual effects of project-related road impacts do not appear to be taken into account in the assessment of consistency with the Kofa Management Plan</p>	<p>Add a summary of the discussions of this objective that are contained in the Kofa Management Plan and in the EA prepared for that plan.</p> <p>Alter the discussion of project effects to use technically correct language that more accurately communicates the effects that the project will actually have. Change the conclusion regarding overall impact to reflect the more accurate assessment of the visual changes.</p> <p>Revise the analysis of consistency with the Kofa Management Plan and the discussions of road impact on page 63-64 to specify the places where "road scarring" is likely to occur and the nature of that scarring. Also revise the conclusions related to the significance of road scarring to take into account the impact attenuation provided by the mitigation measures.</p>

E5-15

NOTE: A = Comment accepted  
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Comment Set E5, cont.  
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Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve
8		D.3-39	CDCA Plan-1980 as amended (Alligator Rock ACEC)	Given the designation of VRM Class II in this area, the project will meet the management objectives as the introduction of the new 500kV line will result in low additional visual contrast (existing corridor, matching structures, etc.), and the level of change to the characteristic landscape (which includes the existing line) will not be significant. This characterization is then consistent with other Class II areas where impacts were determined to be less than significant (e.g., Class III at the crossing of the Colorado River, Viewpoint 7, etc.).	Revise the characterization to be in compliance with VRM II based on the presence of the existing line and utility corridor.

E5-16

NOTE: A = Comment accepted  
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 M = Comment modified

Comment Set E5, cont.  
 Southern California Edison Company

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve
9		D.3-42	“Policy LU 11.1”	<p>The assessment regarding compliance with Land Use Plans is based on criteria that, are intended for land development projects (e.g., residential, commercial, and industrial uses). This has resulted in the assignment of non compliance levels that seem to be contradictory. For instance, in Riverside County, it is acknowledged that “the proposed project is located within a designated utility corridor which would avoid the proliferation of additional utility facilities across the landscape”. (see Policies LU6.1, LU19.4, LU20.1, etc.), and that the project is compliant with respect to the potential effects to Scenic Corridors, based on this location in a designated corridor. However, with regards to other Policies (LU 11.1, LU 20.2, LU 20.4, etc) it has been characterized as non-compliant. By locating the transmission line within the existing corridor, facilities are consolidated, thereby meeting the intent of municipal plans by avoiding the presence of towers in new locations where the visual character (quality or aesthetic) of the landscape may be reduced, or structures may be visible (e.g., ridge tops, etc). in previously unaffected settings. Furthermore, the number of structures for the proposed project in the hillsides West of Devers would be reduced, resulting in aesthetic improvements.</p>	<p>In the assessment of visual resources for consistency with land use plans and policies, state that the proposed transmission line is located entirely within existing (and in some cases designated) utility corridors across all municipalities, and as such, facilities are consolidated in a manner that meets the intention of these municipal plans.</p>

E5-17

NOTE: A = Comment accepted  
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Comment Set E5, cont.  
 Southern California Edison Company

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve
10		D.3-44	Riverside County, California Circulation element : Major Utility Corridors	<p>The analysis states that the project would not be consistent with Riverside County Policy C-25.2, which encourages undergrounding of utilities when possible, and when not possible, location and screening of utilities to reduce their visibility.</p> <p>This analysis fails to recognize the fact that because the State of California retains jurisdiction over all electric facilities in excess of 50 kV, including all transmission level facilities, this policy can pertain only to utility lines under the county's jurisdiction, i.e. distribution lines of 50 kV and less. Thus, this policy does not apply to the proposed transmission line, which is a 500-kV transmission facility under the exclusive jurisdiction of the state.</p>	Change the Consistency discussion to indicate that the policy is not applicable to the project or to any other transmission line over 50 kV

E5-18

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Comment Set E5, cont.  
 Southern California Edison Company

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve
11		D.3-98	V-3a Alligator Rock ACEC	The introduction of the DPV2 line results in a low level of visual contrast, and is located within an existing BLM utility corridor in this area. The use of similar structures, matching of tower placement, and use of existing access (limited if any changes to landform, and minimal vegetation clearing) along with other mitigation measures should effectively reduce the impacts to a less than significant level on the ACEC. In general, these contrast levels should remain relatively consistent, unless additional new access and clearing are required, or the type(s) and number of structures to be paralleled change within the corridor.	Provide quantitative information regarding the assignment of levels used to determine the level of change (e.g., visual contrast). The contrast levels should then be re-examined based on the Key Viewpoint Simulation (KVP 10) in which the structures are identically matched (form, line, color, texture), and there is no visible change depicted for landform and vegetation modifications associated with the proposed line (should result in a low/weak contrast level, and less than significant impact).
12	D.3.7.3	D.3-147	Figure D.3-25A/25 B	Photos A (existing conditions) and B (simulated conditions) on both figures have been cropped resulting in a resolution decrease and enlargement of elements within the photographs. The technique used to create simulations throughout the EIS/EIR is not described; by cropping the original simulations, the existing and proposed structures appear more dominant than they actually are. By cropping the photos, the effective focal length of 50mm, which is equivalent to the human eye, was increased, thus decreasing depth of fields (things look much closer together). Note that this comment applies also to other simulations in this document.	The extent of photographs used to simulate typical views should represent the normal viewing condition at the subject viewpoint.

E5-19

E5-20

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Comment Set E5, cont.  
 Southern California Edison Company

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve
13	D.3.8.1	D.3-157 through 169 and VR-1	VR-1, KVP 27	Review of Figures D.3-28A and D.3-28B indicates that the assessment in the text of 3.8.1 and in the treatment of KVP 27 in Table VR1 overstate the degree of visual change that would be introduced by the project. In particular, this review makes it evident that the references to “view blockage of background sky, distant mountain ranges, and Harquahala Plain” and domination of the views of casual observers are at variance with the actual effects of the proposed lattice steel structures.	Revise the analysis to reflect the project’s actual level of impact, and change the level of significance to Class III.
14	D.3.9.1	D.3-195, D.3-207 through D.3-208 and VR-1	VR-1, KVP 33	Review of Figure D.3-34A and D.3-34B indicates that the assessment in the text of 3.9.1 and in the treatment of KVP 33 in Table VR1 overstate the degree of visual change that would be introduced by the project. In particular, this review makes it evident that the references to view blockage, structural prominence, and increases in “industrial character” are at variance with the actual effects of the proposed lattice steel structures in views from this area.	Revise the analyses to reflect the project’s actual level of impact, and change the levels of significance from Class I to Class III.
15	D.3.9.1	D.3-213 through D.3-214	Impact V-42	There is no identification of a viewpoint for assessment of this impact, and there are no visual representations of existing conditions and conditions with the project. As a consequence, an adequate basis has not been provided for making a determination of the level of impact and its significance.	Identify a representative viewpoint, provide a photo of existing conditions and a simulation of project effects, and make the assessment of the potential visual change and level and significance of the impact based on the evidence.

E5-21

E5-22

E5-23

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Comment Set E5, cont.  
 Southern California Edison Company

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve
16	D.3.9.1	D.3-214 through D.3-215 and VR-1	Impact V-43	Review of Figure D.3-36A and D.3-36B indicates that the assessment in the text of 3.9.1 and in the treatment of KVP 34 in Table VR1 overstate the degree of visual change that would be introduced by the project. In particular, this review makes it evident that the references to view blockage, structural prominence, and increases in “industrial character” are at variance with the actual effects of the proposed lattice steel structures in views from this area.	Revise the analysis to reflect the project’s actual level of impact, and change the level of significance from Class I to Class III.
17	D.3.9.1	D.3-219 and VR-1	Impact V-44	Review of Figure D.3-37A and D.3-37B indicates that the assessment in the text of 3.9.1 and in the treatment of KVP 35 in Table VR1 overstate the degree of visual change that would be introduced by the project. In particular, this review makes it evident that the references to view blockage, structural prominence, and increases in “industrial character” are at variance with the actual effects of the proposed lattice steel structures in views from this area.	Revise the analysis to reflect the project’s actual level of impact, and change the level of significance from Class I to Class III.
18	D.3.9.1	D.3-223	Impact V-45	Although photographs of existing conditions are presented, there are no simulations of the changes that would be brought about by the project. As a consequence, no basis is provided for evaluating the assertions made about skylining, view blockage, and structural prominence, and the actual extent of the impact.	Provide simulations of views from this area and revise the findings to reflect a systematic assessment of the level of visual change these simulations indicate.

E5-24

E5-25

E5-26

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Comment Set E5, cont.  
 Southern California Edison Company

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve
19	D.3.9.1	D.3-229	Impact V-46	There is no identification of a viewpoint for assessment of this impact, and there are no visual representations of existing conditions and conditions with the project. As a consequence, an adequate basis has not been provided for making a determination of the level of impact and its significance.	Identify a representative viewpoint, provide a photo of existing conditions and a simulation of project effects, and make the assessment of the potential visual change and level and significance of the impact based on the evidence.
20	D.3.9.1	D.3-229 and VR-1	Impact V-47	Review of Figure D.3-40A and D.3-40B indicates that the assessment in the text of 3.9.1 and in the treatment of KVP 36 in Table VR1 underplay the role of the existing infrastructure in determining the current visual character and quality of this area, and overstate the degree of visual change that would be introduced by the project. In particular, this review makes it evident that the references to view blockage, contrast, and increases in “industrial character” are at variance with the actual effects of the proposed lattice steel structures in views from this area.	Revise the analysis to more accurately reflect this area’s existing visual conditions and the project’s actual level of impact. Change the level of significance from Class I to Class III.
21	D.5.5.3	D.5-20	5-7	As stated, “significant Class I impacts would continue to occur at the following recreation areas: ... Coachella Valley Preserve and Coachella Valley Fringe-Toed Lizard ACEC.” According to the statement under “Impact WR-3” (p. D.5-34) those impacts would be mitigable and therefore designated “Class II.”	Correct the statement to be consistent with the statement on page D.5-34.

E5-27

E5-28

E5-29

NOTE: A = Comment accepted  
 R = Comment rejected  
 M = Comment modified

Comment Set E5, cont.  
 Southern California Edison Company

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve
22	D.5.6.2	D.5-28	1-14	<p>As stated, “while the Proposed Project would not introduce a new industrial use across an undeveloped recreation area, it would intensify the industrial nature of the ROW through the construction and operation of new towers and spur roads across the refuge... Overall, development and operation... would change the character of the Kofa NWR and would significantly diminish its recreational value.”</p> <p>The proposed project is not a new industrial use, but it is the expansion of existing utility facilities within a corridor that has been used for pipelines since 1950, used for high voltage electrical transmission since 1982, and designated for these purposes. The U.S. Fish &amp; Wildlife Service determined that the right-of-way was environmentally compatible for the proposed DPV2 project in 1989. The use of the Kofa for any recreational purpose would not be affected by the proposed project. While there could be a slight amount of “intensification” of the industrial nature of the corridor, the incremental visual change would be low to moderate and therefore would have a minimal effect to the recreation value of the Kofa NWR.</p>	<p>Revise the characterization of Impact WR-2 to “Class II”, resulting in a less than significant impact with proposed mitigation measures implemented.</p>

E5-30

NOTE: A = Comment accepted  
 R = Comment rejected  
 M = Comment modified

Comment Set E5, cont.  
 Southern California Edison Company

Comment No.	Section	Page	Line	Comment	Remarks/How Suggested to Resolve
23	D.5.6.3	D.5-32	"Impact WR-2"	The impacts on the character of the two ACECs are characterized as "significant and unmitigable" because operation of the project would diminish "its recreational value." As stated in D.5.2.6 (p. D.5-9), the Chuckwalla Valley Dune Thicket ACEC is "designated for its wildlife habitat" and the Alligator Rock ACEC "is designated for its archaeological values." It has been documented that there would be a minimal level of visual impact, and no resultant change in the recreation use of the areas, resulting from the construction and operation of the proposed Devers-Harquahala transmission line. The proposed project would therefore not affect the recreation values of the ACECs.	Modify the characterization of impacts to include proposed mitigation measure WR 3-a, resulting in a "Class II" level of impact.

E5-31

NOTE: A = Comment accepted  
 R = Comment rejected  
 M = Comment modified

## Responses to Comment Set E5 Southern California Edison Company

E5-1 The Visual Resource Management (VRM) Classes used for the DEIR/DEIS were developed by the Draft EIR/EIS consultants on behalf of the BLM. All facets of the VRM inventory were reviewed and approved by BLM staff throughout the course of the inventory and including: (a) determination of overall inventory boundary, (b) determination of scenic quality rating unit boundaries, (c) scenic quality rating unit assessment viewpoints, (d) descriptions of landscape character, (d) determination of scenic quality classifications, (e) verification of distance zones, (f) determination of visual sensitivity levels, and (g) determination of concluding Interim VRM Classifications. The Interim VRM Classifications resulting from this process are to be the subject of a future plan amendment to adopt the Interim VRM Classifications as final. Appendices V-2 and V-3 were inadvertently omitted from the Draft EIR/EIS during the printing process but are provided on a CD with the Final EIR/EIS.

E5-2 While it is true that the Visual Sensitivity-Visual Change (VS-VC) Methodology is more comprehensive and more transparent than other visual impact assessment methodologies used by some consultants, the foundational underpinnings of the VS-VC approach are quite consistent with those of adopted agency methodologies such as the Forest Service’s Scenery Management System and the Bureau of Land Management’s VRM approach where project-induced change is generally assessed against a given landscape’s ability to accommodate change, which for the agencies, is basically manifested in the concluding management objectives (VRM Classifications for BLM and Scenic Integrity Objectives for the Forest Service).

In the present case, the basic similarities between the BLM’s methodology and the VS-VC methodology are clearly illustrated in the summary tables presented in Appendix VR-1 where the factors contributing to the existing visual settings as well the factors contributing to the determination of project induced change (visual contrast analysis for the VRM method and visual change analysis for the VS-VC method) are clearly identified.

E5-3 The comment states that the significance criteria presented on page D.3-55 paraphrase the CEQA significance criteria, include interpretations of the criteria, and are not presented in a way that is true to the CEQA Guidelines. In fact, the entirety of each CEQA criterion is contained in each criterion statement on page D.3-55. Therefore, it is assumed that what the comment is referring to is one the following:

(a) The addition of the following words in the front of each criterion statement in order to make complete sentences out of checklist items: “Project construction or the long-term presence of project components...”,

(b) The addition of the words “view of” as in “...within view of a State Scenic Highway” as opposed to the original CEQA Guidelines wording: “...within a State Scenic Highway.” The EIR/EIS section author believes that in general, the issue relative to the application of this criterion, most often pertains to the visibility of projects from scenic highways as opposed to the visibility of projects within the highway (though clearly road and bridge projects would fall within this category),

(c) The addition of the words “...or be hazardous to motorists or pedestrians” at the end of the criterion: “...create a new source of substantial light or glare that would adversely affect day

or nighttime views in the area.” The decision to add this clarifying phrase is the result of numerous years of public meeting explanations that in some cases, the key concern associated with the addition of substantial glare to the views of nighttime drivers is not the affect on the views of the landscape that the drivers can’t see at night as much as it is the inability to clearly see vehicles or pedestrians in close proximity as a result of glare.

Any other explanatory notes (one occurrence) were clearly noted in the EIR/EIS discussion.

- E5-4 The comment suggests that the VS-VC method does not account for existing landscape character (the existing DPV1 line) or the incremental change of adding a new transmission line to a corridor containing an existing line. In fact, the character (or visual quality) of the existing landscape is discussed throughout the regional and project setting discussions in Sections D.3.1, D.3.2, and D.3.3. This information is also presented in the summary tables of Appendix VR-1.

Also, since the Proposed Project is the addition of new facilities to an existing corridor containing existing facilities, the change is by definition incremental. The presence of the existing transmission line facilities is acknowledged throughout the setting and impact discussions and they are shown in the visual simulations as well.

- E5-5 Impact significance is defined (in the context of significance criteria) on pages D.3-54 and D.3-55 as noted in previous comments. Further, determination of impact significance under the VS-VC method is clearly discussed on page D.3-55 along with the use of Table D.3-7:

*Under the Visual Sensitivity–Visual Change methodology, the degree of impact significance is generally arrived at as a function of overall visual sensitivity and visual change. Table D.3-7 illustrates the general interrelationship between visual sensitivity and visual change and is used primarily as a consistency check between individual KVP evaluations. Actual parameter determinations (e.g., visual contrast, project dominance, and view blockage) are primarily based on analyst experience and site-specific circumstances.*

The comment incorrectly states that impact significance is determined based on use of Table D.3-7. The actual use of Table D.3-7 is described in the text on page D.3-55, which is quoted above.

The comment also questions the assumptions built into Table D.3-7 and their “real world validity.” In fact there are no assumptions built into the table beyond the general observations stated in the text below the table on page D.3-55:

*The interrelationships presented in Table D.3-7 are intended as guidance only, recognizing that site-specific circumstances may warrant a different outcome. However, it is reasonable to conclude that lower visual sensitivity ratings paired with lower visual change ratings will generally correlate well with lower degrees of impact significance when viewed onsite. Conversely, higher visual sensitivity ratings paired with higher visual change ratings will tend to result in higher degrees of visual impact.*

The comment also states that “According to Table D.3-7 (the comment refers to Table D.3-1 but it is assumed that is typographical error), a clear case of significant visual impact requires a rating of at least a ‘high’ rating of one and a ‘moderate to high’ rating of the other overall rankings. It should be noted that, of the six significant visual impacts identified in the DEIR/DEIS through application of the SC-VC methodology, none meet these criteria.”

Both of these observations should be intuitive. Rarely are visual impacts so clear-cut as to have a high degree of visual change occurring in landscapes of high sensitivity. Prudent project siting efforts usually avoid such a circumstance. Thus, it falls to the professional analyst's judgment and site specific circumstances (as noted on page D.3-55) to determine if those visual impacts that are adverse and potentially significant, rise to a level that are in fact sufficient to justify a finding of significance. Table D.3-55 is merely a graphical illustration of those common sense relationships and its genesis is based on over 20 years of experience in the conduct of visual impact analysis.

The comment also states that under the VS-VC methodology, "...impact significance considers "overall visual change rather than the more specific questions that CEQA poses about the degree of degradation of existing levels of visual character and visual quality." In fact, visual change is a summation of the visual degradation caused by increased visual contrast, project dominance, and view blockage.

E5-6 Although NEPA does not specifically require a determination of impact significance, it does require a full analysis of impacts. This EIR/EIS analyzes all impacts in a consistent manner whether the impacts occur on federal land or state land, and in California or Arizona.

E5-7 The comment suggests that the visual methodology is not well described or explained. In fact, the methodology is clearly presented with respect to terminology, component factors, method of assessment, and development of conclusionary statements. Table D.3-7 presents a clear illustration of the relationships of visual sensitivity and visual change to impact significance and Appendix VR-1 presents a summary of each component factor of the analyses, which are also discussed in narrative form in the text.

The comment also suggests that there is no basis for the values assigned to viewer concern in the absence of resident or motorist surveys. In the absence of such survey data (which is almost always the case), the determination of viewer concern relies on the professional judgment of the analyst. In the case of the DPV2 EIR/EIS, the conclusions regarding viewer concern are reasonable and reflect only a common sense understanding of the factors to which general viewing populations are visually adverse as well as over 20 years of professional experience in conducting visual impact assessments; participating in public hearings, scoping meetings, and public workshops; and reviewing public comments on high-voltage transmission line projects.

The comment also questions the use of the term view blockage and suggests that lattice towers rather than block views actually interfere with views. While it is not clear what the commenter is referring to as view interference, or what aspects of the structure is causing the interference, or specifically what is being interfered with, or for that matter how view interference differs from view blockage, the EIR/EIS is clear as to what view blockage or view impairment is as defined on page D.3-54:

*View Blockage or Impairment describes the extent to which any previously visible landscape features are blocked from view as a result of the project's scale and/or position. Blockage of higher quality landscape features by lower quality project features causes adverse visual impacts. The degree of view blockage can range from none to high.*

The comment also notes that the lattice design enables a viewer to "see through" the structures. This is true to a degree and the "transparent" characteristic of lattice structures is particularly effective in enabling structures to blend with an appropriately mottled background when viewed

from distance. However, from closer viewpoints, this design characteristic is less effective. Thus, to the extent that the built structure blocks or impairs the view of the background landscape, this is referred to in the text as view blockage or view impairment and the degree of view blockage or view impairment is illustrated in the simulations.

The comment also states that the use of the term “industrial” to describe the character of the lattice structures is “inaccurate or misleading” and that the term industrial “...is most often used to refer to facilities that involve manufacturing, creation of localized pollution, generation of truck traffic.” The EIS/EIR author is not aware of any empirical data that suggests that the term “industrial” should be reserved for the rather narrow uses suggested in the comment. To the contrary, the use of the term “industrial” to describe the character of electric transmission facilities (including substations) is appropriate and the most readily understandable descriptor of the proposed facilities.

E5-8 The use of visual simulations is intended to present reasonable representations of an actual viewing experience. Simulations are typically prepared for the key viewpoints selected for detailed analysis. As stated on page D.3-5 of the EIR/EIS, Key Viewpoints are “...*generally selected to be representative of the most critical locations from which the project would be seen. KVPs are often located in an effort to evaluate existing landscapes and potential impacts on visual resources with various levels of sensitivity, in different landscape types and terrain, and from various vantage points. Typical KVP locations for the present project include (1) along major or significant travel corridors or points of visual access; (2) at key vista points; (3) at significant recreation areas; (4) in residential areas; and (5) at locations that provide good examples of the existing visual context.*

Some of the reasons that the PEA simulations are not used in an EIR/EIS are: (a) viewpoint locations did not fully capture a project’s visual effects on the landscape, (b) inappropriate or ineffective viewing angles at selected viewpoints, (c) poor image quality, or (d) inappropriate image scale. For the DPV2 project, the comment is incorrect in stating that no simulations from the PEA were used. Two PEA viewpoints and simulations were used in the EIR/EIS analysis. However, many new viewpoints (and simulations) were deemed necessary to more accurately describe the Proposed Project’s potential visual impacts.

The comment also states that: “Maintaining the equivalency of an image taken with a 50 mm lens is essential, because there is professional agreement that images taken with a 50 mm lens are equivalent to what is seen by the human eye.” What the comment fails to point out is that by squeezing what the eye can see down to an 8.5” x 11” page or even an 11” x 17” page, the landscape features would be presented in miniature since the image must be scaled down substantially to fit the page (note: a canvass several feet wide would be required to portray the visible field of view at a standard reading distance of about 18 inches). This may be acceptable for illustrating the visible field of view but it is not appropriate for the presentation of visual simulations because the simulation should communicate a reasonable approximation of the actual viewing experience. Landscape features (including transmission lines) should appear approximately the same scale (size) as if the viewer was standing on location. There should be no visual disconnect between what is seen on a page and what is experienced in the field. The approach suggested in this comment will understate the prominence of landscape features (such as transmission line towers) and will convey a false sense of the project’s potential impacts. That is why the EIR/EIS presents images at life-size scale when viewed at a standard reading distance of 18 inches.

The comment also expresses concern as to the technical construction of the simulations and whether or not the simulations accurately portray the Proposed Project. The Proposed Project is to build, from Harquahala to Devers Substation a new, identical line adjacent to the existing DPV1 line, and to both build and eliminate some existing lines west of Devers Substation. One need only compare the EIR/EIS existing setting images with the simulations to see that the simulations provide reasonable representations of the changes that would occur under the Proposed Project. For the DPV2 project, because of the nature of the changes to occur (the addition of new, adjacent towers similar in design and height to the existing towers), images of the tower type to be installed were obtained and matched with respect to viewing angles and structure scale. Structures were then composited with the existing landscape image using image editing software. Structure locations were determined based on the tower maps provided by the Applicant. Conductors and shield wires were then added and the composite structures were matched to the existing facilities to achieve similar color, weathered appearance, and visibility based on viewing conditions at the time the existing conditions photograph was obtained. This approach achieved highly realistic simulated facilities as evidenced in the figures presented in the EIR/EIS.

- E5-9 The EIR/EIS visual resources author is not in a position to comment on the quality of the visual analysis that was conducted almost 30 years ago for the previous project. However, the conclusions reached in this present analysis for the segment through Kofa NWR are reasonable and accurately state the likely outcome with project implementation.
- E5-10 The phrase “numerous viewpoints” is a reference to all the areas from which the project can be seen or the viewshed, and not “key viewpoints.” Since there are essentially an infinite number of viewpoints (points on the ground) from which the project could be seen, it is sensible to select a finite number of viewpoints to represent the broader viewing opportunities. Similarly, there are other viewing locations that will be less impacted. The selected viewpoint and its accompanying analysis is considered representative of the views and visual impacts within Kofa.
- E5-11 First, it should be made clear again that the BLM method must be used on BLM-administered lands but cannot be used on non-BLM lands since there can be no VRM classifications assigned to those non-BLM lands. While there are differences between the two methods, the foundations of VS-VC approach are consistent with those of the BLM’s VRM system in that both methodologies evaluate project-induced change against a given landscape’s ability to accommodate change. A principal difference is that the ability to accommodate change (or overall visual sensitivity of the landscape under the VS-VC method) is manifested in the concluding management objectives (VRM Classifications) under the BLM system.
- E5-12 Specific values (low to high) were assigned to the various factors that characterize the existing setting and visual change based on the professional judgment of the analyst. This is true for almost all methods that evaluate visual resources. However, the VS-VC method is transparent: all the contributing factors are identified and described, and the tables presented in Appendix VR-1 summarize the analysis in a fashion that is easy to see how the individual factors contribute to the conclusionary statements regarding overall visual sensitivity and visual change.

As for distance zones, Table D.3-4 identifies the three distance zones used in the VRM system as: foreground/middleground – 0 to 3-5 miles, background – 5 to 15 miles, and seldom seen – seldom seen areas. These values are appropriate for the wide open landscapes and distant

sightlines that are typical of the types of lands the BLM manages. However, in more confined landscapes and urban and suburban settings, shorter distance zones can also be appropriate. In the present project, the VS-VC method maintains consistency with the VRM method while providing slightly greater precision with the following distance zones: foreground – 0 to 2 miles, middleground – 2 to 5 miles, and background – greater than 5 miles.

The comment also suggests that the visual contrast conclusion for Viewpoint 19 should be changed (lowered) from the “moderate” level presented in the EIR/EIS. While it is true the replacement of two dissimilar structures helps to reduce visual clutter in the landscape, the substantially greater height of the replacement structure causes increased structure prominence and exacerbates visual contrast relative to vertical form and line. Also, the greater visibility (due to elevated heights) of the conductors also increases the visual contrast associated with the horizontal lines. Therefore, the “moderate” visual contrast conclusion presented in the EIR/EIS is considered accurate and reasonable.

See Response E5-1 regarding Appendices VR-2 and VR-3. Appendix VR-4 was also omitted from the Draft EIR/EIS, but is provided with the Final EIR/EIS on the enclosed CD.

E5-13 The moderate visual contrast and moderate to high view blockage determinations presented in the EIR/EIS accurately characterize the visual impact that would occur along the Kofa segment. These determinations along with the conclusions for overall visual sensitivity and visual change neither understate nor overstate the project’s effects on landscape views within Kofa. Furthermore, as previously noted, some views along this segment will experience even greater degrees of visual contrast and view blockage due to viewpoint proximity and angle of view relative to the proposed route.

A good example of this type of view is presented in the simulation for Key Viewpoint 10 in Alligator Rock ACEC on page D.3-103 of the Draft EIR/EIS.

E5-14 Please refer to Response E5-13.

E5-15 The descriptions of project visual effects presented in the EIR/EIS (increased industrial character, visual contrast, structure prominence, and view blockage) accurately characterize the visual impact that would occur along the Kofa segment and are not prejudicial. These conclusions are fully supported in the text and in the visual simulation for this location. With regard to the effects of land disturbance, it is well known that land scars associated with disturbance of soils and vegetation in arid environments are very persistent due to slow vegetation recovery and are difficult to mitigate.

Since no specific restoration plan has been submitted that details how land scars from soil and vegetation disturbance would be remediated in a timely fashion (given the harshness of the environment, arid conditions, and lack of moisture) it is reasonable to conclude that the project “...may also result in increased land scarring.”

The comment also requests a summary of the discussions of Objective 1 contained in the *KOFA National Wildlife Refuge & Wilderness and New Water Mountains Wilderness Interagency Plan and Environmental Assessment* referenced in the EIR/EIS. Specifically, Objective 1 addresses preservation of wilderness values. Although the project route in KOFA would not be located in designated wilderness, it would be located within the planning area (as an authorized

development). Objective 1 states: “*Maintain or enhance the wilderness values of naturalness, outstanding opportunities for solitude and primitive recreation, and special features of the planning area by:*

- *Minimizing impacts of recreational use and visual impacts of authorized developments.*

It is this aspect of Objective 1 that the Proposed Project was found to be inconsistent with.

E5-16 The VRM Class designation has no relationship to the project effects. The EIR/EIS visual analysis of the Alligator Rock ACEC accurately characterizes the visual contrast that would result from the project as moderate in terms of form and line. The resulting moderate degree of change would exceed the low level of change requirement for VRM Class II areas and would not “...repeat the predominant natural features of the characteristic landscape.” As a result, this segment of the project would not be consistent with the applicable VRM classification.

E5-17 It is acknowledged that the Proposed Project would in some cases be consistent with local policies while at the same time be inconsistent with others. However, the EIR/EIS policy analysis does not attempt to uncover policy intent, it simply evaluates a literal interpretation of the policy. On that basis, the EIR/EIS policy analysis finds that the Proposed Project would be consistent with most local policies but not consistent with others.

E5-18 First, the comment is not correct that the State retains jurisdiction over all electric facilities over 50 kV. While the State does have jurisdiction over electric facilities proposed by investor-owned utilities (like SCE), it has no jurisdiction over electric facilities of municipal utilities or irrigation districts of any voltage (e.g., Imperial Irrigation District’s 500 kV Desert Southwest Transmission Project).

The comment correctly notes that the County of Riverside does not have jurisdiction over high voltage transmission lines proposed by investor-owned utilities like SCE. However, the assessment of consistency with local plans and policies is provided not to assert jurisdiction, but to inform the decisionmakers of the extent to which a major project complies with local requirements and local values.

E5-19 The comment requests quantitative information regarding the assignment of levels used to determine the level of change (e.g. visual contrast). However, the BLM’s Visual Contrast Analysis methodology is not quantitative. Based on the landscape changes caused by the proposed activity, degrees of contrast ranging from none to strong are selected for form, line, color, and texture. The professional judgment of the analyst determines the individual levels of contrast and the overall level of change. In this case, moderate degrees of contrast were determined for form and line while weak degrees of contrast were found for color and texture. Based on these findings, the overall level of change was determined to be moderate.

E5-20 By squeezing what the eye can see down to an 8.5” x 11” frame or even an 11” x 17” frame, the landscape features would be presented in miniature since the image must be scaled down substantially to fit the page (note: a canvass several feet wide would be required to portray the visible field of view at a standard reading distance of approximately 18 inches). While this may be sufficient for illustrating the visible field of view, it is not appropriate for the presentation of visual simulations because the simulation should communicate a reasonable approximation of the actual viewing experience. Landscape features (including transmission lines) should appear approximately the same size (scale) as if the viewer was standing on location. There

should be no visual disconnect between what is seen on a page and what is experienced in the field. The approach suggested in this comment will understate the prominence of landscape features (such as transmission line towers) and will convey a false sense of the project's potential impacts. That is why the EIR/EIS presents images at life-size scale when viewed at a standard reading distance of 18 inches.

- E5-21 As shown in Figure D.3-28A, the existing landscape does not include any noticeable built structures with complex industrial forms and lines. Therefore, the introduction of such structures with strong form and line contrast, into an otherwise naturally appearing landscape would result in a moderate to high level of change. For these reasons, the EIR/EIS analysis is considered an accurate assessment of the visual impacts that would result along this route segment.
- E5-22 As stated in the EIR/EIS, the Devers-Valley Alternative would result in moderate degrees of visual contrast and view blockage and would appear co-dominant with the existing landscape features. Therefore, the EIR/EIS conclusion that this alternative route segment would cause a moderate degree of visual change that would result in a significant Class I visual impact is considered accurate and reasonable. This key viewpoint is representative of many of the views from the PCT in the lower elevation portions of the route, as the viewer approaches the route from either the north or south.
- E5-23 In this particular case, a viewpoint was not selected because the applicable Scenic Integrity Objective applicable at the time of the analysis was VERY HIGH. Very High scenic integrity refers to landscapes where the valued landscape character “is” intact with only minute if any deviations. The existing landscape character and sense of place is expressed at the highest possible level. Since the alternative would add additional built structures with complex forms and lines and industrial character, the Devers-Valley No. 2 Alternative clearly could not be consistent with the scenic integrity objective. Therefore, a viewpoint and simulation were not and are not considered warranted. However, SBNF has now stated that the Scenic Integrity Objective (SIO) applicable to this portion of the route will be changed to “HIGH” from “VERY HIGH” and that SBNF believes that the landscape containing the easement can be managed to the “HIGH” SIO standard. It should be noted that “HIGH” scenic integrity *“...refers to landscapes where the valued landscape character ‘appears’ to be intact. Deviations may be present but must repeat the form, line, color, texture, and pattern common to the landscape character so completely and at such scale that they are not evident.”* If the SIO is changed to “HIGH” and if SBNF is able to manage the easement in such a way as to make the addition of the new 500 kV transmission line “not evident,” then the project would be consistent with the new “HIGH” SIO and the visual impact would not be considered significant.
- E5-24 The EIR/EIS conclusion that the Devers-Valley No. 2 Alternative route segment would cause a moderate to high degree of visual change that would result in a significant Class I visual impact is considered accurate and reasonable and is supported by the simulation presented as Figure D.3-36B.
- E5-25 The EIR/EIS conclusion that this alternative route segment would cause a moderate to high degree of visual change that would result in a significant Class I visual impact when viewed from the State-designated Scenic Highway is considered accurate and reasonable and is supported by the simulation presented as Figure D.3-37B.

- E5-26 Views of the Devers-Valley No. 2 Alternative route in southern Banning and Beaumont would be similar to the views that would occur in the Cabazon rural residential area (KVP 34 – see Figures D.3-36A/B). Because of the similarity of the viewing circumstances (particularly for the closer proximity residences), a simulation for Banning/Beaumont was not prepared. The EIR/EIS conclusion that the alternative route through southern Banning and Beaumont would cause a moderate to high degree of visual change that would result in a significant Class I visual impact is considered accurate and reasonable.
- E5-27 In this particular case, a viewpoint was not selected because the applicable VRM Classification is Class II. The VRM Class II management objective requires that the existing character of the landscape be retained and that the level of change to the characteristic landscape be low and not attract the attention of the casual observer. Also, any changes to the landscape must repeat the basic elements of form, line, color, and texture found in the predominant natural features of the landscape. Since the Devers-Valley No. 2 Alternative would clearly not achieve any of the Class II requirements, a viewpoint and simulation were not considered warranted.
- E5-28 The EIR/EIS conclusion that this alternative route segment would cause a moderate to high degree of visual change that would result in a significant Class I visual impact is considered accurate and reasonable and is supported by the simulation presented as Figure D.3-40B.
- E5-29 The text in Section D.5.5.3 on page D.5-20 of the Draft EIR/EIS has been revised to reflect the comment regarding Impact WR-1 (Construction activities would temporarily reduce access and visitation to recreation or wilderness areas) as follows:
- However, significant Class I impacts would continue to occur within the following recreation areas: Harquahala Peak, Kofa NWR, the Chuckwalla Valley Dune Thicket ACEC, and the Alligator Rock ACEC, ~~and the Coachella Valley Preserve and Coachella Valley Fringe Toed Lizard ACEC.~~
- E5-30 Note that while recreational activities will not be precluded by implementation of the Proposed Project (as acknowledged by Impact WR-3), the intensification of an industrial use (i.e., addition of another large transmission tower) across a National Wildlife Refuge is considered an alteration in the general character of the wilderness area based on the long-term and permanent change to the landscape (Impact WR-2). This is considered a contribution to the overall reduction in the recreational value of the wildlife refuge. Therefore, the impact classification for Impact WR-2 has not been changed based on this comment.
- E5-31 The comment incorrectly characterizes the visual impact at the Alligator Rock ACEC. In fact, the EIR/EIS visual analysis of the Alligator Rock ACEC accurately characterizes the visual contrast that would result from the project as moderate in terms of form and line. The resulting moderate degree of change would exceed the low level of change requirement for VRM Class II areas and would not “...repeat the predominant natural features of the characteristic landscape.” As a result, the segment of the project through the ACEC would not be consistent with the applicable VRM classification and the resulting visual impact would be significant (Class I).

As described in Section D.5.4, Applicable Regulations, Plans, and Standards, ACECs are designated to protect and prevent damage to historic, cultural, or scenic values, fish and wildlife resources, or other natural processes. The value of the resources that are protected within

the Alligator Rock and Chuckwalla Valley Dune Thicket ACECs is partly determined by the natural setting and undeveloped landscape that characterizes the majority of the ACECs, in addition to the archaeology and wildlife habitat for which each ACEC was designated. The existing DPV1 transmission line has already introduced an industrial land use across the ACECs. The addition of another large transmission tower across this area is considered an alteration in the general character of the ACECs. This is considered a contribution to the overall reduction in the recreational value of the ACECs. Therefore, the impact classification for Impact WR-2 has not been changed based on this comment.