

Corridor EIS Archives

From: corridoreiswebmaster@anl.gov
Sent: Monday, July 10, 2006 2:18 PM
To: corridoreisarchives,
Subject: Preliminary Draft Corridor Map Comment M0090

Attachments: SCE_PEIS_comments_Preliminary_Corridor_Maps_July_10,_2006_M0090.doc



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Thank you for your comment, Nino Mascolo.

The comment tracking number that has been assigned to your comment is M0090. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: July 10, 2006 02:17:25PM CDT

Preliminary Draft Corridor Map Comment: M0090

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Attachment: C:\Documents and Settings\ferrylm\My Documents\Legislation\Energy Bill
\Corridors\PEIS Section 368\Draft Maps of Potential Corridors\SCE PEIS comments
Preliminary Corridor Maps July 10, 2006.doc

Questions about submitting comments over the Web? Contact us at:
corridoreiswebmaster@anl.gov or call the Preliminary Draft Corridor Map Webmaster at
(630)252-6182.

July 10, 2006

VIA Electronic Filing

Office of Electricity Delivery and Energy Reliability
Room 8H-033
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington, DC 20585

Re: Preliminary Draft Map of Potential Energy Corridors on Federal Lands - Comments
of Southern California Edison Company

Dear Gentlemen:

Southern California Edison Company appreciates the opportunity to comment once more in the Department of Energy's process to prepare a draft Programmatic Environmental Impact Statement implementing Section 368 of the Energy Policy Act of 2005 (P.L. 109-58).

SCE provided oral comments at the November 2, 2005 NOI scoping meeting held in Las Vegas, Nevada, and at the California Energy Commission's February 8 workshop in Ontario, California. SCE also provided written comments in the proceeding on November 28. SCE would like to supplement its previous comments regarding the PEIS with the attached written comments.

Should you have any questions, please do not hesitate to contact me at (626) 302-4459.

Sincerely,

/s/ Nino J. Mascolo

Nino J. Mascolo
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**Comments of
Southern California Edison Company**

**Preliminary Draft Map of Potential Energy Corridors on Federal Lands
Department of Energy - West-wide Energy Corridor PEIS**

Southern California Edison Company (SCE) appreciates the opportunity to provide comments on the Preliminary Map of Potential Energy Corridors on Federal Lands. SCE provided oral and written comments previously in this proceeding during the public scoping meetings phase held late last year and at the California Energy Commission (CEC) workshops held in February 2006. Below, SCE provides additional comments on the preliminary corridor map released by the U.S. Departments of Energy, Interior, Agriculture, and Defense (the Agencies).

SCE believes it is extremely important that existing corridors be identified and retained throughout the Agencies' process. In its earlier comments filed with the Agencies on November 28, 2005, SCE provided a detailed list of its existing corridors and requested that those corridors be included in this process. SCE also identified new corridors and requested that those corridors also be designated during this process. SCE's proposed and existing corridors were correctly incorporated into the February 2, 2006 map titled "Southern California – Stakeholder Identified Energy Corridor Needs", posted to the CEC website. However, after reviewing the more recent maps released by the Agencies on June 9, 2006, it appears that few, if any, of SCE's existing and proposed corridors were considered for corridor designation by the Agencies. SCE's existing corridors include:

- i. Big Creek T/L System: located in the Sierra National Forest, Los Padres National Forest, and Angeles National Forest;
- ii. Midway-Vincent T/L: Located in the Angeles National Forest and the Los Padres National Forest, as well as on Bureau of Land Management lands;
- iii. Vincent-Rio Hondo T/L: Located in the Angeles National Forest and on Corps of Engineers lands;

- iv. Antelope-Pardee T/L (Saugus del Sur Corridor): Located in the Angeles National Forest;
- v. Vincent-Gould T/L: Located in the Angeles National Forest and on Corps of Engineers lands;
- vi. Serrano-Valley T/L: Located in the Cleveland National Forest;
- vii. Lugo-Eldorado T/L: Located on land managed by the Bureau of Land Management (BLM) and the National Park Service;
- viii. Mohave-Lugo T/L: Located on land managed by the Bureau of Land Management (BLM) and the National Park Service;
- ix. Lugo-Mira Loma T/L: Located in the San Bernardino National Forest;
- x. Lugo-Serrano T/L: Located in the San Bernardino National Forest;
- xi. Devers-Valley T/L: Located in the San Bernardino National Forest and on land managed by the BLM;
- xii. Devers-Palo Verde T/L: Located on land managed by the BLM and U.S. Fish and Wildlife (KOFA Wildlife Reserve Arizona); and,
- xiii. Other transmission lines, including Control-Inyokern, Coolwater-Kramer, Kramer-Victor, Vincent-Lugo, Devers-Mirage, Devers-Julian Hinds, etc.

SCE requests that the Agencies clarify the status of SCE's and other utilities' existing corridors in the western United States; will they be designated and carried forward in this process or will only newly proposed corridors will be considered in this process? As stated above, SCE believes it is very important that existing corridors be retained throughout this process.

SCE also reiterates its request that its proposed new corridors crossing federal lands should be included in the draft Programmatic Environmental Impact Statement and ultimately designated as corridors. SCE considers these new corridors as critical in meeting growing demand, accessing new diversified generating resources, and mitigating potential congestion due to significant load growth in Southern California, which is

mostly surrounded by federally-owned lands.¹ SCE's list of proposed new corridors is below:

San Bernardino National Forest

- ◆ In addition to the existing corridors within the San Bernardino National Forest, a new corridor crossing the San Bernardino National Forest, south of Interstate 10 and adjacent to the San Jacinto Wilderness State Park in Riverside County, California should be designated and preserved to accommodate future transmission facilities. The corridor should begin in the north Palm Springs area, traverse the San Bernardino National Forest in an east-to-west direction, and end near the San Jacinto area. The transmission facilities situated in this corridor would bring needed power to the load centers in western Riverside County from the southwest, as well as improve reliability in the area. SCE plans to construct a second 500 kV line between our Devers and Valley substations as a part of the new Devers-Palo Verde #2 500 kV line project (DPV2), within an existing designated corridor. However, another separate corridor for a third transmission line should be designated. A separate corridor will significantly reduce risks associated with otherwise constructing new line(s) within the existing transmission right of way.

Cleveland National Forest

- ◆ A new corridor crossing the northern end of the Cleveland National Forest should be developed to accommodate future transmission facilities. The corridor should begin in the northeastern foothills of the Santa Ana mountain range south of the city of Corona, Riverside County, cross the northern edge of the Cleveland National Forest south of state highway 91, and end at the northwestern foothills of the Santa Ana mountain range in the proximity of state highway 91 and 241 interchange in Orange County, California. The new transmission facilities situated on this corridor would bring needed power from the southwest to the load centers in Orange County. SCE has plans to construct a new 500 kV line between our Valley and Serrano substations following the completion of the DPV2 project in late 2009. A separate corridor for the new transmission line will significantly reduce risks associated with constructing the new line within the existing transmission corridor in the Cleveland National Forest.

Angeles National Forest

¹ The southern California area (Los Angeles and Orange Counties) is bordered on the north by the Los Padres and Angeles National Forests, on the northeast and east by the San Bernardino National Forest and on the east and southeast by the Cleveland National Forest. Camp Pendleton, also federal land, is to the south. To the, northeast, east, and southeast sides of these national forests lies vast areas of other federal land administered by the Bureau of Land Management. It is virtually impossible to bring transmission lines to the southern California area without crossing federal lands.

- ◆ In addition to the use of existing corridors through the Angeles National Forest, a new corridor should be developed to accommodate future transmission facilities that would provide additional transmission capacity to bring needed power from northern California, as well as renewable resources located in the Mojave Desert, to the major load centers in the Los Angeles basin. The corridor should begin in the northern foothills of the San Gabriel mountain range near SCE's Vincent Substation in the city of Palmdale, California, cross over the Angeles National Forest in a north to south direction, and stop at the southern edge of the Angeles National Forest near SCE's Rio Hondo Substation in the city of Irwindale, California.

- ◆ New corridors crossing the Angeles National Forest and potential National Conservation Area also should be developed to accommodate future intra-state transmission facilities. A new corridor should start near PG&E's Midway Substation near Buttonwillow, CA, cross over potential National Conversation Area in a northwestern to southeastern direction, and end at the Tehachapi area north of Lancaster, CA. A separate north to south corridor should continue from the Tehachapi area, traverse the Angeles National Forest in a north to south direction near Palmdale, CA, and end at the southern edge of the Castaic mountain range near Santa Clarita Valley. The new transmission facilities situated on these corridors would be needed to bring economic power from the northern California and the Pacific Northwest areas to southern California, and integrate renewable resources developed in the Mojave Desert. These corridors should be separate from the existing corridors in the Angeles National Forest to significantly enhance system reliability.

Los Padres National Forest

- ◆ A new corridor should be designated and preserved in order to accommodate future transmission facilities from Ventura to Goleta, California. This corridor should cross southern portions of the Los Padres National Forest, paralleling to interstate highway 101 in an east to west direction. The new transmission facilities situated on this corridor would provide additional transmission capacity to serve loads as well as improve reliability to customers in the Santa Barbara and Ventura areas.

It appears the corridors described below were included in the proposed corridor maps. SCE is also including a description of these proposed corridors to ensure that the Agencies continue to include the designation of these corridors in any future maps. SCE respectfully requests further clarification from the Agencies as to why only the proceeding corridors were included in the preliminary corridor maps and other SCE-proposed corridors were not. SCE believes it is imperative that each of the proposed

areas be designated as a corridor and is concerned that the Agencies appear to have designated only proposed corridors that do not cross national forest lands.²

Mojave National Preserve

- ◆ A new east-to-west corridor should be designated in order to accommodate future inter-regional transmission facilities that would bring economic power to the major load centers in southern California from Nevada/Arizona/New Mexico area. This corridor would start from the southern tip of Nevada near the Nevada/California/Arizona border, cross the Mohave National Preserve paralleling Interstate 40 and Bureau of Land Management (BLM) land, and end near Barstow, California.

Joshua Tree National Park

- ◆ A new corridor should be designated and preserved to accommodate future inter-state transmission facilities from southern Arizona near the Palo Verde area to SCE's Devers Substation near Palm Springs, California. This corridor should cross southern portions of the Joshua Tree National Park in an east to west direction.

SCE respectfully requests the agencies carry forward all of the existing corridors in their respective Resource Management Plans and designate newly proposed corridors as described above, and as requested by SCE in previous comments for consideration in the Programmatic Environmental Impact Statement and future Resource Management Plans. However, if there are specific instances where the Agencies do not believe it is possible to designate corridors due to environmental or other concerns, SCE requests that the Agencies instead consider widening, to a minimum width of twice the current corridor width, any existing SCE corridors on federal lands.

Further, the corridor width proposed by the Agencies (3,500 feet) is not conducive to siting high-voltage transmission facilities. As SCE stated in its previous comments, the minimum width for a corridor should be at least one mile to allow for at least three high voltage transmission lines. Each single overhead high voltage transmission line requires approximately 200 feet of right-of-way ("ROW") width within a corridor. Voltage and tower design may necessitate somewhat more or less width as different utility design

² The four southern California National Forests recently developed Land Management Plans. Each of these plans has one or more designated utility corridors, many of which are the same as the corridors proposed by SCE. SCE does not understand why the PEIS does not include the corridors that are already included in the Land Management Plans.

factors are considered. Additionally, ROW width should accommodate access roads for maintenance vehicles and allow for vegetation management for brush fires and physical clearance considerations. The recommended width for grading purposes alone is 50 feet. Although access roads may depart significantly from the transmission facility due to terrain or other issues, it is important that sufficient width for permanent access roads be included in any corridor designations. Importantly, a one-mile width is necessary to allow infrastructure to be located in areas within the corridors to facilitate reducing any impacts to sensitive resources.

SCE is investing approximately \$2.7 billion in transmission infrastructure through the year 2010. In order to facilitate the timely construction of these transmission facilities, SCE will need streamlined siting processes on federal, state and locally-owned land. Any corridors designated through the Agencies' process will help enable SCE to meet its customers' needs for the provision of safe and reliable energy in a timely fashion. Recently, SCE filed applications with the California Public Utilities Commission and the U.S. Forest Service for the Antelope –Pardee Transmission Project, which would upgrade an existing 66 kV transmission line to a 220 kV transmission line. The existing line is located within an existing corridor in the Angeles National Forest. However, the Forest Service interprets the Angeles National Forest Land Management Plan (LMP) corridor to include only a 1,000 foot wide ROW. That width is insufficient for upgrading the existing line to a new location that is not on the ridgeline within the existing corridor. Thus, an amendment to the LMP will be necessary. A further amendment to the LMP will be necessary to make the LMPs "scenic integrity objectives" consistent with the presence of a transmission line, because the designation of a utility corridor does not override the LMPs scenic integrity objectives. Finally, the LMP also provides that transmission lines should be built outside the National Forest to the extent that they can be reasonably accommodated. The LMP does not define the term "reasonably accommodated." Thus, to accommodate a transmission line within an existing corridor could take three amendments to the LMP. This is an inefficient process and may result in increasing the costs and time to obtain approvals for the transmission line upgrade. Thus, even with the designation of a utility corridor, utilities may run into problems siting and

constructing new infrastructure. Therefore, in addition to including this existing corridor in the PEIS, the PEIS should ensure that it includes the necessary specific requirements so that federal agency corridor designation will accomplish the purpose of providing usable corridors for utility infrastructure.

SCE also believes it is very important that before the actual designation of corridors and incorporation of these corridors into the relevant agency land use and resource plans, the agencies take into account the decisions of the local, sub-regional, and regional transmission planning organizations. Each designated corridor must be evaluated based upon the planning decisions of the relevant planning entities to ensure that corridors are located in areas that are conducive to the long-term requirements of an economic, reliable and safe energy delivery system. Also, the obligation of the incumbent utility to serve its customers within its service territory must be facilitated. This means that the process to designate corridors should first consider meeting the needs of the incumbent utility or utilities that have the obligation to build facilities to ensure that each utility can reliably and economically serve every customer on its system. Further, existing and proposed transmission rights-of-way are extremely critical for SCE to meet the needs of its growing load requirements. SCE believes it is important that these rights-of-way also be considered and ultimately designated as corridors. Their use must be preserved for the utilities for which they were designated.

SCE appreciates this opportunity to provide additional comments in the west-wide corridor designation process and respectfully requests that the Agencies further consider the designation of the corridors proposed by SCE in its comments.