Comment Set F3: Southern California Edison Company, Appendix B

Executive Summary

Page ES-2

DEIR/DEIS Text: F3-1

Description of the Proposed Project-Connected Actions

A number of solar generation projects appear to depend on the WOD Upgrade Project in order to move to construction and operation, because there currently is inadequate transmission capacity west of Devers Substation. The following generation projects are analyzed as actions connected to the WOD Project:

- Palen Solar Electric Generating System II, LLC (CAISO Queue 365) – 500 MW Solar Power Tower
- Desert Harvest, LLC (CAISO Queue 643AE) – 150 MW Solar Photovoltaic (PV)
- Project 1: Connecting to Blythe-Eagle Mountain 161 kV line (CAISO Queue 421) – 50 MW Solar PV
- Project 2: Connecting at Red Bluff Substation 230 kV (CAISO Queue 1070) – 250 MW Solar PV
- Project 3: Connecting at Colorado River Substation 230 kV (CAISO Queue 576) – 224 MW Solar PV
- Project 4: Connecting at Colorado River Substation 230 kV (CAISO Queue 970) – 150 MW Solar PV
- Project 5: Connecting at Colorado River Substation 230 kV (CAISO Queue 1071) – 150 MW Solar PV

SCE Comment:

Please see SCE's accompanying cover letter for concerns related to the DEIR/DEIS's analysis of actions connected to the WOD Upgrade Project.

Page ES-6

DEIR/DEIS Text: F3-2

CPUC and BLM Project Objectives

Having taken into consideration the six objectives set forth by SCE above, the CPUC and BLM identified three basic project objectives…

SCE Comment:

Please see SCE's accompanying cover letter for concerns related to the DEIR/DEIS's identification of three basic project objectives for the WOD Upgrade Project as opposed to the six project objectives identified by SCE in the PEA for the Proposed Project.

Page ES-6

DEIR/DEIS Text: F3-3

CPUC and BLM Project Objectives

Basic Project Objective 1: to upgrade the WOD 220 kV transmission lines between Devers, El Casco, Vista, and San Bernardino Substations to increase system deliverability by at least 2,200 MW.

The first Basic Project Objective reflects the aim to provide increased deliverability of electricity, defined in terms of megawatts (MW), for existing and planned generating facilities that are located far from the utility load centers in the Los Angeles basin. Before the Proposed Project was planned, the transmission transfer capability of the WOD 220 kV corridor was limited to approximately 550 MW. Since then, several generators with plans to be online before the Proposed Project's estimated completion date in 2020 requested interconnection to the system. In order to accommodate and deliver the initial group of 5 solar power generation projects that was planned, totaling 2,200 MW (CAISO, 2010), the minimum total capability that would need to be achieved by the Proposed Project or any alternative is 2,750 MW. Accordingly, the first Basic Project Objective is to increase deliverability by at least 2,200 MW.

Basic Project Objective 2: to support achievement of State and federal renewable energy goals.

The second Basic Project Objective is directly related to the first, because the projects that plan to rely on the Proposed Project for delivering electricity to the Los Angeles basin are primarily solar generation projects. Therefore, an increase in the capacity of the WOD transmission lines would directly improve the ability for

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

numerous renewable generation projects to interconnect. Aside from the resources imported via transmission lines from outside of the SCE territory, all of the interconnecting projects are solar powered, as described in SCE's Application and PEA Sections 1.1 and 1.2. F3-3 cont.

California's renewable energy goals are defined on the CPUC's website (CPUC, 2015): Established in 2002 under Senate Bill 1078, accelerated in 2006 under Senate Bill 107 and expanded in 2011 under Senate Bill 2, California's Renewables Portfolio Standard (RPS) is one of the most ambitious renewable energy standards in the country. The RPS program requires investor-owned utilities (IOUs), electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 33% of total procurement by 2020.

The CPUC states that California's three large utilities collectively served 22.7% of their 2013 retail electricity sales with renewable power. The federal government also has prioritized the development of renewable energy, but has not set specific development targets for the country as a whole.

SCE Comment:

Please see SCE's accompanying cover letter and Attachment A regarding SCE's concerns about Basic Project Objective 2.

Pages ES-10 through ES-11

DEIR/DEIS Text: F3-4

CEQA and NEPA Requirements for Alternatives

Under CEQA, alternatives to the Proposed Project are identified and evaluated in accordance with CEQA Guidelines. CEQA Guidelines (Section 15126(a)) state:

An EIR shall describe a reasonable range of alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project.

SCE Comment:

Please see SCE's accompanying cover letter for concerns related to the DEIR/DEIS's lack of evidence supporting the conclusion that the alternatives retained for full analysis would avoid or substantially lessen significant effects for the Proposed Project.

Page ES-15

DEIR/DEIS Text: F3-5

Phased Build Alternative

Under the heading phased build alternative,

The high-performance conductors would maximize power transfer and avoid structurally overloading the existing towers. In this alternative, the existing 66 kV sub-transmission system would not be affected and the replacement 66 kV line that would move to Iowa Street under the Proposed Project would not be required.

SCE Comment:

Based on preliminary review of the Phased Build Alternative, SCE cannot confirm the 66 kV line would not be affected as there is not sufficient space to safely string conductor without a shoo-fly or multiple line outages. Please see SCE's accompanying cover letter for additional information related to these construction constraints.

Page ES-16

DEIR/DEIS Text: F3-6

Phased Build Alternative

Footnote 3: The Phased Build Alternative would have capacity for all the generation included in the CAISO 2024 Reliability Base Case (see EIR/EIS Appendix 5 (Alternatives Screening Report), Attachment 2, pages 5-6 and Table A4). This scenario includes 3,754 MW of Total Generation Online and 6,901 MW of Total Generation Capacity, as

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

well as the power flow on the system resulting from import of 1,400 MW from the Imperial Irrigation District into the Los Angeles Basin. F3-6 cont.

SCE Comment:

Please see SCE's accompanying cover letter and Attachment A for reasons as to why the CAISO 2024 Reliability Base Case should not be used in considering alternatives to the Proposed Project.

Page ES-16

DEIR/DEIS Text: F3-7

Phased Build Alternative- Description

Retain existing double-circuit towers. The existing double-circuit towers would be retained. Prior to reconductoring approximately 20% of the existing structures would be strengthened and their heights increased.

SCE Comment:

Appendix 5, attachment 3 confirms SCE's original response in Data Request 10 stating that the single conductor Drake 795 ACCR conductor would require a 30% increase in strength or height for the structures. Further, structure height increases would require SCE to evaluate the means and methods for performing the work. For example, existing tower foundations may not support the increase in structure height, thus, requiring new foundations and possibly new towers to be constructed for this alternative.

Please make the following revision to the DEIR language:

Prior to reconductoring, approximately

~~20%~~ 30% of the existing structures would likely be replaced to provide increased strength~~ened~~ and/or ~~their~~ height~~s increased~~.

Page ES-16

DEIR/DEIS Text: F3-8

Phased Build Alternative- Description

Allow for future capacity expansion within the existing corridor with several optional future phases. These phases would be implemented as generation projects become certain and capacity is clearly required. Because the Phased Build Alternative would accommodate projects now defined in the CAISO's 2024 Reliability Base Case, it may be 10 years before additional upgrades are needed. The future phases could include:

–Reconductoring the newly constructed 220 kV structures with higher capacity conductors;

–Replacing the retained 220 kV structures with new, stronger 220 kV structures in order to carry heavier, higher capacity conductors;

–Install a single- or double-circuit 500 kV or 220 kV line in the vacant space remaining in the ROW.

SCE Comment:

Please see SCE's accompanying cover letter for concerns related to the DEIR/DEIS's characterization of optional future phases to the WOD Upgrade Project.

Page ES-16

DEIR/DEIS Text: F3-9

Phased Build Alternative- Description

Install high-capacity conductors on all four circuits. Both the new and existing 220 kV double-circuit towers would have the "795 Drake" Aluminum Conductor Composite Reinforced (ACCR) installed.

SCE Comment:

This bullet point referencing installation of the high capacity conductor in the executive summary conflicts with the description for conductor installation as seen in Appendix 5, specifically in Segment 1 (Etiwanda-San Bernardino and San Bernardino-Vista). For clarity, please make the following revision:

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Install high-capacity conductors on all four circuits. Both the new and existing 220 kV double-circuit towers would have the "795 Drake" Aluminum Conductor Composite Reinforced (ACCR) installed with the exception of Segment 1, where only two of the existing four circuits would use the high capacity conductor. F3-9 cont.

Page ES-16

DEIR/DEIS Text: F3-10

Rationale for Full Analysis. The Phased Build Alternative is retained for analysis because it would reduce the environmental impacts of the Proposed Project by greatly reducing the amount of construction disturbance in comparison with the Proposed Project.

SCE Comment:

Please see SCE's accompanying cover letter for concerns related to the DEIR/DEIS's lack of evidence supporting the conclusion that the alternatives retained for full analysis would avoid or substantially lessen significant effects for the Proposed Project.

Page ES-67

DEIR/DEIS Text: F3-11

Also, less power would flow through the transmission lines in this alternative compared to the Proposed Project, and it is assumed that this reduced amount of power flow would also lead to a reduced potential for electrical interference.

SCE Comment:

Because electrical interference is based on system voltage as opposed to power flow, the alterative would not have a difference in potential impacts as compared to the Proposed Project.

Please delete the following from the DEIR:

~~Also, less power would flow through the transmission lines in this alternative compared to the Proposed Project, and it is assumed that this reduced amount of power flow would also lead to a reduced potential for electrical interference.~~

Page ES-71

DEIR/DEIS Text: F3-12

Under heading ES.6.2 Environmentally Superior/Preferred Alternative, and the Phased Build Alternative,

The Phased Build Alternative is preferred over the Proposed Project because it would reduce construction impacts by eliminating the need to remove and reconstruct the existing 220 kV structures and relocate the existing 66 kV subtransmission lines.

SCE Comment:

The sentence implies that all of the 220 kV structures would not need to be removed and reconstructed, when in fact, the Phased Build Alternative calls for the removal and reconstruction of the single-circuit structures. As such, the following revision is suggested:

The Phased Build Alternative is preferred over the Proposed Project because it would reduce construction impacts by eliminating the need to remove and reconstruct the double circuit ~~existing~~ 220 kV structures and relocate the existing 66 kV subtransmission lines.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page ES-71

DEIR/DEIS Text: F3-13

The Phased Build Alternative would not require implementation of the Iowa Street 66 kV Underground Alternative, since the existing 66 kV system would not be affected.

SCE Comment:

Based on SCE's preliminary review of the Phased Build Alternative, SCE cannot confirm the 66 kV line would not be affected as there is not sufficient space for safely stringing conductor without a shoo-fly or multiple line outages. Please see SCE's accompanying cover letter for additional information related to construction constraints.

Responses to Comment Set F3 – Executive Summary

F3-1 See Response to Comment F1-4 regarding connected actions.

F3-2 Please see General Response GR-2 (Agency-defined Basic Project Objectives) and Responses to Comment F1-7 through F1-9.

F3-3 Please see General Responses GR-2 (Agency-defined Basic Project Objectives) and GR-3 (Renewable Energy Accommodated by the Phased Build Alternative) and Responses to Comment F1-7 through F1-9.

F3-4 Please see General Response GR-3 (Renewable Energy Accommodated by the Phased Build Alternative) and Responses to Comment F1-7 through F1-9. The description of the impacts of the Phased Build Alternative is presented in Section D for each discipline, and summarized in Section G, Comparison of Alternatives.

F3-5 SCE notes that the relocation of the 66 kV transmission line in Segment 1 may not be eliminated by the Phased Build Alternative. Please see Responses to Comment F1-18.

F3-6 Please see General Response GR-3 (Renewable Energy Accommodated by the Phased Build Alternative) and Response to Comment F1-8. In addition, please see Response to Comment F1-8 regarding the use of the CAISO 2024 Reliability Base Case.

F3-7 The comment requests a clarification in the description of the Phased Build Alternative that is now included in the EIS as: "up to 30% of the existing structures would need to be replaced or modified to provide increased strength~~ened~~ and/or ~~their~~ height~~s increased~~". This text change has been made in the Executive Summary (Section ES.3.2), Section C (Section C.4.3), and Appendix 5 (Alternatives Screening Report, Section 4.4).

F3-8 See General Response GR-4 (Analysis of Potential Future Construction under the Phased Build Alternative).

F3-9 The comment suggests clarifying that new high-capacity conductors would be included on all four circuits, except in Segment 1, where only two of the existing four circuits would use the high capacity conductor. The text has been changed to reflect this clarification.

F3-10 See Response to Comment F3-4.

F3-11 The commenter requests deletion of the statement that under the Phased Build Alternative a reduced amount of power flow would lead to a reduced potential for electrical interference. Section ES.4.21.2 (Effects of Alternatives on Electrical Interference and Safety) in the Executive Summary of the Final EIS has been revised to remove the sentence. In addition, a similar statement has been removed in Section D.21.4.3 (Phased Build Alternative) in Response to Comment F3-531.

F3-12 The suggested clarification as to which 220 kV structures would be removed has been made in the Final EIS.

F3-13 Please see Response to Comment F3-5.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Section A Introduction

Page A-3

DEIR/DEIS Text: F3-14

Footnote 1 - Pursuant to 25 U.S.C. §323.

SCE Comment:

Pursuant to 25 U.S.C. §~~323~~ 81.

Page A-5

DEIR/DEIS Text: F3-15

A.2.1.3 Review of SCE's Purpose and Need

As a result, SCE proposes to remove all existing 220 kV structures and replace them with larger capacity 220 kV structures.

SCE Comment:

As described in the Proposed Project, SCE proposes the reuse of some of the existing double-circuit 220 kV structures and as such recommends the following edit:

As a result, SCE proposes to remove ~~all~~ a majority of the existing 220 kV structures and replace them with larger capacity 220 kV structures.

Page A-11

DEIR/DEIS Text: F3-16

CPUC and BLM Project Objectives

Having taken into consideration the objectives and purpose and need set forth by SCE (Sections A.2.1.1 and A.2.1.2), the CPUC and BLM identified 3 basic project objectives. These objectives are used by the CPUC and BLM to evaluate alternatives and to define a range of reasonable alternatives to the Proposed Project. The evaluation of alternatives in this EIR/EIS provides information on whether each alternative could feasibly accomplish most or all of these basic objectives.

SCE Comment:

Please see SCE's accompanying cover letter for concerns related to the DEIR/DEIS's identification of three basic project objectives for the WOD Upgrade Project as opposed to the six project objectives identified by SCE in the PEA for the Proposed Project.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page A-11

DEIR/DEIS Text: F3-17

A.2.3 CPUC and BLM Project Objectives

Basic Project Objective 1: To upgrade the WOD 220 kV transmission lines between Devers, El Casco, Vista, and San Bernardino Substations to increase system deliverability by at least 2,200 MW.

The first Basic Project Objective reflects the aim to provide increased deliverability of electricity, defined in terms of MW, for existing and planned generating facilities that are located far from the utility load centers in the Los Angeles basin. Before the Proposed Project was planned, the transmission transfer capability of the WOD 220 kV corridor was limited to approximately 550 MW. Since then, several generators with plans to be online before the Proposed Project's estimated completion date in 2020 requested interconnection to the system. In order to accommodate and deliver the initial group of 5 solar power generation projects that was planned, totaling 2,200 MW (CAISO,2010), the minimum total capability that would need to be achieved by the Proposed Project or an alternative is 2,750 MW. Accordingly, the first Basic Project Objective is to increase deliverability by at least 2,200 MW. The initial 5 projects are described in Section A.2.1.4.1 above, Table A-3, and in 2010 they were the following: –NextEra Desert Center Blythe, LLC (Genesis McCoy): 500 MW —NextEra Blythe Solar Energy Center, LLC: 1,000 MW —Palen SEGS II, LLC (Palen) subsidiary of BrightSource Energy: 500 MW —Project interconnecting at Blythe–Eagle Mountain 161 kV line: 50 MW —Project interconnecting at Colorado River 220 kV: 150 MW The EIR/EIS team completed independent power flow modeling to evaluate the capacity of the current transmission system, the Proposed Project, and several sensitivities. The report of these studies is presented as Attachment 2 to EIR/EIS Appendix 5 (Alternatives Screening Report). The CAISO's 2024 Reliability Base Case, from the CAISO's 2013/2014 transmission planning process (one of the base cases used in the alternative analysis) represents the view from the CAISO's and SCE's perspective (a collaborative effort) of the level of generation deemed viable (based on a number of criteria) and to be in place and operational in2024. The generation level from all renewable and conventional resources within the Eastern Bulk system for the region under analysis is: —Total Generation On-line: 3,754 MW —Total Generation Capacity: 6,901 MW The power flow modeling for the WOD Upgrade Project, and potential alternatives that would need to meet this objective, uses the 2024 Reliability Base Case

SCE Comment:

Please see SCE's accompanying cover letter and Attachment A for a detailed description of SCE's argument that Basic Project Objective 1 does not sufficiently meet the need for the WOD Upgrade Project and the CAISO 2024 Reliability Base Case should not be used in considering alternatives to the Proposed Project.

Page A-12

DEIR/DEIS Text: F3-18

Basic Project Objective 2: to support achievement of State and federal renewable energy goals.

The second Basic Project Objective is directly related to the first, because the projects that plan to rely on the Proposed Project for delivering electricity to the Los Angeles basin are primarily solar generation projects. Therefore, an increase in the capacity of the WOD transmission lines would directly improve the ability for numerous renewable generation projects to interconnect. Aside from the resources imported via transmission lines from outside of the SCE territory, all of the interconnecting projects are solar powered, as described in SCE's Application and PEA Sections 1.1 and 1.2. See also Section A.2.1.4.1 (above).

SCE Comment:

Please see SCE's accompanying cover letter and Attachment A for SCE's concerns about Basic Project Objective 2.

Page A-13

DEIR/DEIS Text: F3-19

A.3 Definition of Connected Actions and Related Projects

Table A-6. Project Analysis Determinations

SCE Comment:

Please see SCE's accompanying cover letter for concerns related to the DEIR/DEIS's analysis of actions connected to the WOD Upgrade Project.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page A-16

DEIR/DEIS Text: F3-20

SCE would apply to BIA for the grant of ROW across the new 3-mile alignment across the Morongo tribal land and for the replacement and upgrade aspects of the transmission line.

SCE Comment:

The BIA will not be approving SCE's construction in the tribal trust lands. Instead, BIA will consider that construction as a reasonably foreseeable impact in determining whether or not to approve the ROW grant. Please make the following revisions:

SCE would apply to BIA for the grant of ROW across the new 3-mile alignment across the Morongo tribal land. ~~and for the replacement and upgrade aspects of the transmission line.~~

Page A-16

DEIR/DEIS Text: F3-21

No local discretionary (e.g., use) permits are required, since the CPUC has preemptive jurisdiction over the construction, maintenance, and operation of SCE facilities in California. SCE would still have to obtain all ministerial building and encroachment permits from local jurisdictions, and the CPUC's General Order 131-D requires SCE to comply with local building, design, and safety standards to the greatest degree feasible to minimize project conflicts with local conditions. The CPUC's authority does not preempt special districts, such as the South Coast Air Quality Management District, or other State agencies or the federal government.

SCE Comment:

The CPUC's General Order 131-D does not state that SCE must comply with local building, design and safety standards as indicated in the DEIR/DEIS. General Order 131-D, Section XIV, Part B explains that local jurisdictions acting pursuant to local authority are preempted from regulating electric power line projects, distribution lines, substations or electric facilities constructed by public utilities subject to the Commission's Jurisdiction. However, in locating such projects, the public utilities shall consult with local agencies regarding land use matters. For accuracy, please make the following revision.

No local discretionary (e.g., use) permits are required, since the CPUC has preemptive jurisdiction over the construction, maintenance, and operation of SCE facilities in California. However, the CPUC's General Order 131-D requires SCE to consult with local agencies in locating its project. ~~SCE would still have to obtain all ministerial building and encroachment permits from local jurisdictions, and the CPUC's General Order 131-D requires SCE to comply with local building, design, and safety standards to the greatest degree feasible to minimize project conflicts with local conditions.~~ The CPUC's authority does not preempt special districts, such as the South Coast Air Quality Management District, or other State agencies or the federal government.

Page A-17

DEIR/DEIS Text: F3-22

Table A-7 Permits that may be Required for the West of Devers Upgrade Project

SCE Comment:

Please add to the table the following under the Tribal Lands header.

Agency	Jurisdiction	Requirements
U.S. Environmental Protection Agency	Tribal Lands	Clean Water Act Section 402, General Permit for Storm Water Discharges Associated with Construction Activities On Tribal Land

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Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page A-17

DEIR/DEIS Text: F3-23

Table A-7 Permits that may be Required for the West of Devers Upgrade Project

SCE Comment:

In addition to FAA 7460-1, SCE will also apply for FAA 7460-2 Notice of Actual Construction or Alteration which is required 5 days after reaching the maximum height. Please include the 7460-2 in the requirements section added below:

Agency	Jurisdiction	Requirements
Federal Aviation Administration (FAA)	Air safety near San Bernardino International Airport and Banning Municipal Airport	• Form 7460–1, Notice of Proposed Construction or Alteration; Permit and Notice to Airmen • Form 7460-2 Notice of Actual Construction or Alteration

Page A-17

DEIR/DEIS Text: F3-24

Table A-7 Permits that may be Required for the West of Devers Upgrade Project

SCE Comment:

Please remove the reference to Section 401 and update the description of the 404 permit.

Agency	Jurisdiction	Requirements
U.S. Army Corps of Engineers (USACE), Los Angeles District	Construction or operation of facilities which may result in any discharge into U.S. navigable waters	• Section ~~401~~/404 Permit – ~~streambed alteration/crossing~~ discharge of fill material into jurisdictional waters

Page A-17

DEIR/DEIS Text: F3-25

Under State or Regional Agencies:

Regional Water Quality Control Board (RWQCB) – Colorado River Office (Region 7) and Santa Ana Office (Region 8)"

SCE Comment:

Please remove the "Clean Water Act 401 certification" from the RWQCB section and add it under a new Section for State Water Resources Control Board (SWRCB).

State or Regional Agencies		
Regional Water Quality Control Board (RWQCB) – Colorado River Office (Region 7) and Santa Ana Office (Region 8)	Protection of surface waters under the Clean Water Act	• ~~Clean Water Act Section 401 certification~~ • Clean Water Act Section 402, General Permit for Storm Water Discharges Associated with Construction Activities
State Water Resources Control Board (SWRCB)	Protection of surface waters under the Clean Water Act	• Clean Water Act Section 401 certification

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page A-17

DEIR/DEIS Text: F3-26

South Coast Air Basin and Coachella Valley

SCE Comment:

Please see addition to South Coast Air Basin and Coachella Valley added in "and portion of the Salton Sea Air Basin".

State or Regional Agencies		
South Coast Air Quality Management District (SCAQMD)	South Coast Air Basin and Coachella Valley and portion of the Salton Sea Air Basin	• Fugitive Dust Control Plan

Responses to Comment Set F3 – Section A Introduction

F3-14 As suggested by the commenter, footnote 1 in Section A.1.3 (Morongo Tribal Land History and Background) has been revised to say "Pursuant to 25 U.S.C. § 81."

F3-15 As suggested by the commenter, the text in Section A.2.1.3 (Review of SCE's Purpose and Need) has been revised to more accurately reflect the description of the Proposed Project. The Final EIS states that SCE proposes to remove "a majority of the existing 220 kV structures" instead of "all" structures, as was written in the Draft EIR/EIS.

F3-16 Please see General Responses GR-2 (Basic Project Objectives), GR-3 (Renewable Energy Accommodated by the Phased Build Alternative), and GR-4 (Potential Future Construction under the Phased Build Alternative)

F3-17 Please see Responses to Comments on SCE's Attachment A (Comment Set F2).

F3-18 Please see General Response GR-2 (Basic Project Objectives).

F3-19 Please see Response to Comment F1-4 regarding the commenter's concerns about the Draft EIR/EIS's analysis of connected actions.

F3-20 The commenter states that the Bureau of Indian Affairs (BIA) will not be approving SCE's construction on the tribal trust lands. Instead, BIA will consider construction as a reasonably foreseeable impact in determining whether or not to approve the ROW grant.

As a result, Section A.4.3 (Other Agencies) of the Final EIS has been revised and now states that SCE would apply to BIA for the grant of ROW across the new 3-mile alignment across the Morongo tribal land. As suggested, the text regarding BIA's approval of the replacement and upgrade aspects of the transmission line has been deleted.

F3-21 The commenter states that the CPUC's General Order 131-D does not state that SCE must comply with local building, design and safety standards as indicated in the Draft EIR/EIS. General Order 131-D applies to the CPUC and not BLM. However, the text in Section A.4.3 (Other Agencies) has been revised in the Final EIS to directly quote the language used in General Order 131-D, Section XIV, Part B.

F3-22 The commenter requests that an additional permit be added to Table A-7 (Permits that May Be Required for the West of Devers Upgrade Project) in Section A.4.4 (Permits Required for the Proposed Project). Table A-7 has been revised in the Final EIS to make this requested update.

F3-23 The commenter requests that Form 7460-2 be added to Table A-7 (Permits that May Be Required for the West of Devers Upgrade Project) in Section A.4.4 (Permits Required for the Proposed Project) for the FAA as SCE will be providing two notices to the FAA. Table A-7 has been revised in the Final EIS to make this requested update.

F3-24 The commenter requests that Table A-7 be updated such that reference to the Section 401 permit be removed from the U.S. Army Corp of Engineers and that the reference to the Section 404 permit be retained but revised to include a description of the Section 404 requirements which states "discharge of fill material into jurisdictional waters." Table A-7 has been revised in the Final EIS to make these requested changes.

F3-25 The commenter requests that Table A-7 be updated such that the Clean Water Act Section 401 certification permit be removed from the Regional Water Quality Control Board and

added under a new row to the State Water Resources Control Board. Table A-7 has been revised in the Final EIS to make these requested changes.

F3-26 The commenter requests that Table A-7 be updated to include a portion of the Salton Sea Air Basin in the description of the jurisdiction of the South Coast Air Quality Management District. The South Coast AQMD does include a portion of the Salton Sea Air Basin, so Table A-7 has been revised in the Final EIS to make this requested update.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Section B Description of the Proposed Project

Page [none]

DEIR/DEIS Text: F3-27

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SCE Comment:

As explained to the CPUC/BLM, SCE proceeded with additional engineering for the Proposed Project during the agencies preparation of the DEIR/DEIS in order to meet the in-service date for the West of Devers Upgrade Project. The modifications to the Proposed Project description as a result of this additional engineering analysis would generally reduce impacts described in the DEIR/DEIS.

Page B-1

DEIR/DEIS Text: F3-28

Upgrade substation equipment at Timoteo and Tennessee Substations to accommodate 66 kV subtransmission line relocations;

SCE Comment:

As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations:

~~Upgrade substation equipment at Timoteo and Tennessee Substations to accommodate 66 kV sub-transmission line relocations;~~

Page B-1

DEIR/DEIS Text: F3-29

The existing WOD corridor traverses a combination of residential, commercial, agricultural, recreation, and open space land uses. The existing structures and existing conductor would be removed and replaced within the existing ROW, except for an approximately 3-mile portion of Segment 5 on the Morongo Band of Mission Indians (Morongo) Reservation that would be in new ROW.

SCE Comment:

SCE suggests including the word “primarily” as indicated below in order to be consistent with verbiage elsewhere in the DEIR/DEIS:

The existing WOD corridor traverses a combination of residential, commercial, agricultural, recreation, and open space land uses. The existing structures and existing conductor would be removed and replaced <u>primarily</u> within the existing ROW, except for an approximately 3-mile portion of Segment 5 on the Morongo Band of Mission Indians (Morongo) Reservation that would be in new ROW.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page B-1

DEIR/DEIS Text: F3-30

Originally, the upgrades west of Devers Substation were planned as part of the Devers–Palo Verde No.2 Project (DPV2). Proposed by SCE in 2005, DPV2 involved construction of a new 230-mile 500 kV line from the Harquahala Substation in Arizona to the Devers Substation in North Palm Springs, California, as well as upgrading an additional 50 miles of 220 kV transmission lines west of Devers Substation. The original WOD proposed upgrades included replacing two existing single-circuit 220 kV lines with a new double-circuit 220 kV line and reconductoring a third 220 kV line between Devers Substation and San Bernardino Junction; reconductoring of 4.8 miles of 220 kV transmission line between San Bernardino Junction and Vista Substation; and reconductoring of 3.4 miles of 220 kV transmission line between San Bernardino Junction and San Bernardino Substation located in San Bernardino County, California.

SCE Comment:

SCE recommends the following explanation clarifying the original need for the West of Devers Upgrade Project that was considered in 2005 as compared to the need for today's Proposed Project, which should be included in this section. Please revise to add the following:

The reason for the scope difference between the original WOD project as part of the Devers – Palo Verde No.2 and the current Proposed WOD upgrade is that the original WOD project scope was limited to 1200MW flow increase associated with th~~e~~ Devers – Palo Verde No.2 project, while the scope of the Proposed Project is to maximize the transfer capability on the WOD corridor to accommodate the renewable resources development in Riverside East.

Page B-1

DEIR/DEIS Text: F3-31

Upgrade substation equipment at Timoteo and Tennessee Substations to accommodate 66 kV subtransmission line relocations;

SCE Comment:

As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations

~~Upgrade substation equipment at Timoteo and Tennessee Substations to accommodate 66 kV sub-transmission line relocations;~~

Page B-1

DEIR/DEIS Text: F3-32

Upgrade substation equipment at Timoteo and Tennessee Substations to accommodate 66 kV subtransmission line relocations;

SCE Comment:

As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.

~~Upgrade substation equipment at Timoteo and Tennessee Substations to accommodate 66 kV sub-transmission line relocations;~~

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page B-2

DEIR/DEIS Text: F3-33

FN1 - However, the replacement and upgrade project is subject to BIA approval.

SCE Comment:

The BIA will not be approving SCE's construction in the tribal trust lands. Instead, BIA will consider that construction as a reasonably foreseeable impact in determining whether or not to approve the ROW grant. Please remove the following footnote:

~~However, the replacement and upgrade project is subject to BIA approval~~.

Page B-2

DEIR/DEIS Text: F3-34

Under the heading of " The main differences…, the 1st bullet states:

Replacement Structures Due to Heavier Conductor: SCE's proposes to use heavier (higher capacity) conductors. The existing 220 kV structures would not support the greater weight and SCE is proposing to remove and replace all structures in the corridors.

SCE Comment:

For clarification please change the word "heavier" to "SCE's standard":

Replacement Structures Due to Heavier Conductor: SCE proposes to use ~~heavier~~ SCE's standard (higher capacity) conductors. The existing 220 kV structures would not support the greater weight and SCE is proposing to remove and replace all structures in the corridors.

Page B-4

DEIR/DEIS Text: F3-35

Under the heading Segment 1: San Bernardino (MP SB0 to MP SB3.5), the last sentence on the second paragraph states :

Transmission line work within Segment 1 would include removal of approximately 45 220 kV LSTs, installation of approximately 49 220 kV structures, and modifications to 1 existing LST within the existing ROW.

SCE Comment:

As a result of additional engineering analysis, the following changes have been identified:

Transmission line work within Segment 1 would include removal of approximately 45 220 kV LSTs, installation of approximately ~~49~~ 46 220 kV structures, and modifications to 1 existing LST within the existing ROW.

Page B-4

DEIR/DEIS Text: F3-36

Under the heading Segment 2: Colton, Grand Terrace and Loma Linda (MP 0 to MP 5.2) the last sentence on the second paragraph states :

Transmission work within Section 2 would include removal of approximately 25 double-circuit LSTs, installation of approximately 28 structures, and modifications to 4 existing structures.

SCE Comment:

As a result of additional engineering analysis, the following changes have been identified:

Transmission work within Section 2 would include removal of approximately ~~25~~ 23 double-circuit LSTs, installation of approximately ~~28~~ 25 structures, and modifications to ~~4~~ 6 existing structures.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page B-5

DEIR/DEIS Text: F3-37

Under the heading Segment 3: San Timoteo Canyon (MP 5.2 to MP 15.2) the last sentence on the second paragraph states :

Project work within Segment 3 would include removal of approximately 118 LSTs, installation of approximately 104 structures, and modifications to 4 existing structures.

SCE Comment:

As a result of additional engineering analysis, the following changes have been identified:

Project work within Segment 3 would include removal of approximately 118 LSTs, installation of approximately ~~104~~ 102 structures, and modifications to 4 existing structures.

Page B-5

DEIR/DEIS Text: F3-38

Under the heading Segment 4: Beaumont and Banning (MP 15.2 to MP 27.4) the last sentence on page B-5 states :

Project work within Segment 4 would include removal of 161

SCE Comment:

As a result of additional engineering analysis, the following changes have been identified:

Project work within Segment 4 would include removal of ~~161~~ 160

Page B-6

DEIR/DEIS Text: F3-39

Under the heading Segment 4: Beaumont and Banning (MP 15.2 to MP 27.4) the first sentence on page B-6 states:

structures, installation of approximately 112 structures, and modifications to 5 existing structures.

SCE Comment:

As a result of additional engineering analysis, the following changes have been identified:

structures, installation of approximately ~~112~~ 111 structures, and modifications to ~~5~~ 6 existing structures.

Page B-6

DEIR/DEIS Text: F3-40

Under the heading Segment 6: Whitewater and Devers (MP 36.9 to MP 45) the last sentence on the second paragraph states:

Project work within Segment 6 includes removal of 112 structures, installation of 79 structures, and modifications to 5 existing structures.

SCE Comment:

As a result of additional engineering analysis, the following changes have been identified:

Project work within Segment 6 includes removal of ~~112~~ 117 structures, and installation of ~~79~~ 85 structures, ~~and modifications to 5 existing structures.~~

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page B-7

DEIR/DEIS Text: F3-41

Table B-1. Typical Transmission Structure Dimensions

Type of Structure	Proposed Number of Structures	Approximate Height Above Ground	Approximate Pole Diameter	Approximate Auger Hole Depth	Approximate Auger Diameter
LST	394	110–189 feet	N/A	15–50 feet	3.0–7.0 feet at each leg
TSP	76	110–200 feet	3.0–7.0 feet	30–60 feet	5–12 feet

SCE Comment:

As a result of additional engineering analysis, the following changes have been identified:

Please see attached file "WODUP Tables B-1 and B-2 Rev.xlsx and updated Table B-1 below:

Table B-1. Typical Transmission Structure Dimensions

Type of Structure	Proposed Number of Structures	Approximate Height Above Ground	Approximate Pole Diameter	Approximate Auger Hole Depth	Approximate Auger Diameter
LST	~~394~~384	110–193~~189~~ feet	N/A	15–50 feet	3.0–7.0 feet at each leg
TSP	~~76~~83	110–198~~200~~ feet	3.0–10.0 ~~7.0~~ feet	30–60 feet	5–14~~12~~ feet

Page B-7

DEIR/DEIS Text: F3-42

Under **Table B-1. Typical Transmission Structure Dimensions** states: Source: SCE, 2013.

SCE Comment:

Please see revised text: Source: SCE, ~~2013~~ 2015.

Page B-7

DEIR/DEIS Text: F3-43

Footnote 1 under **Table B-1. Typical Transmission Structure Dimensions** states:

1 - Includes 38 TSPs in Segment 5 per agreement between SCE and Morongo.

SCE Comment:

As a result of additional engineering analysis, the following changes have been identified:

1 - Includes ~~38~~ 34 TSPs in Segment 5 per agreement between SCE and Morongo.

Page B-7

DEIR/DEIS Text: F3-44

The second sentence on the first paragraph under **Table B-1. Typical Transmission Structure Dimensions** states:

As part of the entire Proposed Project, approximately 5 TSPs, 153 H-frame structures, 408 LSTs, 29 three-pole structures, and approximately 562 miles of conductor would be removed, as shown in Table B-2.

SCE Comment:

As a result of additional engineering analysis, the following changes have been identified:

As part of the entire Proposed Project, approximately 5 TSPs, 153 H-frame structures, ~~408~~ 413 LSTs, 29 three-pole structures, and approximately 562 miles of conductor would be removed, as shown in Table B-2.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page B-7

DEIR/DEIS Text: F3-45

Table B-2. Transmission 220 kV Removal and Installation Per Segment

Segment 1	Segment 2	Segment 3	Segment 4		Segment 5	Segment 6	Total
Proposed Project Removals							
Double-circuit lattice steel tower	44	25	33	37	33	28	200
Single-circuit lattice steel tower	1	0	85	61	34	30	211
H-frame	0	0	0	53	55	45	153
Three-pole structure	0	0	0	10	10	9	29
Single-circuit TSP	0	0	0	0	5	0	5
Conductor (miles)	59	31	120	148	108	96	562
OHGW (miles)	7	5	50	63	45	40	210
Proposed Project Installation							
Double-circuit lattice steel tower	46	19	94	98	60	77	394
Double-circuit tubular steel pole	1	7	10	14	38	2	72
Single-circuit tubular steel pole	2	2	0	0	0	0	4
Circuit length (miles)	14	10	40	48	36	32	180
Conductor (miles)	87	67	264	320	250	211	1,199
OPGW (miles)	7	6	22	26	20	18	99
Proposed Project Existing Structures To Be Modified							
Double-circuit lattice steel tower	1	4	4	5	0	5	19

SCE Comment:

As a result of additional engineering analysis, the following changes have been identified.

Please see attached file "WODUP Tables B-1 and B-2 Rev.xlsx and updated Table B-1.

Page B-7

DEIR/DEIS Text: F3-46

Under **Table B-2. Transmission 220 kV Removal and Installation Per Segment** states: Source: SCE, 2013.

SCE Comment:

Please see revised text. Source: SCE, ~~2013~~ 2015.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page B-8

DEIR/DEIS Text: F3-47

Additionally, SCE would replace the circuit breakers and foundations at the Timoteo and Tennessee substations to accommodate the 66 kV subtransmission line relocations. The required substation modifications would not result in any change to the height or width of the existing substation facilities.

SCE Comment:

As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.

~~Additionally, SCE would replace the circuit breakers and foundations at the Timoteo and Tennessee substations to accommodate the 66 kV subtransmission line relocations. The required substation modifications would not result in any change to the height or width of the existing substation facilities.~~

Page B-8

DEIR/DEIS Text: F3-48

Additionally, SCE would replace the circuit breakers and foundations at the Timoteo and Tennessee substations to accommodate the 66 kV subtransmission line relocations. The required substation modifications would not result in any change to the height or width of the existing substation facilities.

SCE Comment:

As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.

~~Additionally, SCE would replace the circuit breakers and foundations at the Timoteo and Tennessee substations to accommodate the 66 kV subtransmission line relocations. The required substation modifications would not result in any change to the height or width of the existing substation facilities.~~

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page B-10

DEIR/DEIS Text: F3-49

B.2.2.6 Timoteo Substation

Timoteo Substation is an existing 66/12 kV substation located near the intersection of Redlands Boulevard and Mountain View Avenue in the City of Loma Linda, as shown on Figure B-11g. The Proposed Project would modify 66 kV equipment within the existing switchrack and protective relay equipment inside the MEER.

The 66 kV switchrack has six positions. The following work would be carried out at two positions:

– Replacement of two oil-type 66 kV CBs with new SF6 gas-type CBs;

– Installation of 12 surge arresters; and

– Replacement of existing equipment foundations to accommodate new equipment and reconnect to existing conduit and grounding.

SCE Comment:

As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.

~~B.2.2.6 Timoteo Substation~~

~~Timoteo Substation is an existing 66/12 kV substation located near the intersection of Redlands Boulevard and Mountain View Avenue in the City of Loma Linda, as shown on Figure B-11g. The Proposed Project would modify 66 kV equipment within the existing switchrack and protective relay equipment inside the MEER.~~

~~The 66 kV switchrack has six positions. The following work would be carried out at two positions:~~

~~– Replacement of two oil-type 66 kV CBs with new SF6 gas-type CBs;~~

~~– Installation of 12 surge arresters; and~~

~~– Replacement of existing equipment foundations to accommodate new equipment and reconnect to existing conduit and grounding.~~

Page B-10

DEIR/DEIS Text: F3-50

B.2.2.7 Tennessee Substation

Tennessee Substation is an existing 66/12 kV substation located at Avenue E and 18th Street in the City of Yucaipa, as shown on Figure B-11h. The Proposed Project would modify 66 kV equipment within the existing switchrack and protective relay equipment inside the MEER.

The 66 kV switchrack has six positions. The following work would be conducted at one position:

– Replacement of one oil-type 66 kV CB with a new SF6 gas-type CB;
– Installation of six surge arresters; and
– Replacement of existing equipment foundations to accommodate new equipment conduit and grounding.

SCE Comment:

Please remove the following references to the Tennessee Substation.

~~B.2.2.7 Tennessee Substation~~

~~Tennessee Substation is an existing 66/12 kV substation located at Avenue E and 18th Street in the City of Yucaipa, as shown on Figure B-11h. The Proposed Project would modify 66 kV equipment within the existing switchrack and protective relay equipment inside the MEER.~~

~~The 66 kV switchrack has six positions. The following work would be conducted at one position:~~

~~– Replacement of one oil-type 66 kV CB with a new SF6 gas-type CB;~~
~~– Installation of six surge arresters; and~~
~~– Replacement of existing equipment foundations to accommodate new equipment conduit and grounding.~~

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page B.11

DEIR/DEIS Text: F3-51

B.2.2.8 Substation Lighting

Approximately 10 new and 30 replacement lights would be installed on the switchracks for upgraded line positions at Devers, El Casco, Vista, San Bernardino, Timoteo, and Tennessee Substations.

SCE Comment:

As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.

B.2.2.8 Substation Lighting

Approximately 10 new and 30 replacement lights would be installed on the switchracks for upgraded line positions at Devers, El Casco, Vista, and San Bernardino~~, Timoteo, and Tennessee~~ Substations.

Page B-15

DEIR/DEIS Text: F3-52

Dental 12 kV Distribution Circuit relocation would be approximately 1.0 mile in length and would reconnect in a new underground system, which would originate on the north side of mission Road and east of Mountain View Avenue and extend southeasterly for approximately 1.0 mile to California Street. The 12 kV underground system would then extend south along California Street for approximately 500 feet to Barton Road. At this location, the 12 kV circuit would transition from underground to overhead via a distribution riser pole and reconnect to the existing Dental 12 kV circuit.

SCE Comment:

As a result of additional engineering analysis, the following changes have been identified:

Dental 12 kV Distribution Circuit relocation would be approximately 1.0 mile in length and would reconnect in a new underground system, which would originate on the north side of mission Road and east of Mountain View Avenue and extend southeasterly for approximately 1.0 mile to California Street. The 12 kV underground system would then extend south along California Street for approximately 500 feet to Barton Road. At this location, the 12 kV circuit would transition from underground to overhead via a distribution riser pole and reconnect to the existing Dental 12 kV circuit. Included on the Dental is a reconductor of approximately 0.3mi of 3W 1/0ACSR and a new overhead three phase bank for the removal of an existing overhead three phase bank in the transmission corridor. This reconductor may require approximately four distribution pole replacements.

Page B-15

DEIR/DEIS Text: F3-53

Intern 12 kV Distribution Circuit relocation would be approximately 2.0 miles in length and would be relocated in the same new underground system described for the Dental 12 kV circuit. The Intern 12 kV circuit would transition from underground to overhead via a distribution riser pole at Barton Road, then continue west from California Street for 0.5 miles to Mayberry Street as underbuild (installing distribution circuit facilities under the 66 kV subtransmission circuit on the same structure) on an existing subtransmission pole. The new underbuild may require approximately 11 subtransmission structures be replaced.

SCE Comment:

As a result of additional engineering analysis, the following changes have been identified:

Intern 12 kV Distribution Circuit relocation would be approximately 2.0 miles in length and would be relocated in the same new underground system described for the Dental 12 kV circuit. The Intern 12 kV circuit would transition from underground to overhead via a distribution riser pole at Barton Road, then continue west from California Street for 0.5 miles to Mayberry Street as underbuild (installing distribution circuit facilities under the 66 kV subtransmission circuit on the same structure) on an existing subtransmission pole. The new underbuild may require approximately ~~11~~ one subtransmission structures be replaced and one new subtransmission structure.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Pages B-15 through 16

DEIR/DEIS Text: F3-54

2. Connect the existing Devers-Valley OPGW to the MEER in Banning Substation.

Install approximately 690 feet of fiber optic cable in a new underground conduit between the existing Devers-Valley No. 2 500 kV structure M21-T3 to an existing distribution pole on Coyote Trail approximately 3,200 feet west of Old Idyllwild Road. From this existing distribution pole on Coyote Trail, install approximately 4,100 feet of new fiber optic cable east on existing distribution poles (combination of public and private lands) to a location 350 feet south of Old Idyllwild Road. From this location, install approximately 470 feet of fiber optic cable in new underground conduit to cross under the existing Devers-Valley 500 kV ROW to an existing distribution pole. From this location, install fiber optic cable overhead on a combination of distribution and subtransmission poles for approximately 2,100 feet to Wesley Street. The fiber optic cable would then extend east along Wesley Street for approximately 1,300 feet to existing SCE ROW and then north for approximately 3,300 feet to East Lincoln Street. It would transition underground at this location and install approximately 230 feet of fiber optic cable and new underground conduit into the MEER at Banning Substation.

SCE Comment:

As a result of additional engineering analysis, the following changes have been identified:

2. Connect the existing Devers-Valley OPGW to the MEER in Banning Substation.

Install approximately 690 feet of fiber optic cable in a new underground conduit between the existing Devers-Valley No. 2 500 kV structure ~~M21-T3~~ M21 T1 to an existing distribution pole on Coyote Trail approximately 3,200 feet west of Old Idyllwild Road. The new underground conduit would be installed by directional bore. From this existing distribution pole on Coyote Trail, install approximately 4,100 feet of new fiber optic cable east on existing distribution poles (combination of public and private lands) to a location 350 feet south of Old Idyllwild Road. From this location, install approximately 470 feet of fiber optic cable in new underground conduit to cross under the existing Devers-Valley 500 kV ROW to an existing distribution pole. From this location, install fiber optic cable overhead on a combination of distribution and subtransmission poles for approximately 2,100 feet to Wesley Street. The fiber optic cable would then extend east along Wesley Street for approximately 1,300 feet to existing SCE ROW and then north for approximately 3,300 feet to East Lincoln Street. It would transition underground at this location and install approximately ~~230~~ 280 feet of fiber optic cable and new ~~underground~~ conduit ~~into the MEER at Banning Substation~~ to an existing trench in Banning Substation and would additionally install approximately 170 feet of fiber optic cable trench to Banning Substation MEER.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Pages B-16 through 17

F3-55

DEIR/DEIS Text:

3. Connect the existing Devers-Valley OPGW to the MEER in Maraschino Substation.

- Install approximately 1,500 feet of fiber optic cable and new underground conduit from the existing Devers-Valley No. 2 500 kV structure M24-T3 to an existing distribution pole on Highland Springs Avenue approximately 300 feet south of Breckenridge Avenue. From this location, install approximately 1,700 feet of fiber optic cable on existing distribution poles along Highland Springs Avenue to approximately 190 feet south of Crooked Creek. At this location, the fiber optic cable would transition underground and extend 2,900 feet in existing underground conduit north to an existing vault approximately 300 feet north of Potrero Boulevard. From the existing vault, approximately 1,000 feet of fiber optic cable and new conduit would be installed to East First Street. From East First Street, the fiber optic cable and conduit would extend west for approximately 600 feet to an existing manhole. From the existing manhole, the fiber optic cable would extend west within existing underground conduit for approximately 12,600 feet to a distribution riser pole 200 feet west of Beaumont Avenue. The fiber optic cable would be installed overhead for approximately 3,200 feet on First Street to Veile Avenue. The fiber optic cable would then extend north on Veile Avenue on existing subtransmission poles for approximately 1,600 feet. From this location, the fiber optic cable would transition underground for 400 feet in an existing underground conduit and cable trench to the MEER located in Maraschino Substation.

4. Connect the Redlands Inland Empire District Office-San Bernardino fiber optic cable through proposed conduit and on proposed and existing poles.

- From the MEER located inside San Bernardino approximately 2,000 feet of fiber optic cable would be installed in an existing conduit and cable trench to a riser pole located outside of San Bernardino Substation on San Bernardino Avenue. From this location, approximately 1,260 feet of fiber optic cable would be installed on existing subtransmission poles extending east to Marigold Avenue. From this location, the telecommunications facilities would then be co-located on the newly relocated San Bernardino–Redlands-Timoteo 66 kV Subtransmission Line. The co-location of telecommunications would require approximately 6,140 feet of fiber optic cable be installed on new subtransmission structures in private and public rights-of-way to the first structure on Bryn Mawr Avenue just north of the proposed subtransmission TSP riser pole. The telecommunications facilities would transition underground at this location which would require the installation of approximately 560 feet of new conduit and fiber optic cable to an existing pole on the south side of Redlands Boulevard just west of Bryn Mawr Avenue. At this location, the new fiber optic cable would then transition overhead via a telecommunications riser and would connect to the existing fiber optic cable.

SCE Comment:

As a result of additional engineering analysis, the following changes have been identified:

3. Connect the existing Devers-Valley OPGW to the MEER in Maraschino Substation.

- Install approximately ~~1,500~~ 425 feet of fiber optic cable and new underground conduit from the existing Devers-Valley No. 2 500 kV structure M24~~-T3~~-T1 to an existing distribution vault located on the west side of Highland Springs Avenue and the north boundary of the SCE 500kV right of way. From this location fiber optic cable would be installed north approximately 5,565 feet in existing conduit to an existing distribution vault approximately 300 feet north of Potrero Boulevard. ~~pole on Highland Springs Avenue approximately 300 feet south of Breckenridge Avenue. From this location, install approximately 1,700 feet of fiber optic cable on existing distribution poles along Highland Springs Avenue to approximately 190 feet south of Crooked Creek. At this location, the fiber optic cable would transition underground and extend 2,900 feet in existing underground conduit north to an existing vault approximately 300 feet north of Potrero Boulevard.~~ From the existing vault, approximately 1,000 feet of fiber optic cable and new conduit would be installed to East First Street. From East First Street, the fiber optic cable and conduit would extend west for approximately 600 feet to an existing manhole. From the existing manhole, the fiber optic cable would extend west within existing underground conduit for approximately 12,600 feet to a distribution riser pole 200 feet west of Beaumont Avenue. The fiber optic cable would be installed overhead for approximately 3,200 feet on First Street to Veile Avenue. The fiber optic cable would then extend north on Veile Avenue on existing subtransmission poles for approximately 1,600 feet. From this location, the fiber optic cable would transition underground for 400 feet in an existing underground conduit and cable trench to the MEER located in Maraschino Substation.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

F3-55 cont.

As a result of additional engineering analysis, the following changes have been identified:

4. Connect the Redlands Inland Empire District Office-San Bernardino fiber optic cable through proposed conduit and on proposed and existing poles.

- From the MEER located inside San Bernardino approximately 2,000 feet of fiber optic cable would be installed in an existing conduit and cable trench to a riser pole located outside of San Bernardino Substation on San Bernardino Avenue. From this location, approximately 1,260 feet of fiber optic cable would be installed on existing subtransmission poles extending east to Marigold Avenue. From this location, the telecommunications facilities would then be co-located on the newly relocated San Bernardino–Redlands-Timoteo 66 kV Subtransmission Line. The co-location of telecommunications would require approximately 6,140 feet of fiber optic cable be installed on new subtransmission structures in private and public rights-of-way to the first structure on Bryn Mawr Avenue just north of the proposed subtransmission TSP riser pole. The telecommunications facilities would transition underground at this location which would require the installation of approximately ~~560~~ 400 feet of new conduit and fiber optic cable to an existing pole on the south side of Redlands Boulevard just ~~west~~ east of Bryn Mawr Avenue. At this location, the new fiber optic cable would then transition overhead via a telecommunications riser and would connect to the existing fiber optic cable.

Please add new language below to the project description.

6. Connect El Casco-Banning Fiber Optic Cable (10132) to Devers-Vista Skywrap (09033) tap to Maraschino substation.

- Install approximately 790 feet of fiber optic cable on existing poles on Oak Valley Parkway west from an existing splice located at Oak View Drive to a distribution pole approximately 300 feet east of Golf Club drive. From this pole install approximately 1,150 feet of fiber optic cable and new conduit west crossing Interstate 10 to an existing distribution vault east of Desert Lawn Drive.

7. Connect El Casco Fiber optic Cable (10132) to Vista-Moreno fiber Optic Cable (10131) tap to El Casco

- Install approximately 615 feet of fiber optic cable in existing underground conduit from a distribution vault on San Timoteo Canyon Road approximately 3,650 feet east of the railroad crossing at the El Casco Substation to the existing an riser pole. New conduit and fiber optic cable would be extended west from the existing conduit approximately 155 feet to an existing distribution pole. From this distribution pole approximately 3,060 feet of overhead fiber optic cable would be installed crossing the railroad to an existing pole with an existing pole on the west side of the access road to the El Casco Substation.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page B-17

DEIR/DEIS Text: F3-56

6. Connect Devers-Vista OPGW to the MEER in Banning Substation

- From the new 220 kV structure (Structure 5S54), install approximately 500 feet of fiber optic cable and new underground conduit to an existing distribution pole located approximately 660 feet north of Summit Drive on San Gorgonio Avenue. The new fiber optic cable would connect on that pole to an existing fiber optic cable that extends to the MEER in Banning Substation.

7. Connect Devers-Vista OPGW to the MEER in Maraschino Substation

- From the new 220 kV structure (Structure 4S37), install approximately 350 feet of fiber optic cable and new underground conduit to an existing manhole located on Oak View Drive approximately 320 feet north of Parkview Street. The new fiber optic cable would connect in that manhole to an existing fiber optic cable that extends to the MEER in Maraschino Substation.

8. Connect the Devers-Vista OPGW to the MEER in El Casco Substation

- From the new 220 kV structure (Structure 3S02), install approximately 200 feet of fiber optic cable and new underground conduit to an existing manhole located in the existing SCE ROW immediately south of the El Casco Substation. The new fiber optic cable would connect in that manhole to an existing fiber optic cable that extends to the MEER in El Casco Substation.
- From the new 220 kV structure (Structure 3S25), install approximately 200 feet of fiber optic cable and new underground conduit to an existing distribution pole located nearby. The new fiber optic cable would connect on that pole to an existing fiber optic cable that extends to the MEER in El Casco Substation.

9. Connect the Devers-Vista OPGW and Devers–El Casco OPGW to the MEER in Devers Substation.

- From the new 220 kV structure (Structure 6N07), install approximately 100 feet of fiber optic cable and new underground conduit to an existing telecommunications manhole located inside Devers Substation.
- From the new 220 kV structure (Structure 6S07), install approximately 350 feet of fiber optic cable and new underground conduit to an existing cable trench located inside Devers Substation.

SCE Comment:

As a result of additional engineering analysis, the following changes have been identified, as a result of the changes please update the numbering of the bullets point as shown below:

~~6~~8 Connect Devers-Vista OPGW to the MEER in Banning Substation

- From the new 220 kV structure (Structure 5S54 4S01), install approximately 500 feet of fiber cable and new underground conduit to an existing distribution pole located approximately 660 feet north of Summit Drive on San Gorgonio Avenue. The new fiber optic cable would connect on that pole to an existing fiber optic cable that extends to the MEER in Banning Substation.

~~7~~9. Connect Devers-Vista OPGW to the MEER in Maraschino Substation

- From the new 220 kV structure (Structure 4S37 4S35), install approximately ~~350~~ 2012 feet of fiber optic cable and new underground conduit to an existing ~~manhole~~ distribution pole ~~located~~ on Oak View ~~Drive~~ Parkway approximately ~~320~~ 690 feet ~~north~~ east of ~~Parkview Street~~ Noble Creek across from Noble Creek Park. The new fiber optic cable would riser up the distribution pole and connect ~~in that manhole to~~ an existing fiber optic cable that extends to the MEER in Maraschino Substation.

~~8~~10. Connect the Devers-Vista OPGW to the MEER in El Casco Substation

- From the new 220 kV structure (Structure 3S02), install approximately 200 feet of fiber optic cable and new underground conduit to an existing manhole located in the existing SCE ROW immediately south of the El Casco Substation. The new fiber optic cable would connect in that manhole to an existing fiber optic cable that extends to the MEER in El Casco Substation.
- From the new 220 kV structure (Structure 3S25), install approximately 200 feet of fiber optic cable conduit to an existing distribution pole located nearby. The new fiber optic cable would connect on that pole to an existing fiber optic cable that extends to the MEER in El Casco Substation.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

F3-56 cont.

~~9~~11. Connect the Devers-Vista OPGW and Devers–El Casco OPGW to the MEER in Devers Substation.

- From the new 220 kV structure (Structure ~~6N07~~ 6N10), install approximately ~~100~~ 1,805 feet of fiber optic cable and new underground conduit to an existing telecommunications manhole located beside the driveway to the ~~inside~~ Devers Substation. The fiber optic cable would then continue in existing conduit to the 220 kV MEER in Devers Substation.
- From the new 220 kV structure (Structure ~~6S07~~ 6S10), install approximately ~~350~~ 1,110 feet of fiber optic cable and new underground conduit to an existing ~~cable trench located inside~~ manhole located inside WOD Interim Reactors. The fiber optic The fiber optic cable would then continue in existing conduit to the 200kV MEER in Devers Substation.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

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DEIR/DEIS Text:

10. Connect the Devers–El Casco OPGW and El Casco–San Bernardino OPGW to the MEER in El Casco Substation. F3-57

- From the new 220 kV structure (Structure 4N65), install approximately 850 feet of fiber optic cable and new underground conduit to an existing distribution manhole located outside El Casco Substation.
- From the new 220 kV structure (Structure 3N02), install approximately 200 feet of fiber optic cable and new underground conduit to an existing telecommunications manhole located outside El Casco Substation.

SCE Comment:

As a result of additional engineering analysis, the following changes have been identified:

12~~0~~. Connect the Devers–El Casco OPGW and El Casco–San Bernardino OPGW to the MEER in El Casco Substation.

- From the new 220 kV structure (Structure ~~4N65~~ 4N64), install approximately 850 feet of fiber optic cable and new ~~underground~~ conduit to an existing distribution manhole located outside El Casco Substation. From this manhole the fiber optic cable would continue in existing conduit to the 220kV MEER in the El Casco Substation.
- From the new 220 kV structure (Structure 3N02), install approximately 200 350 feet of fiber optic cable and new underground conduit to an existing ~~telecommunications manhole located outside El Casco Substation.~~ Cable trench located inside El Casco Substation. The fiber optic cable would then continue to the El Casco 220kV MEER.
- From the new 220 kV structure (Structure 3N02), install approximately 115 feet of fiber optic cable and new underground conduit to new 220 kV structure (Structure 4N64),

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page B-18

DEIR/DEIS Text: F3-58

11. Connect the El Casco–San Bernardino OPGW and San Bernardino–Vista OPGW to the MEER in San Bernardino Substation.

- From the new 220 kV structure (Structure 1E26, install approximately 350 feet of fiber optic cable and new underground conduit to an existing manhole. Install approximately 1,550 feet of fiber optic cable in existing conduit and 60 feet of fiber optic cable in an existing cable trench to the MEER inside San Bernardino Substation.
- From the new 220 kV structure (Structure 1W26), install approximately 350 feet of fiber optic cable and new underground conduit. Install approximately 315 feet of fiber optic cable in an existing cable trench to the MEER inside San Bernardino Substation.

12. Connect the Devers-Vista OPGW to the MEER in Vista Substation. cable and new underground structures to the MEER inside Vista Substation.

Fiber Optic Cable Removal. The removal of the existing fiber optic cable (located on the OHGW) from the existing 220 kV structures is described in Section B.2.1.1, 220 kV Transmission Line Segments. Additionally, removal of the fiber optic portions from the 220 kV existing structures to connections in the field and/or at existing substations would be required and are described below:

- Removal of approximately 250 feet of fiber optic cable from conduit and 600 feet from a cable trench within Vista Substation.
- Removal of approximately 325 feet of fiber optic cable from conduit between existing Structure M17-T2 (existing Devers-Vista No. 2 220 kV structure) and a riser pole 660 feet north of Summit Drive on San Gorgonio Avenue.
- Removal of approximately 225 feet of fiber optic cable from conduit between existing Structure M24-T2 (existing Devers-Vista No. 2 220 kV structure) and the manhole located on Oak View Drive approximately 320 feet north of Parkview Street.

SCE Comment:

As a result of additional engineering analysis, the following changes have been identified:

13~~1~~. Connect the El Casco–San Bernardino OPGW and San Bernardino–Vista OPGW to the MEER in San Bernardino Substation.

- From the new 220 kV structure (Structure 1E26), install approximately ~~350~~ 40 feet of fiber optic cable and new underground conduit to ~~an existing~~ new manhole. From the new manhole install approximately 490 feet of fiber optic cable and new conduit to an existing manhole inside the San Bernardino Substation. From this existing manhole the fiber optic cable would continue in existing conduit to the MEER inside San Bernardino Substation. ~~Install approximately 1,550 feet of fiber optic cable in existing conduit and 60 feet of fiber optic cable in an existing cable trench to the MEER inside San Bernardino Substation.~~
- From the new 220 kV structure (Structure 1W26), install approximately ~~350~~ 55 feet of fiber optic cable and new underground conduit to the new manhole installed for the route from Structure 1E26. From the new manhole the fiber optic cable would continue in existing conduit to the MEER inside San Bernardino Substation. ~~Install approximately 315 feet of fiber optic cable in an existing cable trench to the MEER inside San Bernardino Substation.~~

14~~2~~. Connect the Devers-Vista OPGW to the MEER in Vista Substation.

- From the new 220 kV structure (Structure ~~2N37~~ 2N36), install approximately 1,~~000~~ 420 feet of fiber optic cable and new conduit to an existing manhole inside the Vista substation, from the existing manhole install fiber optic cable in existing conduit to the MEER inside Vista Substation. ~~underground structures to the MEER inside Vista Substation.~~

Fiber Optic Cable Removal. The removal of the existing fiber optic cable (located on the OHGW) from the existing 220 kV structures is described in Section B.2.1.1, 220 kV Transmission Line Segments. Additionally, removal of the fiber optic portions from the 220 kV existing structures to connections in the field and/or at existing substations would be required and are described below:

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

F3-58 cont.

- Removal of approximately 250 feet of fiber optic cable from conduit and 600 feet from a cable trench within Vista Substation.
- Removal of approximately 325 feet of fiber optic cable from conduit between existing Structure M17-T2 (existing Devers-Vista No. 2 220 kV structure) and a riser pole 660 feet north of Summit Drive on San Gorgonio Avenue.
- Removal of approximately 2,595 feet of fiber optic cable from conduit between existing Structure M24-T2 (existing Devers-Vista No. 2 220 kV structure) and the riser pole located on Oak View Drive and Oak valley Parkway. ~~Removal of approximately 225 feet of fiber optic cable from conduit between existing Structure M24-T2 (existing Devers-Vista No. 2 220 kV structure) and the manhole located on Oak View Drive approximately 320 feet north of Parkview Street.~~

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

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F3-59

DEIR/DEIS Text:

Under the heading 220 kV Transmission Line and the discussion of Segment 3B, the bullets under the third paragraph states:

make determinations on the following structures (for lighting) and spans (for marker balls):

- 46 structures and 0 spans in Segment 1
- 6 structures and 14 spans in Segment 2
- 0 structures and 46 spans in Segment 3
- 14 structures and 22 spans in Segment 4
- 60 structures and 2 spans in the eastern portion of Segment 5
- 0 structures and 10 spans in Segment 6

SCE Comment:

Based on additional engineering analysis and updated analysis by SCE's aviation consultant, the following changes have been identified:

make determinations on the following structures (for lighting) and spans (for marker balls):

- 47 ~~46~~ structures and ~~0~~ 2 spans in Segment 1
- 12 ~~6~~ structures and 14 spans in Segment 2
- ~~0~~ 8 structures and ~~46~~ 56 spans in Segment 3
- ~~14~~ 16 structures and ~~22~~ 23 spans in Segment 4
- ~~60~~ 88 structures and ~~2~~ 8 spans in the eastern portion of Segment 5
- 0 structures and 10 spans in Segment 6

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

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DEIR/DEIS Text: F3-60

220 kV Transmission Line. SCE anticipates that over the entire length of the Proposed Project (220 kV transmission lines component) approximately 220 structures and spans would be submitted to the FAA in order that the FAA could make the ultimate determinations for potential hazards. The structures requiring notification are more likely to trigger appurtenances that make structures or conductor spans more visible to aircraft. FAA's recommendations could include installation of lights on proposed new structures, or they could suggest installation of orange, yellow and white marker balls on certain conductor spans.

SCE Comment:

Based on additional engineering analysis and updated analysis by SCE's aviation consultant, the following changes have been identified:

220 kV Transmission Line. SCE anticipates that over the entire length of the Proposed Project (220 kV transmission lines component) approximately ~~220~~ 171 structures and 113 spans would be submitted to the FAA in order that the FAA could make the ultimate determinations for potential hazards. The structures requiring notification are more likely to trigger appurtenances that make structures or conductor spans more visible to aircraft. FAA's recommendations could include installation of lights on proposed new structures, or they could suggest installation of orange, yellow and white marker balls on certain conductor spans.

Page B-21

DEIR/DEIS Text: F3-61

Under the heading of 220 kV Transmission Line and the second paragraph on page B-21 states:

Due to the proximity to the Banning Airport and potential feasibility issues with the route preferred by the Morongo Tribe, SCE submitted early FAA notification and received determinations from the FAA for the structures in the western most portion of Segment 5. FAA has indicated that 18 structures on the west end of the Morongo Reservation would benefit from lighting on the west end of the Morongo Reservation in order to consider them as "no hazard" facilities (see EIR/EIS Appendix 1B) (SCE, 2014).

SCE Comment:

Based on additional engineering analysis and updated analysis by SCE's aviation consultant, the following changes have been identified:

Due to the proximity to the Banning Airport and potential feasibility issues with the route preferred by the Morongo Tribe, SCE submitted early FAA notification and received determinations from the FAA for the structures in the western most portion of Segment 5. FAA has indicated that 18 structures on the west end of the Morongo Reservation would benefit from lighting on the west end of the Morongo Reservation in order to consider them as "no hazard" facilities (see EIR/EIS Appendix 1B) (SCE, 2014).SCE anticipates four additional structures will benefit from lighting based on final engineering and resubmittal to the FAA.

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DEIR/DEIS Text: F3-62

Table B-4. Approximate Land Disturbance Summary for the Proposed Project

SCE Comment:

SCE has updated Table B-11 with revised acreages and, therefore, Table B-4 will need to be updated as well.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page B-23

F3-63

DEIR/DEIS Text:

B.3.1.1 Staging Areas and other Work Areas

Table B-5. Potential Staging Yard Locations

Table B-6. Potential Staging Yard Approximate Land Disturbance

SCE Comment:

SCE has included an additional Material Staging Yard, due to the potential for any one of the yards listed in Table B-5 to be occupied and unavailable prior to SCE commencing with construction. SCE has also updated Figure B-16 to include the additional yard. A memo supporting the environmental analysis of this additional yard and concluding that the addition of this yard would not result in any additional impacts beyond those already described in the DEIR/DEIS is attached. See attached file "WODUP_MatichYardAssessement.pdf".

Yard Name	Location	Condition	Approximate Area (acres)
Matich Material and Equipment Staging Area	Southwest corner of E Theodore Street and N Hathaway	Previously Disturbed; Vacant	21

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F3-64

DEIR/DEIS Text:

Modifications or upgrades to the existing Vista, San Bernardino, El Casco, Etiwanda, Timoteo, Tennessee, and Devers Substations would be confined inside each existing site boundary fence for all the facilities.

SCE Comment:

As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.

Modifications or upgrades to the existing Vista, San Bernardino, El Casco, Etiwanda, ~~Timoteo, Tennessee,~~ and Devers Substations would be confined inside each existing site boundary fence for all the facilities.

Page B-27

F3-65

DEIR/DEIS Text:

Work at Tennessee and Timoteo Substations would include replacement of circuit breakers and foundations.

SCE Comment:

As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support
the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.
~~Work at Tennessee and Timoteo Substations would include replacement of circuit breakers and foundations.~~

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

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DEIR/DEIS Text: F3-66

Work at Etiwanda Substation would occur within the existing Mechanical and Electrical Equipment Room (MEER) and include replacement of protective relay equipment. Work at Tennessee and Timoteo Substations would include replacement of circuit breakers and foundations.

SCE Comment:

As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.

Work at Etiwanda Substation would occur within the existing Mechanical and Electrical Equipment Room (MEER) and include replacement of protective relay equipment. ~~Work at Tennessee and Timoteo Substations would include replacement of circuit breakers and foundations.~~

Page B-27

DEIR/DEIS Text: F3-67

Retaining walls may be required along some of the access roads. Retaining wall locations are preliminarily assumed to occur within areas identified for proposed grading. For the purposes of the environ-mental analysis, it is estimated that the project will have approximately 4,010 linear feet of retaining wall structures spread amongst the various project segments. The specific number of retaining wall structures and locations would be identified during final engineering. Retaining walls could range between 5 and 20 feet in exposed height.

Table B-10. Approximate Length of New Retaining Wall Per Segment

	Segment 1	Segment 2	Segment 3	Segment 4	Segment 5	Segment 6	Total
Retaining wall (feet)	0	810	2,050	350	400	400	4,010

SCE Comment:

As a result of additional engineering analysis, the following changes have been identified:

Retaining walls may be required along some of the access roads. Retaining wall locations are preliminarily assumed to occur within areas identified for proposed grading. For the purposes of the environ-mental analysis, it is estimated that the project will have approximately ~~4,010~~ 3,168 linear feet of retaining wall structures spread amongst the various project segments. The specific number of retaining wall structures and locations would be identified during final engineering. Retaining walls could range between ~~5~~ 2 and ~~20~~ 18 feet in exposed height.

The estimated length of new retaining walls for each segment is summarized in Table B-10, Approximate Length of New Retaining Wall per Segment, and shown in Figure B-17.

Table B-10. Approximate Length of New Retaining Wall Per Segment

Retaining wall (feet)	Segment 1	Segment 2	Segment 3	Segment 4	Segment 5	Segment 6	Total
	0	~~810~~ 1124	~~2050~~ 1192	~~350~~ 431	~~400~~ 231	~~400~~ 190	~~4010~~ 3,168

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

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DEIR/DEIS Text: F3-68

Found in Table B-9. Substation Cut/Fill Grading and Surface Improvements Summary

Timoteo Substation			
Substation equipment foundations, cut	Concrete	70	5
Substation equipment foundations, import	Concrete	60	4
Site fill	Soil	10	1
Tennessee Substation			
Substation equipment foundations, cut	Concrete	30	2
Substation equipment foundations, import	Concrete	40	2
Site cut	Soil	10	—

SCE Comment:

As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.

~~Timoteo Substation~~			
~~Substation equipment foundations, cut~~	~~Concrete~~	~~70~~	~~5~~
~~Substation equipment foundations, import~~	~~Concrete~~	~~60~~	~~4~~
~~Site fill~~	~~Soil~~	~~10~~	~~1~~
~~Tennessee Substation~~			
~~Substation equipment foundations, cut~~	~~Concrete~~	~~30~~	~~2~~
~~Substation equipment foundations, import~~	~~Concrete~~	~~40~~	~~2~~
~~Site cut~~	~~Soil~~	~~10~~	—

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

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DEIR/DEIS Text: F3-69

Table B-11. Transmission Approximate Land Disturbance

Project Feature	Site Quantity	Approximate Disturbed Acreage Calculation (L × W)	Approximate Total Acres Disturbed During Construction	Approximate Total Acres to be Restored (Temporary)	Approximate Total Acres Permanently Disturbed
Guard structures	667	150 feet × 50 feet	114.8	114.8	0.0
Remove existing lattice steel tower1	408	220 feet × 220 feet	453.3	453.3	0.0
Remove existing tubular steel pole1	5	220 feet × 150 feet	3.8	3.8	0.0
Remove existing 220 kV wood H-frame & wood 3 pole structures1	182	175 feet × 125 feet	91.4	91.4	0.0
Construct new lattice steel tower2	413	220 feet × 220 feet	458.9	355.6	103.3
Construct new tubular steel pole2	76	220 feet × 150 feet	57.6	53.0	4.6
Conductor stringing setup area3	123	600 feet × 150 feet	254.1	254.1	0.0
Conductor splicing setup areas3	14	200 feet × 150 feet	9.6	9.6	0.0
Existing access roads to be improved4	130.0	linear miles × 18 feet'	283.6	0.0	283.6
New access roads4	20	linear miles × 18 feet	43.6	0.0	43.6
Crane pads, walls, cut slopes	—	—	2919.7	2840.5	79
Total Estimated Disturbance Acreage	4690.6		4176.3	514.3	

SCE Comment:

As a result of additional engineering analysis, and for consistency with the updated structure counts provided in comments above, the following changes have been identified:

Please make the following revisions to the DEIR language.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

F3-69 cont.

Table B-11. Transmission Approximate Land Disturbance

Project Feature	Site Quantity	Approximate Disturbed Acreage Calculation (L × W)	Approximate Total Acres Disturbed During Construction	Approximate Total Acres to be Restored (Temporary)	Approximate Total Acres Permanently Disturbed
Guard structures	667	150 feet × 50 feet	114.8	114.8	0.0
Remove existing lattice steel tower1	~~408~~ 413	220 feet × 220 feet	~~453.3~~ 458.9	~~453.3~~ 458.9	0.0
Remove existing tubular steel pole1	5	220 feet × 150 feet	3.8	3.8	0.0
Remove existing 220 kV wood H-frame & wood 3 pole structures1	182	175 feet × 125 feet	91.4	91.4	0.0
Construct new lattice steel tower2	~~413~~ 384	220 feet × 220 feet	~~458.9~~ 426.7	~~355.6~~ 330.7	~~103.3~~ 96
Construct new tubular steel pole2	~~76~~ 83	220 feet × 150 feet	~~57.6~~ 62.9	~~53.0~~ 57.9	~~4.6~~ 5.0
Conductor stringing setup area3	123	600 feet × 150 feet	254.1	254.1	0.0
Conductor splicing setup areas3	14	200 feet × 150 feet	9.6	9.6	0.0
Existing access roads to be improved4	130.0	linear miles × 18 feet'	283.6	0.0	283.6
New access roads4	20	linear miles × 18 feet	43.6	0.0	43.6
Crane pads, walls, cut slopes	—	—	2919.7	2840.5	79
Total Estimated Disturbance Acreage			~~4690.6~~ 4669.2	~~4176.3~~ 4161.8	~~514.3~~ 507.5

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

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DEIR/DEIS Text: F3-70

Under Table B-11. Transmission Approximate Land Disturbance states:

Source: SCE, 2013.

1 - Includes the removal of existing conductor, teardown of existing structure, and removal of foundation 2' below ground surface.

2 - Includes structure assembly& erection conductor& OPGW installation. Area to be restored after construction. Portion of ROW within 20' of ALL structures to remain cleared of vegetation. Permanently disturbed areas for LST = 0.25 acres, TSP=0.06 acres, LWS=0.05 acres, and H-Frame=0.06 acres.

3 - Based on 9,000' standard conductor reel lengths, conductor size, number of circuits, route design, and terrain.

4 - Based on approximate length of road in miles x driveable road width of 14'–22' with 2' of berm on each side of road.

The disturbed acreage calculations are estimates based upon SCE's preferred area of use for the described project feature, the width of the existing right-of-way, or the width of the proposed right-of-way and, they do not include any new access/spur road information; they are subject to revision based upon final engineering and review of the project by SCE's Construction Manager and/or Contractor awarded project.

Footing/Base Volume and Area Calculations (approximate):

- Average TSP depth 30 feet deep, 7-foot diameter, quantity 1 per TSP: earth removed for footing = 42.8 c.y.; surface area = 38.5 sq.ft.
- Average LWS/Wood pole depth 12 feet deep, 2.5-foot diameter, quantity 1 per LWS/wood pole; earth removed for pole base 2.2 c.y.; surface area = 4.9 sq.ft.
- Average Wood H-Frame depth 12 feet deep, 2.5-foot diameter, qty 2 per H-Frame: earth removed for pole base= 4.4 c.y.; surface area = 9.8 sq.ft.

Permanent areas of disturbance were calculated based on the footprint of the structures with an additional 20-foot buffer around the structures reserved for operation and maintenance purposes and the utilization of the crane pad for O&M activities.

Acres permanently disturbed are assumed to be project areas where the disturbance will continue to be used during Operations and Maintenance (O&M) Activities post construction. Areas that would be stabilized or revegetated per requirements identified in Section 4.4 Biological Resources and not used for O&M have been assumed to be temporarily impacted (Acres to be Restored).

SCE Comment:

Please see revised language.

Source: SCE, ~~2013~~ 2015.

1 - Includes the removal of existing conductor, teardown of existing structure, and removal of foundation 2' below ground surface.

2 - Includes structure assembly& erection conductor& OPGW installation. Area to be restored after construction. Portion of ROW within 20' of ALL structures to remain cleared of vegetation. Permanently disturbed areas for LST = 0.25 acres, TSP=0.06 acres, LWS=0.05 acres, and H-Frame=0.06 acres.

3 - Based on 9,000' standard conductor reel lengths, conductor size, number of circuits, route design, and terrain.

4 - Based on approximate length of road in miles x driveable road width of 14'–22' with 2' of berm on each side of road.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

F3-70 cont.

The disturbed acreage calculations are estimates based upon SCE's preferred area of use for the described project feature, the width of the existing right-of-way, or the width of the proposed right-of-way and, they do not include any new access/spur road information; they are subject to revision based upon final engineering and review of the project by SCE's Construction Manager and/or Contractor awarded project.

Footing/Base Volume and Area Calculations (approximate):

- Average TSP depth 30 feet deep, 7-foot diameter, quantity 1 per TSP: earth removed for footing = 42.8 c.y.; surface area = 38.5 sq.ft.
- Average LWS/Wood pole depth 12 feet deep, 2.5-foot diameter, quantity 1 per LWS/wood pole; earth removed for pole base 2.2 c.y.; surface area = 4.9 sq.ft.
- Average Wood H-Frame depth 12 feet deep, 2.5-foot diameter, qty 2 per H-Frame: earth removed for pole base= 4.4 c.y.; surface area = 9.8 sq.ft.

Permanent areas of disturbance were calculated based on the footprint of the structures with an additional 20-foot buffer around the structures reserved for operation and maintenance purposes and the utilization of the crane pad for O&M activities.

Acres permanently disturbed are assumed to be project areas where the disturbance will continue to be used during Operations and Maintenance (O&M) Activities post construction. Areas that would be stabilized or revegetated per requirements identified in Section 4.4 Biological Resources and not used for O&M have been assumed to be temporarily impacted (Acres to be Restored).

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page B-32

DEIR/DEIS Text: F3-71

The first paragraph under **Table B-12. Subtransmission Approximate Land Disturbance** states:
The foundation process begins with the drilling of the holes using truck- or track-mounted excavators with various diameter augers to match the diameter requirements of the structure type. LSTs typically require an excavated hole approximately 3 feet to 7 feet in diameter and approximately 15 feet to 50 feet deep; TSPs typically require an excavated hole approximately 5 feet to 12 feet in diameter and approximately 30 feet to 60 feet deep. On average, each footing for a LST structure would project approximately 2 to 5 feet above ground level; TSP footings would project approximately 1 to 3 feet above ground level within franchise areas and approximately 2 to 4 feet above ground level in uninhabited areas.

SCE Comment:

As a result of additional engineering analysis, the following changes have been identified:

The foundation process begins with the drilling of the holes using truck- or track-mounted excavators with various diameter augers to match the diameter requirements of the structure type. LSTs typically require an excavated hole approximately 3 feet to 7 feet in diameter and approximately 15 feet to 50 feet deep; TSPs typically require an excavated hole approximately 5 feet to ~~12~~ 14 feet in diameter and approximately 30 feet to 60 feet deep. On average, each footing for a LST structure would project approximately 2 to 5 feet above ground level; TSP footings would project approximately 1 to 3 feet above ground level within franchise areas and approximately 2 to ~~4~~ 5 feet above ground level in uninhabited areas.

Page B-33

DEIR/DEIS Text: F3-72

The first sentence/paragraph on page B-33 states:

each site, LSTs would require approximately 20 to 310 cubic yards of concrete delivered to each structure location and, TSPs would require approximately 25 to 270 cubic yards of concrete delivered to each structure location.

SCE Comment:

As a result of additional engineering analysis, the following changes have been identified:

each site, LSTs would require approximately 20 to 310 cubic yards of concrete delivered to each structure location and, TSPs would require approximately 25 to ~~270~~ 370 cubic yards of concrete delivered to each structure location.

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DEIR/DEIS Text: F3-73

B.3.5.1 Access

Once the underground infrastructure is in place, the crews would install cable in two of the four conduits.

SCE Comment:

As a result of additional engineering analysis, the following changes have been identified:

Once the underground infrastructure is in place, the crews would install cable in two of the ~~four~~ six conduits.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page B-46

DEIR/DEIS Text: F3-74

Project Feature	Site Quantity	Disturbed Acreage Calculation (L × W)	Approximate Total Acres Disturbed During Construction	Approximate Total Acres to be Restored	Approximate Total Acres Permanently Disturbed
Vault	10	55' × 40'	0.5	0.5	0

SCE Comment:

Project Feature	Site Quantity	Disturbed Acreage Calculation (L × W)	Approximate Total Acres Disturbed During Construction	Approximate Total Acres to be Restored	Approximate Total Acres Permanently Disturbed
Vault/Manhole	10	55' × 40'	0.5	0.5	0

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page B-47

DEIR/DEIS Text: F3-75

Underground Telecom Facilities Installation – Fiber Optic Cable

New underground conduit and structures would typically be installed using a backhoe. The trench would be excavated to approximately 12 to 18 inches wide and a minimum of approximately 36 inches deep. The ground disturbance area for the trenching would be approximately 25 feet wide by the specific length of the excavation. PVC conduit would be placed in the trench and covered with approximately 8 inches of concrete slurry, then backfilled and compacted. For manholes and pull boxes, a hole is excavated between approximately 4 to 10 feet deep, 5 to 8 feet long, and 4 to 8 feet wide. The ground disturbance area for the manhole installation is approximately 40 feet wide by 50 feet long. The disturbance is due to activities associated with the conduit and structure installation and concrete encasement. The manhole or pull box would be lowered into place, connected to the conduits, and backfilled with 2-sack concrete/sand slurry. Excess soil would be hauled to an approved disposal facility in accordance with all applicable laws or may be used as fill material for transmission, subtransmission, distribution, or substation project elements. Construction activities would typically include the use of a backhoe, dump trucks, crew trucks, and concrete trucks. See Figure B-23, Typical Telecommunications Duct Bank, for the standard telecommunications duct bank configuration. See Figure B-24, Typical Manhole Design, for the standard manhole configuration.

The fiber optic cable would be installed throughout the length of the underground conduit and structures by first installing an innerduct, which provides for protection and identification of the cable. The innerduct would be pulled in the conduit from structure to structure using a pull rope and pulling machine, or truck-mounted hydraulic capstan. After installation of the innerduct, the fiber optic cable would be pulled through the innerduct using similar equipment.

SCE Comment:

As a result of additional engineering analysis, the following changes have been identified:

Underground Telecom Facilities Installation – Fiber Optic Cable

New underground conduit and structures would typically be installed using a backhoe. The trench would be excavated to approximately 12 to 18 inches wide and a minimum of approximately 36 inches deep. The ground disturbance area for the trenching would be approximately 25 feet wide by the specific length of the excavation. PVC conduit would be placed in the trench and covered with approximately 8 inches of concrete slurry, then backfilled and compacted. For manholes and pull boxes, a hole is excavated between approximately 4 to 10 feet deep, 5 to 8 feet long, and 4 to 8 feet wide. The ground disturbance area for the manhole installation is approximately 40 feet wide by 50 feet long. The disturbance is due to activities associated with the conduit and structure installation and concrete encasement. The manhole or pull box would be lowered into place, connected to the conduits, and backfilled with 2-sack concrete/sand slurry. Excess soil would be hauled to an approved disposal facility in accordance with all applicable laws or may be used as fill material for transmission, subtransmission, distribution, or substation project elements. Construction activities would typically include the use of a backhoe, dump trucks, crew trucks, and concrete trucks. See Figure B-23, Typical Telecommunications Duct Bank, for the standard telecommunications duct bank configuration. See Figure B-24, Typical Manhole Design, for the standard manhole configuration.

New underground conduit would be installed by direction bore in this manner. Existing utilities that would be crossed or are in close proximity to the bore would be physically located by digging a pot hole with a backhoe or vacuum truck. A bore pit approximately two feet wide and ten feet long is then dug with a backhoe on each end of the proposed bore. The horizontal bore rig is set up at one of the bore pits. Setup includes anchoring the rig to the ground with augers attached to the front. The bore machine spins the drill head while inserting drilling rods behind the head as it is pushed through the ground. Drilling fluid under high pressure assist in drilling, moves the dirt loosened by the drill head, and holds the hole formed in the drilling process. Excess drilling fluid accumulated in the bore pits is vacuumed up and disposed of at safe site. The depth and direction of the bore is monitored and controlled by telemetry between the bore head and a devise held on the surface by a worker. The bore head is guided to the second bore pit where the drill head is removed and a reamer is installed on the drilling steel. The conduit that has been glued together and laid in line with the bore is then attached to the reamer. The

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

F3-75 cont.

conduit is installed in the bore as the reamer is pulled back to the bore rig. The bore pits are used for other bores going the opposite direction or will be part of the excavation for a manhole.

The fiber optic cable would be installed throughout the length of the underground conduit and structures by first installing an innerduct, which provides for protection and identification of the cable. The innerduct would be pulled in the conduit from structure to structure using a pull rope and pulling machine, or truck-mounted hydraulic capstan. After installation of the innerduct, the fiber optic cable would be pulled through the innerduct using similar equipment.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page B-57

DEIR/DEIS Text: F3-76

Segment 6, Model 2	27.3	31.9

SCE Comment:

Please add Northern for the current values shown and add Southern with the respective values:

Segment 6, Model 2	Northern 27.3 Southern 28.4	Northern 31.9 Southern 75.3

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DEIR/DEIS Text: F3-77

- Arranging the conductors in a triangular configuration to maximize field cancellation.
- Placing the conductors for the transmission line in the right-of-way at the greatest distance from buildings housing priority land uses to reduce magnetic field exposure along the entire route, except where the location of existing utilities prevent strategic line placement.
- Moving the conductors further from the edge of the right-of-way near high priority groups including school, day care, hospital and residential land uses.

SCE Comment:

Please remove the current options listed and include the common magnetic field reduction options SCE utilizes to comply with the CPUC EMF Policy:

- ~~Arranging the conductors in a triangular configuration to maximize field cancellation.~~
- ~~Placing the conductors for the transmission line in the right-of-way at the greatest distance from buildings housing priority land uses to reduce magnetic field exposure along the entire route, except where the location of existing utilities prevent strategic line placement.~~
- ~~Moving the conductors further from the edge of the right-of-way near high priority groups including school, day care, hospital and residential land uses.~~
- Increasing the distance from electrical facilities by:
  - o Increasing pole (structure) height,
  - o Increasing the width of right-of-way, and/or
  - o Locating power lines closer to the centerline of the corridor.
- Reducing conductor (phase) spacing.
- Arrange conductors to reduce magnetic field.
- Converting single-phase circuits to split-phase circuits.

Page B-59

DEIR/DEIS Text: F3-78

Proposed EMF Reduction Measures. The Preliminary Field Management Plan for the Proposed Project (EIR/EIS Appendix 4) includes each of these measures, as “no cost” and “low cost” magnetic field reduction steps:

SCE Comment:

For clarification, please make the following revision:

Proposed EMF Reduction Measures. The Preliminary Field Management Plan for the Proposed Project (EIR/EIS Appendix 4) includes each of these measures, as “no cost” ~~and~~ or “low cost” magnetic field reduction steps:

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page B-58

DEIR/DEIS Text: F3-79

Segment 6, Model 2 27.3 31.9

SCE Comment:

Please add Northern for the current values shown and add Southern with the respective values:

Segment 6, Model 2

Northern 13.0 Northern 0.9 Northern 137.2 Northern 54.8

Southern 156.2 Southern 53.9 Southern 164.0 Southern 63.9

Page B-63

DEIR/DEIS Text: F3-80

APM-BIO-9

Jurisdictional Water Permits. Jurisdictional waters permits would be obtained from CDFW under Cal. Fish & Game Code Section 1602, and from USACE, EPA and the SWRCB appropriate Regional Water Quality Control Boards in accordance with Sections 404 and 401 of the Clean Water Act, to address unavoidable impacts to State and Federal jurisdictional waters. Impacts would be mitigated based on the terms of the permits.

The applicant would develop a Habitat Mitigation and Monitoring Plan (HMMP) for affected jurisdictional areas within established riparian areas, as needed, for review and approval by the USACE, CDFW, the EPA and the SWRCB Regional Boards as appropriate. The plan would describe measures to accomplish restoration, provide criteria for restoration success, and specify compensation ratios. Monitoring and reporting requirements and the duration of post-construction monitoring would be specified. A copy of the final HMMP would be provided to the CPUC, USACE, EPA, SWRCB, and CDFW.

Regarding any affected Riparian/Riverine drainages and habitat areas in Segments 3 and 4 in Western Riverside County, if SCE participates in the WR-MSHCP, SCE would prepare a DBESP that would include mitigation measures consistent with the HMMP as previously described. The RCA would request USFWS and CDFW concurrence with the MSHCP

SCE Comment:

For clarification regarding agency involvement for jurisdictional water permits for the Proposed Project, please make the following revision:

APM BIO-9

Jurisdictional Water Permits. Jurisdictional waters permits would be obtained from CDFW under Cal. Fish & Game Code Section 1602, and from USACE, EPA and the SWRCB ~~appropriate Regional Water Quality Control Boards~~ in accordance with Sections 404 and 401 of the Clean Water Act, to address unavoidable impacts to State and Federal jurisdictional waters. Impacts would be mitigated based on the terms of the permits.

The applicant would develop a Habitat Mitigation and Monitoring Plan (HMMP) for affected jurisdictional areas within established riparian areas, as needed, for review and approval by the USACE, CDFW, the EPA and the SWRCB ~~Regional Boards~~ as appropriate. The plan would describe measures to accomplish restoration, provide criteria for restoration success, and specify compensation ratios. Monitoring and reporting requirements and the duration of post-construction monitoring would be specified. A copy of the final HMMP would be provided to the CPUC, USACE, EPA, SWRCB, and CDFW.

Regarding any affected Riparian/Riverine drainages and habitat areas in Segments 3 and 4 in Western Riverside County, if SCE participates in the WR-MSHCP, SCE would prepare a DBESP that would include mitigation measures consistent with the HMMP as previously described. The RCA would request USFWS and CDFW concurrence with the MSHCP "findings of consistency," as well as DBESP approval. Subsequent coordination on any biological issues would be addressed through consultation with the RCA. The RCA would determine the need for additional consultation with the USFWS and CDFW.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page B-67

DEIR/DEIS Text: F3-81

Project 1: Connecting to Blythe-Eagle Mountain 161 kV line (CAISO Queue 421)

SCE Comment:

SCE is aware that the Point of Interconnection for this project was changed from Blythe – Eagle Mountain 161kV to Red Bluff Substation 220 kV bus. Please make the following revision:

Project 1: ~~Connecting to Blythe-Eagle Mountain 161 kV line~~ Red Bluff Substation 220 kV bus (CAISO Queue 421)

Page B-67

DEIR/DEIS Text: F3-82

Table B-22. Connected Actions – Solar Generation Projects

Confidential Projects Requesting Interconnection

Project 3: Connecting at Colorado River Substation 230 kV (CAISO Queue 576)

SCE Comment:

Known Projects with Interconnection Agreements

SCE would like to clarify that Project 3 has executed an interconnection agreement in July 2015 that presumes implementation of WOD Upgrade Project and achieving deliverability via Colorado River Substation. The Solar Star Blythe Mesa (Queue 576) was filed at FERC on July 31, 2015.

Page B-77

DEIR/DEIS Text: F3-83

Figure B-2b

SCE Comment:

Please see attached file "WODUP_Figure B-2b_Rev.pdf" updating Figure B-2b.

Page B-105

DEIR/DEIS Text: F3-84

Figure B-10

SCE Comment:

Please see attached file "WODUP_Figure B-10_Rev.pdf" updating Figure B-10.

Page B-125

DEIR/DEIS Text: F3-85

Location 2: Removal of 12kV and Relocation on the New 66kV Structures.

SCE Comment:

Please remove location 2 from the map and legend, there is no overhead 12kV on Nevada St from Lugonia Ave to Almond Ave.

~~Location 2: Removal of 12kV and Relocation on the New 66kV Structures.~~

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.3-12

DEIR/DEIS Text:

F3-86

Table D.3-8. Construction-Phase Regional Emissions Impacts (lb/day)

Project Component	NOx	VOC	PM10	PM2.5	CO
Devers Substation	59.0	8.1	3.4	2.7	40.8
El Casco Substation	53.3	7.2	2.9	2.4	33.3
Vista Substation	53.4	7.4	3.0	2.4	35.1
San Bernardino Substation	61.5	8.4	4.1	2.9	40.4
Etiwanda Substation	0.2	0.0	0.0	0.0	2.0
Timoteo Substation	1.4	0.3	0.1	0.1	6.4
Tennessee Substation	1.5	0.3	0.1	0.1	6.7
220 kV Transmission Line	4,009.0	525.9	243.2	155.9	2,259.0
Shoo-Fly	1,739.3	241.3	165.0	87.7	837.6
66 kV Subtransmission Line	828.2	111.5	57.1	34.8	448.6
Telecommunications System	141.2	17.4	9.9	5.6	54.6
Total Peak Daily Construction	6,948.0	927.9	489.3	294.6	3,764.4
Total Peak Construction with APMs	5,558.4	927.9	378.3	271.6	3,764.4
SCAQMD Regional Threshold for Construction	100	75	150	55	550

SCE Comment:

As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations and revise the totals in the table as follows:

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

F3-86 cont.

Table D.3-8. Construction-Phase Regional Emissions Impacts (lb/day)

Project Component	NOx	VOC	PM10	PM2.5	CO
Devers Substation	59.0	8.1	3.4	2.7	40.8
El Casco Substation	53.3	7.2	2.9	2.4	33.3
Vista Substation	53.4	7.4	3.0	2.4	35.1
San Bernardino Substation	61.5	8.4	4.1	2.9	40.4
Etiwanda Substation	0.2	0.0	0.0	0.0	2.0
~~Timoteo Substation~~	~~1.4~~	~~0.3~~	~~0.1~~	~~0.1~~	~~6.4~~
~~Tennessee Substation~~	~~1.5~~	~~0.3~~	~~0.1~~	~~0.1~~	~~6.7~~
220 kV Transmission Line	4,009.0	525.9	243.2	155.9	2,259.0
Shoo-Fly	1,739.3	241.3	165.0	87.7	837.6
66 kV Subtransmission Line	828.2	111.5	57.1	34.8	448.6
Telecommunications System	141.2	17.4	9.9	5.6	54.6
Total Peak Daily Construction	~~6,948.0~~ 6,945.1	~~927.9~~ 927.2	~~489.3~~ 488.6	~~294.6~~ 294.4	~~3,764.4~~ 3,751.4
Total Peak Construction with APMs	5,558.4	927.9	378.3	271.6	3,764.4
SCAQMD Regional Threshold for Construction	100	75	150	55	550

Responses to Comment Set F3 – Section B Description of the Proposed Project

F3-27 The commenter states that SCE has proceeded with additional engineering for the Proposed Project during the agencies' preparation of the Draft EIR/EIS in order to meet the in-service date for the West of Devers Upgrade Project. SCE states that these modifications to the Proposed Project description as a result of this additional engineering analysis would generally reduce impacts described in the Draft EIR/EIS. The Project Description (Section B) has been updated with the new information that SCE has provided, and certain of the maps in Appendix 2 (Detailed Maps) have been modified to show the updated tower locations. However, the EIS acknowledges that subsequent "final" engineering may result in ongoing minor changes in the locations of some towers, the heights of towers, and other aspects of the project. For example, Section B.2.1.2 (Transmission Line Infrastructure), states "The types and quantities of proposed structures, groundwire, and conductor to be removed and installed are approximate and subject to change following the completion of final engineering." Overall, Section B references nearly 30 instances where it is stated that final engineering will be needed to determine the exact locations of individual structures, access roads, vaults, shoo flies, pull sites, marker balls, etc.

F3-28 The commenter states that as a result of additional engineering, the work originally proposed for the Timoteo and Tennessee Substations is no longer needed to support the Proposed Project. The reference to these substations has been stricken from Section B.1 (Description of the Proposed Project, Introduction and Overview) as requested.

F3-29 The commenter requests that the description of the Proposed Project be revised to note that the Proposed Project would replace the existing structures and conductors primarily within the existing ROW, consistent with the descriptions elsewhere in the document including in Section B.2.6 (Right-of-Way Requirements). The language in Section B.1 (Introduction and Overview) has been revised as requested.

F3-30 The commenter recommends clarifying the original need for the West of Devers Upgrade Project that was considered in 2005 as compared to the need for today's Proposed Project. Text addressing SCE's requested clarification has been added to the Final EIS in Section B.1.1 (Historical Background in Project Area). See General Response GR-1 (Project Need) for a discussion of purpose and need for the currently Proposed Project.

F3-31 The commenter states that as a result of additional engineering, the work originally proposed for the Timoteo and Tennessee Substations is no longer needed to support the Proposed Project and requests that the reference to it on EIS page B-1 be removed. There is only one reference to these substations on this page. It was already deleted as noted above in Response to Comment F3-28.

F3-32 This comment repeats Comments F3-28 and F3-31. Please see Response to Comment F3-28 regarding the Timoteo and Tennessee Substations.

F3-33 The commenter notes that the Bureau of Indian Affairs will not be approving SCE's construction in the tribal trust lands as noted in Footnote 1 of Section B. Instead, the BIA will consider construction of the Proposed Project as a reasonably foreseeable impact in determining whether or not to approve the ROW grant. The footnote on page B-2 of the Draft EIR/EIS has been updated in the Final EIS to reflect this information by deleting the final sentence as requested in this comment.

F3-34 The commenter requests that language in Section B.1.1 (Description of the Proposed Project, Historical Background in Project Area) be revised to state that SCE proposes to use "SCE's standard" conductors for the Proposed Project instead of the current statement that SCE proposes to use "heavier" conductors.

This change has not been made. The bullet is highlighting the main differences between the DPV2 Project and the current West of Devers Upgrade Project including the replacement of all the structures. While it may be SCE's standard conductors that are being proposed, these are heavier than existing conductors and the structures are being replaced because of the conductors' weight, as noted in the section. The commenter apparently agrees that the currently proposed conductors are heavier than those previously proposed for the DPV2 Project as no objection to the reference to their "greater weight" in this section has been made.

F3-35 The commenter requests that Section B.2.1.1 (Description of the Proposed Project, 220 kV Transmission Line Segments) update the description of the installation of the 220 kV structures for Segment 1 of the Proposed Project based on the results of SCE's additional engineering analysis by changing the number of newly installed structures required from 49 to 46. Section B.2.1.1 has been revised in the Final EIS to make this this requested change.

F3-36 The commenter requests that Section B.2.1.1 (Description of the Proposed Project, 220 kV Transmission Line Segments) update the description of the removal, and installation and modification of the 220 kV structures for Segment 2 of the Proposed Project based on the results of SCE's additional engineering analysis by changing the number of existing structures required to be removed from 25 to 23, the number of newly installed structures required from 28 to 25 and the number of existing structures required to be modified from 4 to 6. Section B.2.1.1 has been revised in the Final EIS to make these requested changes.

F3-37 The commenter requests that Section B.2.1.1 (Project Description, 220 kV Transmission Line Segments) update the description of the installation of the 220 kV structures for Segment 3 of the Proposed Project based on the results of SCE's additional engineering analysis by changing the number of newly installed structures required from 104 to 102. Section B.2.1.1 has been revised in the Final EIS to make this requested change.

F3-38 The commenter requests that Section B.2.1.1 (Description of the Proposed Project, 220 kV Transmission Line Segments) update the description of the removal of the existing 220 kV structures for Segment 4 of the Proposed Project based on the results of SCE's additional engineering analysis by changing the number of existing structures required to be removed from 161 to 160. Section B.2.1.1 has been revised in the Final EIS to make this requested change.

F3-39 The commenter requests that Section B.2.1.1 (Description of the Proposed Project, 220 kV Transmission Line Segments) update the description of the installation and modification of the 220 kV structures for Segment 4 of the Proposed Project based on the results of SCE's additional engineering analysis, by changing the number of newly installed structures required from 112 to 111 and the number of existing structures required to be modified from 5 to 6. Section B.2.1.1 has been revised in the Final EIS to make these requested changes.

F3-40 The commenter requests that Section B.2.1.1 (Description of the Proposed Project, 220 kV Transmission Line Segments) update the description of the removal, installation and modification of the 220 kV structures for Segment 6 of the Proposed Project based on the results

of SCE's additional engineering analysis by changing the number of existing structures required to be removed from 112 to 117,the number of newly installed structures required from 79 to 85 and to delete any reference to the need to modify any existing structures. Section B.2.1.1 has been revised in the Final EIS to make these requested changes.

F3-41 The commenter requests that Table B-1 (Typical Transmission Structure Dimensions) in Section B.2.1.2 (Description of the Proposed Project, Transmission Line Infrastructure) be revised based on the results of SCE's additional engineering analysis by changing the proposed number of structures from 394 (LST) and 76 (TSP) to 384 (LST) and 83 (TSP); the approximate height above ground from 110-189 feet (LST) and 110-200 feet (TSP) to 110-193 feet (LST) and 110-198 feet (TSP); the approximate pole diameter from 2-7 feet (TSP) to 3-10 feet (TSP) and the approximate auger diameter from 5-12 feet (TSP) to 5-14 feet (TSP). Table B-1 has been revised in the Final EIS to make these requested changes. See Response to Comment F4-1.

F3-42 The commenter requests that the source for Table B-1 be updated to reflect the current information provided by SCE. The text associated with and below Table B-1 now indicates the 2013 source has been updated by SCE's Comment Letter.

F3-43 The commenter requests that Footnote 1 under Table B-1 be updated based on the results of SCE's additional engineering analysis to indicate that 34 TSPs, rather than 38 TSPs, are required to be installed in the portion of Segment 5 within the Morongo Reservation. Footnote 1 to Table B-1 has been revised in the Final EIS to make this requested change.

F3-44 The commenter requests that the description in Section B.2.1.2 (Description of the Proposed Project, Transmission Line Infrastructure) of the lattice steel towers that would be removed be changed based on the results of SCE's additional engineering analysis from 408 to 413. Section B.2.1.2 has been revised in the Final EIS to make this requested change.

F3-45 The commenter requests that Table B-2 (Transmission 220 kV Removal and Installation Per Segment) in Section B.2.1.2 (Description of the Proposed Project, Transmission Line Infrastructure) be revised due to additional engineering. These changes to the numbers of double-circuit lattice steel towers and tubular steel poles installed and removed and the length of OHGW by segment have been made to the Final EIS. See also Response to Comment F4-1.

F3-46 The commenter requests that the source for Table B-2 be updated to reflect the current information provided. The text associated with and below Table B-2 now indicates that the 2013 source has been updated by SCE's Comment Letter. See also Response to Comment F4-1.

F3-47 The commenter states that as a result of additional engineering, the work for the Timoteo and Tennessee Substations is no longer needed to support the Proposed Project. The reference to the proposed work to replace the circuit breakers and foundations at the Timoteo and Tennessee substations has been stricken from Section B.2.2 (Project Description, Substation Improvements) in the Final EIS as requested.

F3-48 This comment repeats Comment F3-47. See Response to Comment F3-47.

F3-49 The commenter states that work at the Timoteo and Tennessee Substations is no longer needed to support the Proposed Project. EIS Section B.2.2.6 (Description of the Proposed Project, Timoteo Substation) has been stricken as requested.

F3-50 The commenter states that work at the Timoteo and Tennessee Substations is no longer needed to support the Proposed Project. EIS Section B.2.2.7 (Description of the Proposed Project, Tennessee Substation) has been stricken as requested.

F3-51 The commenter states that work at the Timoteo and Tennessee Substations is no longer needed to support the Proposed Project. The reference to these substations has been stricken from Section B.2.2.8 (Description of the Proposed Project, Substation Lighting) as requested.

F3-52 The commenter states that as a result of additional engineering the description of the Dental 12 kV Distribution Circuit should be updated in Section B.2.4 (Description of the Proposed Project, 12 kV Distribution Line Improvements) to include additional discussion of necessary reconductoring, a new overhead three-phase bank (replacing an existing three-phase bank), and four distribution pole replacements. Section B.2.4 has been revised in the Final EIS to make this requested change. These changes would be minor and similar to proposed work that has already been encompassed in the analysis of the Proposed Project. Therefore, there would be no changes to the impact analysis or conclusions in the EIS regarding the distribution relocation component of the project.

F3-53 The commenter states that as a result of additional engineering the description of the Intern 12 kV Distribution Circuit should be updated in Section B.2.4 (Description of the Proposed Project, 12 kV Distribution Line Improvements) by changing the number of new underbuild subtransmission structures that may be required to be replaced from 11 to 1 and acknowledging that one new subtransmission structure may be required. Section B.2.4 has been revised in the Final EIS to make these requested changes.

F3-54 The commenter states that as a result of additional engineering the description of the telecommunication systems upgrades connecting the existing Devers-Valley OPGW to the MEER in Banning Substation should be updated in Section B.2.5 (Description of the Proposed Project, Telecommunication Systems Upgrades) to address noted minor changes involving the location and extent of this component of the proposed telecommunications system upgrade work. Section B.2.5 has been revised in the Final EIS to make these requested changes. See Responses to Comments F3-55 through F3-58 regarding additional suggested revisions to the proposed telecommunication systems upgrades.

F3-55 The commenter states that as a result of additional engineering the description of the telecommunication systems upgrades connecting the existing Devers-Valley OPGW to the MEER in Maraschino Substation and connecting Connect the Redlands Inland Empire District Office–San Bernardino fiber optic cable should be updated in Section B.2.5 (Description of the Proposed Project, Telecommunication Systems Upgrades) to address minor changes involving the location and extent of these components of the proposed telecommunications system upgrade work. Additionally, the commenter states that two new telecommunication system upgrades should been included in the project description. Section B.2.5 has been revised in the Final EIS to make these requested changes.

F3-56 The commenter states that as a result of additional engineering the description of the telecommunication systems upgrades proposed to be conducted in order to facilitate the connection of existing substations to the new OPGW located on the new 220 kV structures should be updated in Section B.2.5 (Description of the Proposed Project, Telecommunication Systems Upgrades) to address minor changes involving the location and extent of these components of the proposed telecommunications system upgrade work. Additionally, the

new telecommunication system upgrades requested and made in the Final EIS as noted in Response to Comment F3-55 require renumbering these elements. Section B.2.5 has been revised in the Final EIS to make these requested changes.

F3-57 The commenter states that as a result of additional engineering the description of the telecommunication systems upgrades proposed to be conducted in order to facilitate the connection of existing substations to the new OPGW located on the new 220 kV structures should be updated in Section B.2.5 (Description of the Proposed Project, Telecommunication Systems Upgrades) to address minor changes involving the location and extent of these components of the proposed telecommunications system upgrade work. Additionally, the new telecommunication system upgrades requested and made in the Final EIS as noted in Response to Comment F3-55 require renumbering this element. Section B.2.5 has been revised in the Final EIS to make these requested changes.

F3-58 The commenter states that as a result of additional engineering the description of the telecommunication systems upgrades proposed to be conducted in order to facilitate the connection of existing substations to the new OPGW located on the new 220 kV structures should be updated in Section B.2.5 (Description of the Proposed Project, Telecommunication Systems Upgrades) to address minor changes involving the location and extent of these components of the proposed telecommunications system upgrade work. Additionally, the new telecommunication system upgrades requested and made in the Final EIS as noted in Response to Comment F3-55 require renumbering these elements. Section B.2.5 has been revised in the Final EIS to make these requested changes.

F3-59 The commenter states that as a result of additional engineering and analysis the description of the locations where SCE expects FAA to make determinations on the lighting and marker ball structures should be updated. This change has been made in Section B.2.6.4 (Project Description, Federal Aviation Administration Considerations), indicating the updated numbers of structures and spans requiring lighting or marker ball determinations.

F3-60 The commenter states that as a result of additional engineering and analysis the number of poles and spans where SCE expects FAA to make determinations on the lighting and marker ball structures should be updated to change the numbers from 220 to 171 structures and add reference to 113 spans. These changes have been made in Section B.2.6.4 (Description of the Proposed Project, Federal Aviation Administration Considerations) in the Final EIS.

F3-61 The commenter states that as a result of additional engineering and analysis the information regarding the Banning Airport and FAA safety requirements should be updated to indicate that the FAA may indicate that up to four additional structures would benefit from lighting. This change has been made in Section B.2.6.4 (Description of the Proposed Project, Federal Aviation Administration Considerations) in the Final EIS.

F3-62 The commenter states that as a result of additional engineering and analysis the acreage information in Table B-4 (Approximate Land Disturbance Summary for the Proposed Project) should be updated consistent with the commenter's requested changes to the acreages in Table B-11 as noted in comment F3-69. These changes have been made to Table B-4 in Section B.3.1 (Description of the Proposed Project, General Construction) in the Final EIS.

F3-63 The commenter has identified the potential need for an additional yard, the Matich Material Staging Yard, in the event that one of the other proposed yards is occupied and unavailable prior to SCE commencing construction. The commenter requests that Figures B-5, B-6 and B-16 be revised to include the information provided about this additional yard. A memoran-

dum identifying the site and including a brief environmental analysis of this additional yard was also provided. The SCE memorandum presented as Comment F4-2 presents environmental information about this new yard. The EIS team has reviewed the proposed construction yard and has concluded that it would not create any new or more severe impacts beyond those already described in the Draft EIR/EIS. The yard has been added to Tables B-5 and B-6 in the Final EIS, as well as in Section D, as applicable. See Response to Comment F4-2.

F3-64 The commenter states that work at the Timoteo and Tennessee Substations is no longer needed to support the Proposed Project. The reference to these substations has been stricken from Section B.3.1.1 (Description of the Proposed Project, Staging Areas and other Work Areas) in the Final EIS as requested.

F3-65 The commenter states that work at the Timoteo and Tennessee Substations is no longer needed to support the Proposed Project. The reference to these substations has been stricken from Section B.3.2 (Description of the Proposed Project, Modifications to Existing Substations) in the Final EIS as requested.

F3-66 The commenter repeats Comment F3-65. See Response to Comment F3-65.

F3-67 The commenter states that as a result of additional engineering the description in Section B.3.3.1 (Description of the Proposed Project, Access, Spur, and Temporary Roads) and in Table B-10 (Approximate Length of New Retaining Wall Per Segment) of the approximate lengths and heights of new retaining walls should be reduced. Section B.3.3.1 and Table B-10 in the Final EIS have been revised to make these requested reductions.

F3-68 The commenter states that the work at the Timoteo and Tennessee Substations is no longer needed to support the Proposed Project. The reference to these substations has been stricken from Table B-9 (Substation Cut/Fill Grading and Surface Improvements Summary) in Section B.3.2.1 (Description of the Proposed Project, Substation Ground Surface Improvements) in the Final EIS as requested.

F3-69 The commenter states that as a result of additional engineering the description of the estimated land disturbance for the Proposed Project transmission structures in Table B-11 in Section B.3.3.3 (Description of the Proposed Project, Foundation Installation) should be revised as indicated in this comment's reproduction of and edits to Table B-11. This change has been made to Table B-11 in the Final EIS.

F3-70 The commenter requests that the source for Table B-11 be updated to reflect the current information provided. The text included below Table B-11 in the Final EIS now indicates the 2013 source has been updated by SCE's Comment Letter.

F3-71 The commenter states that as a result of additional engineering the description of the foundation drilling process in Section B.3.3.3 (Description of the Proposed Project, Foundation Installation) should be revised to indicate changes in typical depths. This requested change has been made in the Final EIS.

F3-72 The commenter states that as a result of additional engineering the description of the amount of concrete delivered to each TSP should be revised in Section B.3.3.3 (Description of the Proposed Project, Foundation Installation) by changing the range from 25-270 cubic yards to 25-370 cubic yards. This change has been made in Section B.3.3.3 in the Final EIS.

F3-73 The commenter states that as a result of additional engineering the description of the installed cable in the conduits should be revised in Section B.3.5.1 (Description of the Proposed Project, Access) by changing four conduits to six conduits. This change has been made in the Final EIS.

F3-74 The commenter requests a minor revision be made to the name of a project feature in Table B-15 (Approximate Land Disturbance of Distribution Line Construction) in Section B.3.5.2 (Distribution Land Disturbance) by changing Vault to Vault/Manhole. This change has been made in the Final EIS.

F3-75 The commenter states that as a result of additional engineering the description of the underground telecom facilities installation should be revised in Section B.3.7.2 (Description of the Proposed Project, Fiber Optic Cable Installation) to describe directional bore construction. This change has been made in the Final EIS.

F3-76 The commenter requests that additional detail be added to Table B-19 (Magnetic Field Levels along Existing 220 kV Transmission Corridor) in Section B.5.2 (EMF in the Proposed Project Area) in Segment 6, Model 2 to separate Magnetic Field Levels along the existing transmission corridor between the northern and southern areas of this right of way. This requested information has been added in the Final EIS.

F3-77 The commenter has requested that the SCE EMF Design Guidelines reduction options listed in the Draft EIR/EIS be replaced with common magnetic field reduction options SCE uses to comply with the CPUC EMF Policy. As requested, the text in Section B.5.3 (Field Management Plan for the Proposed Project) has been revised to list the suggested EMF reduction options in the Final EIS.

F3-78 The commenter requests that the reference to the Proposed EMF Reduction Measures in Section B.5.3 (Project Description, Field Management Plan for the Proposed Project) clarify the reference to “no cost” and “low cost” measures as “no cost” or “low cost”.

This requested change has not been made. SCE’s Preliminary Field Management Plan for the Proposed Project (EIS Appendix 4) refers to the measures as “no cost” *and* “low cost”, instead of using the term “no cost” *or* “low cost” as requested in the comment.

F3-79 The commenter requests that additional detail be added to Table B-20 (Calculated Magnetic Field Levels along Proposed 220 kV Transmission Corridor) in Section B.5.3 (Project Description, Field Management Plan for the Proposed Project) in Segment 6, Model 2 to separate calculated Magnetic Field Levels along the proposed corridor between the northern and southern areas of this right of way . This requested information has been added to the Final EIS.

F3-80 The commenter requests a revision to APM-BIO-9 in Table B-21 (Applicant Proposed Measures [APMs]) in Section B.6 (Project Description, Applicant Proposed Measures) for clarification purposes. This requested change has been made in the Final EIS. (Note, however, APM-BIO-9 has been superseded by mitigation measures as described in Section D.4 Biological Resources – Vegetation.)

F3-81 The commenter notes that the interconnection location for Project 1, in Table B-22 (Connected Actions – Solar Generation Projects) in Section B.7.1 (Definition of Connected Action Projects) has been changed from Blythe – Eagle Mountain 161 kV to Red Bluff Substation 220 kV bus. Table B-22 has been revised in the Final EIS. Table A-6 (Project Analysis

Determinations) and Table B-23 (Analysis Assumptions for Confidential Connected Action Projects, All Solar PV) have also been revised to make a similar change in the Final EIS.

F3-82 The commenter has stated that it would like to clarify that Project 3 in Table B-22 (Connected Actions – Solar Generation Projects) of the Draft EIR/EIS executed an interconnection agreement in July 2015 that presumes implementation of WOD Upgrade Project and achieving deliverability via Colorado River Substation. The Solar Star Blythe Mesa (Queue 576) was filed at FERC on July 31, 2015.

This clarification has been made as a footnote to Table B-22 in the Final EIS. The name of the project has also been updated in Table B-22 and in Table A-6 (Project Analysis Determinations) in Sections A.3 (Definition of Connected Actions and Related Projects). Because connected actions do not drive the determination for mitigation, its placement in Table B-22 and the impact analysis have not been revised in the Final EIS.

F3-83 The commenter has submitted as an attachment an updated Figure B-2b (Existing and Proposed Corridor Profile – Segment 1) for inclusion in the Final EIS. The figure has been updated in the Final EIS. Please see Response to Comment F4-4.

F3-84 The commenter has submitted as an attachment an updated Figure B-10 (Typical 220 kV Transmission Structures) for inclusion in the Final EIS. The figure has been updated in the Final EIS. Please see Response to Comment F4-5.

F3-85 The commenter has requested removal of Location 2 (Removal of 12kV and Relocation on the New 66kV Structures) from the map and legend on Figure B-13 (Proposed Relocated Subtransmission and Distribution Line Routes), because there is no overhead 12 kV on Nevada Street from Lugonia Avenue to Almond Avenue. The requested revision has been made to Figure B-13 in the Final EIS.

F3-86 The commenter states that as a result of additional engineering analysis the work for Timoteo and Tennessee Substations is no longer needed and Table D.3-8 (Construction Phase Regional Emissions Impacts [lb/day]) should be updated in the Final EIS to reflect new construction-phase emissions given the removal of work at those substations. The table has been updated in the Final EIS to reflect the requested changes.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Section C Alternatives

Page C-3

DEIR/DEIS Text: F3-87

Basic Project Objective 1: to upgrade the WOD 220 kV transmission lines between Devers, El Casco, Vista, and San Bernardino Substations to increase system deliverability by at least 2,200 MW.

SCE Comment:

Please see SCE's accompanying cover letter and Attachment A: for reasons as to why Basic Project Objective 1 does not sufficiently meet the need for the WOD Upgrade Project.

Page C-7

DEIR/DEIS Text: F3-88

Phased Build Alternative	Fully meets all basic project objectives.

SCE Comment:

Please see SCE's accompanying cover letter and Attachment A: for concerns related to the Phased Build Alternative.

Page C-8

DEIR/DEIS Text: F3-89

500 kV Towers Alternative	Fully meets all basic project objectives

SCE Comment:

The conclusion that the 500 kV Towers Alternative meets all basic project objectives is not supported by the information included in the DEIR/DEIS. The DEIR/DEIS did not include a power flow study that would be needed to make such a conclusion.

Page C-25

DEIR/DEIS Text: F3-90

The alternative would reduce environmental impacts, while still providing capacity for all the generation included in the CAISO 2024 Reliability Base Case. This scenario includes 3,754 MW of Total Generation On-line and 6,901 MW of Total Generation Capacity from all renewable and conventional resources, as well as the power flow on the system resulting from import of 1,400 MW from the Imperial Irrigation District into the Los Angeles Basin.

SCE Comment:

Please see SCE's accompanying cover letter for concerns related to the DEIR/DEIS's lack of evidence supporting conclusions that the alternatives retained for full analysis would avoid or substantially lessen significant effects for the Proposed Project as well as and why the CAISO 2024 Reliability Base Case is incorrect for use in considering alternatives to the Proposed Project.

Page C-38

DEIR/DEIS Text: F3-91

The SPS is also known as the existing West of Devers Remedial Action Scheme.

SCE Comment:

For clarification, please make the following revision:

The SPS is also known as the ~~existing West of Devers~~ Devers Remedial Action Scheme.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page C-39

DEIR/DEIS Text: F3-92

West of Devers Interim Project. In 2011, CAISO found that placing series reactors on the Devers–San Bernardino 230 kV line and Devers–El Casco 230 kV line could balance the line loading on the existing WOD transmission lines. These reactors were installed in 2013; when needed, these reactors have been redirecting power flows onto the 500 kV system between the Devers and Valley Substations (also see Section B.1.1, Historical Background in Project Area).

SCE Comment:

The WOD interim is in-service all the time, please make the following revision:

West of Devers Interim Project. In 2011, CAISO found that placing series reactors on the Devers–San Bernardino 230 kV line and Devers–El Casco 230 kV line could balance the line loading on the existing WOD transmission lines. These reactors were installed in 2013; ~~when needed,~~ these reactors have been redirecting power flows onto the 500 kV system between the Devers and Valley Substations (also see Section B.1.1, Historical Background in Project Area).

Responses to Comment Set F3 – Section C Alternatives

F3-87 Please see General Response GR-2 (Basic Project Objectives).

F3-88 Please see Responses to Comments F1-5 through F1-15 regarding the Phased Build Alternative.

F3-89 The commenter states that EIS does not support the conclusion that the 500 kV Towers Alternative meets all basic project objectives. Power flow modeling would not be necessary for this alternative because the electrical configuration of the 220 kV topology would be essentially identical to that of the Proposed Project, with the exception of certain larger capacity conductors and structures. Therefore, power flow performance of this alternative would be nearly identical to or of greater capabilities than that of the Proposed Project.

F3-90 Please see responses to comments for Comment Set F1 (SCE Cover Letter).

F3-91 The commenter requested a modification in Section C.6.2.1 (Current Transmission Plans) to indicate that the SPS is also known as the Devers Remedial Action Scheme as opposed to the existing West of Devers Remedial Action Scheme as noted in the Draft EIR/EIS. This suggested revision has been made to the Final EIS.

F3-92 The commenter states that the West of Devers Interim Project is in service all of the time. Therefore, as suggested, “when needed” has been deleted from the description of its use in Section C.6.2.1 (Current Transmission Plans) of the Final EIS.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Section D.2 Agriculture

Page D.2-2

DEIR/DEIS Text: F3-93

Agriculture plays a large economic role in both Riverside and San Bernardino Counties. In Riverside County, approximately 5 percent of the County's unincorporated areas are designated for agricultural use (County of Riverside 2008a, 2008b). In the 2007 USDA Agricultural Census, there were 3,463 farms in Riverside County with an average size of 102 acres (USDA, 2008). The gross value of the County's agricultural commodities was $1.25 million in 2012 (14th in the state). Riverside County's top agricultural commodities were milk, ornamental nursery plants, grapes, and hay.

SCE Comment:

Based on review of the Riverside County Agricultural report referenced, please make the following revision:

Agriculture plays a large economic role in both Riverside and San Bernardino Counties. In Riverside County, approximately 5 percent of the County's unincorporated areas are designated for agricultural use (County of Riverside 2008a, 2008b). In the 2007 USDA Agricultural Census, there were 3,463 farms in Riverside County with an average size of 102 acres (USDA, 2008). The gross value of the County's agricultural commodities was $1.25 ~~m~~billion in 2012 (14th in the state). Riverside County's top agricultural commodities were milk, ornamental nursery plants, grapes, and hay.

Page D.2-3

DEIR/DEIS Text: F3-94

In San Bernardino County, approximately 2 percent of the County's unincorporated areas are designated for agriculture (County of San Bernardino, 2009). In 2007, there were 1,405 farms in the County with an average size of 366 acres. The gross value was of the County's agricultural commodities was $466,505 (24th in the state). San Bernardino County's top agricultural commodities were milk, eggs, cattle, and hay.

SCE Comment:

Based on review of the San Bernardino County agricultural report referenced, please make the following revision:

In San Bernardino County, approximately 2 percent of the County's unincorporated areas are designated for agriculture (County of San Bernardino, 2009). In 2007, there were 1,405 farms in the County with an average size of 366 acres. The gross value ~~was~~ of the County's agricultural commodities in 2012 was $582,229,000 ~~$466,505~~ (~~24~~ 18th in the state). San Bernardino County's top agricultural commodities were milk, eggs, cattle, and hay.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.2-8 and 9

DEIR/DEIS Text: F3-95

D.2.3.2 CEQA Significance Criteria

The significance criteria listed below are based on the Environmental Checklist form in Appendix G of the CEQA guidelines. They are used to determine whether a project and its alternatives would result in significant impacts to agricultural resources as defined by CEQA. According to the CEQA Checklist, a project causes a potentially significant impact if it would:

- Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use;
- Conflict with existing agricultural use, or a Williamson Act contract;
- Conflict with existing zoning for, or cause rezoning of, forest land (as defined in the Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g));
- Result in the loss of forest land or conversion of forest land to non-forest use; or
- Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to nonagricultural use or conversion of forest land to non-forest use.

The project vicinity does not contain forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)).1 Therefore, impacts to forest land are not addressed further in this EIR. Impacts related to Williamson Act lands are also not addressed further because the nearest Williamson Act lands are 0.8 miles from the Proposed Project.

For the purposes this analysis, impacts would be potentially significant if the Proposed Project would:

- Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Important Farmland), as designated by the Farmland Mapping and Monitoring Program, to non-agricultural use;
- Conflict with existing zoning for agricultural use;
- Involve other changes in the existing environment which, due to their location or nature, would impair the use of agricultural land.

The third criteria addresses impairment of agricultural land rather than conversion in order to better capture indirect impacts and potential impacts to surrounding agricultural operations.

SCE Comment:

Significance criteria not found in the California Environmental Quality Act (CEQA) guidelines are not appropriate for inclusion in an analysis of CEQA Significance Criteria. As such, please remove the following:

~~Involve other changes in the existing environment which, due to their location or nature, would impair the use of agricultural land.~~

~~The third criteria addresses impairment of agricultural land rather than conversion in order to better capture indirect impacts and potential impacts to surrounding agricultural operations.~~

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.2-9

DEIR/DEIS Text: F3-96

Impact AG-2: Project would conflict with existing zoning for agricultural use The Proposed Project would cross 267 acres of land zoned for agricultural use. The Proposed Project would be located on land zoned for agriculture in the cities of Banning, Loma Linda, and Redlands and in Riverside County. Agricultural zoning in the project vicinity is described in more detail in Section D.2.1 (Environmental Setting). In addition, City of Grand Terrace uses an Agriculture Overlay Zone in some areas under its jurisdiction, including portions of the project vicinity. Public utility transmission lines and poles are an allowable use in all of the agriculture zones affected by the Proposed Project. Therefore, the Proposed Project would not conflict with the use of lands zoned for agriculture.

Potential construction impacts to agricultural operations would be temporary and would not conflict with zoning designations. The use of the transmission line and access roads during operations would be consistent with agricultural zoning

SCE Comment:

Impact AG-2 states that the project does not conflict with zoning for agricultural use but the discussion fails to include an explanation that the CPUC has preemptive jurisdiction over the Proposed Project as explained in Section A.4.3 Other Agencies. It is recommended that the following language be added:

Impact AG-2: The CPUC has preemptive jurisdiction over the Project, as such, the following information is provided for informational purposes only. Project would conflict with existing zoning for agricultural use The Proposed Project would cross 267 acres of land zoned for agricultural use….

Page D.2-9

DEIR/DEIS Text: F3-97

Paragraph 2, Sentence 4: The following is stated:

Transmission infrastructure and new roads would permanently convert 3.5 acres of Important Farmland to non-agricultural use.

SCE Comment:

Please make the following revisions to acknowledge that tower removals would result in a benefit: :

Transmission infrastructure and new roads would permanently convert **3.5** acres of Important Farmland to non-agricultural use. This is an overestimation as it does not take into account acreage that may be converted back to agricultural uses with the removal of the existing transmission lines.

Page D.2-10

DEIR/DEIS Text: F3-98

D.2.3.3 Impacts and Mitigation Measures

Impact AG-3: Project would involve changes in the existing environment which would impair the use of agricultural land

Temporary impacts could include damage to equipment, crops, and livestock from increased traffic on farm roads; water and soil contamination; suppression of plant growth by fugitive dust; soil erosion; and the spread of weeds.

SCE Comment:

The statement that the Proposed Project could result in damage to equipment and/or damage due to increased traffic is unsubstantiated. Please make the following revision:

Temporary impacts could include damage to ~~equipment,~~ crops~~,~~ and livestock ~~from increased traffic on farm roads;~~ water and soil contamination; suppression of plant growth by fugitive dust; soil erosion; and the spread of weeds.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.2.10 through 11

DEIR/DEIS Text: F3-99

Mitigation Measures for Impact AG-3: Project would involve changes in the existing environment which would impair the use of agricultural land

AG-3a Establish agreement and coordinate construction activities with agricultural landowners.

Sixty (60) days prior to the start of project construction, Southern California Edison (SCE) shall secure a signed agreement with property owners of Important Farmland (Prime Farmland, Farmland of Statewide Importance, Unique Farmland) that will be used for construction and operation of the project, access and spur roads, staging areas, and other project-related activities. The purpose of this agreement will be to set forth the use of Prime Farm-land, Farmland of Statewide Importance, Unique Farmland during construction in order to: (1) schedule proposed construction activities at a location and time when damage to agricultural operations would be minimized, and (2) ensure that any areas damaged or disturbed by construction are restored to a condition mutually agreed upon by the landowner and SCE.

SCE shall coordinate with the agricultural landowners in the affected areas where Important Farmland will be temporarily disturbed in order to determine when and where construction should occur in order to minimize damage to agricultural operations. This includes avoiding construction during peak planting, growing, and harvest seasons. If damage or destruction does occur, SCE shall perform restoration activities on the disturbed area in order to return the area to a pre-determined condition or the pre-construction condition, whichever option is agreed upon by the landowner and SCE. This could include activities such as soil preparation, regrading, and reseeding. This measure applies to agricultural landowners with land that is impacted by the Proposed Project. SCE shall provide proof of the continued use of Important Farmland through the submittal of a signed agreement between an individual property owner and SCE. The signed agreements shall be submitted to the CPUC for review and approval prior to the start of construction.

SCE Comment:

Mitigation Measure AG-3a as written is unnecessarily restrictive and disproportionate to the potential temporary impact. AG-3a could result in project delay due to inability to procure agreements mandated by this mitigation measure. In addition, SCE has existing easement rights that grant SCE the right to construct without having to secure an additional agreement within the existing ROW. Please make the following revisions:

AG-3a Establish agreement and coordinate construction activities with agricultural landowners. Sixty (60) days prior to the start of project construction, Southern California Edison (SCE) shall ~~secure a signed agreement~~ coordinate with property owners of Important Farmland (Prime Farm-land, Farmland of Statewide Importance, Unique Farmland) that is currently being used for agricultural purposes and that will be used for construction and operation of the project, access and spur roads, staging areas, and other project-related activities. Should SCE require an additional agreement, such as a temporary entry permit or temporary construction easement, it would be for temporary purposes outside of the existing SCE ROW whereby SCE does not have an existing or newly acquired/upgraded easement right to perform construction activities.

The purpose of this agreement will be to set forth the use of agriculturally utilized Prime Farm-land, Farmland of Statewide Importance, Unique Farmland during construction in order to: (1) schedule proposed construction activities at a location and time when damage to agricultural operations would be minimized as feasible, and (2) ensure that any areas damaged or disturbed by construction are restored to a condition mutually agreed upon by the landowner and SCE and also in accordance with the existing easement language, if construction activities occur within the existing SCE ROW.

SCE shall coordinate with the agricultural landowners in the affected areas where Important Farmland will be temporarily disturbed in order to determine when and where construction should occur in order to minimize damage to agricultural operations. This includes avoiding construction during peak planting, growing, and harvest seasons as feasible. If damage or destruction does occur, SCE shall perform restoration activities on the disturbed in order to return the area to a pre-determined condition or the pre-construction condition, whichever option is agreed upon by the landowner and SCE and also in accordance with the existing easement language. This could include activities such as soil preparation, regrading, and reseeding. SCE restoration activities performed will vary dependent upon the language within the existing or newly acquired/upgraded easement document. This

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

measure applies to agricultural landowners with agriculturally utilized land that is impacted by the Proposed Project. SCE shall provide proof of the continued use of Important Farmland that is currently utilized for agriculture through the submittal of a signed temporary construction easement or grant of easement agreement between an individual property owner and SCE. The signed agreements shall be submitted to the CPUC for review and approval prior to the start of construction. **F3-99 cont.**

If SCE is unable to coordinate construction activities or enter into a temporary construction easement with any of the land owners, due to an inability to agree to the terms of the agreement or for any other reason, SCE shall notify the CPUC/BLM and the CPUC/BLM shall allow the project construction to continue absent such an agreement.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.2-11

DEIR/DEIS Text: F3-100

Mitigation Measure for Impact AG-3: Project would involve changes in the existing environment which would impair the use of agricultural land

AG-3a Establish agreement and coordinate construction activities with agricultural landowners. Sixty (60) days prior to the start of project construction, Southern California Edison (SCE) shall secure a signed agreement with property owners of Important Farmland (Prime Farmland, Farmland of Statewide Importance, Unique Farmland) that will be used for construction and operation of the project, access and spur roads, staging areas, and other project related activities. The purpose of this agreement will be to set forth the use of Prime Farmland, Farmland of Statewide Importance, Unique Farmland during construction in order to: (1) schedule proposed construction activities at a location and time when damage to agricultural operations would be minimized, and (2) ensure that any areas damaged or disturbed by construction are restored to a condition mutually agreed upon by the landowner and SCE. SCE shall coordinate with the agricultural landowners in the affected areas where Important Farmland will be temporarily disturbed in order to determine when and where construction should occur in order to minimize damage to agricultural operations. This includes avoiding construction during peak planting, growing, and harvest seasons. If damage or destruction does occur, SCE shall perform restoration activities on the disturbed area in order to return the area to a pre-determined condition or the pre-construction condition, whichever option is agreed upon by the landowner and SCE. This could include activities such as soil preparation, regrading, and reseeding. This measure applies to agricultural landowners with land that is impacted by the Proposed Project. SCE shall provide proof of the continued use of Important Farmland through the submittal of a signed agreement between an individual property owner and SCE. The signed agreements shall be submitted to the CPUC for review and approval prior to the start of construction.

SCE Comment:

Mitigation Measure AG-3a is unnecessarily restrictive and disproportionate to the potential temporary impact. Additionally, AG-3a would allow project opponents the ability to delay the project by refusing to enter into agreements mandated by this mitigation measure.

SCE recommends that mitigation measure AG.3a include the following language:

- Southern California Edison (SCE) shall <u>coordinate</u> with property owners of Important Farmland (Prime Farmland, Farmland of Statewide Importance, Unique Farmland) that will be used for construction and operation of the project, access and spur roads, staging areas, and other project related activities. <u>Should SCE require an additional agreement, such as a temporary entry permit or temporary construction easement, it would be for temporary purposes outside of the existing SCE ROW whereby SCE does not have an existing or newly acquired/ upgraded easement right to perform construction activities.</u>
- "…avoiding construction during peak planting, growing, and harvest seasons."
- Peak planting, growing and harvest seasons are undefined times that may vary depending on crop type and the particular landowner. Including such a requirement has the potential to impact SCE's ability to construct the project. As explained in Section B.3.10 Construction Schedule and Sequence, the construction of the Proposed Project would be complex, given the need to keep existing WOD facilities operational during construction and the need to construct safely when in proximity to energized lines. Construction of the Proposed Project is primarily dependent on outages from the CAISO and such a constraint as avoiding construction during peak planting, growing, and harvest seasons which is undefined represents a requirement that is disproportional the impact the document is assessing.
- If damage or destruction does occur, SCE shall perform restoration activities on the disturbed area in order to return the area to a pre-determined condition or the pre-construction condition, whichever option is agreed upon by the landowner and SCE. This could include activities such as soil preparation, regrading, and reseeding.

  SCE restoration activities performed will vary dependent upon the language within the existing or newly acquired/upgraded easement document.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.2-12

DEIR/DEIS Text: F3-101

D.2.3.5 CEQA Significance Determination for Proposed Project and Connected Actions

Impact AG-1: Project would permanently convert Important Farmland to non-agricultural use (Class III for Proposed Project; Class II for Connected Actions)

Construction and operation of the Proposed Project would permanently convert 3.5 acres of designated Important Farmland to non-agricultural use. The scale of this impact is very small, well below the significance threshold of 10 acres of Prime Farmland or 40 acres of non-Prime Farmland. Therefore, this impact would be less than significant, and no mitigation is required (Class III).

SCE Comment:

Consistent with the comment provided above, please make the following revision:

Impact AG-1: Project would permanently convert Important Farmland to non-agricultural use (Class III for Proposed Project; Class II for Connected Actions)

Construction and operation of the Proposed Project would permanently convert 3.5 acres of designated Important Farmland to non-agricultural use. ; this would be an overestimation as it does not take into account acreage that may be converted back to agricultural uses with the removal of the existing transmission lines.". The scale of this impact is very small, well below the significance threshold of 10 acres of Prime Farmland or 40 acres of non-Prime Farmland. Therefore, this impact would be less than significant, and no mitigation is required (Class III).

Page D.2-12

DEIR/DEIS Text: F3-102

D.2.3.5 CEQA Significance Determination for Proposed Project and Connected Actions

Impact AG-1: Project would permanently convert Important Farmland to non-agricultural use (Class III for Proposed Project; Class II for Connected Actions)

Construction and operation of the Proposed Project would permanently convert 3.5 acres of designated Important Farmland to non-agricultural use. The scale of this impact is very small, well below the significance threshold of 10 acres of Prime Farmland or 40 acres of non-Prime Farmland. Therefore, this impact would be less than significant, and no mitigation is required (Class III).

SCE Comment:

The DEIR should clarify that the potential mitigation measures referenced for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

Page D.2-12

DEIR/DEIS Text: F3-103

Impact AG-2: Project would conflict with existing zoning for agricultural use (No Impact for Proposed Project; Class II for Connected Actions)

Both the Desert Center and the Blythe areas include lands that are enrolled in Williamson Act contracts, as well as lands zoned for agricultural use. Depending on the location of the connected actions in these areas, construction and operation would disturb existing agriculture and may require the cancellation of existing Williamson Act contracts. Typical mitigation for this type of impact would be to establish a Williamson Act agricultural preserve in the event that an existing Williamson Act is cancelled. This would reduce impacts to a less than significant level. Conflicts with other agricultural zoning could be minimized through the creation of an agricultural easement or agricultural land mitigation program. With mitigation if required, impacts to agricultural zoning would be less than significant (Class II).

SCE Comment:

The DEIR should clarify that the potential mitigation measures referenced for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.2-13

DEIR/DEIS Text: F3-104

Impact AG-3: Project would involve changes in the existing environment which would impair the use of agricultural land (Class II)

The Proposed Project would temporarily disturb a total of 31.6 acres of designated Important Farmland (26.1 acres of Prime Farmland, 4.7 acres of Farmland of Statewide Importance, and 0.8 acres of Unique Farmland). Surrounding agricultural land may also be affected by temporary construction impacts. These impacts would be minimized through the implementation of Mitigation Measures AG-3a (Establish agreement and coordinate construction activities with agricultural landowners), AQ-1a (Control Fugitive Dust), AQ-1b (Control Off-Road Equipment Emissions), LU-2a (Prepare construction notification plan), HH-1a (Prepare a hazardous materials and waste management plan), HH-2a (Prepare a soil management plan), and HH-3a (Identify pesticide/herbicide contamination). With these measures, impacts would be less than significant.

SCE Comment:

The DEIR should clarify that the potential mitigation measures referenced for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

Page D.2-13

DEIR/DEIS Text: F3-105

Impact AG-3: Project would involve changes in the existing environment which would impair the use of agricultural land (Class II)

The Proposed Project would temporarily disturb a total of 31.6 acres of designated Important Farmland (26.1 acres of Prime Farmland, 4.7 acres of Farmland of Statewide Importance, and 0.8 acres of Unique Farmland). Surrounding agricultural land may also be affected by temporary construction impacts. These impacts would be minimized through the implementation of Mitigation Measures AG-3a (Establish agreement and coordinate construction activities with agricultural landowners), AQ-1a (Control Fugitive Dust), AQ-1b (Control Off-Road Equipment Emissions), LU-2a (Prepare construction notification plan), HH-1a (Prepare a hazardous materials and waste management plan), HH-2a (Prepare a soil management plan), and HH-3a (Identify pesticide/herbicide contamination). With these measures, impacts would be less than significant.

SCE Comment:

The DEIR should clarify that the potential mitigation measures referenced with respect to connected actions will not be imposed on SCE nor are they required to be implemented prior to construction of the West of Devers project.

Page D.2-14

DEIR/DEIS Text: F3-106

Impact AG-2: Project would conflict with existing zoning for agricultural use Limited areas of land zoned for agriculture would be affected under this alternative. Transmission lines and transmission structures are allowed uses in agriculture zoned areas. The amount of agricultural land affected would be similar under both the Proposed Project and the Tower Relocation Alternative. An extended construction period and the use of temporary shoo-flies would not conflict with agricultural zoning.

SCE Comment:

As explained above, Impact AG-2 states that the project does not conflict with zoning for agricultural use, but the discussion fails to include an explanation that the CPUC has preemptive jurisdiction over the Proposed Project as explained in Section A.4.3 Other Agencies. It is recommended that the following language be added as follows:

Impact AG-2: The <u>CPUC has preemptive jurisdiction over the Project, therefore, the following information is provided for</u> <u>informational purposes only.</u> Limited areas of land zoned for agriculture would be affected under this alternative.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.2-14

DEIR/DEIS Text: F3-107

D.2.4.1 Tower Relocation Alternative

Impact AG-3: Project would involve changes in the existing environment which would impair the use of agricultural land (Class III)

Moving selected transmission structures 50 feet from their proposed positions would not require changes in the existing environment that would impair the use of agricultural land. The same access roads and the same number of pads would be required as under the Proposed Project. An additional year on the construction schedule and the temporary placement of shoo-flies would not impair the use of agricultural land.

SCE Comment:

The statement that "An additional year on the construction schedule and the temporary placement of shoo-flies would not impair the use of agricultural land." is inconsistent with findings made for the Proposed Project (which consists of the same type of work) as well as with language further down on the page as follows:

CEQA Significance Determination for Tower Relocation Alternative

Impact AG-3: Project would involve changes in the existing environment which would impair the use of agricultural land (Class II)

Relocating a proposed transmission structure to a new position nearby in the ROW would not impair the use of agricultural land more than it might have been impaired by the Proposed Project. The same mitigation measures applied to the Proposed Project would apply under the Tower Relocation Alternative. These are Mitigation Measure AG-3a, AQ-1a, AQ-1b, LU-2a, HH-1a, HH-2a, and HH-3a, described in Section D.2.3.3. With implementation of these mitigation measures, impacts would be less than significant (Class II).

SCE suggests the following revisions for consistency:

D.2.4.1 Tower Relocation Alternative

Impact AG-3: Project would involve changes in the existing environment which would impair the use of agricultural land

~~Moving selected transmission structures 50 feet from their proposed positions would not require changes in the existing environment that would impair the use of agricultural land. The same access roads and the same number of pads would be required as under the Proposed Project. An additional year on the construction schedule and the temporary placement of shoo-flies would not impair the use of agricultural land.~~

Relocating a proposed transmission structure to a new position nearby in the ROW would not impair the use of agricultural land more than it would have been impaired by the Proposed Project. The same mitigation measures applied to the Proposed Project would apply to the Tower Relocation Alternative. These are Mitigation Measure AG-3a, AQ-1a, AQ-1b, LU-2a, HH-1a, HH-2a, and HH-3a, described in Section D.2.3.3. With implementation of these mitigation measures, impacts would be less than significant (Class II).

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.2-17

DEIR/DEIS Text: F3-108

Mitigation Measures for Impact AG-3: Project would involve changes in the existing environment which would impair the use of agricultural land

AG-3a Establish agreement and coordinate construction activities with agricultural landowners.

Sixty (60) days prior to the start of project construction, Southern California Edison (SCE) shall secure a signed agreement with property owners of Important Farmland (Prime Farm-land, Farmland of Statewide Importance, Unique Farmland) that will be used for construction and operation of the project, access and spur roads, staging areas, and other project-related activities. The purpose of this agreement will be to set forth the use of Prime Farm-land, Farmland of Statewide Importance, Unique Farmland during construction in order to: (1) schedule proposed construction activities at a location and time when damage to agricultural operations would be minimized, and (2) ensure that any areas damaged or disturbed by construction are restored to a condition mutually agreed upon by the landowner and SCE.

SCE shall coordinate with the agricultural landowners in the affected areas where Important Farmland will be temporarily disturbed in order to determine when and where construction should occur in order to minimize damage to agricultural operations. This includes avoiding construction during peak planting, growing, and harvest seasons. If damage or destruction does occur, SCE shall perform restoration activities on the disturbed area in order to return the area to a pre-determined condition or the pre-construction condition, whichever option is agreed upon by the landowner and SCE. This could include activities such as soil preparation, regrading, and reseeding. This measure applies to agricultural landowners with land that is impacted by the Proposed Project. SCE shall provide proof of the continued use of Important Farmland through the submittal of a signed agreement between an individual property owner and SCE. The signed agreements shall be submitted to the CPUC for review and approval prior to the start of construction.

SCE Comment:

Mitigation Measure AG-3a as written is unnecessarily restrictive and disproportionate to the potential temporary impact. AG-3a could result in project delay due to inability to procure agreements mandated by this mitigation measure. In addition, SCE has existing easement rights that grant SCE the right to construct without having to secure an additional agreement within the existing ROW. Please make the following revision:

AG-3a Establish agreement and coordinate construction activities with agricultural landowners. Sixty (60) days prior to the start of project construction, Southern California Edison (SCE) shall ~~secure a signed agreement~~ coordinate with property owners of Important Farmland (Prime Farm-land, Farmland of Statewide Importance, Unique Farmland) that is currently being used for agricultural purposes and that will be used for construction and operation of the project, access and spur roads, staging areas, and other project-related activities. Should SCE require an additional agreement, such as a temporary construction easement, it would be for temporary purposes outside of the existing SCE ROW whereby SCE does not have an existing easement right to perform construction activities.

The purpose of this agreement will be to set forth the use of agriculturally utilized Prime Farm-land, Farmland of Statewide Importance, Unique Farmland during construction in order to: (1) schedule proposed construction activities at a location and time when damage to agricultural operations would be minimized as feasible, and (2) ensure that any areas damaged or disturbed by construction are restored to a condition mutually agreed upon by the landowner and SCE and also in accordance with the existing easement language, if construction activities occur within the existing SCE ROW.

SCE shall coordinate with the agricultural landowners in the affected areas where Important Farmland will be temporarily disturbed in order to determine when and where construction should occur in order to minimize damage to agricultural operations. This includes avoiding construction during peak planting, growing, and harvest seasons as feasible. If damage or destruction does occur, SCE shall perform restoration activities on the disturbed in order to return the area to a pre-determined condition or the pre-construction condition, whichever option is agreed upon by the landowner and SCE and also in accordance with the existing easement language. This could include activities such as soil preparation, regrading, and reseeding. This measure applies to agricultural landowners with agriculturally utilized land that is impacted by the Proposed Project. SCE shall provide proof of

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

the continued use of Important Farmland that is currently utilized for agriculture through the submittal of a signed temporary construction easement or grant of easement agreement between an individual property owner and SCE. The signed agreements shall be submitted to the CPUC for review and approval prior to the start of construction. **F3-108 cont.**

If SCE is unable to coordinate construction activities or enter into a temporary construction easement with any of the land owners, due to an inability to agree to the terms of the agreement or for any other reason, SCE shall notify the CPUC/BLM and the CPUC/BLM shall allow the project construction to continue absent such an agreement.

Responses to Comment Set F3 – Section D.2 Agriculture

F3-93 The commenter requests a typographical correction be made in Section D.2.1.2 (Environmental Setting by Jurisdiction) be made to correct the gross value of Riverside County's agricultural commodities in 2012 from $1.25 million to $1.25 billion. This correction has been made in the EIS.

F3-94 The commenter requests a correction in the agricultural commodity value and ranking information provided in Section D.2.1.2 concerning San Bernardino County. This requested correction has been made in the Final EIS.

F3-95 The commenter asserts that significance criteria not found in the CEQA Guidelines are not appropriate for inclusion in the analysis and requests the criterion regarding impairment of use of agricultural land be deleted.

This comment relates to CEQA, not NEPA. CPUC's response is provided here for informational purposes: Not all significance criteria are or must be found in the CEQA Guidelines. They are determined pursuant to the discretion afforded the lead agency, which may use the CEQA Guidelines, but also may consider the nature of a proposed project, environmental conditions, possible effects, and other relevant factors when identifying the applicable thresholds of significance in an EIR. CEQA Guidelines Appendix G: Environmental Checklist Form often is used as a basis for analyses and setting significance criteria. However, as described in the introduction to the checklist, it is a "sample form" that "may be tailored to satisfy individual agencies' needs and project circumstances" and "[t]he sample questions in this form…do not necessarily represent thresholds of significance." For the EIS topic of agriculture, for example, two of the checklist items were included in the analysis and three were omitted, and a one specific to potential impairment of the use of agricultural land was added. No change in the EIS is required or was made as a result of this comment.

F3-96 The commenter requests insertion of a sentence into the text to say the CPUC has preemptive jurisdiction over the Project [on non-federal lands] and that information following in the paragraph cited in the comment is informational only.

The commenter omits the bold font of the sentence, which is a concise impact statement. The text referenced is in Section D.2.3.3 (Impacts and Mitigation Measures) and reads as a single line in bold: **Impact AG-2: Project would conflict with existing zoning for agricultural use**. This is an impact statement presented in the style and form used throughout the EIS for all impact statements. In this position in the text it serves as both the concise statement of the impact and a header to the discussion under it. An impact statement would not include a disclaimer. In Section D.2.2.3 the text clearly states the CPUC has jurisdiction on siting of investor-owned public utility facilities, and such projects are exempt from local zoning. No change in the EIS is required as a result of this comment.

F3-97 The commenter requests acknowledgement that removal of existing transmission line may allow Important Farmland occupied by transmission structures to be available. A sentence has been added to the paragraph noted, indicating that removal of existing structures may result in some previously occupied Important Farmland becoming unoccupied.

F3-98 The commenter feels that linking damage to equipment and damage due to increased traffic on farm roads is unsubstantiated.

Project equipment and vehicles may use farm roads to access some sites. Equipment such as irrigation systems, tanks, or pumps could be inadvertently damaged if located near roads. The word "increased" has been deleted from the phrase "increased traffic on farm roads", so as to not attribute the potential for damage only to increased traffic.

F3-99 The commenter says that Mitigation Measure AG-3a is overly restrictive and disproportionate to the temporary impact it addresses. Several modifications and clarifications to the text of the mitigation measure are proposed.

Mitigation Measure AG-3a has been revised in light of this comment in the Final EIS. The BLM agrees that only a nominal amount of agricultural land could be affected. The revised mitigation measure is no less effective than as originally written, but clarifications have been included.

F3-100 This comment is an additional comment on Mitigation Measure AG-3a. See Response to Comment F3-99, which addresses this comment as well.

F3-101 This comment is similar to comment F3-97. See Response to Comment F3-97. It is not necessary to repeat the additional sentence.

F3-102 This comment requests clarification in the EIS that mitigation referenced for Connected Actions is not imposed on SCE. Clarification has been added in Section D.1.5 (Analysis of Connected Actions) of the Final EIS in response to this comment.

F3-103 This comment is similar to Comment F3-102. See Response to Comment F3-102.

F3-104 See Response to Comment F3-102.

F3-105 See Response to Comment F3-102.

F3-106 This comment is similar to Comment F3-96. See Response to Comment F3-96.

F3-107 The commenter suggests using the text in one part of Section D.2.4.1 to replace text elsewhere in the section. The EIS has been revised consistent with this comment.

F3-108 This comment is similar to Comment F3-96 for text in Table D.2-3. (Mitigation Monitoring Program – Agriculture). See Response to Comment F3-96.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Section D.3 Air Quality

Page D.3-5

DEIR/DEIS Text: F3-109

Sensitive receptors in the Blythe Area include agricultural uses, recreational resources, and residences in the City of Blythe and unincorporated Riverside County.

SCE Comment:

Please remove "agricultural uses," because agricultural uses are not considered sensitive receptors for air quality.

Sensitive receptors in the Blythe Area include ~~agricultural uses~~, recreational resources, and residences in the City of Blythe and unincorporated Riverside County.

Page D.3-7

DEIR/DEIS Text: F3-110

The AQMP is the current (2012) comprehensive attainment strategy for ozone and PM2.5. The AQMP identifies the rules and regulations and contingency measures that demonstrate how the region will achieve the necessary overall emission reductions to attain the federal 24-hour PM2.5 standard in 2014, with a possibility of up to a five-year extension by U.S. EPA to 2019, if needed. An update of the plan is planned for 2016. The 2012 AQMP also provides an update to demonstrate progress in attaining the 8-hour ozone standard in 2023 (SCAQMD, 2013).

SCE Comment:

It is relevant to note that the 2012 AQMP specifically takes into consideration emissions from the Proposed Project. SCE recommends including the following language when discussing the 2012 AQMP:

Estimated annual NOx emissions on Federal Lands associated with the Proposed Project are described in the 2012 AQMP as follows:

Southern California Edison (SCE) is currently in the process of, or has plans to construct six linear transmission line projects which would traverse federal lands within the jurisdiction of the [SCAQMD]. The projects are: (1) Devers-Palo Verde No. 2 Transmission Project (DPV2); (2) Tehachapi Renewable Transmission Project (TRTP); (3) Falcon Ridge Substation Project (Falcon Ridge); (4) Path 42 Upgrade Project (Path 42); (5) West of Devers Interim Projects (WOD Interim); and (6) West of Devers Upgrade Project (WOD Upgrade). SCE submitted to the District the NOx emissions estimates expected to be generated during the construction of these transmission lines from 2012 to 2022. The total estimated NOx emissions from these six projects within the South Coast Air Basin are 95 tons per year for 2012; 55 tons per year for 2013; 10 tons per year for 2014; 20 tons per year for 2015; 50 tons per year for 2016 and 2017; and 20 tons per year for 2018 through 2022. These emissions have been accounted for in the general conformity set aside account for NOx." (SCAQMD 2012:III-2-53)

Page D.3-8

DEIR/DEIS Text: F3-111

D.3.3 Environmental Impacts of the Proposed

SCE Comment:

Add "Project" at the end of the heading

D.3.3 Environmental Impacts of the Proposed Project

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.3-11

DEIR/DEIS Text: F3-112

The factors are used in conjunction with SCE's preliminary understanding of equipment activity and construction schedule, which means that the results are estimates based on assumptions that would be refined by SCE after final engineering.

SCE Comment:

SCE would like to clarify that should the assumptions not be changed as a result of final engineering, SCE would not refine the equipment activity and construction schedule from what has been included in this DEIR/DEIS.

Page D.3-12

DEIR/DEIS Text: F3-113

Table D.3-8. Construction-Phase Regional Emissions Impacts (lb/day)

Project Component	NOx	VOC	PM10	PM2.5	CO
Devers Substation	59.0	8.1	3.4	2.7	40.8
El Casco Substation	53.3	7.2	2.9	2.4	33.3
Vista Substation	53.4	7.4	3.0	2.4	35.1
San Bernardino Substation	61.5	8.4	4.1	2.9	40.4
Etiwanda Substation	0.2	0.0	0.0	0.0	2.0
Timoteo Substation	1.4	0.3	0.1	0.1	6.4
Tennessee Substation	1.5	0.3	0.1	0.1	6.7
220 kV Transmission Line	4,009.0	525.9	243.2	155.9	2,259.0
Shoo-Fly	1,739.3	241.3	165.0	87.7	837.6
66 kV Subtransmission Line	828.2	111.5	57.1	34.8	448.6
Telecommunications System	141.2	17.4	9.9	5.6	54.6
Total Peak Daily Construction	6,948.0	927.9	489.3	294.6	3,764.4
Total Peak Construction with APMs	5,558.4	927.9	378.3	271.6	3,764.4
SCAQMD Regional Threshold for Construction	100	75	150	55	550

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

SCE Comment: F3-113 cont.

Please remove the following references to Timoteo and Tennessee Substations.

Table D.3-8. Construction-Phase Regional Emissions Impacts (lb/day)

Project Component	NOx	VOC	PM10	PM2.5	CO
Devers Substation	59.0	8.1	3.4	2.7	40.8
El Casco Substation	53.3	7.2	2.9	2.4	33.3
Vista Substation	53.4	7.4	3.0	2.4	35.1
San Bernardino Substation	61.5	8.4	4.1	2.9	40.4
Etiwanda Substation	0.2	0.0	0.0	0.0	2.0
~~Timoteo Substation~~	~~1.4~~	~~0.3~~	~~0.1~~	~~0.1~~	~~6.4~~
~~Tennessee Substation~~	~~1.5~~	~~0.3~~	~~0.1~~	~~0.1~~	~~6.7~~
220 kV Transmission Line	4,009.0	525.9	243.2	155.9	2,259.0
Shoo-Fly	1,739.3	241.3	165.0	87.7	837.6
66 kV Subtransmission Line	828.2	111.5	57.1	34.8	448.6
Telecommunications System	141.2	17.4	9.9	5.6	54.6
Total Peak Daily Construction	~~6,948.0~~ 6,945.1	~~927.9~~ 927.2	~~489.3~~ 488.6	~~294.6~~ 294.4	~~3,764.4~~ 3751.4
Total Peak Construction with APMs	5,558.4	927.9	378.3	271.6	3,764.4
SCAQMD Regional Threshold for Construction	100	75	150	55	550

Page D.3-13

DEIR/DEIS Text: F3-114

Summary for Construction Emissions of Criteria Pollutants. Controlling dust and equipment exhaust emissions would be necessary to avoid causing any new violations or contributing substantially to existing violations of the ambient air quality standards and to avoid interfering with the established attainment plans. The Proposed Project would be required to implement dust controls required by SCAQMD Rules 403 and 403.1 so that dust does not remain visible in the atmosphere beyond the edge of the right-of-way or create a nuisance off-site.

SCE Comment:

In order to remain consistent with SCAQMD Rule 403 (d)(1)(A), SCE recommends referencing "property line" instead of "right-of-way".

Summary for Construction Emissions of Criteria Pollutants. Controlling dust and equipment exhaust emissions would be necessary to avoid causing any new violations or contributing substantially to existing violations of the ambient air quality standards and to avoid interfering with the established attainment plans. The Proposed Project would be required to implement dust controls required by SCAQMD Rules 403 and 403.1 so that dust does not remain visible in the atmosphere beyond the edge of the ~~right-of-way~~ property line or create a nuisance off-site.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.3-13

DEIR/DEIS Text: F3-115

Mitigation Measures for Impact AQ-1

AQ-1a Control fugitive dust. SCE shall develop a Fugitive Dust Control Plan and at least 60 days prior to construction submit the plan to the CPUC/BLM and SCAQMD for review and approval. The approved plan shall be implemented for all construction activities that may be a source of fugitive dust. Any fugitive dust control requirements in the SCAQMD rules and regulations, specifically Rule 403 and Rule 403.1, that are in addition to or more stringent than the requirements listed below shall be implemented and included in the plan. The plan shall include the following feasible measures:

- Traffic speeds on unpaved roads shall not exceed 15 mph.
- A traffic route plan shall be developed to identify and limit the access and egress points from unpaved roads, while also reducing the amount of unpaved road travel necessary to access the transmission structure work sites.
- Unpaved roads, substation areas, and staging areas shall be watered three times daily when being used by construction vehicle traffic, or non-toxic soil stabilizers shall be applied per manufacturer's recommendations at a frequency necessary to maintain no visible vehicle travel dust emissions. stabilizer to create a surface crust or shall be covered.
- Inactive excavated or grated soils and soil piles shall be sufficiently watered or sprayed with a soil stabilizer to create a surface crust or shall be covered.
- Drop height from excavators and loaders shall be minimized to a distance no more than 5 feet.
- Construction activities that occur on unpaved surfaces shall be discontinued during periods of wind gusts exceeding 25 miles per hour, or when average wind speeds exceed 15 miles per hour, and when those activities are causing visible dust plumes. All grading and excavation activities shall be suspended when wind speeds exceed 30 miles per hour. Wind speed measurement methods shall be consistent with the SCAQMD Implementation Handbook for Rule 403 and Rule 403.1.

SCE Comment:

To maintain consistency with air quality regulations and concerns with implementation and enforcement as currently drafted, please make the following revisions.

Bullet 2: As it related to the requirement to traffic route plan, SCE has already identified access from paved and unpaved roads that have been provided to the CPUC. As a general construction practice, SCE already selects the most efficient route to minimize unpaved road travel. The measure requests SCE to reduce unpaved road travel, however, such a requirement would not result in a substantial or quantifiable reduction in fugitive dust emissions.

Bullet 3: Substation and staging areas (as identified in Table B-5) are going to be rocked and, therefore, stabilized which mitigates the need for watering. SCE intends to comply with Rule 403 to minimize fugitive dust, therefore, prescribing an activity "three times daily" may be insufficient or excessive depending on precipitation and/or soil saturation.

Bullet 7: Due to the potential and frequency of winds to be in excess of 15 mph in the project area the measure has been revised to more suitably reflect the ability to construct the project while maintaining the intent of the regulation. SCE has demonstrated on previous projects within this project area the ability to successfully prevent fugitive dust under high wind conditions during construction.

Mitigation Measures for Impact AQ-1

AQ-1a Control fugitive dust. SCE shall develop a Fugitive Dust Control Plan and at least 60 days prior to construction submit the plan to the CPUC/BLM and SCAQMD for review and approval. The approved plan shall be implemented for all construction activities that may be a source of fugitive dust. Any fugitive dust control requirements in the SCAQMD rules and regulations, specifically Rule 403 and Rule 403.1, that are in addition to

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

or more stringent than the requirements listed below shall be implemented and included in the plan. The plan shall include the following feasible measures: F3-115 cont.

- Traffic speeds on unpaved roads shall not exceed 15 mph. ~~A traffic route plan shall be developed to identify and limit the access and egress points from unpaved roads, while also reducing the amount of unpaved road travel necessary to access the transmission structure work sites~~. SCE will provide maps to its construction contractors that show the travel routes that should be followed to minimize unpaved road use.
- ~~w~~When being actively used by construction vehicle traffic, ~~U~~unpaved roads and project disturbance areas ~~,substation areas, and staging areas~~ shall be watered, or non-toxic soil stabilizers shall be applied per manufacturer's recommendations, ~~three times daily~~ in sufficient quantities to maintain compliance with AQMD and jurisdictional requirements. ~~or non-toxic soil stabilizers shall be applied per manufacturer's recommendations at a frequency necessary to maintain no visible vehicle travel dust emissions~~
- Inactive excavated or grated soils and soil piles shall be sufficiently watered or sprayed with a soil stabilizer to create a surface crust or shall be covered.
- Drop heights from excavators and loaders shall be minimized to a distance of no more than 5 feet.
- Soil truckloads it shall be covered and date seals on dump trucks shall be tight when traveling on public roadways per California Vehicle Code §23114 requirements.
- Construction activities that occur on unpaved surfaces shall be discontinued during periods ~~of wind gusts exceeding 25 miles per hour, or when average wind speeds exceed 15 miles per hour, and~~ when ~~those~~ activities are causing visible dust plumes that cannot be mitigated by approved dust suppression methods. ~~All grading and excavation activities shall be suspended when wind speeds exceed 30 miles per hour. Wind speed measurement methods shall be consistent with the SCAQMD Implementation Handbook for Rule 403 and Rule 403.1~~.

Page D.3-13

DEIR/DEIS Text: F3-116

- Inactive excavated or graded soils and soil piles shall be sufficiently watered or sprayed with a soil stabilizer to create a surface crust or shall be covered.
- Drop heights from excavators and loaders shall be minimized to a distance no more than 5 feet.
- Soil truckloads shall be covered and date seals on dump trucks shall be tight.
- Construction activities that occur on unpaved surfaces shall be discontinued during periods of wind gusts exceeding 25 miles per hour, or when average wind speeds exceed 15 miles per hour, and when those activities are causing visible dust plumes. All grading and excavation activities shall be suspended when wind speeds exceed 30 miles per hour. Wind speed measurement methods shall be consistent with the SCAQMD Implementation Handbook for Rule 403 and Rule 403.1.

SCE Comment:

- Inactive excavated or graded soils and soil piles shall be sufficiently watered or sprayed with a soil stabilizer to create a surface crust or shall be covered.
- Drop heights from excavators and loaders shall be minimized to a distance no more than 5 feet.
- Soil truckloads shall be covered and date seals on dump trucks shall be tight when traveling on public roadways per California Vehicle Code §23114 requirements.
- Construction activities that occur on unpaved surfaces shall be discontinued during periods ~~of wind gusts exceeding 25 miles per hour, or when average wind speeds exceed 15 miles per hour, and~~ when ~~those~~ activities are causing visible dust plumes that cannot be mitigated by approved dust suppression methods. ~~All grading and excavation activities shall be suspended when wind speeds exceed 30 miles per hour. Wind speed measurement methods shall be consistent with the SCAQMD Implementation Handbook for Rule 403 and Rule 403.1.~~

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.3-14

DEIR/DEIS Text: F3-117

The helicopter staging areas, that are not on existing paved airfields or other large paved sites, shall be treated with soil amendments that shall be applied at a frequency necessary to create and maintain surface soil crusts where rotor wash creates fugitive dust emissions;

SCE Comment:

Please add clarifying language as follows:

The helicopter staging areas, that are not on existing paved airfields or other large paved sites, shall be treated with soil amendments (i.e watering, soil binders, etc…) that shall be applied at a frequency necessary to create and maintain surface soil crusts where rotor wash creates fugitive dust emissions;

Page D.3-14

DEIR/DEIS Text: F3-118

Enough land area shall be obtained for each helicopter staging area not located on existing paved airfields or other large paved sites, so that rotor wash does not create visible fugitive dust emissions outside of the controlled staging area.

SCE Comment:

Please add clarifying language as follows:

Enough land area shall be obtained for each helicopter staging area not located on existing paved airfields or other large paved sites, so that rotor wash does not create visible fugitive dust emissions outside of the controlled staging area or right-of-way (ROW).

Page D.3-19

DEIR/DEIS Text: F3-119

Impact AQ-2: Construction would generate emissions of toxic air contaminants (Class III for Proposed Project; Class II for Connected Actions)

Construction activities for the connected actions would be in a localized area, unlike the Proposed Project where activities would occur throughout the transmission corridor. The localized nature of the connected action construction could result in excessive concentrations of TACs……Impacts from the generation of TACs during construction of the connected actions would be less than significant with mitigation (Class II).

SCE Comment:

The DEIR should clarify that the potential mitigation measures referenced for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

Page D.3-19

DEIR/DEIS Text: F3-120

Impact AQ-3: Operation, maintenance, and inspections would generate dust and exhaust emissions (Class III for Proposed Project; Class II for Connected Actions)

The connected actions involve the construction of solar generation facilities in the Desert Center and Blythe areas… The impact of operation, maintenance, and inspection activities in terms of generating dust and exhaust emissions would be less than significant with implementation of recommended mitigation (Class II).

SCE Comment:

The DEIR should clarify that the potential mitigation measures referenced for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.3-24 through 25

DEIR/DEIS Text: F3-121

D.3.4.3 Phased Build Alternative

Impact AQ-1: Construction would generate dust and exhaust emissions of criteria pollutants

Impact AQ-2: Construction would generate emissions of toxic air contaminants (Class III for Proposed Project; Class II for Connected Actions)

Impact AQ-1: Construction would generate dust and exhaust emissions of criteria

SCE Comment:

As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional study and associated additional impact analysis. The additional disturbance areas and the increased duration for construction activities would result in additional emissions impacts beyond those analyzed for the Phased Build Alternative in the document and could be greater than those identified for the Proposed Project.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.3-25

DEIR/DEIS Text: F3-122

MITIGATION MEASURE

AQ-1c: Control helicopter emissions. Helicopter emissions shall be reduced by the following methods and measures:

- Helicopter idling will occur only when necessary for safe operation and emergency readiness purposes.
- Helicopter operators shall use the smallest practical and available helicopter for each lift operation.
- Fugitive dust from the helicopter rotor wash will be reduced through the implementation of the following measures:
  - The helicopter staging areas, that are not on existing paved airfields or other large paved sites, shall be treated with soil amendments that shall be applied at a frequency necessary to create and maintain surface soil crusts where rotor wash creates fugitive dust emissions;
  - Enough land area shall be obtained for each helicopter staging area not located on existing paved airfields or other large paved sites, so that rotor wash does not create visible fugitive dust emissions outside of the controlled staging area.
  - Helicopter operations will take flight paths (i.e. elevation above ground) that will eliminate dust emissions from rotor wash when travelling between the helicopter staging area and the work sites.
  - The helicopter work sites shall be watered prior to helicopter visits. Alternatively, other soil stabilizers shall be applied at a frequency necessary to create and maintain a surface soil crust while helicopter visits are occurring at the work site.

Location	Construction activity in all segments.
Monitoring / Reporting Action	CPUC/BLM monitor verifies that helicopter use and helicopter staging areas are managed as specified.
Effectiveness Criteria	Dust caused by rotor wash does not remain visible beyond staging areas or work sites, and helicopter operator contracting agreements include the specifications.

SCE Comment:

Contracts entered into by SCE and construction contractors require compliance with all project mitigation measures and all workers will be required by additional mitigation measures to undergo WEAP training; environmental information is provided at construction tailboards, and lastly, construction is monitored to ensure that measures are complied with. The additional requirement is thus unnecessary, please make the following edits:

Location	Construction activity in all segments.
Monitoring / Reporting Action	CPUC/BLM monitor verifies that helicopter use and helicopter staging areas are managed as specified.
Effectiveness Criteria	Dust caused by rotor wash does not remain visible beyond staging areas or work sites.~~, and helicopter operator contracting agreements include the specifications~~.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.3-27

F3-123

Mitigation Measures for Impact AQ-1

AQ-1a Control fugitive dust. SCE shall develop a Fugitive Dust Control Plan and at least 60 days prior to construction submit the plan to the CPUC/BLM and SCAQMD for review and approval. The approved plan shall be implemented for all construction activities that may be a source of fugitive dust. Any fugitive dust control requirements in the SCAQMD rules and regulations, specifically Rule 403 and Rule 403.1, that are in addition to or more stringent than the requirements listed below shall be implemented and included in the plan. The plan shall include the following feasible measures:

- Traffic speeds on unpaved roads, while also reducing the amount of unpaved road travel necessary to access the transmission structure work sites.
- A traffic route plan shall be developed to identify and limit the access and egress points from unpaved roads, while also reducing the amount of unpaved road travel necessary to access the transmission structure work sites.
- Traffic speeds on unpaved roads, substation areas, and staging areas shall be watered three times daily when being used by construction vehicle traffic, or non-toxic soil stabilizers shall be applied per manufacturer's recommendations at a frequency necessary to maintain no visible vehicle travel dust emissions.
- Inactive excavated or graded soils and soil piles shall be sufficiently watered or sprayed with a soil stabilizer to create a surface crust or shall be covered.
- Drop heights from excavators and loaders shall be minimized to a distance no more than 5 feet.
- Soil truckloads shall be covered and gate seals on dump trucks shall be tight.
- Construction activities that occur on unpaved surfaces shall be discontinued during periods of wind gusts exceeding 25 miles per hour, or when average wind speeds exceed 15 miles per hour, and when those activities are causing visible dust plumes. All grading and excavation activities shall be suspended when wind speeds exceed 30 miles per hour. Wind speed measurement methods shall be consistent with the SCAQMD Implementation Handbook for Rule 403 and Rule 403.1.

SCE Comment:

To maintain consistency with air quality regulations and to address SCE's concerns with implementation and enforcement as currently drafted in the DEIR/DEIS, please make the following revisions:

Mitigation Measures for Impact AQ-1

AQ-1a Control fugitive dust. SCE shall develop a Fugitive Dust Control Plan and at least 60 days prior to construction submit the plan to the CPUC/BLM and SCAQMD for review and approval. The approved plan shall be implemented for all construction activities that may be a source of fugitive dust. Any fugitive dust control requirements in the SCAQMD rules and regulations, specifically Rule 403 and Rule 403.1, that are in addition to or more stringent than the requirements listed below shall be implemented and included in the plan. The plan shall include the following feasible measures:

- Traffic speeds on unpaved roads, while also reducing the amount of unpaved road travel necessary to access the transmission structure work sites.
- ~~A traffic route plan shall be developed to identify and limit the access and egress points from unpaved roads, while also reducing the amount of unpaved road travel necessary to access the transmission structure work sites.~~ SCE will provide maps to its construction contractors that show the travel routes that should be followed to minimize unpaved road use.
- ~~w~~When being actively used by construction vehicle traffic, ~~U~~unpaved roads and project disturbance areas ~~, substation areas, and staging areas~~ shall be watered, or non-toxic soil stabilizers shall be applied per manufacturer's recommendations, ~~three times daily~~ in sufficient quantities to maintain compliance with AQMD and jurisdictional requirements. ~~or non-toxic soil stabilizers shall be applied per manufacturer's recommendations at a frequency necessary to maintain no visible vehicle travel dust emissions.~~
- Inactive excavated or graded soils and soil piles shall be sufficiently watered or sprayed with a soil stabilizer to create a surface crust or shall be covered.
- Drop heights from excavators and loaders shall be minimized to a distance no more than 5 feet.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

- Soil truckloads shall be covered and gate seals on dump trucks shall be tight when traveling on public roadways per California Vehicle Code §23114 requirements. **F3-123 cont.**
- Construction activities that occur on unpaved surfaces shall be discontinued during periods ~~of wind gusts exceeding 25 miles per hour, or when average wind speeds exceed 15 miles per hour, and~~ when ~~those~~ activities are causing visible dust plumes that cannot be mitigated by approved suppression methods. ~~All grading and excavation activities shall be suspended when wind speeds exceed 30 miles per hour. Wind speed measurement methods shall be consistent with the SCAQMD Implementation Handbook for Rule 403 and Rule~~

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.3-28

DEIR/DEIS Text: F3-124

The helicopter staging areas, that are not on existing paved airfields or other large paved sites, shall be treated with soil amendments that shall be applied at a frequency necessary to create and maintain surface soil crusts where rotor wash creates fugitive dust emissions;

SCE Comment:

To ensure that either watering, soil binders or other methods would be considered appropriate for dust suppression at these locations. Please make the following revision:

The helicopter staging areas, that are not on existing paved airfields or other large paved sites, shall be treated with soil amendments (i.e watering, soil binders, etc.) that shall be applied at a frequency necessary to create and maintain surface soil crusts where rotor wash creates fugitive dust emissions;

Responses to Comment Set F3 – Section D.3 Air Quality

F3-109 The commenter requests "agricultural uses" be struck from the list of sensitive receptors in the Blythe area. See Section D.3.1.3 (Air Quality, Environmental Setting for Connected Actions) where agricultural uses are identified as a sensitive receptor. In Section D.2.3.3 (Agriculture, Impacts and Mitigation Measures), Impact AG-3 (Project would involve changes in the existing environment that would impair the use of agricultural land) notes that one effect on agriculture is "suppression of plant growth by fugitive dust." Mitigation Measure AQ-1a (Control fugitive dust) would minimize this impact, as well as other dust-related impacts. The sentence cited by the commenter in Section D.3.1.3 is modified to change "agricultural uses" to "agriculture."

F3-110 The commenter requests that a paragraph from the SCAQMD AQMP be inserted in Section D.3.2.3 (Air Quality, Applicable Regulations, Plans, and Standards, Local). The paragraph is regarding the planned levels of SCE's actions with regard to the SCAQMD Air Quality Management Plan. The discussion of the applicability of the federal General Conformity rule under Impact AQ-1 is revised to illustrate that certain levels of NOx are included in the planning-level emission inventory and accounted for in the SCAQMD General Conformity set aside account specifically for SCE's major transmission construction activities for 2018 through 2022 (as in Appendix III, p. III-2-53, of the AQMP) (SCAQMD, 2012).

F3-111 The commenter suggests an edit, which has been made: adding Project at the end of the heading D.3.3 Environmental Impacts of the Proposed <u>Project</u>.

F3-112 The commenter clarifies that if assumptions on equipment activity and construction schedule are not changed as a result of final engineering, SCE would not refine the equipment activity and construction schedule included in the Draft EIR/EIS. This clarification is noted. For clarity, In Section D.3.3.3 (Air Quality, Impacts and Mitigation Measures) the last sentence in the fourth paragraph has been modified, changing "assumptions would be refined" to "assumptions could be refined" by SCE after final engineering.

F3-113 The commenter requests that Timoteo and Tennessee Substations be omitted from Table D.3-8 (Construction-Phase Regional Emissions Impacts (lb/day)). SCE has stated elsewhere in its comments that these two substations are no longer part of the Proposed Project. The requested edits have been made and the totals adjusted.

F3-114 The commenter suggests changing "edge of the right of way" to "edge of the property line" in the Summary of Construction Emissions of Criteria Pollutants discussion in Section D.3.3.3 (Impacts and Mitigation Measures). This edit has been made.

F3-115 The commenter recommends modifications to Mitigation Measure AQ-1a (Control fugitive dust) in Section D.3.3.3 (Air Quality, Impacts and Mitigation Measures). Portions of the suggested modifications would not be appropriate to implement as they would remove performance standards necessary for satisfactory monitoring or repeat regulatory requirements. Certain portions of the minor clarifications are included in the revisions to the mitigation that appear in the Final EIS.

F3-116 This comment repeats a portion of Comment F3-115. Please see Response to Comment F3-115.

F3-117 The commenter requests insertion after "soil amendments" the parenthetical phrase "(i.e., watering, soil binders, etc.)" in Mitigation Measure AQ-1c (Control helicopter emissions). For clarification, in both Mitigation Measure AQ1a (Control fugitive dust) and AQ-1c text has been added listing examples: "(e.g., water, tackifiers, and soil binders)."

F3-118 The commenter requests the addition of "or right-of-way (ROW)" to in Mitigation Measure AQ-1c (Control helicopter emissions). This edit has been made by adding "or ROW."

F3-119 This comment requests clarification in the EIS that mitigation referenced for Connected Actions is not imposed on SCE. See Response to Comment F3-102 with regard to mitigation for connected actions.

F3-120 See Response to Comment F3-102 with regard to mitigation for connected actions.

F3-121 The commenter states that there are additional impacts associated with the Phased Build Alternative that were not addressed in the Draft EIR/EIS. Please see General Response GR-4.

F3-122 The commenter requests a text deletion in Section D.3.6 (Air Quality, Mitigation Monitoring, Compliance, and Reporting), Table D.3-11 (Mitigation Monitoring Program – Air Quality), for Mitigation Measure AQ-1c (Control helicopter emissions). The commenter notes that SCE's contracts with construction contractors require compliance with all mitigation measures and that specifically requiring inclusion of this measure in helicopter operator contracting agreements is unnecessary. Since SCE is responsible for ensuring implementation of mitigation measures, the requested edit has been made.

F3-123 This comment repeats Comment F3-115. See Response to Comment F3-115.

F3-124 This comment repeats Comment F3-117. See Response to Comment F3-117.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Section D.4 Biological Resources – Vegetation

Page D.4-3

DEIR/DEIS Text: F3-125

One sensitive forbland community is found on the route. The *Amsinckia* Herbaceous Alliance (Fiddleneck Fields) is a seasonal community dominated by rancher's fiddleneck (*Amsinckia intermedia*) and numerous native and naturalized annual and perennial forbs and grasses. This alliance occupies upland slopes and valleys, and fallow fields with well-drained loamy soils. The *Amsinckia* Herbaceous Alliance has a Global and State Rarity ranking of G4/S4 (Sawyer et al., 2009), meaning that the community is at fairly low risk of extinction or elimination due to an extensive range or many populations or occurrences, but with possible cause for concern as a result of local recent declines, threats, or other factors. This community is found in one small area in the San Timoteo Badlands along Segment 3, near Mile Point (MP) 7.0.

SCE Comment:

The rarity rank of G4/S4 is not high enough to consider it as a significant impact.

CDFW provides background information regarding its List of Natural Communities for the State and presents some specific information regarding the codes it uses as well as Rarity ranking and global and State ranks for natural communities of interest. (Please see: http://www.dfg.ca.gov/biogeodata/vegcamp/natural_comm_background.asp)

The information stipulates that: "For alliances with State ranks of S1-S3, all associations within them are also considered to be highly imperiled." It also specifies that analysts should "Refer to the current standard list of natural communities to determine if any of these types are considered of special concern (S1-S3 rank); if so, the CEQA Guidelines checklist (at IVb) should be considered." Communities ranked S4 or S5 are not included in this specification and are not mentioned regarding sensitivity. Thus, it should be understood that they may be of interest to the State and recognized by the CNDDB but communities ranked S4 or S5 are not considered imperiled to the extent that impacts to them warrant consideration as significant under CEQA.

SCE recommends that the reference to this plant community be deleted.

Based on The Manual of California Vegetation (Manual), 2nd edition, Amsinckia intermedia does not form an alliance. Rather, it is A. menziesii and A. tessellata that form the sensitive alliance.

In the Remarks section the manual comments on other Amsinckia spp. but not A. intermedia. Further, the Alliance that has been reference has the following characteristics, based on the Manual: 1) A. menziesii and/or A. tessellata is seasonally co-dominant in the herbaceous layer 2) A. menziesii > 10% relative cover in herbaceous layer or Vulpia bromoides co-dominates with A. menziesii and Plagiobothrys canescens. DEIR does not provide a valid reference as to why this species was included as independent plant community.

Therefore, the plant community being described in the DEIR may not fall within this plant community alliance. A. intermedia does not form a sensitive forbland community based on the current and accepted CDFW sensitive plant community list.

Suggested Revision:

~~One sensitive forbland community is found on the route. The *Amsinckia* Herbaceous Alliance (Fiddleneck Fields) is a seasonal community dominated by rancher's fiddleneck (*Amsinckia intermedia*) and numerous native and naturalized annual and perennial forbs and grasses. This alliance occupies upland slopes and valleys, and fallow fields with well-drained loamy soils. The *Amsinckia* Herbaceous Alliance has a Global and State Rarity ranking of G4/S4 (Sawyer et al., 2009), meaning that the community is at fairly low risk of extinction or elimination due to an extensive range or many populations or occurrences, but with possible cause for concern as a result of local recent declines, threats, or other factors. This community is found in one small area in the San Timoteo Badlands along Segment 3, near Mile Point (MP) 7.0.~~

Comment Set F3: Southern California Edison Company (cont.)

Page D.4-6

DEIR/DEIS Text: F3-126

Aeolian sand narrative

SCE Comment:

For Table D.4-1, Aeolian Sand is a habitat subclass within the Desert Scrub plant community and the narrative should address it as such.

Page D.4-7

DEIR/DEIS Text: F3-127

Stabilized and partially stabilized desert dunes and sand fields are classified by CDFW as G4/S3 (CDFG, 2010), meaning that they are considered vulnerable and at moderate risk of extinction.

SCE Comment:

CDFG 2010 does not recognize and "stabilized and partially stabilized desert dune and sand fields." Further, the G4/S3 classification is reserved for plant communities. In addition, the reference being cited here is a list of sensitive plant communities.

No plant communities are listed for what is being described as Aeolian sand habitat. Therefore, the DEIR/DEIS should not make the assertion that these dunes have been classified under CDFW rarity rankings. Furthermore, the DEIR/DEIS should not conclude that this dune habitat is sensitive based on the information provided. In addition, there are a number of dunes in California authorized for recreational purposes . Simply because Aeolian sand habitat is present does not automatically make it a sensitive resource unless a sensitive plant community also is present.

Suggested Revision:

~~Stabilized and partially stabilized desert dunes and sand fields are classified by CDFW as G4/S3 (CDFG, 2010), meaning that they are considered vulnerable and at moderate risk of extinction.~~

Page D.4-8

DEIR/DEIS Text: F3-128

Figures Ap.7-3a through Ap.7-3k, Special-status Species Observations, depicts the locations of federal- and state-listed and state designated species of special concern that were observed during surveys conducted between 2011 and 2013.

SCE Comment:

Figures Ap.7-3a through Ap.7-3k, Special-status Species Observations, depicts the locations of federal- and state-listed and state designated ~~species of special concern~~ rare plants that were observed during surveys conducted between 2011 and 2013.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.4-9

DEIR/DEIS Text: F3-129

California Department of Fish and Wildlife Jurisdiction

All of the potential USACE jurisdictional areas would also be considered CDFW jurisdictional. In addition, 196 drainages that did not meet the USACE nexus criteria, but showed evidence of a bed and bank (e.g., not categorized as swales) were also identified and are potentially subject to CDFW jurisdiction. Riparian vegetation, such as willows and mulefat, associated with these drainages is also potentially under CDFW jurisdiction.

SCE Comment:

As Morongo lands are not subject to the state's jurisdiction and SCE did not conduct a significant nexus determination, the following clarification is recommended:

California Department of Fish and Wildlife Jurisdiction

All of the potential USACE jurisdictional areas outside of those found on the Morongo Indian Reservation land would also be considered CDFW jurisdictional. ~~In addition, 196 drainages that did not meet the USACE nexus criteria, but showed evidence of a bed and bank (e.g., not categorized as swales) were also identified and are potentially subject to CDFW jurisdiction~~. Riparian vegetation, such as willows and mulefat, associated with these drainages is also potentially under CDFW jurisdiction.

Comment Set F3: Southern California Edison Company (cont.)

Page D.4-9

DEIR/DEIS Text: F3-130

Regional Water Quality Control Board Jurisdiction

Areas of potential Regional Water Quality Control Board (RWQCB) jurisdiction coincide with the identified limits of potential USACE jurisdiction, per the September 2004 Workplan (SWRCB, 2004). These areas may be subject to RWQCB jurisdiction through provisions in the CWA.

In addition, areas that are potentially subject to CDFW jurisdiction, but do not qualify as USACE jurisdiction (i.e., isolated areas with a bed and bank that do not connect to a TNW and isolated wetlands), may also be subject to RWQCB jurisdiction through Porter-Cologne. The drainages in the western half of the Proposed Project study area (Segments 1–4), which flow into the Santa Ana River, will be subject to jurisdiction by Region 8 (Santa Ana RWQCB) of the SWRCB. The drainages in the eastern part of the Proposed Project study area (Segments 4–6), which flow into the Salton Sea, are regulated by Region 7 (Colorado River RWQCB) of the SWRCB. This includes the depressional feature (Drainage 182B) on the reservation (Segment 5).The regional boundary within the Proposed Project study area is approximately the border (generally Highland Springs Avenue) between the cities of Beaumont and Banning in Riverside County.

SCE Comment:

The Proposed Project crosses multiple Regional Board boundaries and tribal land and is subject to regulation under Section 401 by the SWRCB. SCE recommends the following changes:,

State~~Regional~~ Water ~~Quality~~ Resources Control Board Jurisdiction

Board (RWQCB) in the western part of the project, and within the jurisdictional boundaries of the Colorado River RWQCB in the eastern part of the project. In situations where projects extend into multiple Regional Board boundaries, the project is subject to regulation by the SWRCB. Areas of potential ~~Regional Water Quality Control Board (RWQCB)~~ SWRCB jurisdiction coincide with the ~~identified~~ limits of potential USACE jurisdiction, per the September 2004 Workplan (SWRCB, 2004). These areas may be subject to ~~RWQCB~~ SWRCB jurisdiction through provisions in the CWA.

In addition, areas that are potentially subject to CDFW jurisdiction, but do not qualify as USACE ~~jurisdiction~~ jurisdiction (i.e., isolated areas with a bed and bank that do not connect to a TNW and isolated wetlands), may also be subject to ~~RWQCB~~ SWRCB jurisdiction through Porter-Cologne. ~~The drainages in the western half of the Proposed Project study area (Segments 1–4), which flow into the Santa Ana River, will be subject to jurisdiction by Region 8 (Santa Ana RWQCB) of the SWRCB. The drainages in the eastern part of the Proposed Project study area (Segments 4–6), which flow into the Salton Sea, are regulated by Region 7 (Colorado River RWQCB) of the SWRCB. This includes the depressional feature (Drainage 182B) on the reservation (Segment 5).The regional boundary within the Proposed Project study area is approximately the border (generally Highland Springs Avenue) between the cities of Beaumont and Banning in River-side County.~~ Additionally, project areas that fall within the Morongo Indian Reservation are not subject to regulation by the SWRCB. Regulation under Section 401 of the Clean Water Act is under the jurisdiction of the U.S. Environmental Protection Agency (EPA).

Page D.4.12

DEIR/DEIS Text: F3-131

Devers Staging Yard (Segment 6; Riverside County, CV-MSHCP). Use of the area may result in impacts to disturbed desert scrub (up to 10.0 acres) within the staging yard which could support special-status plant species. No sensitive vegetation communities are present within the disturbance areas. Potential jurisdictional drainage features are present and would be impacted by construction and use of the staging yard.

SCE Comment:

Please make the following revision:

Devers Staging Yard (Segment 6; Riverside County, CV-MSHCP). The Devers Staging Yard is an existing staging yard. ~~Use of the area may result in impacts to disturbed desert scrub (up to 10.0 acres) within the staging yard which could support special-status plant species~~. No sensitive vegetation communities are present within the disturbance areas. Potential jurisdictional drainage features are present and would be impacted by construction and use of the staging yard.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.4-14

DEIR/DEIS Text: F3-132

Five sensitive vegetation communities are found on Segment 3 (see Section D.4.1.1, Vegetation):

- *Amsinckia* Herbaceous Alliance (Fiddleneck Fields) is found in one small area in the Badlands near MP 7.0.

SCE Comment:

For consistency with the same comment as 4-3, please remove *Amsinckia* Herbaceous Alliance (Fiddleneck Fields):

Four ~~Five~~ sensitive vegetation communities are found on Segment 3 (see Section D.4.1.1, Vegetation):

~~- *Amsinckia* Herbaceous Alliance (Fiddleneck Fields) is found in one small area in the Badlands near MP 7.0.~~

Page D.4-16

DEIR/DEIS Text: F3-133

Special-status Plants

One special-status species, chaparral sand-verbena (Abronia villosa var. aurita), has a high potential to occur in Segment 4 and four additional special-status species were observed during surveys: Yucaipa onion (Allium marvinii), Plummer's mariposa-lily, smooth tarplant, and Engelmann oak (Quercus engelmannii). Please see Table Ap.7-1 and Figures Ap.7-3a through Ap.7-3k, Special-status Species Observations (Appendix 7). Several special-status plant species have a low or moderate potential to occur within Segment 4, including Nevin's barberry and Mojave tarplant.

SCE Comment:

Please remove the incorrect reference to smooth tarplant as the Botanical Surveys in 2012 and 2013 did not find that species on Segment 4:

Special-status Plants

One special-status species, chaparral sand-verbena (*Abronia villosa* var. *aurita*), has a high potential to occur in Segment 4 and ~~four~~ three additional special-status species were observed during surveys: Yucaipa onion (*Allium marvinii*), Plummer's mariposa-lily, ~~smooth tarplant,~~ and Engelmann oak (*Quercus engelmannii*). Please see Table Ap.7-1 and Figures Ap.7-3a through Ap.7-3k, Special-status Species Observations (Appendix 7). Several special-status plant species have a low or moderate potential to occur within Segment 4, including Nevin's barberry and Mojave tarplant.

Page D.4-16

DEIR/DEIS Text: F3-134

D.4.1.2.4 Segment 4: Beaumont and Banning

Segment 4 is approximately 12.0 miles long and extends from the El Casco Substation east to the west-ern edge of the Morongo Indian reservation at San Gorgonio Avenue in the City of Banning; see Figure B-5a, Proposed Transmission Line Route – Segment 4. The entire segment is within Riverside County and within the WR-MSHCP plan area. No part of Segment 4 is covered by the CV-MSHCP, nor is it on BLM or reservation lands; see Figures Ap.7-1a through Ap.7-1k, Land Management and Critical Habitat Areas (in Appendix 7).

SCE Comment:

There is a parcel of Morongo Indian Reservation Land that the ROW Crosses west of Sunset in Banning. Revise the segment description for consistency and update Fig. Ap. 7-1a-1k accordingly:

D.4.1.2.4 Segment 4: Beaumont and Banning

Segment 4 is approximately 12.0 miles long and extends from the El Casco Substation east to the western edge of the Morongo Indian reservation at San Gorgonio Avenue in the City of Banning; see Figure B-5a, Proposed Transmission Line Route – Segment 4. The entire segment is within Riverside County and within the WR-MSHCP plan area. The ROW crosses a parcel of Morongo Indian Reservation Land west of Sunset Avenue in Banning. No part of Segment 4 is covered by the CV-MSHCP, nor is it on BLM ~~or reservation~~ lands; see Figures Ap.7-1a through Ap.7-1k, Land Management and Critical Habitat Areas (in Appendix 7).

Comment Set F3: Southern California Edison Company (cont.)

Page D.4-19

DEIR/DEIS Text: F3-135

Three sensitive vegetation communities and habitat types are found on Segment 6 (Section D.4.1.1):

- *Lepidospartum squamatum* Shrubland Alliance (Scalebroom Scrub) is found along the Whitewater River and several smaller washes.
- *Ericameria paniculata* Shrubland Alliance (Black-stem Rabbitbrush Scrub) is found in a small area near Devers Substation.
- Aeolian (wind-blown) sand habitat is found east of the Whitewater River and in the Whitewater River wash.

SCE Comment:

For consistency with the same comment as 4-7, please delete Aeolian (wind-blown) sand habitat as a sensitive vegetation community:

~~Three~~ Two sensitive vegetation communities and habitat types are found on Segment 6 (Section D.4.1.1):

- *Lepidospartum squamatum* Shrubland Alliance (Scalebroom Scrub) is found along the Whitewater River and several smaller washes.
- *Ericameria paniculata* Shrubland Alliance (Black-stem Rabbitbrush Scrub) is found in a small area near Devers Substation.
- ~~Aeolian (wind-blown) sand habitat is found east of the Whitewater River and in the Whitewater River wash. .~~

Page D.4-20

DEIR/DEIS Text: F3-136

Examples of sensitive habitats in this area are aeolian sand (described in Section D.4.1.1), including active desert dunes and partially stabilized desert dunes, and desert dry wash woodland.

SCE Comment:

For consistency with the same comment as 4-7, please make the following revision:

Examples of sensitive habitats in this area are ~~aeolian sand (described in Section D.4.1.1), including active desert dunes and~~ ~~partially stabilized desert dunes, and~~ desert dry wash woodland.

Page D.4-20

DEIR/DEIS Text: F3-137

Wetlands and other waters. There are numerous dry (episodic or ephemeral) washes and channels here. These washes rarely carry surface flow except during rainstorms or during floods originating from heavy precipitation higher in the watershed. As described in Section D.4.1.1, under the federal Clean Water Act and State Fish and Game Code, these channels may be subject to USACE, CDFW, and RWQCB jurisdiction.

SCE Comment:

Please make the following revision:

Wetlands and other waters. There are numerous dry (episodic or ephemeral) washes and channels here. These washes rarely carry surface flow except during rainstorms or during floods originating from heavy precipitation higher in the watershed. As described in Section D.4.1.1, under the federal Clean Water Act and State Fish and Game Code, these channels may be subject to USACE, CDFW, SWRCB and ~~RWQCB~~ EPA jurisdiction.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.4-21

DEIR/DEIS Text: F3-138

***Wetlands and other waters*.** The Colorado River is located east of Blythe. The river itself is considered waters of the state and waters of the U.S. Riparian and wetland vegetation, wash habitat, and irrigation or drainage canals along the river, its floodplain, and its tributary washes also may meet jurisdictional criteria. Further to the west, outside the agricultural areas, there are numerous dry (episodic or ephemeral) washes and channels. These washes rarely carry surface flow except during rainstorms or during floods originating from heavy precipitation higher in the watershed. As described in Section D.4.1.1, under the federal Clean Water Act and State Fish and Game Code, these channels may be subject to USACE, CDFW, and RWQCB jurisdiction. Irrigation channels and stock ponds may be found within the agricultural areas; depending on the situation these may also be jurisdictional.

SCE Comment:

There are no proposed impacts to any waters within the Colorado River watershed. SCE recommends that this section be deleted , however if this section should remain, please make the following revision:

***Wetlands and other waters*.** The Colorado River is located east of Blythe. The river itself is considered waters of the state and waters of the U.S. Riparian and wetland vegetation, wash habitat, and irrigation or drainage canals along the river, its floodplain, and its tributary washes also may meet jurisdictional criteria. Further to the west, outside the agricultural areas, there are numerous dry (episodic or ephemeral) washes and channels. These washes rarely carry surface flow except during rainstorms or during floods originating from heavy precipitation higher in the watershed. As described in Section D.4.1.1, under the federal Clean Water Act and State Fish and Game Code, these channels may be subject to USACE, CDFW, SWRCB and ~~RWQCB~~ EPA jurisdiction. Irrigation channels and stock ponds may be found within the agricultural areas; depending on the situation these may also be jurisdictional.

Page D.4-21

DEIR/DEIS Text: F3-139

Clean Water Act (33 USC Sections 1251-1376). Regulates the chemical, physical, and biological integrity of the nation's waters. Section 401 of the Clean Water Act (CWA) requires that an applicant obtain State certification for discharge into waters of the United States. The Regional Water Quality Control Boards administer the certification program in California. Section 404 of the CWA establishes a permit program, administered by the U.S. Army Corps of Engineers (USACE), to regulate the discharge of dredged or fill material into waters of the United States, including wetlands. Individual projects may qualify under "Nationwide General Permits," or may require project-specific "Individual Permits."

SCE Comment:

Please make the following revision:

Clean Water Act (33 USC Sections 1251-1376). Regulates the chemical, physical, and biological integrity of the nation's waters. Section 401 of the Clean Water Act (CWA) requires that an applicant obtain State certification for discharge into waters of the United States. The State Water Resources Control Board and Regional Water Quality Control Boards administer the certification program in California, and the EPA administers the certification program on sovereign tribal land. Section 404 of the CWA establishes a permit program, administered by the U.S. Army Corps of Engineers (USACE), to regulate the discharge of dredged or fill material into waters of the United States, including wetlands. Individual projects may qualify under "Nationwide General Permits," or may require project-specific "Individual Permits."

Comment Set F3: Southern California Edison Company (cont.)

Page D.4-23

DEIR/DEIS Text: F3-140

D.4.3.1 Approach to Impact Assessment

The Proposed Project includes a construction phase, projected to take place over approximately 36 to 48 months. Following construction, temporary disturbance areas would be revegetated according to applicable mitigation measures. Revegetation efforts, along with implementation and monitoring of other mitigation measures identified herein, would necessitate ongoing vehicle access and soil disturbance beyond the completion of construction. This phase is referred to as the Proposed Project's "restoration" phase in the following analysis.

Additionally, vehicle access and other project activities would continue during operation and maintenance (O&M), throughout the life of the Proposed Project. Each potential impact to vegetation is described, to indicate whether it is a direct or indirect impact; whether its effects would be permanent, long-term or short-term; and whether it would occur during one or more of the Proposed Project's phases, including construction, restoration, or O&M.

SCE Comment:

The Draft EIR/EIS should state that O&M associated with the Proposed Project would be less than or at most equivalent to O&M to the existing facilities in this section. As such, these are not new impacts as compared to existing conditions.

Page D.4-24

DEIR/DEIS Text: F3-141

D.4.3.1.1 Applicant Proposed Measures

The PEA includes a series of Applicant Proposed Measures (APMs) proposed by SCE to reduce or avoid impacts to biological resources. The APMs are considered to be commitments made by SCE, and they are assumed to be implemented in this evaluation of impacts to biological resources. SCE's APMs addressing vegetation and special-status plants are presented in Table D.4-3. APMs that relate strictly to wildlife are presented in Section D.5. The additional mitigation measures recommended in this analysis generally incorporate the APMs, while adding conditions or details to protect resources to the extent feasible. Therefore, the APMs in Table D.4-3 are superseded by mitigation measures provided.

SCE Comment:

The quoted text, below, needs clarification, it is not the objective of CEQA or NEPA to protect resources to the extent feasible.

Rather, in the case of CEQA significant impacts must be mitigated to below a level of significance, unless the Lead Agency provides a Statement of Overriding Consideration.

<u>The additional mitigation measures recommended in this analysis generally incorporate the APMs, while adding conditions or details to protect resources to the extent feasible.</u>

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.4-26

DEIR/DEIS Text: F3-142

Jurisdictional Water Permits.

Jurisdictional waters permits would be obtained from CDFW under Cal. Fish & Game Code Section 1602, and from USACE, and the appropriate Regional Water Quality Control Boards in accordance with Sections 404 and 401 of the Clean Water Act, to address unavoidable impacts to State and Federal jurisdictional waters. Impacts would be mitigated based on the terms of the permits. The applicant would develop a Habitat Mitigation and Monitoring Plan (HMMP) for affected jurisdictional areas within established riparian areas, as needed, for review and approval by the USACE, CDFW, and the Regional Boards as appropriate. The plan would describe measures to accomplish restoration, provide criteria for restoration success, and specify compensation ratios. Monitoring and reporting requirements and the duration of post-construction monitoring would be specified. A copy of the final HMMP would be provided to the CPUC, USACE and CDFW.

Regarding any affected Riparian/Riverine drainages and habitat areas in Segments 3 and 4 in Western Riverside County, if SCE participates in the WR-MSHCP, SCE would prepare a DBESP [Determination of Biologically Equivalent or Superior Preservation] that would include mitigation measures consistent with the HMMP as previously described. The RCA would request USFWS and CDFW concurrence with the MSHCP "findings of consistency," as well as DBESP approval. Subsequent coordination on any biological issues would be addressed through consultation with the RCA. The RCA would determine the need for additional consultation with the USFWS and CDFW.

SCE Comment:

Please make the following revisions:

Jurisdictional Water Permits

Jurisdictional waters permits would be obtained from CDFW under Cal. Fish & Game Code Section 1602, and from USACE, EPA, and the ~~appropriate Regional Water Quality Control Boards~~ State Water Resources Control Board in accordance with Sections 404 and 401 of the Clean Water Act, to address unavoidable impacts to State and Federal jurisdictional waters. Impacts would be mitigated based on the terms of the permits. The applicant would develop a Habitat Mitigation and Monitoring Plan (HMMP) for affected jurisdictional areas within established riparian areas, as needed, for review and approval by the USACE, EPA, CDFW, and the SWRCB ~~Regional Boards~~ as appropriate. The plan would describe measures to accomplish restoration or revegetation, provide criteria for ~~restoration~~ success, and specify compensation ratios. Monitoring and reporting requirements and the duration of post-construction monitoring would be specified. A copy of the final HMMP would be provided to the CPUC, USACE, EPA and CDFW.

Regarding any affected Riparian/Riverine drainages and habitat areas in Segments 3 and 4 in Western Riverside County, if SCE participates in the WR-MSHCP, SCE would prepare a DBESP [Determination of Biologically Equivalent or Superior Preservation] that would include mitigation measures consistent with the HMMP as previously described. The RCA would request USFWS and CDFW concurrence with the MSHCP "findings of consistency," as well as DBESP approval. Subsequent coordination on any biological issues would be addressed through consultation with the RCA. The RCA would determine the need for additional consultation with the USFWS and CDFW.

Comment Set F3: Southern California Edison Company (cont.)

Page D.4-29

DEIR/DEIS Text: F3-143

The Proposed Project also would affect wetland or riparian habitat, vegetation and habitat that may support special-status plants or animals, and vegetation types designated by CDFW (CDFG, 2010) as "communities with highest inventory priority." These habitats include alluvial scrub, coast live oak woodland, coastal sage scrub, chaparral, desert scrub, riparian woodland, aeolian sand, and grassland/forbland potentially supporting Stephens' kangaroo rat, or native grasslands (i.e., grassland/forbland with 10 percent or greater relative cover of native perennial grasses).

SCE Comment:

Chaparral and desert scrub are not considered sensitive plant communities.

CDFW provides background information regarding its List of Natural Communities for the State and presents some specific information regarding the codes it uses as well as Rarity ranking and global and State ranks for natural communities of interest. (Please see: http://www.dfg.ca.gov/biogeodata/vegcamp/natural_comm_background.asp)

The information stipulates that: "For alliances with State ranks of S1-S3, all associations within them are also considered to be highly imperiled." It also specifies that analysts should "Refer to the current standard list of natural communities to determine if any of these types are considered of special concern (S1-S3 rank); if so, the CEQA Guidelines checklist (at IVb) should be considered." Communities ranked S4 or S5 are not included in this specification and are not mentioned regarding sensitivity. Thus, it should be understood that they may be of interest to the State and recognized by the CNDDB but communities ranked S4 or S5 are not considered imperiled to the extent that impacts to them warrant consideration as significant under CEQA.

If these plant communities are included due to their value as special-status species habitat, mitigation should only apply to locations where specific special-status species are known to occur.

Chaparral, Desert Scrub, and Aeolian Sand should be deleted because they are not by themselves sensitive vegetation communities and specific special-status species known to occur in these communities along the ROW are not clearly identified:

The Proposed Project also would affect wetland or riparian habitat, vegetation and habitat that may support special-status plants or animals, and vegetation types designated by CDFW (CDFG, 2010) as "communities with highest inventory priority." These habitats include alluvial scrub, coast live oak woodland, coastal sage scrub, ~~chaparral, desert scrub~~, riparian woodland, ~~aeolian sand~~, and grassland/forbland potentially supporting Stephens' kangaroo rat, or native grasslands (i.e., grassland/forbland with 10 percent or greater relative cover of native perennial grasses).

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.4-29

DEIR/DEIS Text: F3-144

Mitigation Measures for Impact VEG-1: Land clearing for construction and future operations and maintenance would cause loss or degradation of vegetation and habitat, including sensitive habitats.

VEG-1a Conduct biological monitoring and reporting. The following provisions shall apply to the approved project.

Lead biologist: SCE shall nominate a lead biologist and submit the nominee's resume to the CPUC and BLM for concurrence, no less than 60 days prior to the start of any ground-disturbing activities, including those occurring prior to site mobilization (including, but not limited to geotechnical borings or hazardous waste evaluations). At minimum the lead biologist will hold a bachelor's degree in biological sciences, zoology, botany, ecology, or a closely related field; have at least three years of experience in field biology and at least one year of direct field experience with biological resources found in or near the project area. The resume shall demonstrate to the satisfaction of the CPUC and BLM the appropriate education and experience to accomplish the assigned biological resources tasks.

The lead biologist will be SCE's primary point of contact to CPUC, BLM, CDFW, and USFWS regarding any biological resources issues and implementation of related mitigation measures and permit conditions throughout project construction and post-construction restoration work. In addition, the lead biologist will be responsible for supervising and training biological monitors (below), and preparing and submitting all monitoring reports and notifications (below).

If the lead biologist is replaced, the specified information of the proposed replacement must be submitted to the CPUC and BLM at least ten working days prior to the termination or release of the preceding lead biologist. In an emergency, SCE shall immediately notify the CPUC and BLM to discuss the qualifications and approval of a short-term replacement while a permanent lead biologist is proposed for consideration.

Biological monitors: SCE shall assign qualified biological monitors to the project to monitor all work activities during the construction phase.

Monitors are responsible for ensuring that impacts to special-status species, native vegetation, wildlife habitat, and sensitive or unique biological resources are avoided to the fullest extent safely possible. Monitors are also responsible to ensure that work activities are con-ducted in compliance with APMs, mitigation measures, permit conditions, and other project requirements.

Resumes of all biological monitors, including specialty monitors (including but not limited to bat, nesting bird, and special-status species monitors), shall be provided for concurrence by the CPUC and BLM, prior to the monitor commencing field duties. The resumes shall demonstrate, to the satisfaction of the CPUC and BLM, the appropriate education and experience to accomplish the assigned biological resources tasks.

SCE shall provide training to biological monitors, in addition to WEAP (see Mitigation Measure VEG-1b) and prior to the monitor commencing field duties, on biological resources present or potentially present on the Proposed Project, as well as mitigation measures, permit requirements, project protocols, and the duties and responsibilities of a biological monitor. Biological monitors shall inform construction crews daily of any environmentally sensitive areas (ESAs), nest buffers, or other resource issues or restrictions that affect the work sites for that day. Biological monitors shall communicate with construction supervisors and crews as needed (e.g., at daily tailgate safety meetings ("tailboards"), by telephone, text message, or email) to provide guidance to maintain compliance with mitigation measures and permit conditions. SCE shall ensure that adequate numbers of monitors are assigned to effectively monitor work activities and that communications from biological monitors are promptly directed to crews at each work site for incorporation into daily work activities. If biological monitors are unavailable for a tailboard meeting, the construction supervisors shall communicate all ESA, nest buffers, or other resource restrictions to crews during the meeting. SCE shall ensure that biological monitors are provided with an accurate daily construction work schedule as well as updated information on any alterations to the daily construction work schedule. This information shall also be provided to CPUC monitors. SCE shall ensure that biological monitors are provided with up-to-date biological resource maps and construction maps in hardcopy or digital format. These maps shall also be provided to CPUC monitors. Monitors shall be familiar with the biological resources present or potentially present, ESAs, nest buffers, and any other resource issues at the site(s) they are

Comment Set F3: Southern California Edison Company (cont.)

monitoring, as well as the applicable mitigation measures and permit requirements. Monitors shall exhibit diligence in F3-144 cont.

- **Final report:** After construction has been completed, a final environmental compliance monitoring report shall be submitted to the CPUC and BLM for review and approval. This report shall be submitted within twelve (12) months of the completion of construction and shall include:
  - A summary of all non-compliance records occurring during the construction phase, and remedial actions applied for each one, with additional explanatory text and explanation of resolution of each substantial non-compliance incident (often termed "Level 3 non-compliance");
  - A summary of all nest buffer incursions, including helicopter incursions, (see Mitigation Measure WIL-1c) occurring during the construction phase, with explanation of follow-up actions and resolution for each one;
  - Final compilations of permanent and temporary impact acreages by habitat and land use jurisdiction;
  - Summaries of all other monitoring reporting requirements, as specified in mitigation measures in the Vegetation and Wildlife Resources sections; and
  - Discussion of "lessons learned" during construction, and recommended or proposed measures to improve compliance for future projects.

Implementation locations: San Bernardino County (all); WR-MSHCP (within the WR-MSHCP regardless of SCE's PSE status); CV-MSHCP (within the CV-MSHCP regardless of SCE's PSE status); BLM (all); reservation (recommended for all Morongo Tribal Lands).

SCE Comment:

SCE's existing team structure includes a staff Project Lead Biologist assigned to the project. The Project Lead Biologist manages the entire biology field team, is familiar with the biological resources in the project area, and would be the primary point of contact to CPUC, BLM, CDFW, and USFWS staff; thus, therefore there is no reason to "nominate" a lead biologist as indicated in the measure. The Project Lead Biologist, in compliance with the Biological Opinion, will designate a Field Contact Representative (FCR) who will additionally be responsible for compliance with project mitigation measures, field monitors, and conservation measures outlined in the Biological Opinion. The Authorized or Qualified Biologist may also serve as the FCR, and the resumes of the FCR will be submitted to the agencies for approval.

Additionally, this measure does not acknowledge the existing O&M activities occurring along the WOD project ROW. The maintenance currently occurring on the existing lines is greater than or at most equal to the maintenance that will be required for the WOD project. Due to this existing baseline environmental condition, the proposed O&M vegetation and habitat removal impacts would be less than significant without this mitigation measure following construction of the WOD Project.

Lastly, pre-construction activities such as geotechnical investigation and hazardous waste evaluations do not create the same level of impacts as construction activity. Further, a FCR may not be in place during preconstruction activities. As such, a requirement to have a Lead Biologist – or a Field Contact Representative - approved prior to conducing these activities is not necessary as long as SCE avoids impacts to biological resources.

For the reasons stated above, please make the following revisions:

Mitigation Measures for Impact VEG-1: Land clearing for construction ~~and future operations and maintenance~~ would cause loss or degradation of vegetation and habitat, including sensitive habitats.

VEG-1a Conduct biological monitoring and reporting. The following provisions shall apply to the approved project.

~~**Lead biologist:** SCE shall nominate a lead biologist and submit the nominee's resume to the CPUC and BLM for concurrence, no less than 60 days prior to the start of any ground-disturbing activities. , including those occurring prior to site mobilization (including, but not limited to geotechnical borings or hazardous waste evaluations). At minimum the lead biologist will hold a bachelor's degree in biological sciences, zoology, botany, ecology, or a closely related field; have at least three years of experience in field biology and at least one year of direct field experience with biological resources found in or near the project area. The resume shall demonstrate to the satisfaction of the CPUC and BLM the appropriate education and experience to accomplish the assigned biological resources tasks.~~

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

F3-144 cont.

SCE's ~~The~~ lead biologist will be SCE's primary point of contact to CPUC, BLM, CDFW, and USFWS regarding any biological resources issues and implementation of related mitigation measures and permit conditions throughout project construction and post-construction restoration work. In addition, the lead biologist will ~~be responsible~~ have oversight of ~~for~~ supervising and of training bio-logical monitors (below), and preparing and submitting all monitoring reports and notifications (below).

~~If the lead biologist is replaced, the specified information of the proposed replacement must be submitted to the CPUC and BLM at least ten working days prior to the termination or release of the preceding lead biologist. In an emergency, SCE shall immediately notify the CPUC and BLM to discuss the qualifications and approval of a short-term replacement while a permanent lead biologist is proposed for consideration.~~

Biological monitors: SCE shall assign qualified biological monitors to the project to monitor ~~all~~ work activities, where special status plant and wildlife, sensitive vegetation communities, special status species habitat and other regulated biological resources have the potential to occur, during the construction phase.

Monitors are responsible for ensuring that impacts to special-status species, sensitive ~~native~~ vegetation communities, special-status species ~~wildlife~~ habitat, and sensitive or unique biological resources are avoided or minimized to the fullest extent safely possible. Monitors are also responsible to ensure that work activities are con-ducted in compliance with APMs, mitigation measures, permit conditions, and other project requirements.

Resumes of all biological monitors, including specialty monitors (including but not limited to bat, nesting bird, and special-status species monitors), shall be provided for concurrence by the CPUC and BLM, prior to the monitor commencing field duties. The resumes shall demonstrate, to the satisfaction of the CPUC and BLM, the appropriate education and experience to accomplish the assigned biological resources tasks.

SCE shall provide training to biological monitors, in addition to WEAP (see Mitigation Mea-sure VEG-1b) and prior to the monitor commencing field duties, on biological resources present or potentially present on the Proposed Project, as well as mitigation measures, permit requirements, project protocols, and the duties and responsibilities of a biological monitor.

Biological monitors shall inform construction crews daily of any environmentally sensitive areas (ESAs), nest buffers, or other resource issues or restrictions that affect the work sites for that day. Biological monitors shall communicate with construction supervisors and crews as needed (e.g., at daily tailgate safety meetings ("tailboards"), by telephone, text message, or email) to provide guidance to maintain compliance with mitigation measures and permit conditions. SCE shall ensure that adequate numbers of monitors are assigned to effectively monitor work activities and that communications from biological monitors are promptly directed to crews at each work site for incorporation into daily work activities. If biological monitors are unavailable for a tailboard meeting, the construction supervisors shall communicate all ESA, nest buffers, or other resource restrictions to crews during the meeting. SCE shall ensure that biological monitors are provided with an accurate daily construction work schedule as well as updated information on any alterations to the daily construction work schedule. This information shall also be provided to CPUC monitors.

SCE shall ensure that biological monitors are provided with up-to-date biological resource maps and construction maps in hardcopy or digital format. These maps shall also be provided to CPUC monitors.

Monitors shall be familiar with the biological resources present or potentially present, ESAs, nest buffers, and any other resource issues at the site(s) they are monitoring, as well as the applicable mitigation measures and permit requirements. Monitors shall exhibit diligence in

- **Final report:** After construction has been completed, a final environmental compliance monitoring report shall be submitted to the CPUC and BLM for review and approval. This report shall be submitted within twelve (12) months of the completion of construction and shall include:
  - A summary of all non-compliance records occurring during the construction phase, and remedial actions applied for each one, with additional explanatory text and explanation of resolution of each substantial non-compliance incident (often termed "Level 3 non-compliance");
  - A summary of all nest buffer incursions, including helicopter incursions, (see Mitigation Measure WIL-1c) occurring during the construction phase, with explanation of follow-up actions and resolution for each one;
  - Final compilations of permanent and temporary impact acreages by habitat and land use jurisdiction;

Comment Set F3: Southern California Edison Company (cont.)

F3-144 cont.

- Summaries of all other monitoring reporting requirements, as specified in mitigation measures in the Vegetation and Wildlife Resources sections; and
- Discussion of "lessons learned" during construction, and recommended or proposed measures to improve compliance for future projects.

Implementation locations: San Bernardino County (all); WR-MSHCP (within the WR-MSHCP regardless of SCE's PSE status); CV-MSHCP (within the CV-MSHCP regardless of SCE's PSE status); BLM (all); reservation (recommended for all Morongo Tribal Lands)

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.4-31

DEIR/DEIS Text: F3-145

Resumes of all biological monitors, including specialty monitors (including but not limited to bat, nesting bird, and special-status species monitors), shall be provided for concurrence by the CPUC and BLM, prior to the monitor commencing field duties. The resumes shall demonstrate, to the satisfaction of the CPUC and BLM, the appropriate education and experience to accomplish the assigned biological resources tasks.

SCE Comment:

Following Clarification Requested:

- SCE Requests to be informed of the duration of the anticipated review period for resumes in order to schedule and retain qualified monitors prior to initiating work for work scheduling purposes.
- Last sentence of this section is very subjective and we request additional detail.

Suggested Revision:

Resumes of all biological monitors, including specialty monitors (including but not limited to bat, nesting bird, and special-status species monitors), shall be provided for concurrence by the CPUC and BLM, prior to the monitor commencing field duties. CPUC and BLM, or their designee, will provide concurrence within 10 working days following submittal of resumes. The resumes shall demonstrate, to the satisfaction of the CPUC and BLM, the appropriate education and experience to accomplish the assigned biological resources tasks.

Page D.4-31

DEIR/DEIS Text: F3-146

Biological monitor duties and responsibilities: Throughout the duration of construction, SCE shall conduct biological monitoring of all work activities in the project area, including work sites, yards, staging areas, access roads, and any area subject to project disturbance. All pre-construction activities (e.g., for geotechnical borings, hazardous waste evaluations, etc.) and post-construction restoration shall also be monitored by a biological monitor.

SCE Comment:

To ensure implementation for this portion of the mitigation measure is achievable, please include clarification related to the following:

- SCE Requests clarification that not "all" work activities would require monitoring, rather, monitoring would be required where work activities have the potential to impact special-status biological resources.
- Pre-construction

Additionally, please make the following revision**:**

Biological monitor duties and responsibilities: Throughout the duration of construction, SCE shall conduct biological monitoring of ~~all~~ work activities in the project area, including work sites, yards, staging areas, access roads, and any area subject to project disturbance, where there is a potential to impact impact sensitive plant or wildlife resources. ~~All pre-construction activities (e.g., for geotechnical borings, hazardous waste evaluations, etc.) and~~ Post-construction restoration shall also be monitored by a biological monitor in specific locations where restoration activities have the potential to impact sensitive plant or wildlife resources.

Comment Set F3: Southern California Edison Company (cont.)

Page D.4-35

DEIR/DEIS Text: F3-147

- Printed training materials, including photographs and brief descriptions of all special-status plants and animals that may be encountered on the project, including behavior, ecology, sensitivity to human activities, legal protection, penalties for violations, reporting requirements, and protection measures.

SCE Comment:

With the widespread availability of portable electronic devices, providing an option for distributing electronic copies will save resources. As such, please make the following revision:

- Printed or electronic copies of training materials, including photographs and brief descriptions of all special-status plants and animals that may be encountered on the project, including behavior, ecology, sensitivity to human activities, legal protection, penalties for violations, reporting requirements, and protection measures.

Page D.4-37

DEIR/DEIS Text: F3-148

For all revegetation or restoration areas, if a fire, flood, or other disturbance beyond the control of SCE, CPUC, and BLM damages a revegetation area within the monitoring period, SCE shall be responsible for a one-time replacement. If a second event occurs, no replanting is required, unless the event is caused by SCE's activity (based upon maintenance of erosion control measures; fencing, gates, or other site control; or investigation by a firefighting agency).

SCE Comment:

SCE should not be held responsible for events that are beyond SCE's control. ~~act's of God.~~ In the event of a fire, flood, or other disturbance the site conditions within the temporary impact areas may be no different than the surround vegetation. This statement assumes that surrounding native vegetation will respond better to fire, flood, or other disturbance than restoration areas but provides no evidence to support this assumption.

Suggested Revision:

For all revegetation or restoration areas, if a fire, flood, or other disturbance beyond the control of SCE, CPUC, and BLM damages a revegetation area within the monitoring period, SCE shall not be responsible for replacement. N~~n~~o replanting is required, unless the event is caused by SCE's activity (based upon maintenance of erosion control measures; fencing, gates, or other site control; or investigation by a firefighting agency).

Page D.4-37

DEIR/DEIS Text: F3-149

On completion of project construction, SCE shall provide CPUC and BLM with GIS shapefiles of all actual temporary and permanent disturbance areas, up to date ortho-rectified aerial imagery of the project area, and summary data of all discrepancies between final engineering and "as-built" conditions for each vegetation or habitat type, within each jurisdictional area (San Bernardino County, WR-MSHCP, CV-MSHCP, reservation, and BLM).

SCE Comment:

Providing updated ortho-rectified aerial imagery is an unnecessary additional expense. Current aerial imagery is readily available from various sources and is accurate. The provided GIS files should be sufficient to validate the actual vs. temporary impact areas.

Please make the following revision:

On completion of project construction, SCE shall provide CPUC and BLM with GIS shapefiles of all actual temporary and permanent disturbance areas, ~~up to date ortho-rectified aerial imagery of the project area,~~ and summary data of all discrepancies between final engineering and "as-built" conditions for each vegetation or habitat type, within each jurisdictional area (San Bernardino County, WR-MSHCP, CV-MSHCP, reservation, and BLM).

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.4-37 through 39

DEIR/DEIS Text: F3-150

VEG-1d Restore or revegetate temporary disturbance areas. [Supersedes APM BIO-1 to provide further specificity.] This measure has two parts: Part A and Part B. Part A is applicable to all temporary disturbance areas, and Part B is applicable to disturbance occurring in sensitive vegetation types and special-status species habitats.

For all revegetation or restoration areas, if a fire, flood, or other disturbance beyond the control of SCE, CPUC, and BLM damages a revegetation area within the monitoring period, SCE shall be responsible for a one-time replacement. If a second event occurs, no replanting is required, unless the event is caused by SCE's activity (based upon maintenance of erosion control measures; fencing, gates, or other site control; or investigation by a firefighting agency).

Part A: Habitat restoration and revegetation for all temporary disturbance areas.

SCE shall prepare and implement a Habitat Restoration and Revegetation Plan (HRRP), to restore or revegetate all temporary disturbance areas, including temporary disturbance areas around tower construction sites, laydown or staging areas, temporary access and spur roads, cut and fill slopes, and locations of existing towers that are removed during construction of the project. For temporary disturbances in agriculture, developed/disturbed, and most grassland/forbland (excluding suitable Stephens' kangaroo rat habitat and any areas with 10 percent or greater relative cover of native perennial grass species), the overall goals of the HRRP will be to minimize weed invasion, dust generation, and soil erosion. The goals for sensitive vegetation and special-status species habitat are described in Part B of this Mitigation Measure.

The Draft HRRP shall be submitted to CPUC and BLM review and approval prior to the beginning of ground-disturbing activities. SCE shall incorporate all requested revisions in coordination with the CPUC and BLM and finalize the HRRP within 12 months from the start of construction. For all temporary disturbance areas, the HRRP shall include the following elements:

- A statement of revegetation goals and objectives for each portion of the project area, based on vegetation type and jurisdictional status of each site.
- Quantitative success criteria for each revegetation or restoration site or category. Implementation details, including but not limited to topsoil stockpiling and handling; post-construction site preparation; soil decompaction and recontouring; planting and seeding palettes to include only native, locally sourced materials with confirmed availability from suppliers; fall-season planting or seeding dates.
- Maintenance, including but not limited to irrigation or hand-watering schedule and equipment, erosion control, and weed control.
- Monitoring and Reporting, specifying monitoring schedule and data collection methods throughout establishment of vegetation with key indicators of successful or unsuccessful progress, and quantitative values to objectively determine success or failure at the conclusion of the monitoring period.
- Contingency measures such as re-planting, drainage repairs, adjustments to irrigation or weeding schedule, and extension of maintenance beyond the original schedule, to repair or remediate sites not on track to meet success criteria, or not meeting the criteria at the close of the originally scheduled monitoring period.

The Integrated Weed Management Plan (Mitigation Measure VEG-2a) will be implemented throughout implementation of the HRRP. For all revegetation or restoration areas, only seed or potted nursery stock of locally occurring native species from a local source will be used for revegetation. Seeding and planting will be conducted as described in Chapter 5 of *Rehabilitation of Disturbed Lands in California* (Newton and Claassen, 2003). The list of plants observed during botanical surveys of the project area will be used as a guide to site-specific plant selection.

For all revegetation or restoration areas, the HRRP will include objective, quantifiable success criteria, commensurate with the goals for each site. Monitoring of the reclamation, revegetation, or restoration sites will continue annually for no fewer than five (5) years or until the defined success criteria are achieved, whichever is later. SCE will be responsible for implementing remediation measures as needed. Following remediation work, each site will be subject to the success criteria and monitoring period as required for the initial reclamation, revegetation, or restoration.

Comment Set F3: Southern California Edison Company (cont.)

Part B: Additional habitat restoration and revegetation requirements for sensitive vegetation and special-status species habitat. F3-150 cont.

For temporary disturbances in grassland/forbland that is either suitable Stephens' kangaroo rat habitat, or has 10 percent or greater relative cover of native perennial grass species (see VEG-1c), and in all other vegetation types (alluvial scrub, coast live oak woodland, coastal sage scrub, chaparral, desert scrub, riparian woodland, and aeolian sand), the Habitat Resto-ration and Revegetation Plan will be designed to replace the habitat values present prior to disturbance (i.e., native plant species cover, habitat structure, and soil or substrate conditions). The following performance standards must be met by the end of the monitoring period:

- At least 80 percent of the vegetation cover within the restoration area shall be native species that naturally occur in local native habitats;
- Absolute cover and density of native plant species within the restoration areas shall equal at least 60 percent of the pre-disturbance or reference vegetation cover; and
- The site shall have persisted successfully without irrigation or remedial planting for a minimum of three years prior to completion of monitoring.

For revegetation or restoration in these habitats, the HRRP will include (in addition to the components listed in Part A):

- A map depicting the locations of all temporary disturbance areas in these habitats, including a quantitative evaluation of native grass cover and Stephens' kangaroo rat habitat suitability in all mapped grassland/forbland areas, subject to requirements of Part B;
- An inventory of any temporary disturbance areas that cannot be effectively revegetated or restored to replace habitat values within a five-year timeframe (these will be categorized as "long-term disturbance areas," to be addressed under habitat compensation, Mitigation Measure VEG-1e).

Reporting (for Part A and Part B). For all revegetation or restoration areas, SCE will provide annual reports to the CPUC and BLM verifying the total vegetation acreage subject to temporary and permanent disturbance, identifying which items of the HRRP have been completed, and which items are still outstanding. The annual reports will also include a summary of the reclamation, revegetation, or restoration activities for the year, a discussion of whether performance standards for the year were met, any remedial actions conducted and recommendations for remedial action, if warranted, that are planned for the upcoming year. Each annual report will be submitted within 90 days after completion of each year of revegetation and restoration work.

Implementation locations: Parts A and B of this mitigation measure shall apply as follows: San Bernardino County (all); WR-MSHCP (within the WR-MSHCP regardless of SCE's PSE status); CV-MSHCP (within the CV-MSHCP regardless of SCE's PSE status); BLM (all); reservation (recommended for all Morongo Tribal Lands).

SCE Comment:

Included below are concerns related to VEG-1d and suggested revisions:

Paragraph 2:

In the event of a fire, flood, or other disturbance beyond the control of SCE, the site conditions within the temporary impact areas may be similar to those of the surrounding vegetation. The DEIR/DEIS assumes that surrounding native vegetation will respond better to fire, flood, or other disturbance than restoration areas, but provides no evidence to support this assumption.

Paragraph 3:

"Long-term restoration sites," that cannot be effectively revegetated or restored within the 5-year timeframe will need to be stabilized to prevent the potential for soil erosion. An additional sentence to account for this has been included.

Paragraph 13:

If SCE elects to take remedial action to ensure that success criteria are met within the 5 year period, SCE should not be penalized by being obligated to continue monitoring for another 5 years from the point of remedial action. SCE has an incentive to meet success criteria within the 5-year period and resetting the period would diminish the incentive. SCE recommends deletion of last sentence.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

F3-150 cont.

Part B, Paragraph 1:

See comments in 4-7. SCE recommends deleting aeolian, sand, chaparral, and desert scrub Aeolian sand, as they are not sensitive vegetation communities.

CDFW provides background information regarding its List of Natural Communities for the State and presents some specific information regarding the codes it uses as well as Rarity ranking and global and State ranks for natural communities of interest. (Please see: http://www.dfg.ca.gov/biogeodata/vegcamp/natural_comm_background.asp)

The information stipulates that: "For alliances with State ranks of S1-S3, all associations within them are also considered to be highly imperiled." It also specifies that analysts should "Refer to the current standard list of natural communities to determine if any of these types are considered of special concern (S1-S3 rank); if so, the CEQA Guidelines checklist (at IVb) should be considered." Communities ranked S4 or S5 are not included in this specification and are not mentioned regarding sensitivity. Thus, it should be understood that they may be of interest to the State and recognized by the CNDDB but communities ranked S4 or S5 are not considered imperiled to the extent that impacts to them warrant consideration as significant under CEQA.

These vegetation communities have the potential to support sensitive wildlife species, however, only those habitats that are occupied require restoration for temporary impacts and compensation for permanent impacts to mitigate significant impacts.

Part B, Performance Standard Bullets:

Because this part of the MM seems to apply to grassland habitat considered suitable for SKR and other sensitive plant communities, SCE is requesting modifications to the MM, as described below.

In the project area, some of the plant communities listed do not naturally exhibit 80% relative cover by native species. For example, desert and alluvial areas have a low absolute cover of native species due to large areas of bare ground. Further, many of California's ecosystems are highly invaded, resulting in naturally occurring communities that have less than 80% relative cover of native species. Therefore, the goals for total or absolute as well as native cover should be based on both the absolute and relative coverage attributed to the existing plant communities being replaced. Setting a standard at 80% native species could mean that SCE's restoration efforts must achieve coverage levels that exceed existing values in the on-site or adjacent plant communities.

In addition, cover and density measure the same thing; so the references to both is confusing. SCE recommends using only cover or density in the MM.

Requiring that all restoration sites must persist for at least 3 years without irrigation before monitoring is complete is excessive and inconsistent with the two year standard requirement typically established by the resource agencies. SCE recommends a two year requirement.

Although some grassland/forbland habitat may be considered potentially suitable for Stephens' kangaroo rat, the habitat is not occupied by that species unless that species is present. If the habitat is not occupied, then the plant community is not sensitive nor does it support special status species (SKR). Requiring revegetation of this non-sensitive, predominantly ruderal plant community should not be required, unless the temporary loss is considered significant. Establishing performance standards and a 5-year monitoring requirement for a non-native grassland should not be required, as this vegetation rapidly becomes reestablished by itself following construction activities. SCE suggests replacing "suitable habitat" for SKR with "occupied habitat" for SKR.

For the reasons stated abov,e please make the following revisions:

VEG-1d Restore or revegetate temporary disturbance areas. [Supersedes APM BIO-1 to provide further specificity.] This measure has two parts: Part A and Part B. Part A is applicable to all temporary disturbance areas, and Part B is applicable to disturbance occurring in sensitive vegetation types and special-status species habitats.

For all revegetation or restoration areas, if a fire, flood, or other disturbance beyond the control of SCE, CPUC, and BLM damages a revegetation area within the monitoring period, SCE shall not be responsible for ~~a one-time~~ replacement. ~~If asecond event occurs, n~~ No replanting is required, unless the event is caused by SCE's activity (based upon maintenance of erosion control measures; fencing, gates, or other site control; or investigation by a firefighting agency).

Comment Set F3: Southern California Edison Company (cont.)

F3-150 cont.

Part A: Habitat restoration and revegetation for all temporary disturbance areas.

SCE shall prepare and implement a Habitat Restoration and Revegetation Plan (HRRP), to restore or revegetate all temporary disturbance areas, including temporary disturbance areas around tower construction sites, laydown or staging areas, temporary access and spur roads, cut and fill slopes, and locations of existing towers that are removed during construction of the project. For temporary disturbances in agriculture, developed/ disturbed, ~~and~~ most grassland/forbland (excluding suitable occupied Stephens' kangaroo rat habitat and any areas with 10 percent or greater relative cover of native perennial grass species), and for temporary disturbance areas that are stabilized because they cannot be effectively revegetated, the overall goals of the HRRP will be to minimize weed invasion, dust generation, and soil erosion. The goals for sensitive vegetation and special-status species habitat are described in Part B of this Mitigation Measure.

The Draft HRRP shall be submitted to CPUC and BLM review and approval prior to the beginning of ground-disturbing activities. SCE shall incorporate all requested revisions in coordination with the CPUC and BLM and finalize the HRRP within 12 months from the start of construction.

For all temporary disturbance areas, the HRRP shall include the following elements:

- A statement of revegetation goals and objectives for each portion of the project area, based on vegetation type and jurisdictional status of each site.
- Quantitative success criteria for each revegetation or restoration site or category.
- Implementation details, including but not limited to topsoil stockpiling and handling; post-construction site preparation; soil decompaction and recontouring; planting and seeding palettes to include only native, locally sourced materials with confirmed availability from suppliers; fall-season planting or seeding dates.
- Maintenance, including but not limited to irrigation or hand-watering schedule and equipment, erosion control, and weed control.
- Monitoring and Reporting, specifying monitoring schedule and data collection methods throughout establishment of vegetation with key indicators of successful or unsuccessful progress, and quantitative values to objectively determine success or failure at the conclusion of the monitoring period.
- Contingency measures such as re-planting, drainage repairs, adjustments to irrigation or weeding schedule, and extension of maintenance beyond the original schedule, to repair or remediate sites not on track to meet success criteria, or not meeting the criteria at the close of the originally scheduled monitoring period.

The Integrated Weed Management Plan (Mitigation Measure VEG-2a) will be implemented throughout implementation of the HRRP. For all revegetation or restoration areas, only seed or potted nursery stock of locally occurring native species from a local source will be used for revegetation. Seeding and planting will be conducted as described in Chapter 5 of *Rehabilitation of Disturbed Lands in California* (Newton and Claassen, 2003). The list of plants observed during botanical surveys of the project area will be used as a guide to site-specific plant selection.

For all revegetation or restoration areas, the HRRP will include objective, quantifiable success criteria, commensurate with the goals for each site. Monitoring of the reclamation, revegetation, or restoration sites will continue annually for ~~no fewer than~~ five (5) years or until the defined success criteria are achieved, ~~whichever is later~~. SCE will be responsible for implementing remediation measures as needed. ~~Following remediation work, each site will be subject to the success criteria and monitoring period as required for the initial reclamation, revegetation, or restoration.~~

Part B: Additional habitat restoration and revegetation requirements for sensitive vegetation and special-status species habitat.

For temporary disturbances in grassland/forbland that is either ~~suitable~~ occupied Stephens' kangaroo rat habitat, or has 10 percent or greater relative cover of native perennial grass species (see VEG-1c), and in all other sensitive vegetation types (alluvial scrub, coast live oak woodland, coastal sage scrub, ~~chaparral, desert scrub,~~ and riparian woodland, ~~and aeolian sand~~), the Habitat Restoration and Revegetation Plan will be designed to replace the habitat values that were present prior to disturbance (i.e., native plant species cover, habitat structure, and swell or substrate conditions). The following performance standards must be met by the end of the monitoring period:

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

F3-150 cont.

- Performance standards for absolute (total) cover by all vegetation types and for relative cover by native species will be established by the HRRP and will depend on pre-construction conditions (i.e., total coverage and relative native cover) in the specific communities being replaced in each area or based on the absolute and relative native coverage values identified within adjacent communities that contain the same vegetation type and on similar slope aspect of the vegetation being re-established.
- ~~At least 80% of the vegetation cover within the restoration area shall be native species that naturally occur in local sensitive habitats;~~
- Absolute cover ~~and density~~ of ~~native~~ all plant species within the restoration areas shall equal at least ~~60~~ 80 percent of the total cover by vegetation within pre-disturbance or reference vegetation ~~cover~~; and
- Native plant species in the restoration areas shall contribute at least 70 percent of the relative cover contributed by native species within pre-disturbance or reference vegetation; and
- The site shall have persisted successfully without irrigation or remedial planting for a minimum of ~~three~~ two years prior to completion of monitoring.

For revegetation or restoration in these habitats, the HRRP will include (in addition to the components listed in Part A):

- A map depicting the locations of all temporary disturbance areas in these habitats, including a quantitative evaluation of native grass cover and occupied Stephens' kangaroo rat habitat ~~suitability~~ in all mapped grassland/forbland bland areas, subject to the requirements of Part B;
- An inventory of any temporary disturbance areas occupied by special-status species that cannot be effectively revegetated or restored to replace habitat values within a five-year timeframe (these will be categorized as "long-term disturbance areas," to be addressed under habitat compensation, Mitigation Measure VEG-1-e).

Reporting (for Part A and Part B). For all revegetation or restoration areas, SCE will provide annual reports to the CPUC and BLM verifying the total vegetation acreage subject to temporary and permanent disturbance, identifying which items of the HRRP have been completed, and which items are still outstanding. The annual reports will also include a summary of the reclamation, revegetation, or restoration activities for the year, a discussion of whether performance standards for the year were met, any remedial actions conducted and recommendations for remedial action, if warranted, that are planned for the upcoming year. Each annual report will be submitted within 90 days after completion of each year of revegetation and restoration work.

Implementation locations: Parts A and B of this ~~mitigation measure shall apply as follows: San Bernardino County (all); WR-MSHCP (within the WR-MSHCP regardless of SCE's PSE status); CV-MSHCP (within the CV-MSHCP regardless of SCE's PSE status); BLM (all); reservation (recommended for all Morongo Tribal Lands).~~ mitigation measure applies to all locations within San Bernardino County and on all BLM lands, and is recommended for implementation on all tribal lands. Within the WR-MSHCP and CV-MSHCP areas, if SCE does not obtain PSE status under the applicable MSHCP, this mitigation measure shall apply within the MSHCP area. If SCE obtains PSE status under either MSHCP, the project's temporary habitat impacts will be restored, revegetated or stabilized according to the requirements of the MSHCP, and this mitigation measure will not apply within the applicable MSHCP area.

Comment Set F3: Southern California Edison Company (cont.)

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DEIR/DEIS Text: F3-151

VEG-1e Compensate for permanent habitat loss. SCE shall compensate for permanent or long-term habitat loss through off-site habitat acquisition and management. This compensation may be accomplished through participation in the WR-MSHCP, CV-MSHCP (within the respective MSHCP areas) if SCE obtains PSE status. This mitigation measure will be applicable to all permanent project disturbance areas and to areas designated as temporary disturbance, but that cannot be effectively revegetated or restored to replace habitat values within a five-year timeframe.

Habitat compensation for all permanent or long-term habitat loss that is not compensated through participation in the WR-MSHCP or CV-MSHCP will be accomplished by acquisition of mitigation land or conservation easements or by providing funding for specific land acquisition, endowment, restoration, and management actions. SCE will prepare a Habitat Compensation Plan to be reviewed and approved by the CPUC, BLM, in consultation with the USFWS and CDFW.

SCE will acquire and protect, in perpetuity, compensation habitat to mitigate impacts to biological resources as detailed below. SCE shall be responsible for the acquisition, initial protection and habitat improvement, and long-term maintenance and management of compensation lands. The compensation lands will be placed under conservation management to be funded through the terms described herein.

The acreages of compensation land will be based upon final engineering calculation of impacted acreage for each resource and on ratios set forth in this measure, or in the USFWS Biological Opinion, the CDFW Streambed Alteration Agreement, the CDFW Incidental Take Permit, or the Consistency Determination, whichever presents a higher ratio. Acreages will be adjusted as appropriate for other alternatives or future modifications during implementation.

Compensation will be provided for impacts to the following resources, at the ratios specified below (acres acquired and preserved to acres impacted). These ratios reflect multiple bio-logical resource values, including habitat suitability for special-status species and wildlife movement or biological connectivity.

- Previously disturbed lands (agriculture, developed/disturbed) and open water: n/a (no habitat compensation required)
- Chaparral, desert scrub, and grassland/forbland: 1:1
- Alluvial scrub, coast live oak woodland, coastal sage scrub, riparian woodland, and aeolian sand: 3:1

The Habitat Compensation Plan will specify compensation acreage for each habitat type, based on final engineering and on MSHCP coverage as applicable. Final compensation requirements may be adjusted to account for any deviations in project disturbance, according to the as-built shapefiles ortho-rectified aerial imagery (Mitigation Measure VEG-1c).

Compensation Land Selection Criteria. Criteria for the acquisition, initial protection and habitat improvement, and long-term maintenance and management of compensation lands for impacts to biological resources will include all of the following:

- Compensation lands will provide habitat value that is equal to or better than the quality and function of the habitat impacted by the project, taking into consideration soils, vegetation, topography, human-related disturbance, wildlife movement opportunity, proximity to other protected lands, management feasibility, and other habitat values, subject to review and approval by CPUC and BLM;
- To the extent that proposed compensation habitat may have been degraded by previous uses or activities, the site quality and nature of degradation must support the expectation that it will regenerate naturally when disturbances are removed;
- Be near larger blocks of lands that are already protected or planned for protection, or which could feasibly be protected long-term by a public resource agency or a non-governmental organization dedicated to habitat preservation;
- Not have a history of intensive recreational use or other disturbance that might cause future erosion or other habitat damage, and make habitat recovery and restoration infeasible;
- Not be characterized by high densities of invasive species, either on or immediately adjacent to the parcels under consideration, that might jeopardize habitat recovery and restoration;

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

F3-151 cont.

- Not contain hazardous wastes that cannot be removed to the extent that the site could not provide suitable habitat;
- Must provide wildlife movement value equal to that on the project site, based on topography, presence and nature of movement barriers or crossing points, location in relation-ship to other habitat areas, management feasibility, and other habitat value; and
- Have water and mineral rights included as part of the acquisition, unless the CPUC and BLM, in consultation with CDFW and USFWS, agree in writing to the acceptability of land without these rights.

Review and Approval of Compensation Lands Prior to Acquisition. SCE shall submit a Draft Habitat Compensation Plan for review and approval by the CPUC and BLM describing the parcel(s) intended for protection. This Plan will discuss the suitability of the proposed parcel(s) as compensation lands in relation to the selection criteria listed above.

Management Plan. SCE or approved third party will prepare a management plan for the compensation lands in consultation with the entity that will be managing the lands. The goal of the management plan will be to support and enhance the long-term viability of the bio-logical resources. The Management Plan will be submitted for review and approval to the CPUC and BLM, in consultation with CDFW and USFWS.

Compensation Lands Acquisition Requirements. SCE will comply with the following requirements relating to acquisition of the compensation lands after the CPUC and BLM have approved the proposed compensation lands:

- **Preliminary Report.** SCE or an approved third party will provide a recent preliminary title report, initial hazardous materials survey report, biological resources analysis, and other necessary or requested documents for the proposed compensation land to the CPUC and BLM. All documents conveying or conserving compensation lands and all conditions of title are subject to review and approval by the CPUC in consultation with CDFW and USFWS. For conveyances to the State, approval may also be required from the California Department of General Services, the Fish and Game Commission, and the Wildlife Conservation Board.
- **Title/Conveyance.** SCE will acquire and transfer fee title to the compensation lands, a conservation easement over the lands, or both fee title and conservation easement, as required by the CPUC and BLM, in consultation with USFWS and CDFW. Any transfer of a conservation easement or fee title must be to CDFW, to a non-profit organization qualified to hold title to and manage compensation lands (pursuant to California Government Code section 65965), or to BLM or other public agency approved by the CPUC and BLM. If an approved non-profit organization holds fee title to the compensation lands, a conservation easement will be recorded in favor of CDFW or another entity approved by the CPUC and BLM. If an entity other than CDFW holds a conservation easement over the compensation lands, the CPUC and BLM may require that CDFW or another entity approved by the CPUC and BLM, in consultation with CDFW and USFWS, be named a third party beneficiary of the conservation easement. SCE will obtain approval of the CPUC and BLM of the terms of any transfer of fee title or conservation easement to the compensation lands.
- **Initial Protection and Habitat Improvement.** SCE will fund activities that the CPUC and BLM may require for the initial protection and habitat improvement of the compensation lands. These activities will vary depending on the condition and location of the land acquired, but may include trash removal, construction and repair of fences, invasive plant removal, and similar measures to protect habitat and improve habitat quality on the compensation lands. A non-profit organization, CDFW, or another public agency may hold and expend the habitat improvement funds if it is qualified to manage the compensation lands (pursuant to California Government Code section 65965), if it meets the approval of the CPUC and BLM, in consultation with USFWS and CDFW, and if it is authorized to participate in implementing the required activities on the compensation lands. If CDFW takes fee title to the compensation lands, the habitat improvement fund must be paid to CDFW or its designee.
- **Property Analysis Record.** Upon identification of the compensation lands, SCE will con-duct a Property Analysis Record (PAR) or PAR-like analysis to establish the appropriate amount of the long-term maintenance and management fund to pay the in-perpetuity management of the compensation lands. The PAR or PAR-like analysis must be approved by the CPUC and BLM, in consultation with USFWS and CDFW, before it can be used to establish funding levels or management activities for the compensation lands.
- **Long-term Maintenance and Management Funding.** SCE will provide funding to establish an account with non-wasting capital that will be used to fund the long-term maintenance and management of the compensation lands. The amount of money will be determined through an approved PAR or PAR-like analysis conducted for the compensation lands. SCE must obtain the BLM and Riverside County's approval of the entity that will receive and hold the long-term maintenance and management fund for the compensation lands. The CPUC and

Comment Set F3: Southern California Edison Company (cont.)

BLM will consult with USFWS and CDFW before deciding whether to approve an entity to hold the project's long-term maintenance and management funds. F3-151 cont.

SCE will ensure that an agreement is in place with the long-term maintenance and management fund holder/ manager to ensure the following requirements are met:

- **Interest.** Interest generated from the initial capital long-term maintenance and management fund will be available for reinvestment into the principal and for the long-term operation, management, and protection of the approved compensation lands, including reasonable administrative overhead, biological monitoring, habitat improvements, patrol and law enforcement activities, and any other action that is approved by the CPUC and BLM and is designed to protect or improve the habitat values of the compensation lands.
- **Withdrawal of Principal**. The long-term maintenance and management fund principal will not be drawn upon unless such withdrawal is deemed necessary by the CPUC and BLM, or by the approved third-party long-term maintenance and management fund manager, to ensure the continued viability of the species on the compensation lands.
- **Pooling Long-Term Maintenance and Management Funds.** An entity approved to hold long-term maintenance and management funds for the project may pool those funds with similar non-wasting funds that it holds from other projects for long-term maintenance and management of compensation lands. However, for reporting purposes, the long-term maintenance and management funds for this project must be tracked and reported individually to the CPUC and BLM.

▪ **Other Expenses.** In addition to the costs listed above, SCE will be responsible for all other costs related to acquisition of compensation lands and conservation easements, including but not limited to the title and document review costs incurred from other state agency reviews, overhead related to providing compensation lands to CDFW or an approved third party, escrow fees or costs, environmental contaminants clearance, and other site cleanup measures.

▪ **Delegation.** The responsibility for acquisition of compensation lands may be delegated to a third party, by written agreement of the CPUC and BLM, in consultation with CDFW, prior to land acquisition, enhancement or management activities.

Implementation Locations: This mitigation measure applies to all locations within San Bernardino County and on all BLM lands, and is recommended for implementation on all tribal lands. Within the WR-MSHCP and CV-MSHCP areas, if SCE does not obtain PSE status under the applicable MSHCP, this mitigation measure shall apply within the MSHCP area. If SCE obtains PSE status under either MSHCP, the project's permanent habitat impacts will be compensated according to the requirements of the MSHCP and this mitigation measure will not apply within the applicable MSHCP area.

SCE Comment:

Edits to VEG-1e are proposed for the following reasons:

Paragraph 1:

Inserted "approved in-lieu-fee compensatory mitigation bank" to clarify the option to use mitigation banks.

Paragraph 4:

The resource agencies are responsible for oversight on compensatory mitigation to special-status species. As such, special-status species habitat specific mitigation ratios as specified in the permit conditions, should supersede the ratios in VEG-1e. Ratios applied may vary based on the functions and values of disturbed habitat vs. the functions and values of the replacement habitat which should be taken into consideration and the ratios specified in VEG-1e should not be absolute.

Paragraph 5, Compensation Ratios:

Aeolian sand is not designated as a state sensitive natural community and is recommended to be deleted, as with chaparral, desert scrub and grassland/forbland, which are common communities along the project route and are not considered to be of special concern (ranked S-1 to S-3) by the. If the intent is to compensate for special-status species habitat, only habitat known to support them should require compensation, which would be required in the applicable resource agency permit condition.

As stated in *Impact WIL-4: Project activities and facilities could cause adverse effects to habitat linkages or wildlife movement corridors, "…the Proposed Project would not cause increased barriers or hindrances to wildlife*

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

movement, no mitigation is recommended." As such, compensation ratios should not be based on wildlife movement or biological connectivity, because the transmission line does not block wildlife movement. **F3-151 cont.**

In addition, coastal sage scrub habitat along the project is generally patchy and its function and value as California gnatcatcher habitat is reduced, as evidenced by the negative survey results in 2012, 2013, and most recently in 2015. A 1:1 ratio is suggested for Coastal sage scrub, subject to revision based on subsequent permit conditions.

Paragraphs 10-32:

The information described in these paragraphs are typical requirements of compensatory mitigation included in resource agency permit conditions. The level of detail included this mitigation measure may lead to inconsistencies in requirements. It is recommended that this level of detail be removed from this mitigation measure to prevent future conflicts with subsequent permit conditions. A Habitat Compensation Plan will be prepared to comply with permit conditions which will include the details similar to the list below.

Suggested Revisions:

VEG-1e Compensate for permanent habitat loss. SCE shall compensate for permanent or long-term habitat loss through off-site habitat acquisition and management, or through participation in an approved in-lieu-fee compensatory mitigation bank. This compensation may be accomplished through participation in the WR-MSHCP, CV-MSHCP (within the respective MSHCP areas) if SCE obtains PSE status. This mitigation measure will be applicable to all permanent project disturbance and to areas designated as temporary disturbance, but that cannot be effectively revegetated or restored to replace habitat values within a five-year timeframe.

Habitat compensation for all permanent or long-term habitat loss that is not compensated through participation in the WR-MSHCP or CV-MSHCP will be accomplished by acquisition of mitigation land or conservation easements or by providing funding for specific land acquisition, endowment, restoration, and management actions. SCE will prepare a Habitat Compensation Plan to be reviewed and approved by the CPUC, BLM, in consultation with the USFWS and CDFW.

SCE will acquire and protect, in perpetuity, compensation habitat to mitigate impacts to sensitive bio-logical resources as detailed below. SCE shall be responsible for the acquisition, initial protection and habitat improvement, and long-term maintenance and management of compensation lands. The compensation lands will be placed under conservation management to be funded through the terms described herein.

The acreages of compensation land will be based upon final engineering calculation of impacted acreage for each resource and on ratios set forth in this measure, or will be superseded with the ratios in the USFWS Biological Opinion, the CDFW Streambed Alteration Agreement, the CDFW Incidental Take Permit, or the Consistency Determination.~~, whichever presents a higher ratio.~~ Acreages will be adjusted as appropriate for other alternatives or future modifications during implementation.

Compensation will be provided for impacts to the following resources, at the ratios specified below (acres acquired and preserved to acres impacted). These ratios reflect multiple bio-logical resource values, including habitat suitability for special-status species. ~~and wildlife movement or biological connectivity~~.

- Previously disturbed lands (agriculture, developed/disturbed) and open water; n/a (no habitat compensation required)
- ~~Chaparral, desert scrub, and grassland/forbland~~ Coastal sage scrub: 1:1
- Alluvial scrub, coast live oak woodland, ~~coastal sage scrub~~, and riparian wetland~~, and aeolian sand~~: 3:1

The Habitat Compensation Plan will specify compensation acreage for each habitat type, based on final engineering and on MSHCP coverage as applicable. Final compensation requirements may be adjusted to account for any deviations in project disturbance, according to the as-built shapefiles ortho-rectified aerial imagery (Mitigation Measure VEG-1c).

~~**Compensation Land Selection Criteria.** Criteria for the acquisition, initial protection and habitat improvement, and long-term maintenance and management of compensation lands for impacts to biological resources will include all of the following:~~

- ~~Compensation lands will provide habitat value that is equal to or better than the quality and function of the habitat impacted by the project, taking into consideration soils, vegetation, topography, human-related~~

Comment Set F3: Southern California Edison Company (cont.)

F3-152 cont.

~~disturbance, wildlife movement opportunity, proximity to other protected lands, management feasibility, and other habitat values, subject to review and approval by CPUC and BLM;~~

- ~~To the extent that proposed compensation habitat may have been degraded by previous uses or activities, the site quality and nature of degradation must support the expectation that it will regenerate naturally when disturbances are removed;~~
- ~~Be near larger blocks of lands that are either already protected or planned for protection, or which could feasibly be protected long-term by a public resource agency or a non-governmental organization dedicated to habitat preservation;~~
- ~~Not have a history of intensive recreational use or other disturbance that might cause future erosion or other habitat damage, and make habitat recovery and restoration infeasible;~~
- ~~Not be characterized by high densities of invasive species, either on or immediately adjacent to the parcels under consideration, that might jeopardize habitat recovery and restoration;~~
- ~~Not contain hazardous wastes that cannot be removed to the extent that the site could not provide suitable habitat;~~
- ~~Must provide wildlife movement value equal to that on the project site, based on topography, presence and nature of movement barriers or crossing points, location in relation-ship to other habitat areas, management feasibility, and other habitat values; and~~
- ~~Have water and mineral rights included as part of the acquisition, unless the CPUC and BLM, in consultation with CDFW and USFWS, agree in writing to the acceptability of land without these rights.~~

~~**Review and Approval of Compensation Lands Prior to Acquisition.** SCE shall submit a Draft Habitat Compensation Plan for review and approval by the CPUC and BLM describing the parcel(s) intended for protection. This Plan will discuss the suitability of the proposed parcel(s) as compensation lands in relation to the selection criteria listed above.~~

~~**Management Plan.** SCE or approved third party will prepare a management plan for the compensation lands in consultation with the entity that will be managing the lands. The goal of the management plan will be to support and enhance the long-term viability of the biological resources. The Management Plan will be submitted for review and approval to the CPUC and BLM, in consultation with CDFW and USFWS.~~

~~**Compensation Lands Acquisition Requirements.** SCE will comply with the following requirements relating to acquisition of the compensation lands after the CPUC and BLM have approved the proposed compensation lands:~~

- ~~**Preliminary Report.** SCE or an approved third party will provide a recent preliminary title report, initial hazardous materials survey report, biological resources analysis, and other necessary or requested documents for the proposed compensation land to the CPUC and BLM. All documents conveying or conserving compensation lands and all conditions of title are subject to review and approval by the CPUC in consultation with CDFW and USFWS. For conveyances to the State, approval may also be required from the California Department of General Services, the Fish and Game Commission, and the Wildlife Conservation Board.~~
- ~~**Title/Conveyance.** SCE will acquire and transfer fee title to the compensation lands, a conservation easement over the lands, or both fee title and conservation easement, as required by the CPUC and BLM, in consultation with USFWS and CDFW. Any transfer of a conservation easement or fee title must be to CDFW, to a non-profit organization qualified to hold title to and manage compensation lands (pursuant to California Government Code section 65965), or to BLM or other public agency approved by the CPUC and BLM. If an approved non-profit organization holds fee title to the compensation lands, a conservation easement will be recorded in favor of CDFW or another entity approved by the CPUC and BLM. If an entity other than CDFW holds a conservation easement over the compensation lands, the CPUC and BLM may require that CDFW or another entity approved by the CPUC and BLM, in consultation with CDFW and USFWS, be named a third party beneficiary of the conservation easement. SCE will obtain approval of the CPUC and BLM of the terms of any transfer of fee title or conservation easement to the compensation lands.~~
- ~~**Initial Protection and Habitat Improvement.** SCE will fund activities that the CPUC and BLM may require for the initial protection and habitat improvement of the compensation lands. These activities will vary depending on the condition and location of the land acquired, but may include trash removal, construction and repair of fences, invasive plant removal, and similar measures to protect habitat and improve habitat quality on the compensation lands. A non-profit organization, CDFW, or another public agency may hold and expend the~~

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F3-151 cont.

~~habitat improvement funds if it is qualified to manage the compensation lands (pursuant to California Government Code section 65965), if it meets the approval of the CPUC and BLM, in consultation with USFWS and CDFW, and if it is authorized to participate in implementing the required activities on the compensation lands. If CDFW takes fee title to the compensation lands, the habitat improvement fund must be paid to CDFW or its designee.~~

- ~~**Property Analysis Record.** Upon identification of the compensation lands, SCE will con-duct a Property Analysis Record (PAR) or PAR-like analysis to establish the appropriate amount of the long-term maintenance and management fund to pay the in-perpetuity management of the compensation lands. The PAR or PAR-like analysis must be approved by the CPUC and BLM, in consultation with USFWS and CDFW, before it can be used to establish funding levels or management activities for the compensation lands.~~
- ~~**Long-term Maintenance and Management Funding.** SCE will provide funding to establish an account with non-wasting capital that will be used to fund the long-term maintenance and management of the compensation lands. The amount of money will be determined through an approved PAR or PAR-like analysis conducted for the compensation lands. SCE must obtain the BLM and Riverside County's approval of the entity that will receive and hold the long-term maintenance and management fund for the compensation lands. The CPUC and BLM will consult with USFWS and CDFW before deciding whether to approve an entity to hold the project's long-term maintenance and management funds.~~

  ~~SCE will ensure that an agreement is in place with the long-term maintenance and management fund holder/manager to ensure the following requirements are met:~~
  - ~~**Interest.** Interest generated from the initial capital long-term maintenance and management fund will be available for reinvestment into the principal and for the long-term operation, management, and protection of the approved compensation lands, including reasonable administrative overhead, biological monitoring, habitat improvements, patrol and law enforcement activities, and any other action that is approved by the CPUC and BLM and is designed to protect or improve the habitat values of the compensation lands.~~
  - ~~**Withdrawal of Principal.** The long-term maintenance and management fund principal will not be drawn upon unless such withdrawal is deemed necessary by the CPUC and BLM, or by the approved third-party long-term maintenance and management fund manager, to ensure the continued viability of the species on the compensation lands.~~
  - ~~**Pooling Long-Term Maintenance and Management Funds.** An entity approved to hold long-term maintenance and management funds for the project may pool those funds with similar non-wasting funds that it holds from other projects for long-term maintenance and management of compensation lands. However, for reporting purposes, the long-term maintenance and management funds for this project must be tracked and reported individually to the CPUC and BLM.~~
- ~~**Other Expenses.** In addition to the costs listed above, SCE will be responsible for all other costs related to acquisition of compensation lands and conservation easements, including but not limited to the title and document review costs incurred from other state agency reviews, overhead related to providing compensation lands to CDFW or an approved third party, escrow fees or costs, environmental contaminants clearance, and other site cleanup measures.~~
- ~~**Delegation.** The responsibility for acquisition of compensation lands may be delegated to a third party, by written agreement of the CPUC and BLM, in consultation with CDFW, prior to land acquisition, enhancement or management activities.~~

Implementation Locations: This mitigation measure applies to all locations within San Bernardino County and on all BLM lands, and is recommended for implementation on all tribal lands. Within the WR-MSHCP and CV-MSHCP areas, if SCE does not obtain PSE status under the applicable MSHCP, this mitigation measure shall apply within the MSHCP area. If SCE obtains PSE status under either MSHCP, the project's permanent habitat impacts will be compensated according to the requirements of the MSHCP and this mitigation measure will not apply within the applicable MSHCP area.

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DEIR/DEIS Text: F3-152

Surface water flow. Project activities could interrupt localized surface hydrology. For example, berms or channel crossings could impound stormwater runoff and sediment on the upstream sides. This impoundment could affect native vegetation and habitat by inundating, burying, or covering it in sediment. In addition, interruption, impoundment, or redirection of natural flows (including infrequent storm flows) could cause substantial erosion to downstream soils where flow is redirected, and prevent water and sediment from reaching downstream vegetation and habitat. This effect could reduce vegetation productivity and related wildlife habitat values (food, shade, and shelter) and reduce availability of silt and sand as habitat substrate for plants and wildlife downstream. Upstream inundation and downstream erosion also could eliminate vegetation and habitat for wildlife, including special-status species, by killing or uprooting plants and eroding or burying burrows. These effects may be limited to the Proposed Project's construction and or restoration phases, if surface contours and soil stability are returned to pre-disturbance conditions during restoration. Alternately, these effects could persist throughout the O&M phase if they are caused by permanent structures (such as impoundments at road crossings).

SCE would implement APM HYDRO-1 through APM HYDRO-3 (see Table B-18) to minimize alteration of surface flows. Under these APMs, drainage improvements (e.g., channel crossings and downslope road drainageways) would be designed to maintain existing flow patterns; soil disturbance would be minimized and designed to prevent long-term erosion through revegetation or construction of permanent erosion control structures; and erosion control plans would be incorporated into the construction bidding specifications to ensure compliance by SCE's contractor. APMs HYDRO-2 and HYDRO-3 are superseded by Mitigation Measure WR-2a (Implement an Erosion Control Plan and demonstrate compliance with water quality permits). Mitigation Measure WR-2a would minimize or mitigate the effects of surface hydrology alterations. These measures include mulching, physical stabilization, dust suppression, berms, ditches, and sediment barriers, and ensure proper compliance with Storm Water Pollution Prevention Plan (SWPPP) requirements and Best Management Practices (BMPs).

SCE Comment:

Please make the following revision:

Surface water flow. Project activities could interrupt localized surface hydrology. For example, berms or channel crossings could impound stormwater runoff and sediment on the upstream sides. This impoundment could affect native vegetation and habitat by inundating, burying, or covering it in sediment. In addition, interruption, impoundment, or redirection of natural flows (including infrequent storm flows) could cause substantial erosion to downstream soils where flow is redirected, and prevent water and sediment from reaching downstream vegetation and habitat. This effect could reduce vegetation productivity and related wildlife habitat values (food, shade, and shelter) and reduce availability of silt and sand as habitat substrate for plants and wildlife downstream. Upstream inundation and downstream erosion also could eliminate vegetation and habitat for wildlife, including special-status species, by killing or uprooting plants and eroding or burying burrows. These effects may be limited to the Proposed Project's construction and or restoration phases, if surface contours and soil stability are returned to pre-disturbance conditions during restoration. ~~Alternately, these~~ These effects could persist throughout the O&M phase if they are caused by permanent structures (such as impoundments at road crossings); <u>however, the increased effects would be similar to the existing baseline conditions caused by existing O&M on the existing WOD ROW</u>.

SCE would implement APM HYDRO-1 through APM HYDRO-3 (see Table B-18) to minimize alteration of surface flows. Under these APMs, drainage improvements (e.g., channel crossings and downslope road drainageways) would be designed to maintain existing flow patterns; soil disturbance would be minimized and designed to prevent long-term erosion through revegetation or construction of permanent erosion control structures; and erosion control plans would be incorporated into the construction bidding specifications to ensure compliance by SCE's contractor. APMs HYDRO-2 and HYDRO-3 are superseded by Mitigation Measure WR-2a (Implement an Erosion Control Plan and demonstrate compliance with water quality permits). Mitigation Measure WR-2a would minimize or mitigate the effects of surface hydrology alterations. These measures include mulching, physical stabilization, dust suppression, berms, ditches, and sediment barriers, and ensure proper compliance with Storm Water Pollution Prevention Plan (SWPPP) requirements and Best Management Practices (BMPs).

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VEG-2a Prepare and implement an Integrated Weed Management Plan. SCE shall prepare and implement an Integrated Weed Management Plan (IWMP) describing the proposed methods of preventing or controlling project-related spread of weeds or new weed infestations. The IWMP also must meet BLM's requirements for NEPA disclosure and analysis if herbicide use is proposed for the project. A Draft IWMP shall be submitted to the CPUC and BLM for review and approval at least 60 days prior to SCE's application for Notice to Proceed, and no pre-construction activities (e.g., for geotechnical borings, hazardous waste evaluations, etc.), construction, equipment or crew mobilization, or project-related ground-disturbing activity shall proceed until the IWMP is approved.

For the purpose of the IWMP, "weeds" shall include designated noxious weeds, as well as any other non-native weeds or pest plants identified on the weed lists of the California Department of Food and Agriculture, the California Invasive Plant Council, or identified by BLM as special concern. The IWMP will include the contents listed below. The IWMP will be implemented throughout project construction, restoration, and O&M. The IWMP will include the information defined in the following paragraphs.

SCE Comment:

As acknowledged in this impact assessment, the project ROW is already heavily infested with weeds. After the IWMP has been fully implemented (and the post-construction restoration period is complete), SCE should not be obligated to monitor and survey during the O&M of the line.

Please make the following revisions:

VEG-2a Prepare and implement an Integrated Weed Management Plan. SCE shall prepare and implement an Integrated Weed Management Plan (IWMP) describing the proposed methods of preventing or controlling project-related spread of weeds or new weed infestations. The IWMP also must meet BLM's requirements for NEPA disclosure and analysis if herbicide use is proposed for the project. A Draft IWMP shall be submitted to the CPUC and BLM for review and approval at least 60 days prior to SCE's application for Notice to Proceed, and no pre-construction activities (e.g., for geotechnical borings, hazardous waste evaluations, etc.), construction, equipment or crew mobilization, or project-related ground-disturbing activity shall proceed until the IWMP is approved.

For the purpose of the IWMP, "weeds" shall include designated noxious weeds, as well as any other non-native weeds or pest plants identified on the weed lists of the California Department of Food and Agriculture, the California Invasive Plant Council, or identified by BLM as special concern. The IWMP will include the contents listed below. The IWMP will be implemented throughout project construction~~,~~ and restoration, ~~and O&M~~. The IWMP will include the information defined in the following paragraphs.

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DEIR/DEIS Text: F3-154

Monitoring. The IWMP shall specify methods to survey for weeds during construction, restoration, and O&M; and shall specify qualifications of botanists responsible for weed monitoring and identification. It must include a monitoring schedule to ensure timely detection and immediate control of weed infestations to prevent further spread. Surveying and monitoring for weed infestations shall occur at least two times per year, to coincide with the early detection period for early season and late season weeds (i.e., species germinating in winter and flowering in late winter or spring, and species germinating later in the season and flowering in summer or fall). It also must include methods for marking invasive weeds on the ROW, and recording and communicating these locations to weed control staff. The map of weed locations (discussed above) shall be updated at least once a year. The monitoring section shall also describe methods for post-eradication monitoring to evaluate success of control efforts and any need for follow-up control.

SCE Comment:

After the IWMP has been fully implemented (and the post-construction restoration period is complete), SCE should not be obligated to monitor and survey during the O&M of the line.

Please make the following revisions:

Monitoring. The IWMP shall specify methods to survey for weeds during construction and restoration; ~~restoration, and O&~~M; and shall specify qualifications of botanists responsible for weed monitoring and identification. It must include a monitoring schedule to ensure timely detection and immediate control of weed infestations to prevent further spread. Surveying and monitoring for weed infestations shall occur at least two times per year, to coincide with the early detection period for early season and late season weeds (i.e., species germinating in winter and flowering in late winter or spring, and species germinating later in the season and flowering in summer or fall). It also must include methods for marking invasive weeds on the ROW, and recording and communicating these locations to weed control staff. The map of weed locations (discussed above) shall be updated at least once a year. The monitoring section shall also describe methods for post-eradication monitoring to evaluate success of control efforts and any need for follow-up control.

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DEIR/DEIS Text: F3-155

VEG-2a Prepare and implement an Integrated Weed Management Plan. SCE shall prepare and implement an Integrated Weed Management Plan (IWMP) describing the proposed methods of preventing or controlling project-related spread of weeds or new weed infestations. The IWMP also must meet BLM's requirements for NEPA disclosure and analysis if herbicide use is proposed for the project. A Draft IWMP shall be submitted to the CPUC and BLM for review and approval at least 60 days prior to SCE's application for Notice to Proceed, and no pre-construction activities (e.g., for geotechnical borings, hazardous waste evaluations, etc.), construction, equipment or crew mobilization, or project-related ground-disturbing activity shall proceed until the IWMP is approved. For the purpose of the IWMP, "weeds" shall include designated noxious weeds, as well as any other non-native weeds or pest plants identified on the weed lists of the California Department of Food and Agriculture, the California Invasive Plant Council, or identified by BLM as special concern. The IWMP will include the contents listed below. The IWMP will be implemented throughout project construction, restoration, and O&M. The IWMP will include the information defined in the following paragraphs.

Background. An assessment of the Proposed Project's potential to cause spread of invasive non-native weeds into new areas, or to introduce new non-native invasive weeds into the ROW. This section must list known and potential non-native and invasive weeds occurring on the ROW and in the project region, and identify threat rankings and potential consequences of project-related occurrence or spread for each species. This assessment will include, but is not limited to, weeds that (1) are rated high or moderate for negative ecological impact in the California Invasive Plant Inventory Database (Cal-IPC, 2006), and (2) aid and promote the spread of wildfires (such as cheatgrass, Saharan mustard, and medusa head). This section will identify control goals for each species (e.g., eradication, suppression, or containment) likely to be found within the Proposed Project area.

Pre-construction weed inventory. SCE shall inventory the entire ROW, including all areas subject to ground-disturbing activity, including, but not limited to, tower pad preparation and construction areas, tower removal sites, pulling and tensioning sites, assembly yards, and any potential new or improved access and spur roads. Weed occurrences shall be mapped and described according to density and area covered. The map will be updated at least once a year.

SCE Comment:

Requiring an inventory of weeds over the entire ROW should not be necessary because substantial areas within the ROW will not be affected. Conversely, there are many areas outside the ROW that will be affected and should be included in the weed inventory effort. It should be sufficient to repeatedly survey the areas in and immediately adjacent to project areas subject to ground disturbing activities.

Suggested Revision:

VEG-2a Prepare and implement an Integrated Weed Management Plan. SCE shall prepare and implement an Integrated Weed Management Plan (IWMP) describing the proposed methods of preventing or controlling project-related spread of weeds or new weed infestations. The IWMP also must meet BLM's requirements for NEPA disclosure and analysis if herbicide use is proposed for the project. A Draft IWMP shall be submitted to the CPUC and BLM for review and approval at least 60 days prior to SCE's application for Notice to Proceed, and no pre-construction activities (e.g., for geotechnical borings, hazardous waste evaluations, etc.), construction, equipment or crew mobilization, or project-related ground-disturbing activity shall proceed until the IWMP is approved.

For the purpose of the IWMP, "weeds" shall include designated noxious weeds, as well as any other non-native weeds or pest plants identified on the weed lists of the California Department of Food and Agriculture, the California Invasive Plant Council, or identified by BLM as special concern. The IWMP will include the contents listed below. The IWMP will be implemented throughout project construction, and restoration~~, and O&M~~. The IWMP will include the information defined in the following paragraphs.

Background. An assessment of the Proposed Project's potential to cause spread of invasive non-native weeds into new areas, or to introduce new non-native invasive weeds into the ROW. This section must list known and potential non-native and invasive weeds occurring on the ROW and in the project region, and identify threat rankings and potential consequences of project-related occurrence or spread for each species. This assessment will include, but is not limited to, weeds that (1) are rated high or moderate for negative ecological impact in the

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California Invasive Plant Inventory Database (Cal-IPC, 2006), and (2) aid and promote the spread of wildfires (such as cheatgrass, Saharan mustard, and medusa head). This section will identify control goals for each species (e.g., eradication, suppression, or containment) likely to be found within the Proposed Project area. **F3-155 cont.**

Pre-construction weed inventory. SCE shall inventory ~~the entire ROW, including~~ all areas subject to ground-disturbing activity, including, but not limited to, tower pad preparation and construction areas, tower removal sites, pulling and tensioning sites, assembly yards, and any potential new or improved access and spur roads. Weed occurrences shall be mapped and described according to density and area covered. The map will be updated at least once a year.

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DEIR/DEIS Text: F3-156

Prevention. The IWMP will specify methods to minimize potential transport of weed seeds onto the ROW, or from one section of the ROW to another. The ROW may be divided into "weed zones," based on known or likely invasive weeds in any portion of the ROW. The IWMP will specify inspection procedures for construction materials and equipment entering the Proposed Project area. Vehicles and equipment may be inspected and cleaned at entry points to specified portions of the ROW, and before leaving work sites where weed occurrences must be contained locally. Construction equipment shall be cleaned of dirt and mud that could contain weed seeds, roots, or rhizomes. Equipment shall be inspected to ensure it is free of any dirt or mud that could contain weed seeds, and the tracks, outriggers, tires, and undercarriage will be carefully washed, with special attention being paid to axles, frame, cross members, motor mounts, underneath steps, running boards, and front bumper/brush guard assemblies. Other construction vehicles (e.g., pick-up trucks) that will be frequently entering and exiting the site will be inspected and washed on an as-needed basis. Tools such as chainsaws, hand clippers, pruners, etc., shall be cleaned of dirt and mud before entering project work areas.

All vehicles will be washed off-site when possible. If off-site washing is infeasible, on-site cleaning stations will be set up at specified locations to clean equipment before it enters the work area. Wash stations will be located away from native habitat or special-status species occurrences. Wastewater from cleaning stations will not be allowed to run off the cleaning station site. When vehicles and equipment are washed, a daily log must be kept stating the location, date and time, types of equipment, methods used, and personnel present. The log shall contain the signature of the responsible crewmember. Written or electronic logs shall be available to BLM and CPUC monitors on request.

SCE Comment:

The requirements stipulating that vehicles and equipment "may" be inspected or "shall" be cleaned of dirt and mud that could contain weed seeds will be cumbersome to implement and may be ineffective. Requirements involving setting up "on-site cleaning stations" will be difficult or highly impractical to implement and requiring inspections and logs to be kept that all vehicles are checked will be very cumbersome and involve substantial cost to maintain inspectors at numerous entry points.

In recognition of the facts that 1) the entire project area is heavily infested with many weed species, some of which all parties recognize it is beyond the scope of the project to manage, and 2) SCE will implement a program to control weeds whenever they appear in areas where they have not previously occurred, it would be highly preferable not to try to put wash stations at multiple locations or try to inspect vehicles at numerous entry points but rather to require the following standard protocol to be adhered to:

Vehicles and equipment traveling between weed zones will require washing at commercial car washes.

The following revisions are suggested:

Prevention. The IWMP will specify ~~methods~~ <u>that vehicles and equipment traveling between weed zones will require washing</u> <u>at commercial car washes</u> to minimize potential transport of weed seeds onto the ROW, or from one section of the ROW to another. The ROW may be divided into "weed zones," based on known or likely invasive weeds in any portion of the ROW. The IWMP will specify inspection procedures for construction materials and equipment entering the Proposed Project area. ~~Vehicles and equipment may be inspected and cleaned at entry points to specified portions of the ROW, and before leaving work sites where weed occurrences must be contained locally. Construction equipment shall be cleaned of dirt and mud that could contain weed seeds, roots, or rhizomes. Equipment shall be inspected to ensure it is free of any dirt or mud that could contain weed seeds, and the tracks, outriggers, tires, and undercarriage will be carefully washed, with special attention being paid to axles, frame, cross members, motor mounts, underneath steps, running boards, and front bumper/brush guard assemblies. Other construction vehicles (e.g., pick-up trucks) that will be frequently entering and exiting the site will be inspected and washed on an as-needed basis.~~ Tools such as chainsaws, hand clippers, pruners, etc., shall be cleaned of dirt and mud before entering project work areas.

~~All vehicles will be washed off-site, when possible. If off-site washing is infeasible, on-site cleaning stations will be set up at specified locations to clean equipment before it enters the work area. Wash stations will be located~~

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~~away from native habitat or special-status species occurrences. Wastewater from cleaning stations will not be allowed to run off the cleaning station site. When vehicles and equipment are washed, a daily log must be kept stating the location, date and time, types of equipment, methods used, and personnel present. The log shall contain the signature of the responsible crewmember. Written or electronic logs shall be available to BLM and CPUC monitors on request.~~ **F3-156 cont.**

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DEIR/DEIS Text: F3-157

Weed infestations will be treated at a minimum of once annually until eradication, suppression, or containment goals are met. For eradication, when no new seedlings or resprouts are observed for three consecutive, normal rainfall years, the weed occurrence can be considered eradicated and weed control efforts may cease for the site.

SCE Comment:

Because the entire project area is heavily infested with many weed species (some of which are unmanageable), SCE will implement a program to control weeds whenever they appear in areas where they have not previously occurred, and the project area is experiencing a long period of drought, SCE recommends the following revisions:

Weed infestations will be treated at a minimum of once annually until eradication, suppression, or containment goals are met per the IWMP. ~~For eradication, when no new seedlings or resprouts are observed, for three consecutive normal rainfall years, the weed occurrence can be considered eradicated and weed control efforts may cease for the site.~~

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DEIR/DEIS Text: F3-158

Potential impacts to jurisdictional drainages would be reduced through implementation of a Storm Water Pollution Prevention Plan (SWPPP) including Best Management Practices (BMPs) as described in Section 4.9 of the PEA (see page 4.9-21), and compliance with the conditions set forth in State and federal permits or authorizations (California Fish & Game Code Sections 1600-1616 and CWA Sections 401 and 404). In addition, Mitigation Measure WR-2a (Implement an Erosion Control Plan and demonstrate compliance with water quality permits) would further minimize or mitigate the effects of surface hydrology alterations. Mitigation Measure VEG-1d would require revegetation or restoration of temporarily disturbed areas, including drainage features. Mitigation Measure VEG-1e would require compensation for permanent habitat loss, including drainage features. And Mitigation Measure VEG-3a would require restoration or compensation to achieve no net loss of wetland and watercourse habitat values. Taken together, these measures would effectively avoid or mitigate the Proposed Project's adverse impacts to biological resources within jurisdictional waters.

SCE Comment:

There should be no need to prepare an Erosion Control Plan (ECP) if a Storm Water Pollution Prevention Plan (SWPPP) is to be prepared and implemented. Please make the following revision:

Potential impacts to jurisdictional drainages would be reduced through implementation of a Storm Water Pollution Prevention Plan (SWPPP) including Best Management Practices (BMPs) as described in Section 4.9 of the PEA (see page 4.9-21), and compliance with the conditions set forth in State and federal permits or authorizations (California Fish & Game Code Sections 1600-1616 and CWA Sections 401 and 404). ~~In addition, Mitigation Measure WR-2a (Implement an Erosion Control Plan and demonstrate compliance with water quality permits) would further minimize or mitigate the effects of surface hydrology alterations.~~ Mitigation Measure VEG-1d would require revegetation or restoration of temporarily disturbed areas, including drainage features. Mitigation Measure VEG-1e would require compensation for permanent habitat loss, including drainage features. And Mitigation Measure VEG-3a would require restoration or compensation to achieve no net loss of wetland and watercourse habitat values. Taken together, these measures would effectively avoid or mitigate the Proposed Project's adverse impacts to biological resources within jurisdictional waters.

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DEIR/DEIS Text: F3-159

No net wetlands loss and watercourse impacts minimization. SCE shall prepare an HMMP which will include restoration or compensation mitigation to assure no net loss of wetland acreage or wetland habitat value from direct or indirect project impacts, including reduction of wetland acreage, and downstream or upstream effects to channels or their associated habitat. The no net loss standard shall be reached through (1) ecological restoration of temporarily disturbed areas to fully replace habitat extent and habitat value, and (2) compensation at a ratio of 1:1 to replace permanently impacted non-wetland jurisdictional areas, and at 3:1 to replace permanently impacted state or federally jurisdictional wetland areas. Restoration and compensation mitigation for impacts to jurisdictional waters shall conform to the requirements of Mitigation Measures VEG-1d (Restore or revegetate temporary disturbance areas) and VEG-1e (Compensate for permanent habitat loss). All wetlands and water-courses, whether intermittent or perennial, will be retained to the extent feasible, and appropriate setbacks or other means will be employed to prevent adverse impacts to sur-face waters or associated habitat values. The HMMP shall be subject to review and approval by the CPUC and BLM. All restoration or compensation mitigation described in the HMMP shall be implemented in full.

SCE Comment:

The mitigation measure should defer to the HMMP and the applicable permit for wetland mitigation requirements. is the mitigation ratio should be modified to reflect a typical ratio for non-wetland jurisdictional areas. .

Please make the following revision:

No net wetlands loss and watercourse impacts minimization. SCE shall prepare an HMMP which will include restoration or compensation mitigation to assure no net loss of wetland acreage or wetland habitat value from direct or indirect project impacts, including reduction of wetland acreage, and downstream or upstream effects to channels or their associated habitat. The no net loss standard shall be reached through (1) ecological restoration or revegetation of temporarily disturbed areas to fully replace habitat extent and habitat value, and (2) compensation ~~at a ratio of 1:1 to replace permanently impacted non-wetland jurisdictional areas, and at 3:1 to replace permanently impacted state or federally jurisdictional wetland areas~~ at a mitigation ratio determined by the wetland/water permitting agencies during the 401/404 and 1602 permitting process. Restoration and compensation mitigation for impacts to jurisdictional waters shall conform to the requirements of Mitigation Measures VEG-1d (Restore or revegetate temporary disturbance areas) and VEG-1e (Compensate for permanent habitat loss). All wetlands and water-courses, whether intermittent or perennial, will be retained to the extent feasible, and appropriate setbacks or other means will be employed to prevent adverse impacts to sur-face waters or associated habitat values. The HMMP will incorporate permit requirements and shall be subject to review and approval by the CPUC and BLM. All restoration or compensation mitigation described in the HMMP shall be implemented in full. This mitigation measure will be superseded by the requirements of water permits.

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DEIR/DEIS Text: F3-160

SCE shall conduct focused surveys for federal- and state-listed and other special-status plants. All special-status plant species (including listed threatened or endangered species, and all CRPR 1A, 1B, 2, 3, and 4 ranked species) impacted by project activities shall be documented in pre-construction survey reports.

SCE Comment:

Some species can already be determined as absent and SCE should not have to continue to survey for absent shrubs. Please make the following revision: SCE shall conduct focused surveys for federal- and state-listed and other special-status plants, except for species already determined to be absent. All special-status plant species (including listed threatened or endangered species, and all CRPR 1A, 1B, 2, 3, and 4 ranked species) impacted by project activities shall be documented in pre-construction survey reports.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

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DEIR/DEIS Text: F3-161

Preconstruction Survey. (Second Paragraph)

If federally listed plants would be affected, SCE shall notify BLM and USFWS to review obtain the appropriate permits from CDFW and USFWS and comply with permit requirements. Additional conservation measures to protect or restore listed plant species or their habitat may be required by BLM, CDFW, or USFWS before impacts are authorized.

SCE Comment:

Please make the following revision:

If state or federally listed plants would be affected, SCE shall notify CDFW ~~BLM~~ and USFWS to ~~review~~ obtain the appropriate permits ~~from CDFW and USFWS~~ and comply with permit requirements. Additional conservation measures to protect or restore listed plant species or their habitat may be required by BLM, CDFW, or USFWS before impacts are authorized.

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DEIR/DEIS Text: F3-162

Native cactus and *Yucca*. Most native cactus and shrubby *Yucca* species (Joshua tree and Mohave yucca) can be successfully salvaged and transplanted, and yuccas often provide an important vertical component to wildlife habitat. Therefore, native cactus (excluding chollas in the genus *Cylindropuntia*) and yuccas (excluding chaparral yucca, *Y. whipplei*), shall be avoided or salvaged according to the strategies described below.

SCE Comment:

The regulatory basis for this measure is not clear in the DEIR/DEIS. Avoidance can be done to the extent possible; however, barrel cactus (and other non-*Cylindropuntia* cacti) are prevalent in the eastern portions of the Proposed Project in numbers that may prove infeasible for translocation. The linear nature of the project would also allow wildlife to continue to use adjacent vertical vegetation components reducing the significance of removal of these types of plants to construct the project.

Without a regulatory basis or significant impact under CEQA/NEPA, removal of this discussion is requested.

~~**Native cactus and *Yucca*.** Most native cactus and shrubby *Yucca* species (Joshua tree and Mohave yucca) can be successfully salvaged and transplanted, and yuccas often provide an important vertical component to wildlife habitat. Therefore, native cactus (excluding chollas in the genus *Cylindropuntia*) and yuccas (excluding chaparral yucca, *Y. whipplei*), shall be avoided or salvaged according to the strategies described below.~~

Comment Set F3: Southern California Edison Company (cont.)

Page D.4-54

DEIR/DEIS Text: F3-163

Avoidance. (Last Sentence of Section)

At minimum, the buffer for trees or shrubs species shall be equal to twice the drip line (i.e., two times the distance from the trunk to the canopy edge) to protect and preserve the root systems. The buffer for herbaceous species shall be a minimum of 50 feet from the perimeter of the occupied habitat or the individual. If a smaller buffer is necessary due to other project constraints, SCE will develop and implement site-specific monitoring and put other measures in place to avoid the take of the species, with the approval of the CPUC and BLM, in consultation with USFWS and CDFW.

SCE Comment:

The requirement for an avoidance buffer for trees to be twice the distance of the drip line is excessive, particularly for non-listed species. Typically the avoidance buffer is out to the edge of the dripline.

Please make the following revisions:

At minimum, the buffer for trees or shrubs species shall be equal to ~~twice~~ the drip line (i.e., ~~two times the distance~~ from the trunk to the canopy edge) to protect and preserve the root systems. The buffer for herbaceous species shall be a minimum of ~~50~~10 feet from the perimeter of the occupied habitat or the individual. If a smaller buffer is necessary due to other project constraints, SCE will ~~develop and~~ implement site-specific monitoring and put other measures in place to avoid the take of the species, with the approval of the CPUC and BLM, in consultation with USFWS and CDFW.

Page D.4-54

DEIR/DEIS Text: F3-164

Off-site compensation. SCE shall provide compensation lands consisting of habitat occupied by the impacted CRPR 1 or 2 ranked plants at a 1:1 ratio of acreage and number of plants for any occupied habitat affected by the project. Occupied habitat will be calculated on the project site and on the compensation lands as including each special status plant occurrence and a surrounding 100-foot buffer area. Off-site compensation shall be incorporated into the project's Habitat Compensation Plan (under Mitigation Measure VEG-1e), for review and approval by the CPUC and BLM in consultation with CDFW and USFWS.

SCE Comment:

The measure as currently written would be very difficult to implement. The count for individuals should be restricted to herbs, shrubs and trees or a density/acre count, depending on species. For example, it would be difficult to count the number of individual grasses, especially as growth patterns may not allow for individual counts.

In addition, SCE should not have to categorically mitigate for a 100-foot buffer around each population because the buffer may not include suitable soils/habitat for the species.

SCE recommends translocation, seed collection and re-seeding, or other *onsite* mitigation options as an alternative to off-site compensation for special status plants as described in APM Bio-7.

(This measure is for SB County, BLM and Morongo only.)

For the reasons stated above, please make the following revision:

~~**Off-site compensation**. SCE shall provide compensation lands consisting of habitat occupied by the impacted CRPR 1 or 2 ranked plants at a 1:1 ratio of acreage and number of plants for any occupied habitat affected by the project. Occupied habitat will be calculated on the project site and on the compensation lands as including each special status plant occurrence and a surrounding 100-foot buffer area. Off-site compensation shall be incorporated into the project's Habitat Compensation Plan (under Mitigation Measure VEG-1e), for review and approval by the CPUC and BLM in consultation with CDFW and USFWS.~~

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.4-54

DEIR/DEIS Text: F3-165

Salvage. SCE shall consult with horticulturists at a qualified institution such as Rancho Santa Ana Botanic Garden (RSABG) regarding the feasibility and likely success of salvage efforts for each species.

SCE Comment:

There are other qualified specialists SCE can consult other than horticulturalists at qualified institutions. Please make the following revision:

Salvage. SCE shall consult with a qualified restoration ecologist or a horticulturist~~s~~ at a qualified institution such as Rancho Santa Ana Botanic Garden (RSABG) regarding the feasibility and likely success of salvage efforts for each species.

Page D.4-55

DEIR/DEIS Text: F3-166

For cacti and yuccas, the goal shall be maximum practicable survivorship of salvaged plants. The Plan will include at minimum: (a) species and locations of plants identified for salvage; (b) criteria for determining whether an individual plant is appropriate for salvage; (c) the appropriate season for salvage; (d) equipment and methods for collection, transport, and re-planting plants or seed banks, to retain intact soil conditions and maximize success; (e) for shrubs, cacti, and yucca, a requirement to mark each plant to identify the north-facing side prior to transport, and replant it in the same orientation; (f) details regarding storage of plants or seed banks for each species; (g) location of the proposed recipient site, and detailed site preparation and plant introduction techniques for top soil storage, as applicable; (h) a description of the irrigation, weed control, and other maintenance activities; (i) success criteria, including specific timeframe for survivor-ship and reproduction of each species; and (j) a detailed monitoring program, commensurate with the Plan's goals.

SCE Comment:

See comment to "Native cactus and *Yucca"* section on Page D.5-53, above. The regulatory need for this mitigation is not clear in the DEIR/DEIS and deleting the requirement to salvage cacti and yucca is recommended, unless they are special-status species:

~~For cacti and yuccas, the goal shall be maximum practicable survivorship of salvaged plants.~~ The Plan will include at minimum: (a) species and locations of plants identified for salvage; (b) criteria for determining whether an individual plant is appropriate for salvage; (c) the appropriate season for salvage; (d) equipment and methods for collection, transport, and re-planting plants or seed banks, to retain intact soil conditions and maximize success; (e) for shrubs, ~~cacti, and yucca,~~ a requirement to mark each plant to identify the north-facing side prior to transport, and replant it in the same orientation; (f) details regarding storage of plants or seed banks for each species; (g) location of the proposed recipient site, and detailed site preparation and plant introduction techniques for top soil storage, as applicable; (h) a description of the irrigation, weed control, and other maintenance activities; (i) success criteria, including specific timeframe for survivorship and reproduction of each species; and (j) a detailed monitoring program, commensurate with the Plan's goals.

Comment Set F3: Southern California Edison Company (cont.)

Page D.4-55

DEIR/DEIS Text: F3-167

VEG-5b Ensure MSHCP equivalency and consistency. If SCE does not obtain PSE status under either the WR-MSHCP or CV-MSHCP, SCE shall prepare an analysis equivalent to the WR-MSHCP Consistency Analysis or the CV-MSHCP Joint Project Review Requirements, as appropriate. This analysis shall identify any potential conflict with the WR-MSHCP or CV-MSHCP and specify detailed measures that it will implement, as a non-participant in either plan, to pre-vent such conflict through habitat compensation or other measures. The analysis and its included specifications for avoiding MSHCP conflicts shall be subject to review and approval by CPUC and BLM, in consultation with CDFW, USFWS, the Western Riverside County Regional Conservation Authority, and the CVCC. The analysis and full implementation of each measure shall be completed prior to the start of any ground-disturbing activity within the WR-MSHCP or CV-MSHCP area.

Implementation locations: WR-MSHCP (all, if SCE does not obtain PSE status); CV-MSHCP (all, if SCE does not obtain PSE status); BLM (all); reservation (recommended for all Morongo Tribal Lands).

SCE Comment:

CEQA Guidelines state that impacts may be significant if the project would:

- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Conflicting with the plans described in the CEQA guidelines is not the same as failing to demonstrate equivalency/consistency as if the project proponent were a PSE. As such, if SCE does not obtain PSE Status, appropriate state and federal endangered species act permits and conditions would be applied to the project. Please make the following revision:

VEG-5b Ensure MSHCP ~~equivalency and~~ consistency. If SCE does not obtain PSE status under either the WR-MSHCP or CV-MSHCP, SCE shall prepare an analysis to demonstrate that the project does not conflict with these MSHCPs. ~~equivalent to the WR-MSHCP Consistency Analysis or the CV-MSHCP Joint Project Review Requirements, as appropriate~~. This analysis shall identify any potential conflict with the WR-MSHCP or CV-MSHCP and specify detailed measures that it will implement, as a non-participant in either plan, to prevent such conflict through habitat compensation or other measures. The analysis and its included specifications for avoiding MSHCP conflicts shall be subject to review and approval by CPUC and BLM, in consultation with CDFW, USFWS, the Western Riverside County Regional Conservation Authority, and the CVCC. The analysis and full implementation of each measure shall be completed prior to the start of any ground-disturbing activity within the WR-MSHCP or CV-MSHCP area.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.4-73 through D.4-77

DEIR/DEIS Text: F3-168

D.4.4.3 Phased Build Alternative

Impact VEG-1: Land clearing for construction and future operations and maintenance would cause loss or degradation of vegetation and habitat, including sensitive habitats

Impact VEG-2: Project activities could cause indirect degradation of surrounding vegetation and habitat from dust, interrupted sand transport, interruption of surface water flows, or introduction and spread of invasive weeds

Impact VEG-3: Construction, operations, and maintenance activities would affect state or federally jurisdictional waters and wetlands through vegetation removal, placement of fill, erosion, sedimentation, or degradation of water quality

Impact VEG-4: Construction, operations, and maintenance activities could cause direct or indirect loss of listed and special-status plants and direct or indirect effects to habitat for listed and special-status plants

Impact VEG-5: Construction, operations, and maintenance activities may conflict with local policies or ordinances protecting biological resources, Habitat Conservation Plans, Natural Communities Conservation Plans, Multiple Species Habitat Conservation Plans, or other approved local, regional, state, or federal conservation plans

SCE Comment:

As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements require additional survey and/or study and associated additional impact analysis. The additional disturbance areas and the increased duration for construction activities would result in additional biological impacts beyond those analyzed for the Phased Build Alternative in the document, and could be greater than those identified for the Proposed Project.

Comment Set F3: Southern California Edison Company (cont.)

Page D.4-80

DEIR/DEIS Text: F3-169

Mitigation Measure Veg-1d: Restore or revegetate temporary disturbance areas

SCE Comment:

Timing should be negotiable if success criteria is met sooner and subsequent follow-up monitoring demonstrates continued success of a restoration site within five years. Please revise as follows:

MITIGATION MEASURE	**VEG-1d: Restore or revegetate temporary disturbance areas *(see full text in Section D.4.3.3)***
Location	All segments.
Monitoring / Reporting Action	SCE submits Habitat Restoration and Revegetation Plan and annual monitoring reports; CPUC/BLM monitor approves plan and report format and content in consultation with CDFW and USFWS.
Effectiveness Criteria	Restoration/revegetation of all temporary disturbance areas, including sensitive vegetation and special-status species habitat.
Responsible Agency	CPUC; BLM Palm Springs–South Coast Field Office in coordination with CDFW and USFWS.
Timing	Within 12 months from the start of construction; restoration phase; for ~~at least~~ 5 years post-construction or at such time as performance standards are met.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.4-81

DEIR/DEIS Text: F3-170

Table D.4-7. Mitigation Monitoring Program Biological Resources – Vegetation

VEG-2a	
Monitoring / Reporting Action	SCE submits Integrated Weed Management Plan; CPUC/BLM monitoring approves plan in consultation with CDFW and USFWS. SCE conducts weed inventory/mapping and monitoring. SCE documents construction vehicle and equipment washing and submits documentation to CPUC/BLM monitor upon request. SCE submits monitoring reports to CPUC/BLM monitor as specified in Integrated Weed Management Plan.
Effectiveness Criteria	Minimize introduction and spread of invasive plants.
Responsible Agency	CPUC; BLM Palm Springs–South Coast Field Office in coordination with CDFW and USFWS.
Timing	At least 60 days prior to SCE's application for Notice to Proceed; pre-construction, construction, post-construction restoration, and O&M phases.

SCE Comment:

As acknowledged in this impact assessment, the project ROW is already ~~heavily infested~~ populated with weeds. Upon completion of implementation of the IWMP (through the post-construction restoration period), SCE should not be obligated to monitor and survey during O&M of the line. SCE recommends the following revisions:

Table D.4-7. Mitigation Monitoring Program – Biological Resources – Vegetation

Monitoring / Reporting Action	SCE submits Integrated Weed Management Plan; CPUC/BLM monitoring approves plan in consultation with CDFW and USFWS. SCE conducts weed inventory/mapping and monitoring. SCE documents construction vehicle and equipment washing and submits documentation to CPUC/BLM monitor upon request. SCE submits monitoring reports to CPUC/BLM monitor as specified in Integrated Weed Management Plan.
Effectiveness Criteria	Minimize introduction and spread of invasive plants.
Responsible Agency	CPUC; BLM Palm Springs–South Coast Field Office in coordination with CDFW and USFWS.
Timing	At least 60 days prior to SCE's application for Notice to Proceed; pre-construction, construction, and post-construction restoration phases.~~, and O&M phases~~.

Comment Set F3: Southern California Edison Company (cont.)

Page D.4-81

DEIR/DEIS Text: F3-171

MITIGATION MEASURE	**VEG-3a: Minimize impacts and ensure no net loss for jurisdictional waters and wetlands *(see full text in Section D.4.3.3)***
Location	All segments.
Monitoring / Reporting Action	SCE submits a Habitat Mitigation and Monitoring Plan for affected jurisdictional areas; USACE, CDFW, RWQCB, and CPUC/BLM approve plan.
Effectiveness Criteria	Minimize impacts to jurisdictional waters and wetlands and mitigate for unavoidable impacts through ecological restoration of temporarily disturbed areas and compensation for permanently disturbed areas.
Responsible Agency	CPUC; BLM Palm Springs–South Coast Field Office in coordination with CDFW and USFWS, USACE, CDFW, RWQCB.
Timing	Prior to, during, and after construction.

SCE Comment:

MITIGATION MEASURE	**VEG-3a: Minimize impacts and ensure no net loss for jurisdictional waters and wetlands *(see full text in Section D.4.3.3)***
Location	All segments.
Monitoring / Reporting Action	SCE submits a Habitat Mitigation and Monitoring Plan for affected jurisdictional areas; USACE, CDFW, SWRCB, EPA,~~RWQCB,~~ and CPUC/BLM approve plan.
Effectiveness Criteria	Minimize impacts to jurisdictional waters and wetlands and mitigate for unavoidable impacts through ecological restoration of temporarily disturbed areas and compensation for permanently disturbed areas.
Responsible Agency	CPUC; BLM Palm Springs–South Coast Field Office in coordination with CDFW and USFWS, USACE, CDFW, ~~RWQCB~~SWRCB, EPA.
Timing	Prior to, during, and after construction.

Responses to Comment Set F3 – Section D.4 Biological Resources – Vegetation

F3-125 The commenter states that *Amsinckia intermedia* is not included in the Manual of California Vegetation (Sawyer et al., 2009) as part of the *Amsinckia* Herbaceous Alliance (Fiddleneck Fields). The commenter further states that the *Amsinckia* Herbaceous Alliance is not considered a sensitive vegetation community and should be deleted from the EIS.

The information on *Amsinckia* Herbaceous Alliance in the Draft EIR/EIS is quoted from the Proponent's Environmental Assessment (PEA), page F-262, and based on field surveys conducted by professional botanists. The Manual of California Vegetation (Sawyer et al., 2009) does not provide a complete list of all possible vegetation associations in the state and must defer at some point to the expert opinion of field botanists.

According to the California Department of Fish and Wildlife (CDFW), the *Amsinckia* Herbaceous Alliance has a G4/S4 rating. G4/S4 does not automatically indicate an imperiled sensitive community. However, given the very limited distribution of this vegetation community in the project area (as shown on the Vegetation Alliance map in the PEA, page F-281), proximity of developed areas to this occurrence, and the definition of the G4/S4 rating, which includes "…with possible cause for concern as a result of local recent declines, threats, or other factors," the characterization of *Amsinckia* Herbaceous Alliance as a locally sensitive vegetation community within the project area is warranted. Text in Section D.4.1.1 (Biological Resources – Vegetation, Regional Setting and Approach to Data Collection) of the Final EIS has been revised to clarify the status of *Amsinckia* Herbaceous Alliance and indicate that characterization of this vegetation community as a locally sensitive vegetation community within the project area is warranted.

F3-126 The commenter states that aeolian sand is a habitat subclass within the desert scrub plant community and the narrative should address it as such.

Within the project area, aeolian sand habitat is vegetated with desert scrub, but sand dunes and sand fields are unique habitats, as recognized by CDFW (formerly the California Department of Fish and Game, CDFG), and not a subclass of any accompanying vegetation. Text in Section D.4.1.1 (Regional Setting and Approach to Data Collection) of the Final EIS has been revised to indicate that aeolian sand habitat in the project area is vegetated with desert scrub.

F3-127 The commenter states that stabilized and partially stabilized desert dunes and sand fields are not recognized by CDFG (2010) and the G4/S3 classification is reserved for plant communities. The commenter further states that there are dunes in California authorized for recreational purposes and the EIS should not conclude that dune habitat is sensitive.

The reference for CDFG (2010) was incorrectly listed in the Draft EIR/EIS. It has been corrected in the Final EIS to reference a similar document (*Hierarchical List of Natural Communities with Holland Types*) on the same web page. The incorrectly referenced document lists only plant communities. The correctly referenced document lists all natural communities, which are primarily plant communities, but also include glaciers, desert dunes, and other unique habitats.

Stabilized and partially stabilized desert dune and sand fields are classified as G4/S3 in this document. As a G4/S3 habitat, aeolian sand is considered a sensitive natural community and does not require the presence of a sensitive plant community to qualify it as a sensitive

resource. Further, aeolian sand habitat in the Coachella Valley has suffered significant declines in recent decades, and has the potential to support sand-endemic special-status plant and wildlife species. Sand habitat within the project area is not within a designated recreation area.

F3-128 The commenter notes that Draft EIR/EIS incorrectly refers to "species of special concern," a term reserved for wildlife, in a discussion of special-status plants.

The commenter is correct. Text in Section D.4.1.1 (Regional Setting and Approach to Data Collection) and Section D.4.1.2 (Environmental Setting by Segment) of the Final EIS has been revised to replace "species of special concern" with "special-status plant species."

F3-129 The commenter states that Morongo Tribal Lands are not subject to state jurisdiction, and the Draft EIR/EIS should be revised to indicate that potential U.S. Army Corps of Engineers (USACE) jurisdictional areas would also be considered CDFW jurisdictional only outside of the Morongo Tribal Lands.

Text in Section D.4.1.1 (Regional Setting and Approach to Data Collection) of the Final EIS has been revised to clarify that CDFW jurisdiction over waters and wetlands applies only outside of Morongo Tribal Lands.

The commenter also states that Southern California Edison (SCE) did not conduct a significant nexus determination and text should be deleted in the Draft EIR/EIS regarding 196 drainages that did not meet USACE nexus criteria but are potentially subject to CDFW jurisdiction.

The referenced text from the Draft EIR/EIS regarding the 196 drainages was taken verbatim from the PEA, page 4.4-71, and is stated in the Preliminary Jurisdictional Drainage Assessment, page F-1243, included in Appendix F of the PEA. Text in Section D.4.1.1 (Regional Setting and Approach to Data Collection) of the Final EIS has been revised to indicate that the determination regarding the 196 drainages is from a Preliminary Drainage Assessment, and only those drainages outside of the Morongo Tribal Lands would be potentially subject to CDFW jurisdiction.

F3-130 The commenter requests that text in the Draft EIR/EIS be revised to clarify the jurisdictional boundaries of the Environmental Protection Agency (EPA), U.S. Army Corps of Engineers (USACE), State Water Resources Control Board (SWRCB), and Regional Water Quality Control Boards (RWQCBs).

Based on the updated information provided in the comment regarding the jurisdictions of the various water and wetland regulatory agencies within the project area, text in Section D.4.1.1 (Regional Setting and Approach to Data Collection), Section D.4.1.3 (Environmental Setting for Connected Actions), Section D.4.2 (Applicable Regulations, Plans, and Standards), APM BIO-9 in Section D.4.3.1.1 (Applicant Proposed Measures), Section D.4.3.3 (Impacts and Mitigation Measures) and Section D.4.6 (Mitigation Monitoring, Compliance, and Reporting) of the Final EIS has been revised to indicate that, in regard to jurisdictional waters and wetlands, the EPA has jurisdiction on Morongo Tribal Lands, and since the project extends into two RWQCB boundaries, it is subject to regulation by the SWRCB.

F3-131 The commenter requests that the description of Devers Staging Yard be revised to state that it is an existing staging yard, and that text stating that, "use of the area may result in impacts to disturbed desert scrub… which could support special-status plant species," be deleted.

The quoted text from the Draft EIR/EIS is summarized from, and entirely consistent with, information in the PEA, page 4.4-100. The existing staging yard, although disturbed, may support special-status plants. The text has not been revised.

F3-132 The commenter requests that reference to *Amsinckia* Herbaceous Alliance (Fiddleneck Fields) be removed from the list of sensitive vegetation communities. Please see Response to Comment F3-125.

F3-133 The commenter notes that smooth tarplant was not found in Segment 4 and the reference to it should be deleted.

The commenter is correct. As shown on Figure Ap.7-3d (Special-status Species Observations, Segments 3 & 4), smooth tarplant was observed in Segment 3, but not in adjacent portions of Segment 4. Text in Section D.4.1.2.4 (Segment 4: Beaumont and Banning) and Table Ap.7-1 has been revised in the Final EIS to list smooth tarplant as having a high probability of occurrence in Segment 4, rather than having been observed there.

F3-134 The commenter states that there is a separate parcel of Morongo Indian Reservation land that the project right-of-way (ROW) crosses in Segment 4, and Draft EIR/EIS text and Figure Ap.7-1 should be revised accordingly.

The commenter is correct. Text in Section D.4.1.2.4 (Segment 4: Beaumont and Banning) of the Final EIS has been revised to include the Morongo Tribal Land in Segment 4. Figure Ap.7-1 is correct as it stands and no change to it was made in the Final EIS.

F3-135 The commenter states that aeolian sand habitat should be deleted from the list of sensitive habitats in Segment 6. Please see Response to Comment F3-127.

F3-136 The commenter states that aeolian sand habitat should be deleted from the list of sensitive habitats for Connected Actions in the Desert Center area. Please see Response to Comment F3-127.

F3-137 The commenter requests minor revisions to clarify the jurisdiction of the EPA and SWRCB regarding wetlands and other waters. Please see Response to Comment F3-130.

F3-138 The commenter notes that there are no proposed impacts to the Colorado River watershed and recommends this section be deleted. If the section remains, the commenter requests minor revisions to clarify the jurisdiction of the EPA and SWRCB regarding wetlands and other waters.

The discussion of the Colorado River watershed is in the Environmental Setting for Connected Actions (Section D.4.1.3 of the EIS). Connected Actions in the Desert Center and Blythe areas are in the Colorado River watershed, and the information presented is applicable. Regarding clarification of the jurisdiction of the EPA, USACE, SWRCB, and CDFW over wetlands and other waters, please see Responses to Comments F3-129 and F3-130.

F3-139 The commenter requests minor revisions to clarify the jurisdiction of the EPA and SWRCB regarding wetlands and other waters. Please see Response to Comment F3-130.

F3-140 The commenter notes that Draft EIR/EIS should state that Operations and Maintenance (O&M) of the proposed project would be less than or equivalent to O&M of the existing facilities.

The comment is consistent with information provided in the PEA. Text in Section D.4.3.3 (Impacts and Mitigation Measures) of the Final EIS has been revised to state that O&M of the proposed project would be less than or equivalent to O&M of the existing facilities.

F3-141 The commenter states that text regarding additional mitigation measures in Section D.4.3.1.1 (Applicant Proposed Measures) requires clarification, as it is not the objective of CEQA to protect resources to the extent feasible.

This comment relates to CEQA, not NEPA. However, CPUC's response is provided for informational purposes: Text in Section D.4.3.1.1 (Applicant Proposed Measures) of the Final EIS has been revised to state that additional mitigation measures add conditions or details as needed to *mitigate potential impacts to levels of insignificance* rather than to protect resources to the extent feasible.

F3-142 The commenter requests minor revisions to Applicant Proposed Measure (APM) BIO-9 to clarify the jurisdiction of the EPA and SWRCB regarding wetlands and other waters, and to indicate that the Habitat Mitigation and Monitoring Plan (HMMP) would describe measures to accomplish restoration *or revegetation*.

Text in Table D.4-3 (Applicant Proposed Measures – Biological Resources) in Section D.4.3.1.1 (Applicant Proposed Measures) of the Final EIS has been revised to state that the HMMP would describe measures to accomplish restoration *or revegetation*. Regarding the jurisdiction of the EPA and SWRCB, please see Response to Comment F3-130.

F3-143 The commenter states that chaparral, desert scrub, and aeolian sand habitat are not sensitive vegetation communities and should be deleted from the list of habitats where the following mitigation measures apply: Mitigation Measures VEG-1a (Conduct biological monitoring and reporting), VEG-1c (Minimize native vegetation and habitat loss), VEG-1d (Restore or revegetate temporary disturbance areas), and VEG-1e (Compensate for permanent habitat loss). If these plant communities are included due to their value as special-status species habitat, then mitigation should only apply to locations where special-status species are known to occur.

Regarding aeolian sand habitat, please see Response to Comment F3-127. Chaparral and desert scrub support, or have the potential to support, special-status species, whether or not these habitats are known to be currently occupied or utilized by special-status species. The recommended mitigation would minimize, avoid, or offset the loss of special-status species habitat. The text has not been revised.

F3-144 The commenter states that SCE's team currently includes a Project Lead Biologist, and there is therefore no reason to nominate a lead biologist. The commenter requests that this requirement be removed from the mitigation measure, and the text of the mitigation measure be revised to state that the lead biologist will *oversee* supervision and training of biological monitors and preparation and submission of monitoring reports and notifications. The commenter further states that it is unnecessary to have a lead biologist in place prior to pre-construction activities as long as SCE avoids impacts to biological resources.

Mitigation Measure VEG-1a (Conduct biological monitoring and reporting) requires SCE to nominate a lead biologist. It is acknowledged that SCE currently has a Project Lead Biologist, but it cannot be assumed that the current circumstance will continue throughout project implementation, absent a mitigation requirement. The mitigation measure requires SCE to nominate a lead biologist prior to any ground disturbing activities, including pre-construction activities (e.g., geotechnical boring). As it is the lead biologist's responsibility to oversee biological monitors, and monitors are required for ground-disturbing work, the requirement to have a lead biologist in place prior to pre-construction activities is warranted.

Text in Mitigation Measure VEG-1a (Conduct biological monitoring and reporting) in the Final EIS has been revised to state that the lead biologist will oversee biological monitors, as requested. Text in Mitigation Measure VEG-1a in the Final EIS has also been revised to further clarify the education and experience requirements of the lead biologist.

The commenter states that Mitigation Measure VEG-1a (Conduct biological monitoring and reporting) does not acknowledge that the existing O&M activities in the project ROW are greater or at most equal to the O&M required for the project and O&M vegetation removal impacts would be less than significant without the mitigation measure.

The comment is consistent with information provided in the PEA. Impact VEG-1 (Land clearing for construction and future operations and maintenance would cause loss or degradation of vegetation and habitat, including sensitive habitats) has been revised in the Final EIS to state that O&M activities associated with the Proposed Project are expected to be less than or equivalent to O&M of the existing West of Devers system and impacts would be similar to or reduced from existing conditions. Text of Mitigation Measure VEG-1a in the Final EIS has been revised to specify that Mitigation Measure VEG-1a applies to the construction and post-construction restoration phases only.

The commenter suggests revisions to Mitigation Measure VEG-1a to state that biological monitoring will occur where sensitive biological resources have the potential to occur, and to clarify biological monitors' responsibilities regarding avoidance of impacts to sensitive resources.

To ensure that biological monitoring occurs where there is the potential to impact sensitive biological resources or jurisdictional waters, the text of Mitigation Measure VEG-1a has been revised in the Final EIS to require biological monitoring during all activities that may affect sensitive biological resources, including vegetation removal/trimming, initial "drive and crush," and all ground disturbing activities, and in any area subject to project disturbance where there is a potential to impact sensitive biological resources or jurisdictional waters. This shall also apply to pre-construction, construction, and post-construction restoration phases of the Proposed Project. The mitigation measure has also been revised in the Final EIS to clarify that monitors are responsible to ensure that impacts to sensitive biological resources are avoided *or minimized*.

F3-145 The commenter requests that Mitigation Measure VEG-1a (Conduct biological monitoring and reporting) include the duration of the review period for biological monitors' resumes, and suggests a period of 10 working days. The commenter further requests that additional detail be provided regarding the requirement that resumes demonstrate the appropriate education and experience to accomplish the assigned biological resources tasks.

Given the variety of biological resources tasks that may be required during project implementation, it is not possible to provide details on the appropriate education and experience required for each. Concurrence on qualification will be established on a case-by-case basis through the resume review process. The text of Mitigation Measure VEG-1a in the Final EIS has been revised to include the requested 10 working day review period.

F3-146 The commenter requests revisions to Mitigation Measure VEG-1a (Conduct biological monitoring and reporting) to restrict biological monitoring to areas where there is a potential to impact sensitive plant or wildlife resources and eliminate biological monitoring of pre-construction activities.

Please see Response to Comment F3-144.

F3-147 The commenter requests revision of Mitigation Measure VEG-1b (Prepare and implement a Worker Environmental Awareness Program [WEAP]) to allow training materials to be provided in electronic form to save resources.

It is acknowledged that distributing training materials in electronic form would save resources. However, in the interest of ensuring that training materials are reliably distributed to all personnel and have the greatest chance of being referenced, a hard copy format is required. The text was not revised.

F3-148 The commenter states that SCE should not be held responsible for events beyond SCE's control. After a fire, flood, or other disturbance, site conditions within restoration areas may be no different than surrounding vegetation. The commenter further states that the Draft EIR/EIS assumes that surrounding native vegetation will respond better to fire, flood, or other disturbance than restoration areas.

Mitigation Measure VEG-1d (Restore or revegetate temporary disturbance areas) requires that, if a fire, flood, or other disturbance beyond the control of SCE, CPUC, and BLM damages a revegetation area within the monitoring period, SCE shall be responsible for a one-time replacement. If a second event occurs, no replanting is required unless the disturbance is caused by SCE's activity.

Depending on the type and level of disturbance, surrounding native vegetation is likely to recover more readily than vegetation in restoration areas. In most cases, native vegetation would have mature root systems and an intact soil seed bank, which facilitate post-disturbance recovery. In the event of a fire, flood, or other disturbance, restoration areas generally would not be able to recover to native habitat without additional restoration work; this reduced capacity for recovery results from project-related disturbance. The text was not revised.

F3-149 The commenter states that accurate aerial imagery is readily available, and providing up-to-date ortho-rectified aerial imagery of the project area is an unnecessary expense.

Upon completion of the project, Mitigation Measure VEG-1c (Minimize native vegetation and habitat loss) requires SCE to provide the CPUC and the BLM with GIS shapefiles of all actual temporary and permanent disturbance areas, up-to-date ortho-rectified aerial imagery of the project area, and summary data of all discrepancies between final engineering and "as-built" conditions. It is acknowledged that accurate aerial imagery is readily available. Mitigation Measure VEG-1c in the Final EIS retains the requirement for SCE to provide

accurate aerial imagery of the project area, but the text has been revised to delete the requirement for up-to-date ortho-rectified imagery.

F3-150 The commenter contends that after a fire, flood, or other disturbance of restoration areas, site conditions within restoration areas may be no different than surrounding vegetation. The commenter further states that the Draft EIR/EIS assumes that surrounding native vegetation will respond better to fire, flood, or other disturbance than restoration areas. Revisions to Mitigation Measure VEG-1d (Restore or revegetate temporary disturbance areas) are suggested to delete the requirement for a one-time replacement of restoration plantings after a fire, flood, or other disturbance event beyond SCE's control.

Please see Response to Comment F3-148.

The commenter states that temporary impact areas that cannot be effectively revegetated or restored will need to be stabilized to prevent soil erosion. The commenter further suggests revisions to include these temporary disturbance areas in Part A of Mitigation Measure VEG-1d (Restore or revegetate temporary disturbance areas).

Part A of Mitigation Measure VEG-1d specifies certain types of habitats where the goal of the Habitat Restoration and Revegetation Plan (HRRP) will be to minimize weed invasion, dust generation, and soil erosion. Temporary impact areas that cannot be effectively revegetated or restored require off-site compensation according to the requirements of Mitigation Measure VEG-1e (Compensate for permanent habitat loss). It is appropriate to include these areas in Part A of Mitigation Measure VEG-1d and the text of the Final EIS has been revised accordingly.

The commenter states that if remedial action is taken to meet success criteria, monitoring of restoration sites should not continue for five years beyond the date of the remedial action, as required by Mitigation Measure VEG-1d (Restore or revegetate temporary disturbance areas). The commenter suggests revisions to Mitigation Measure VEG-1d to delete this requirement and also to delete the requirement that initial monitoring continue for a minimum of five years.

Monitoring of restoration areas is required for at least five years, and until success criteria are reached, to ensure that the vegetation is well established and on a trajectory toward successful restoration of native habitat values. The intent of Mitigation Measure VEG-1d was not to 'reset the clock' for remedial measures, but to require monitoring of remedial measures concurrent with that of the initial restoration. The text of Mitigation Measure VEG-1d has been revised in the Final EIS to clarify that the monitoring period for remedial measures is concurrent with that of the initial restoration.

The commenter states that chaparral, desert scrub, and aeolian sand habitat are not sensitive vegetation communities and should be deleted from restoration requirements in Mitigation Measure VEG-1d (Restore or revegetate temporary disturbance areas).

Regarding aeolian sand habitat, please see Response to Comment F3-127. For chaparral and desert scrub, please see Response to Comment F3-143.

The commenter states that some of the plant communities in the project area do not have 80 percent relative cover by native species and some communities naturally have a low abso-

lute cover of native species. The mitigation requirement could mean that SCE's restoration efforts must achieve native cover greater than the on-site or adjacent plant communities.

Mitigation Measure VEG-1d (Restore or revegetate temporary disturbance areas) requires that at least 80 percent of the vegetation cover within the restoration area be contributed by native species (i.e., of the vegetation present, whatever its absolute cover may be, at least 80 percent is native with the remainder being non-native), and that absolute cover and density of native plant species is at least 60 percent of the pre-disturbance or reference vegetation cover.

The requirement that absolute cover and density of native plant species is at least 60 percent of the pre-disturbance or reference vegetation cover, would not require greater cover than is present in the reference sites. For example, if pre-disturbance cover of native vegetation in an open desert scrub community is 20 percent, the requirement for the restoration is 60 percent of this, or 12 percent native cover.

It is acknowledged that grassland and forbland in the project area may have a relative cover of native species that is less than 80 percent. The text of Mitigation Measure VEG-1d in the Final EIS has been revised to state that, in grassland or forbland habitat, this criterion will be adjusted to account for pre-disturbance non-native grass cover. However, for other habitats, the purpose of restoration is to establish native plants on a trajectory toward a functioning natural vegetation community. Allowing high non-native weed cover during the restoration period is likely to compromise the establishment of native plants and jeopardize the success of the restoration. Although native vegetation cover in restoration areas may exceed that in surrounding habitat during the restoration period, the requirement is warranted to ensure that mitigation is achieved.

The commenter states that cover and density measure the same thing and Mitigation Measure VEG-1d (Restore or revegetate temporary disturbance areas) should use only one or the other.

Cover refers to the area occupied by vegetation (typically expressed as a percentage) and density refers to the number of individuals (e.g., shrubs and trees) within a specified area (typically expressed as number per acre). Mitigation Measure VEG-1d requires absolute cover and density of native plant species within the restoration areas to equal at least 60 percent of the pre-disturbance or reference vegetation cover. This means that both cover of all vegetation and density of shrubs and trees are required to be at least 60 percent of the pre-disturbance or reference vegetation. The text of Mitigation Measure VEG-1d in the Final EIS has been revised to clarify that both cover of all vegetation and density of shrubs and trees are required to be at least 60 percent of the pre-disturbance or reference vegetation.

The commenter states that requiring restoration sites to persist for at least three years without irrigation before monitoring is complete is excessive and inconsistent with the two year requirement typically established by the resource agencies.

Mitigation Measure VEG-1d (Restore or revegetate temporary disturbance areas) has been revised in the Final EIS to require a minimum of two years prior to completion of monitoring to ensure that plants in restoration sites are sufficiently established to be able to survive the harsh conditions found in the project area.

The commenter states that grassland/forbland that is potentially suitable habitat for Stephens' kangaroo rat (SKR) is not a sensitive community unless it is actually occupied by SKR and restoration should be required only for occupied habitat.

Mitigation Measure VEG-1d (Restore or revegetate temporary disturbance areas) requires restoration of temporary disturbance areas in grassland/forbland that is either suitable SKR habitat or has 10 percent or greater relative cover of native perennial grass species. Suitable habitat supports, or has the potential to support, SKR whether or not the habitat is known to be currently occupied or utilized by SKR. Restoration of these habitats in temporary impact areas is required to mitigate loss of habitat for SKR. The text of Mitigation Measure VEG-1d has been revised in the Final EIS to state that habitat suitability is to be determined by a qualified SKR biologist.

The commenter suggests revising Mitigation Measure VEG-1d to state that if SCE obtains Participating Special Entity (PSE) status under either the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) or Coachella Valley MSHCP, the project's temporary impacts will be restored, revegetated, or stabilized according to the requirements of the MSHCP and Mitigation Measure VEG-1d will not apply.

Mitigation Measure VEG-1d (Restore or revegetate temporary disturbance areas) would mitigate the effects of temporary disturbance, including those occurring within the MSHCP areas. The two MSHCPs provide for ESA and CESA take authorization for covered species. The Coachella Valley MSHCP does not provide mitigation for other biological resources impacts that may be identified, such as temporary vegetation and habitat impacts, and does not require restoration or similar mitigation for such impacts. The Western Riverside County MSHCP requires implementation of Standard Best Management Practices, which include revegetation of temporary impact areas with native species, but the requirement lacks specificity. Mitigation Measure VEG-1d is necessary to mitigate the project's temporary impacts to vegetation and habitat, including those impacts occurring within the two MSHCP areas, whether or not SCE obtains PSE status. The requested revision is not made.

F3-151 The commenter proposes adding the option to use mitigation banks to Mitigation Measure VEG-1e (Compensate for permanent habitat loss).

Text of Mitigation Measure VEG-1e in the Final EIS has been revised to include the option to use mitigation banks.

The commenter states that special-status species habitat-specific mitigation ratios from resource agency permits should supersede those in Mitigation Measure VEG-1e. Ratios applied may vary based on the relative functions and values of disturbed habitat versus replacement habitat and the ratios specified in Mitigation Measure VEG-1e should not be absolute.

Compensation ratios were established in Mitigation Measure VEG-1e (Compensate for permanent habitat loss) based on the vegetation types in the project area, as presented in the PEA, and on the selection criteria stated in Mitigation Measure VEG-1e, requiring that compensation habitat will be of equal or greater quality and function to the disturbed habitat. The text of Mitigation Measure VEG-1e was revised in the Final EIS to clarify that if resource agency take permits require different ratios than Mitigation Measure VEG-1e, the more stringent requirements will apply. .

The commenter suggests removing aeolian sand, chaparral, desert scrub, and grassland/ forbland from the mitigation requirements in Mitigation Measure VEG-1e (Compensate for permanent habitat loss). Only habitat in these vegetation types known to support special-status species should require mitigation, as specified in resource agency permits.

Regarding aeolian sand habitat, please see Response to Comment F3-127. For chaparral and desert scrub, please see Response to Comment F3-143. For grassland/forbland, please see Response to Comment F3-150.

The commenter states that compensation ratios in Mitigation Measure VEG-1e (Compensate for permanent habitat loss) should not be based on impacts to wildlife movement and biological connectivity because the transmission line does not block wildlife movement.

The comment is correct. Text of Mitigation Measure VEG-1e in the Final EIS has been revised to delete the reference to wildlife movement and biological connectivity.

The commenter states that coastal sage scrub (CSS) habitat along the project is patchy, and its function and value as California gnatcatcher habitat is reduced, as evidenced by negative results during recent surveys. The commenter suggests revising the mitigation ratio to 1:1 for CSS.

Mitigation Measure VEG-1e (Compensate for permanent habitat loss) establishes a mitigation ratio of 3:1 for CSS. CSS is generally of conservation concern because it is the habitat of a listed threatened bird, the California gnatcatcher. Designated critical habitat for California gnatcatcher is found along the ROW in San Bernardino County. Recent project-related surveys for this species were negative in San Bernardino County, but gnatcatchers have been reported in the project vicinity as recently as 2000. No surveys were done in Riverside County, where habitat suitability models indicate that suitable habitat for California gnatcatcher is potentially present.

Mitigation Measure VEG-1e has been revised in the Final EIS to require a mitigation ratio of 3:1 for CSS within California gnatcatcher designated critical habitat and any CSS occupied by California gnatcatcher. Mitigation Measure VEG-1e has also been revised in the Final EIS to state that a mitigation ratio of 1:1 will apply to CSS outside of California gnatcatcher designated critical habitat that is not occupied by California gnatcatcher.

The commenter states that the detailed compensatory mitigation requirements included in Mitigation Measure VEG-1e (Compensate for permanent habitat loss) are typically included in resource agency permits and may lead to inconsistencies between Mitigation Measure VEG-1e and resource agency permits.

The comment is correct, that future resource agency permits may be inconsistent with mitigation in the EIS. The compensation requirements would mitigate the project's habitat impacts, without deferring the mitigation to future permitting actions by other agencies. The text of Mitigation Measure VEG-1e has been revised in the Final EIS to indicate that, if there is a conflict between requirements in resource agency permits and Mitigation Measure VEG-1e, the more stringent requirement shall apply.

F3-152 The commenter suggests revisions to include statement that O&M impacts would be similar to existing conditions.

Please see Response to Comment F3-140. Text of Impact VEG-2 (Project activities could cause indirect degradation of surrounding vegetation and habitat from dust, interrupted sand transport, interruption of surface water flows, or introduction and spread of invasive weeds) in the Final EIS has been revised to state that O&M impacts would be similar to existing conditions.

F3-153 The commenter states that the project ROW is already infested with weeds, and after the Integrated Weed Management Plan (IWMP) has been fully implemented and post-construction restoration is complete, SCE should not be required to monitor and survey for weeds during O&M of the transmission line.

Mitigation Measure VEG-2a (Prepare and implement an Integrated Weed Management Plan) requires implementation of the IWMP. The text of Mitigation Measure VEG-2a has been revised in the Final EIS to specify that implementation of the IWMP is required during the pre-construction, construction, and post-construction restoration phases only.

F3-154 The commenter states that after the IWMP has been fully implemented and post-construction restoration is complete, SCE should not be required to monitor and survey for weeds during O&M of the transmission line. Please see Response to Comment F3-153.

F3-155 The commenter states that requiring a weed inventory over the entire ROW is unnecessary because substantial areas of the ROW will not be affected by construction. Also there are areas outside the ROW that will be affected and should be included in the weed inventory.

Mitigation Measure VEG-2a (Prepare and implement an Integrated Weed Management Plan) has been revised in the Final EIS to specify that weed inventories include all areas (both within and outside of the ROW) subject to project-related vegetation removal, "drive and crush," and ground disturbing activities, vehicle and equipment access routes within the ROW, and all staging/storage yards.

F3-156 The commenter states that it is preferable not to put wash stations at multiple locations or to inspect vehicles at numerous entry points, but to require a standard protocol that requires vehicles and equipment traveling between weed zones to be washed at commercial car washes.

Mitigation Measure VEG-2a (Prepare and implement an Integrated Weed Management Plan) requires preparation and implementation of an IWMP that includes methods to minimize the potential transport of weed seeds onto the ROW or from one section of the ROW to another. The mitigation measure requires cleaning and inspection of construction equipment to ensure that it is free of mud and dirt that could contain weed seeds, and specifies that vehicles will be washed off-site, when possible, stating: "All vehicles will be washed off-site when possible. If off-site washing is infeasible, on-site cleaning stations will be set up at specified locations to clean equipment before it enters the work area." The protocol suggested in the comment, to use commercial car washes, is not precluded by the language of the mitigation measure. The suggested revisions were not made.

F3-157 The commenter states that the project area is experiencing a long period of drought, and a revision is requested to eliminate the requirement to monitor weed eradication areas for three consecutive normal rainfall years with no new seedlings or resprouts before weed control efforts can cease.

It is acknowledged that California is experiencing a drought, and it could be a substantial period of time before three consecutive years of normal rainfall occur. The text of Mitigation Measure VEG-2a (Prepare and implement an Integrated Weed Management Plan) has been revised in the Final EIS to require monitoring for three consecutive normal rainfall years OR for five consecutive years regardless of rainfall.

F3-158 The commenter states that there is no need for an Erosion Control Plan if a Stormwater Pollution Prevention Plan (SWPPP) is prepared and implemented. Please see Response to Comment F3-462.

F3-159 The commenter states that Mitigation Measure VEG-3a should defer to the Habitat Mitigation and Monitoring Plan (HMMP) and the applicable permit for wetland mitigation. The commenter requests revisions to the mitigation measure to indicate that it is superseded by the requirements of wetland/water permits.

Mitigation Measure VEG-3a (Minimize impacts and ensure no net loss for jurisdictional waters and wetlands) would require compensation for permanent impacts at a ratio of 1:1 for non-wetland jurisdictional areas and 3:1 for wetland jurisdictional areas. The compensation requirements would mitigate the project's habitat impacts, without deferring the mitigation to future permitting actions by other agencies. The text of Mitigation Measure VEG-3a has been revised in the Final EIS to state that in the case of any conflict between the mitigation ratios or other requirements specified in wetland/water permits for the project and the mitigation ratios or other requirements specified in Mitigation Measure VEG-3a, the higher mitigation ratios and more stringent requirements shall apply.

F3-160 The commenter states that some species can already be determined as absent and SCE should not have to continue to survey for absent shrubs. The commenter requests that text of mitigation measure be revised to exclude from surveys those species already determined to be absent.

Mitigation Measure VEG-4a (Minimize and mitigate impacts to special-status plants) requires pre-construction focused surveys for special-status plants, conforming to current CDFW botanical field survey protocol. According to the protocol, the surveys will be "floristic in nature." That is, the surveys will identify all plant species located in the survey area, including common species and special-status species. Thus, the survey "target species" are not limited to certain special-status plants which may be considered unlikely to occur. The suggested revisions were not made.

F3-161 The commenter requests revision to mitigation measure to include state-listed plants. Text of Mitigation Measure VEG-4a (Minimize and mitigate impacts to special-status plants) in the Final EIS has been revised to include state-listed plants.

F3-162 The commenter states that the regulatory basis for salvage and transplant of native cactus and yuccas is not clear and requests removal of this requirement.

Mitigation Measure VEG-4a (Minimize and mitigate impacts to special-status plants) would require salvage and transplant of some species of native cactus and yuccas. The measure is not based on a regulatory requirement, but would mitigate project-related loss of wildlife habitat (vertical structure) provided by these species, as described in Impact VEG-4. The requested revision was not made.

F3-163 The commenter states that an avoidance buffer for trees of twice the distance of the drip line is excessive, particularly for non-listed species, and requests the mitigation measure be revised to require a buffer to the edge of the drip line.

Mitigation Measure VEG-4a (Minimize and mitigate impacts to special-status plants) requires a buffer around special-status shrubs and trees of twice the distance of the drip line (i.e., twice the distance from the trunk to the edge of the canopy) to protect plant roots. Tree and shrub roots may extend outward two or three times the radius of the dripline. A buffer of twice the drip line is reasonable to protect the plant from excessive root damage that may lead to loss of vigor or mortality. Mitigation Measure VEG-4a offers an option to implement site-specific measures to protect the plant if a smaller buffer is required due to project constraints. The requested revision was not made.

F3-164 The commenter states that requirement to compensate at a 1:1 ratio of acreage and number of plants would be difficult to implement, as individual grasses may be difficult to count or growth patterns may not allow for individual counts of plants.

The special-status plants that may be affected by the project do not include turf grasses or other species that would be difficult to count. The measure was not revised.

The commenter states that mitigation requirements should not include a 100-foot buffer around each plant population because the buffer may not include suitable soils or habitat for the species.

Mitigation Measure VEG-4a (Minimize and mitigate impacts to special-status plants) would require that occupied habitat will be calculated on the project site and on the compensation lands as including each special-status plant occurrence and a surrounding 100-foot buffer area. The purpose of the buffer is to provide some area surrounding the special-status plants on the compensation land to minimize disturbance, regardless of the suitability of the soils or habitat within the buffer. The measure was not revised.

The commenter recommends translocation, seed collection and reseeding, or other on-site mitigation options as an alternative to off-site compensation for special-status plants, as described in APM BIO-7.

Consistent with the comment, Mitigation Measure VEG-4a (Minimize and mitigate impacts to special-status plants) provides a series of mitigation strategies including off-site compensation, salvage, or horticultural propagation and off-site introduction. The salvage alternative provides an option for on-site mitigation. The measure was not revised.

F3-165 The commenter states that there are specialists available for consultation other than horticulturists at qualified institutions.

Mitigation Measure VEG-4a (Minimize and mitigate impacts to special-status plants) requires that SCE consult with horticulturists at qualified institutions regarding the feasibility and likely success of salvage efforts for each species. The text of Mitigation Measure VEG-4a has been revised in the Final EIS to include qualified restoration ecologists.

F3-166 The commenter states that regulatory basis for salvage of cacti and yuccas is not clear and deletion of this requirement is recommended.

Please see Response to Comment F3-162.

F3-167 The commenter notes that CEQA guidelines state that impacts may be significant if the project would conflict with the provisions of an adopted habitat conservation plan. Conflicting with a habitat conservation plan is not the same as failing to demonstrate equivalency/ consistency.

This comment relates to CEQA, not NEPA. However, Mitigation Measure VEG-5b has been revised in the Final EIS to remove the word "equivalency."

F3-168 The commenter states that there are additional impacts associated with the Phased Build Alternative that were not addressed in the Draft EIR/EIS. Please see General Response GR-4.

F3-169 The commenter states that monitoring of restoration sites should be negotiable if success criteria are met sooner than 5 years. Mitigation Measure VEG-1d (Restore or revegetate temporary disturbance areas) requires monitoring of restoration areas for at least five years, and until success criteria are reached, to ensure that the vegetation is well established and on a trajectory toward successful restoration of native habitat values. The measure was not revised.

F3-170 The commenter refers to Mitigation Measure VEG-2a (Prepare and implement an Integrated Weed Management Plan) and states that the project ROW is already populated with weeds, and after the IWMP has been fully implemented and post-construction restoration is complete, SCE should not be required to monitor and survey for weeds during O&M of the transmission line. This comment is the same as Comment F3-153. Please see Response to Comment F3-153.

F3-171 The commenter requests minor revisions to Mitigation Measure VEG-3a (Minimize impacts and ensure no net loss for jurisdictional waters and wetlands) to clarify the jurisdiction of the EPA and SWRCB regarding wetlands and other waters. Please see Response to Comment F3-130.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Section D.5 Biological Resources – Wildlife

Page D.5-9

DEIR/DEIS Text: F3-172

Golden eagle has a low potential for occurrence on Segment 2. Foraging habitat is potentially present on the ROW and natural nesting habitat is potentially present within 4 miles of the ROW. Golden eagles may occasionally nest on large transmission towers, but the potential for nesting on the ROW is low.

SCE Comment:

According to the Golden Eagle survey report (Appendix I to the BRTR (App. F of the PEA)), the only natural nesting habitat within 4 miles of the ROW is south of Banning, not near Segment 2.

Please make the following revision:

Golden eagle has a low potential for occurrence on Segment 2. Foraging habitat is potentially present on the ROW ~~and natural nesting habitat is potentially present within 4 miles of the ROW~~. Golden eagles may occasionally nest on large transmission towers, but the potential for nesting on the ROW is low.

Page D.5-10

DEIR/DEIS Text: F3-173

Golden eagle has been observed foraging near El Casco Substation on or near Segment 3. Natural nesting habitat is potentially present within 4 miles of the ROW. Golden eagles may occasionally nest on large transmission towers, but the potential for nesting on the ROW is low.

SCE Comment:

According to the Golden Eagle survey report (Appendix I to the BRTR (App. F of the PEA)), the only natural nesting habitat within 4 miles of the ROW is south of Banning and south of Segments 4 and 5, not near Segment 3.

Please make the following revision:

Golden eagle has been observed foraging near El Casco Substation on or near Segment 3. ~~Natural nesting habitat is potentially present within 4 miles of the ROW.~~ Golden eagles may occasionally nest on large transmission towers, but the potential for nesting on the ROW is low.

Page D.5-13

DEIR/DEIS Text: F3-174

The Sierra Madre (mountain) yellow-legged frog has a low potential for occurrence on Segment 5. It was reported from the San Gorgonio River, approximately 2.5 miles south of the ROW, but the habitat where the transmission line would span the San Gorgonio River is not suitable (CPUC and BLM, 2006).

SCE Comment:

All CNDDB records for Sierra Madre (mountain) yellow-legged frog are listed as either extirpated or potentially extirpated. This should be noted in the DEIR/DEIS.

Please make the following revision: The Sierra Madre (mountain) yellow-legged frog has a low potential for occurrence on Segment 5. It was reported from the San Gorgonio River, approximately 2.5 miles south of the ROW, but the habitat where the transmission line would span the San Gorgonio River is not suitable (CPUC and BLM, 2006). Further, all records for this species in the San Gorgonio Pass area are assumed to be extirpated.

Comment Set F3: Southern California Edison Company (cont.)

Page D.5-14

DEIR/DEIS Text: F3-175

The Sierra Madre (mountain) yellow-legged frog has a low potential for occurrence on Segment 6. There is a documented occurrence in the Whitewater River, approximately 3 miles north of I-10, but the habitat where the ROW crosses Whitewater Canyon is probably not suitable for this species due to intermittent surface flow. This species was not found during biological surveys (AMEC, 2012a).

SCE Comment:

For consistency with the comment above at 5-13, please make the following revision:

The Sierra Madre (mountain) yellow-legged frog has a low potential for occurrence on Segment 6. There is a documented occurrence in the Whitewater River, approximately 3 miles north of I-10, but the habitat where the ROW crosses Whitewater Canyon is probably not suitable for this species due to intermittent surface flow. This species was not found during biological surveys (AMEC, 2012a). Further, all records for this species in the San Gorgonio Pass area are assumed to be extirpated.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.5-25

DEIR/DEIS Text: F3-176

WIL-1a Conduct pre-construction biological resources surveys. SCE shall assign qualified biologists to perform pre-construction biological surveys at each project work area and access route, and in the 500-foot area surrounding each work site or access route. Pre-construction surveys shall be planned and implemented to identify locations of special-status plants and wildlife and nesting birds occurring at work areas, other portions of the ROW, or in adjacent buffer areas. Specific pre-construction survey methods or protocols will vary according to the resources which may be present at any given site, and according to season. At minimum, SCE shall complete pre-construction surveys 10 days prior to beginning work in any given area, and repeat the surveys if the work site remains inactive for a period of ten days or more. During nesting season, a qualified biologist shall complete nesting bird surveys no more than four days prior to beginning work at any given area, and repeat the surveys regularly so long as work continues at the site during the nesting season.

SCE Comment:

A 500-foot buffer is unreasonable for most wildlife species and for some project features (e.g., access roads). Buffers will vary as appropriate based on habitat and target species, and as stipulated by project work plans and mitigation plans (e.g., NBMP).

Due to the extensive network of existing access roads along portions of the project, it may not be feasible to complete pre-construction surveys within 10-days of construction along the existing access road and a 500 ft. buffer (based on special status species potential), particularly along Segments 2 and 3. As a result, this mitigation measure may not be possible to implement.

Consistent with other terrestrial sensitive species surveys buffers, such as desert tortoise and Stephens' kangaroo-rat, the survey area should be limited to a resource and suitable habitat dependent buffer around the disturbance areas. Access roads that require heavy road improvement will also be surveyed out to the appropriate species specific survey buffer, 10 days prior to beginning road improvement work. Otherwise, access roads will not be surveys if they are only being used to travel between work areas.

Suggested Revision:

WIL-1a Conduct pre-construction biological resources surveys. SCE shall assign qualified biologists to perform pre-construction biological surveys at each project work area ~~and access route~~, and ~~in the~~ in a buffer up to 500-feet ~~foot area~~ surrounding each work site ~~or access route~~. Buffers areas will vary as appropriate based on habitat and target species, and as stipulated by project work plans and mitigation plans (e.g., NBMP). Access roads that require heavy road improvement will also be surveyed out to the appropriate species specific survey buffer, 10 days prior to beginning road improvement work. Otherwise, access roads will not be surveyed if they are only being used to travel between work areas. Pre-construction surveys shall be planned and implemented to identify locations of special-status plants and wildlife and nesting birds occurring at work areas, other portions of the ROW, or in adjacent buffer areas. Specific pre-construction survey methods or protocols will vary according to the resources which may be present at any given site, and according to season. At minimum, SCE shall complete pre-construction surveys 10 days prior to beginning work in any given area, and repeat the surveys if the work site remains inactive for a period of ten days or more. During nesting season, a qualified biologist shall complete nesting bird surveys no more than four days prior to beginning work at any given area, and repeat the surveys regularly so long as work continues at the site during the nesting season.

Comment Set F3: Southern California Edison Company (cont.)

Page D.5-27

DEIR/DEIS Text: F3-177

WIL-1b

Wildlife netting or exclusion fencing. SCE may install temporary or permanent netting or fencing around equipment, work areas, or project facilities to prevent wildlife exposure to hazards such as toxic materials or vehicle strikes, or prevent birds from nesting on equipment or facilities. Bird deterrent netting will be maintained free of holes and will be deployed and secured on the equipment in a manner that, insofar as possible, prevents wildlife from becoming trapped inside the netted area or within the excess netting. The biological monitor will inspect netting (if installed) twice daily, at the beginning and close of each work day. The biological monitor will inspect exclusion fence (if installed) weekly and will inform SCE of any needed repairs; SCE shall promptly repair any damage to the exclusion fencing.

SCE Comment:

Please make the following revision for consistency with the monitoring of netting as discussed as part of the Nesting Bird Management Plan:

Wildlife netting or exclusion fencing. SCE may install temporary or permanent netting or fencing around equipment, work areas, or project facilities to prevent wildlife exposure to hazards such as toxic materials or vehicle strikes, or prevent birds from nesting on equipment or facilities. Bird deterrent netting will be maintained free of holes and will be deployed and secured on the equipment in a manner that, insofar as possible, prevents wildlife from becoming trapped inside the netted area or within the excess netting. Netting installed within established material yards will be inspected daily. The biological monitor will inspect netting that is installed on vegetation (if installed) twice daily, at the beginning and close of each work day. The biological monitor will inspect exclusion fence (if installed) weekly and will inform SCE of any needed repairs; SCE shall promptly repair any damage to the exclusion fencing.

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DEIR/DEIS Text: F3-178

Dead animals. Dead animals of non-special-status species found on project roads, work areas, or the ROW shall be reported to the appropriate local animal control agency within 24 hours. A biological monitor shall safely move the carcass out of the road or work area as needed. Dead animals of special-status species found on project roads, work areas, or the ROW shall be reported to CDFW within one work day and the carcass handled as directed by CDFW.

SCE Comment:

Please make the following revision:

Dead animals. Dead animals of non-special-status species found on project unpaved roads, work areas, or the ROW shall be reported to the appropriate local animal control agency within 24 hours. A biological monitor shall safely move the carcass out of the road or work area as needed. Dead animals of special-status species found on unpaved project roads, work areas, or the ROW shall be reported to CDFW within one work day and the carcass handled as directed by CDFW.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.5-27 through 28

DEIR/DEIS Text: F3-179

Injured wildlife. SCE shall create and implement guidelines for dealing with injured or entrapped wildlife found on or near project roads, work areas, or the ROW, whether or not the injuries are project-related, and provide these guidelines to all biological monitors. If an animal is entrapped, a qualified biological monitor shall free the animal if feasible, or work with construction crews to free the animal, in compliance with applicable safety regulations and project requirements. If biological monitors cannot free the animal or the animal is too large or dangerous for monitors to handle, SCE shall contact and work with animal control, CDFW, or other qualified party to obtain assistance for the animal as soon as possible.

SCE shall ensure that one or more qualified biological monitors receive training in the safe and proper handling and transport of injured wildlife and are provided with the appropriate equipment. These trained and equipped monitors shall be available to capture and trans-port injured wildlife to a local wildlife rehabilitator or veterinarian as needed. If the injured animal is too large or dangerous for monitors to handle, or a trained and equipped monitor is not available, SCE shall contact and work with a local wildlife rehabilitator, animal control, CDFW, or other qualified party to obtain assistance for the animal as soon as possible. SCE shall bear the costs of veterinary treatment and rehabilitation for any injured wildlife found on or near project roads, work areas, or the ROW and any wildlife injured by project-related activities. Additionally, any entrapped or injured special-status species found on project roads, work areas, or the ROW shall be reported to the appropriate resource agency within one work day.

SCE Comment:

SCE should only be responsible for project-related wildlife injuries. As such please make the following revisions:

Injured wildlife. SCE shall create and implement guidelines for dealing with injured or entrapped wildlife found on or near project roads, work areas, or the ROW, ~~whether or not the injuries are project-related,~~ and provide these guidelines to all biological monitors. If an animal is entrapped, a qualified biological monitor shall free the animal if feasible, or work with construction crews to free the animal, in compliance with applicable safety regulations and project requirements. If biological monitors cannot free the animal or the animal is too large or dangerous for monitors to handle, SCE shall contact and work with animal control, CDFW, or other qualified party to obtain assistance for the animal as soon as possible.

SCE shall ensure that one or more qualified biological monitors receive training in the safe and proper handling and transport of injured wildlife and are provided with the appropriate equipment. These trained and equipped monitors shall be available to capture and trans-port injured wildlife to a local wildlife rehabilitator or veterinarian as needed. If the injured animal is too large or dangerous for monitors to handle, or a trained and equipped monitor is not available, SCE shall contact and work with a local wildlife rehabilitator, animal control, CDFW, or other qualified party to obtain assistance for the animal as soon as possible. SCE shall bear the costs of veterinary treatment and rehabilitation for any ~~injured~~ wildlife ~~found on or near project roads, work areas, or the ROW and any wildlife~~ injured by project-related activities. Additionally, any entrapped or injured special-status species found on project roads, work areas, or the ROW shall be reported to the appropriate resource agency within one work day.

Comment Set F3: Southern California Edison Company (cont.)

Page D.5-28

DEIR/DEIS Text: F3-180

Rattlesnake guidelines. Prior to the start of construction, SCE shall prepare and implement guidelines for dealing with rattlesnakes found in or near project work areas and access roads and provide these guidelines to all biological monitors, safety staff, and other personnel. Killing or harming rattlesnakes or other wildlife is not authorized. If SCE determines that it is appropriate for biological monitors or other project personnel to handle rattlesnakes, SCE shall ensure that an adequate number of qualified individuals are trained in the safe and proper handling of rattlesnakes and provided with the appropriate safety and snake handling equipment, including a secure storage container for transporting snakes. These trained and equipped individuals shall be available to remove rattlesnakes found in or near project work areas and access roads as needed and relocate them to appropriate nearby habitat. Other project personnel shall not harass, or handle rattlesnakes, except as required to maintain immediate safety or in accordance with the guidelines developed by SCE. Handling and relocation of rattlesnakes shall be documented, and the species of rattlesnake determined whenever possible. If a special-status rattlesnake is relocated, documentation shall be sub-mitted to CPUC, BLM, and CDFW.

Alternately, SCE may determine that project personnel shall not handle or approach rattle-snakes. If so, the guidelines shall specify an alternate course of action for rattlesnake encounters, such as avoiding work activity near the snake and monitoring its location and activity until it leaves the area.

SCE Comment:

Prior to the start of construction, SCE will prepare and implement a Worker Environmental Awareness Program (WEAP) that includes guidelines for handling and/or avoiding rattlesnakes.

The section below is therefore redundant and does not mitigate a specific significant impact. Please make the following revision:

~~**Rattlesnake guidelines.** Prior to the start of construction, SCE shall prepare and implement guidelines for dealing with rattlesnakes found in or near project work areas and access roads and provide these guidelines to all biological monitors, safety staff, and other personnel. Killing or harming rattlesnakes or other wildlife is not authorized. If SCE determines that it is appropriate for biological monitors or other project personnel to handle rattlesnakes, SCE shall ensure that an adequate number of qualified individuals are trained in the safe and proper handling of rattlesnakes and provided with the appropriate safety and snake handling equipment, including a secure storage container for transporting snakes. These trained and equipped individuals shall be available to remove rattlesnakes found in or near project work areas and access roads as needed and relocate them to appropriate nearby habitat. Other project personnel shall not harass, or handle rattlesnakes, except as required to maintain immediate safety or in accordance with the guidelines developed by SCE. Handling and relocation of rattlesnakes shall be documented, and the species of rattlesnake determined whenever possible. If a special-status rattlesnake is relocated, documentation shall be sub-mitted to CPUC, BLM, and CDFW.~~

~~Alternately, SCE may determine that project personnel shall not handle or approach rattle-snakes. If so, the guidelines shall specify an alternate course of action for rattlesnake encounters, such as avoiding work activity near the snake and monitoring its location and activity until it leaves the area.~~

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

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DEIR/DEIS Text: F3-181

WIL-1c Prepare and implement a Nesting Bird Management Plan. [Supersedes APM BIO-3] SCE shall prepare a Nesting Bird Management Plan (NBMP) in coordination with CPUC, BLM, CDFW, and USFWS. The NBMP shall describe methods to minimize potential project effects to nesting birds, and avoid any potential for unauthorized take. Project-related disturbance including construction and pre-construction activities shall not proceed until approval of the NBMP by CPUC and BLM in consultation with CDFW and USFWS.

NBMP Content. The NBMP shall include: (1) definitions of standard nest buffers for each species or group of species, depending on characteristics and conservation status for each species; (2) a notification procedure for buffer distance reductions should they become necessary under special circumstances; (4) a rigorous monitoring protocol including qualifications of monitors, monitoring schedule, and field methods, to ensure that any project-related effects to nesting birds will be minimized; and (5) a protocol for documenting and reporting any inadvertent contact or effects to birds or nests.

The paragraphs below describe the NBMP requirements in further detail.

Background. The Background section of the NBMP shall include the following:

A summary of applicable state and federal laws and regulations, including definition of what constitutes a nest or active nest under state and federal law. This section shall describe SCE's proposed applicability of the NBMP in the event that state or federal regulations affecting nesting birds may be revised before project implementation.

A list of bird species potentially nesting on or near the ROW or other work areas, indicating approximate nesting seasons, nesting habitat, typical nest locations (e.g., ground, vegetation, structures, etc.), tolerance to disturbance (if known) and any conservation status for each species. This section will also note any species that do not require avoidance measures (e.g., rock pigeons).

A list of the types of project activities (construction, operations, and maintenance) that may occur during nesting season, with a short description of the noise, physical disturbance, and lighting resulting from each activity.

A discussion of project activity scheduling, to avoid or minimize project impacts to nesting birds. Clearing of any vegetation, preparation in open or barren areas, or other project-related activities that may adversely affect breeding birds shall be scheduled outside the nesting season, as feasible.

Pre-construction nest surveys. Pre-construction nest surveys will be conducted prior to any construction activities scheduled during the breeding period. For this project, the breeding period will be defined as January 1 through August 31. The NBMP shall describe the pro-posed field methods, survey timing, and qualifications of field biologists. Field biologist qualifications will be subject to review by CPUC and BLM. The biologists conducting the surveys shall be experienced bird surveyors and familiar with standard nest-locating techniques such as those described in Martin and Guepel (1993). Nest surveyors will be instructed to focus their efforts on bird activities and movement to detect nesting activity (e.g., carrying nest materials or food, territorial displays, courtship behavior). Surveys shall be conducted in accordance with the following guidelines.

- Surveys shall cover all potential nesting habitat within the ROW or other work areas and access routes and within 500 feet of these areas (100 feet for access routes). Where the 500-foot distance extends onto private property, SCE will make a reasonable effort to obtain permission to access the property for the surveys but, if permission cannot be obtained, then binocular surveys from the ROW boundary may be substituted for standard field survey methods.
- Pre-construction surveys shall be conducted for each work area, no longer than 10 days prior to the start of construction activity. Additional follow-up surveys may be required if periods of construction inactivity exceed one week in any given area (an interval during which birds may establish a nesting territory and initiate egg laying and incubation).
- Prior to the start of any nesting season construction activities, SCE shall provide the CPUC and BLM a report describing the findings of the pre-construction nest surveys, including the time, date, and duration of the survey; identity and qualifications of the surveyor(s); a list of species observed; and electronic data identifying nest locations and the boundaries of buffer zones. The electronic data set will be updated regularly throughout the nesting season. The format and contents of this report will be described in the draft NBMP and will be subject to review and approval by CPUC and BLM.

Comment Set F3: Southern California Edison Company (cont.)

F3-181 cont.

Nest Buffers and Acceptable Activities

The NBMP shall specify measures to delineate buffers on the work site, to consist of clearly visible marking and signage, as well as inspection procedures to ensure that markings and signage remain in place so long as the nest is active. Buffer locations shall be communicated to construction crews, inspectors, helicopter pilots, and other field personnel, and shall remain in effect until formally discontinued (when each nest is no longer active). The NBMP shall specify a procedure for written notification of release of nest buffer restrictions to field personnel when nests become inactive; these notifications shall be provided to CPUC, BLM, CDFW, and USFWS in daily reports. In addition, the NBMP shall specify measures to ensure the buffers are observed, including a direct communication and decision protocol to stop work within buffer areas. In some cases, active nests may be found while work is underway. Therefore, the NBMP shall include a protocol for stopping ongoing work within the buffer area, securing the work site, and removing personnel and equipment from the buffer.

The NBMP shall describe proposed measures to avoid take or adverse effects to nests, such as buffer distances from active nests. These measures shall be based on the specific nature of the bird species and conservation status, and other pertinent factors.

The NBMP will identify bird species (or groups of species) that are relatively tolerant or intolerant of human activities and specify smaller or larger buffer distances as appropriate for each species. If no information is available to specify a buffer distance for a species, then the NBMP shall specify 300 feet as a standard buffer distance, and 500 feet for raptors, special-status species or listed threatened or endangered species. All applicable avoidance measures, including buffer distances, must be continued until nest monitoring (below) confirms that the nestlings have fledged and dispersed, or the nest is no longer active.

For each special-status species potentially nesting within or near project work areas, the NBMP shall specify applicable buffers and any additional nest protection measures, specialty monitoring, or restrictions on work activities.

The NBMP shall identify acceptable work activities within nest buffers (e.g., pedestrian access for inspection or BMP repair) including conditions and restrictions, and any monitoring required. The NBMP shall include pictorial representation showing buffer distances for ground buffers, vertical helicopter buffers, and horizontal helicopter buffers for nests near the ground and nests in towers.

Nest Buffer Modification or Reduction

At times, SCE or its contractor may propose buffer distances different from those approved in the NBMP. Buffer adjustments shall be reviewed and recommended by a qualified avian biologist, approved by CPUC and BLM in consultation with the CDFW and USFWS. The NBMP shall provide a procedure and timing requirements for notifying CPUC, BLM, CDFW, and USFWS of any planned adjustments to nest buffers. Separate and distinct procedures will be provided for special-status birds. The NBMP will list the information to be included in buffer reduction notifications in a standardized format.

Nest deterrents. The NBMP shall describe any proposed measures or deterrents to prevent or reduce bird nesting activity on project equipment or facilities, such as buoys, visual or auditory hazing devices, bird repellents, securing of materials, and netting of materials, vehicles, and equipment. It shall also include timing for installation of nest deterrents and field confirmation to prevent effects to any active nest; guidance and training for the contractor to properly install, maintain, and use nest deterrents; and daily monitoring of nest deterrents to ensure proper installation and functioning and prevent injury or entrapment of birds or other animals. In the event that an active nest is located on project facilities, materials or equipment, SCE will either (1) avoid disturbance or use of the facilities, materials or equipment (e.g., by red-tag) until the nest is no longer active, or (2) coordinate with the CPUC, BLM, CDFW, and USFWS to obtain authorization to remove the nest. The NBMP shall describe the proposed procedure for removal of nests, including wildlife rehabilitation options.

Communication. The NBMP shall specify the responsibilities of construction monitors in regards to nests and nest issues, and specify a direct communication protocol to ensure that nest information and potential adverse impacts to nesting birds can be promptly communicated from nest monitors to construction monitors, so that any needed actions can be taken immediately.

The NBMP shall specify a procedure to be implemented following accidental disturbance of nests or project-related premature fledging, including wildlife rehabilitation options. It also shall describe any proposed measures, and applicable circumstances, to prevent take of precocial young of ground-nesting birds such as

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

killdeer or quail. For example, chick fences may be used to prevent them from entering work areas and access roads. Finally, the NBMP will specify a procedure for removal of inactive nests, including verification that the nest is inactive and notification and approval process prior to removal. F3-181

Monitoring. SCE shall be responsible for monitoring the implementation, conformance, and efficacy of the avoidance measures (above). The NBMP shall include specific monitoring measures to track any active bird nest within or adjacent to project work areas, bird nesting activity, project-related disturbance, and outcome of each nest. SCE shall monitor each nest until nestlings have fledged and dispersed or until the nest becomes inactive. In addition, monitoring shall include pre-construction surveys, daily sweeps of work areas and equipment, and any special monitoring requirements for particular activities (tree trimming, vegetation removal, etc.) or particular species (noise monitoring, etc.). Nest monitoring shall continue throughout the breeding season during each year of the project's construction activities.

Reporting. Throughout the construction phase of the project, nest locations, project active-ties in the vicinity of nests (including helicopter traces), and any adjustments to buffer areas shall be updated and available to CPUC monitors on a daily basis. All buffer reduction notifications and prompt notify-cations of nest-related non-compliance and corrective actions will be made via email to CPUC monitors. The draft NBMP shall include a proposed format for daily reporting (e.g., spreadsheet available online, tracking each nest). In addition, the NBMP shall specify the format and content of nest data to be provided in regular monitoring and compliance reports. At the end of each year's nest season, SCE will submit an annual NBMP report to the CPUC, BLM, CDFW, and USFWS. The annual report shall describe all preconstruction survey work, monitoring data (including names of monitors, activities and sites visited throughout the season), all reductions from standard buffer distances, buffer incursions and nest disturbance, project-related take of nesting birds, injury or entrapment of birds or other animals due to nest deterrents, and nest outcomes for all nests documented throughout the year.

Implementation locations: San Bernardino County (all); WR-MSHCP (all, regardless of SCE's PSE status); CV-MSHCP (all, regardless of SCE's PSE status); BLM (all); reservation (recommended for all Morongo Tribal Lands).

SCE Comment:

The following revisions to WIL-1c are requested due to the redundant detail included in the measure which will be included in the required Nesting Bird Management Plan. Having this level of detail in the Mitigation Measure may result in potential conflicts with the Nesting Bird Management Plan, which is intended to be an adaptive plan.

In the unlikely event that a Nesting Bird Management Plan is not approved prior to the start of construction, a default buffer of 300 feet for common bird species and 500 feet for special status species would be implemented to avoid take of active bird nests.

In addition, required avian surveys should begin Feb 1; however, general pre-construction surveys and sweeps would begin focusing on potential raptor and raven nesting as early as January 1.

For the reasons above, please make the following revisions:

WIL-1c Prepare and implement a Nesting Bird Management Plan. [Supersedes APM BIO-3] SCE shall prepare a Nesting Bird Management Plan (NBMP) in coordination with CPUC, BLM, CDFW, and USFWS. The NBMP shall describe methods to minimize potential project effects to nesting birds, and avoid any potential for unauthorized take. Project-related disturbance including construction and pre-construction activities shall not proceed <u>within 300 feet of common bird species (500 feet for raptors, special-status species or listed threatened or endangered species, except for golden eagle as described in WIL-2f)</u> until approval of the NBMP by CPUC and BLM in consultation with CDFW and USFWS.

NBMP Content. The NBMP shall include: (1) definitions of ~~standard~~ <u>default</u> nest <u>avoidance</u> buffers for each species or group of species, depending on characteristics and conservation status for each species; (2) a notification procedure for buffer distance reductions should they become necessary ~~under special circumstances~~; (4) a rigorous monitoring protocol including qualifications of monitors, monitoring schedule, and field methods, to ensure that any project-related effects to nesting birds will be minimized; and (5) a protocol for documenting and reporting any inadvertent contact or effects to birds or nests.

~~The paragraphs below describe the NBMP requirements in further detail.~~

~~**Background.** The Background section of the NBMP shall include the following:~~

Comment Set F3: Southern California Edison Company (cont.)

F3-181

- ~~A summary of applicable state and federal laws and regulations, including definitions of what constitutes a nest or active ion of what constitutes a nest or active nest under state and federal law. This section shall describe SCE's proposed applicability of the NBMP in the event that state or federal regulations affecting nesting birds may be revised before project implementation.~~
- ~~A list of bird species potentially nesting on or near the ROW or other work areas, indicating approximate nesting seasons, nesting habitat, typical nest locations (e.g., ground, vegetation, structures, etc.), tolerance to disturbance (if known) and any conservation status for each species. This section will also note any species that do not require avoidance measures (e.g., rock pigeons).~~
- ~~A list of the types of project activities (construction, operations, and maintenance) that may occur during nesting season, with a short description of the noise, physical disturbance, and lighting resulting from each activity.~~
- ~~A discussion of project activity scheduling, to avoid or minimize project impacts to nesting birds. Clearing of any vegetation, site preparation in open or barren areas, or other project-related activities that may adversely affect breeding birds shall be scheduled outside the nesting season, as feasible.~~

Pre-construction nest surveys. Pre-construction nest surveys will be conducted prior to any construction activities scheduled during the breeding period. For this project, the breeding period will be defined as ~~January~~ February 1 through August 31. Pre-construction surveys and sweeps will begin focusing on potential raptor and raven nesting substrates as early as January 1. The NBMP shall describe the pro-posed field methods, survey timing, and qualifications of field biologists. Field biologist qualifications will be subject to review by CPUC and BLM. The biologists conducting the surveys shall be experienced bird surveyors and familiar with standard nest-locating techniques such as those described in Martin and Guepel (1993). Nest surveyors will be instructed to focus their efforts on bird activities and movement to detect nesting activity (e.g., carrying nest materials or food, territorial displays, courtship behavior). ~~Surveys shall be conducted in accordance with the following guidelines.~~

- ~~Surveys shall cover all potential nesting habitat within the ROW or other work areas and access routes and within 500 feet of these areas (100 feet for access routes). Where the 500-foot distance extends onto private property, SCE will make a reasonable effort to obtain permission to access the property for the surveys but, if permission cannot be obtained, then binocular surveys from the ROW boundary may be substituted for standard field survey methods.~~
- ~~Pre-construction surveys shall be conducted for each work area, no longer than 10 days prior to the start of construction activity. Additional follow-up surveys may be required if periods of construction inactivity exceed one week in any given area (an interval during which birds may establish a nesting territory and initiate egg laying and incubation).~~
- ~~Prior to the start of any nesting season construction activities, SCE shall provide the CPUC and BLM a report describing the findings of the pre- construction nest surveys, including the time, date, and duration of the survey; identity and qualifications of the surveyor(s); a list of species observed; and electronic data identifying nest locations and the boundaries of buffer zones. The electronic data set will be updated regularly throughout the nesting season. The format and contents of this report will be described in the draft NBMP and will be subject to review and approval by CPUC and BLM.~~

Nest Buffers and Acceptable Activities

The NBMP shall specify measures to delineate buffers on the work site, to consist of clearly visible marking and signage, as well as inspection procedures to ensure that markings and signage remain in place so long as the nest is active. ~~Buffer locations shall be communicated to construction crews, inspectors, helicopter pilots, and other field personnel, and shall remain in effect until formally discontinued (when each nest is no longer active). The NBMP shall specify a procedure for written notification of release of nest buffer restrictions to field personnel when nests become inactive; these notifications shall be provided to CPUC, BLM, CDFW, and USFWS in daily reports. In addition, the NBMP shall specify measures to ensure the buffers are observed, including a direct communication and decision protocol to stop work within buffer areas. In some cases, active nests may be found while work is underway. Therefore, the NBMP shall include a protocol for stopping ongoing work within the buffer area, securing the work site, and removing personnel and equipment from the buffer.~~

~~The NBMP shall describe proposed measures to avoid take or adverse effects to nests, such as buffer distances from active nests. These measures shall be based on the specific nature of the bird species and conservation status, and other pertinent factors.~~

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~~The NBMP will identify bird species (or groups of species) that are relatively tolerant or intolerant of human activities and specify smaller or larger buffer distances as appropriate for each species. If no information is available to specify a buffer distance for a species, then the NBMP shall specify 300 feet as a standard buffer distance, and 500 feet for raptors, special-status species or listed threatened or endangered species. All applicable avoidance measures, including buffer distances, must be continued until nest monitoring (below) confirms that the nestlings have fledged and dispersed, or the nest is no longer active.~~

~~For each special-status species potentially nesting within or near project work areas, the NBMP shall specify applicable buffers and any additional nest protection measures, specialty monitoring, or restrictions on work activities.~~

~~The NBMP shall identify acceptable work activities within nest buffers (e.g., pedestrian access for inspection or BMP repair) including conditions and restrictions, and any monitoring required. The NBMP shall include pictorial representation showing buffer distances for ground buffers, vertical helicopter buffers, and horizontal helicopter buffers for nests near the ground and nests in towers.~~

Nest Buffer Modification or Reduction

At times, SCE or its contractor may propose buffer distances different from those approved in the NBMP. Buffer adjustments shall be reviewed and recommended by a qualified avian biologist, approved by CPUC and BLM in consultation with the CDFW and USFWS. ~~The NBMP shall provide a procedure and timing requirements for notifying CPUC, BLM, CDFW, and USFWS of any planned adjustments to nest buffers. Separate and distinct procedures will be provided for special-status birds. The NBMP will list the information to be included in buffer reduction notifications in a standardized format.~~

Nest deterrents. The NBMP shall describe any proposed measures or deterrents to prevent or reduce bird nesting activity on project equipment or facilities, such as buoys, visual or auditory hazing devices, bird repellents, securing of materials, and netting of materials, vehicles, and equipment. ~~It shall also include timing for installation of nest deterrents and field confirmation to prevent effects to any active nest; guidance and training for the contractor to properly install, maintain, and use nest deterrents; and daily monitoring of nest deterrents to ensure proper installation and functioning and prevent injury or entrapment of birds or other animals. In the event that an active nest is located on project facilities, materials or equipment, SCE will either (1) avoid disturbance or use of the facilities, materials or equipment (e.g., by red-tag) until the nest is no longer active, or (2) coordinate with the CPUC, BLM, CDFW, and USFWS to obtain authorization to remove the nest. The NBMP shall describe the proposed procedure for removal of nests, including wildlife rehabilitation options.~~

Communication. The NBMP shall specify the responsibilities of construction monitors in regards to nests and nest issues, and specify a direct communication protocol to ensure that nest information and potential adverse impacts to nesting birds can be promptly communicated from nest monitors to construction monitors, so that any needed actions can be taken immediately. ~~The NBMP shall specify a procedure to be implemented following accidental disturbance of nests or project-related premature fledging, including wildlife rehabilitation options. It also shall describe any proposed measures, and applicable circumstances, to prevent take of precocial young of ground-nesting birds such as killdeer or quail. For example, chick fences may be used to prevent them from entering work areas and access roads. Finally, the NBMP will specify a procedure for removal of inactive nests, including verification that the nest is inactive and notification and approval process prior to removal.~~

Monitoring. SCE shall be responsible for monitoring the implementation, conformance, and efficacy of the avoidance measures (above). The NBMP shall include specific monitoring measures to track any active bird nest within or adjacent to project work areas, bird nesting activity, project-related disturbance, and nest outcomes. ~~of each nest. SCE shall monitor each nest until nestlings have fledged and dispersed or until the nest becomes inactive. In addition, monitoring shall include pre-construction surveys, daily sweeps of work areas and equipment, and any special monitoring requirements for particular activities (tree trimming, vegetation removal, etc.) or particular species (noise monitoring, etc.). Nest monitoring shall continue throughout the breeding season during each year of the project's construction activities.~~

Reporting. Throughout the construction phase of the project, nest locations, project active-ties in the vicinity of nests (including helicopter traces), and any adjustments to buffer areas shall be updated and available to CPUC monitors on a daily basis. All buffer reduction notify-cations and prompt notifications of nest-related

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non-compliance and corrective actions will be made via email to CPUC monitors. ~~The draft NBMP shall include a proposed format for daily reporting (e.g., spreadsheet available online, tracking each nest). In addition, the NBMP shall specify the format and content of nest data to be provided in regular monitoring and compliance reports. At the end of each year's nest season, SCE will submit an annual NBMP report to the CPUC, BLM, CDFW, and USFWS. The annual report shall describe all preconstruction survey work, monitoring data (including names of monitors, activities and sites visited throughout the season), all reductions from standard buffer distances, buffer incursions and nest disturbance, project-related take of nesting birds, injury or entrapment of birds or other animals due to nest deterrents, and nest outcomes for all nests documented throughout the year.~~ F3-181

Implementation locations: San Bernardino County (all); WR-MSHCP (all, regardless of SCE's PSE status); CV-MSHCP (all, regardless of SCE's PSE status); BLM (all); reservation (recommended for all Morongo Tribal Lands).

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DEIR/DEIS Text: F3-182

WIL-2b Prepare and implement Raven Monitoring, Management, and Control Plan. SCE shall pre-pare and implement a Raven Monitoring, Management, and Control Plan (Raven Plan) consistent with USFWS raven management guidelines and that meets the approval of the CPUC and BLM in consultation with USFWS, and CDFW. The purpose of the Raven Plan shall be to minimize project-related predator subsidies and prevent any increases in raven numbers or activity within desert tortoise habitat during construction, restoration, and O&M phases. The Plan shall address all project components and their potential effects on raven numbers and activity. The threshold for implementation of raven control measures shall be any increases in raven numbers from baseline conditions, as detected by monitoring to be implemented pursuant to the Plan. Regardless of raven monitoring results, SCE shall be responsible for all other aspects of raven management described in the Raven Plan, such as avoidance and minimization of project-related trash, water sources, or perch/roost/nest sites that could contribute to increased raven numbers. In addition, to offset the cumulative contributions of the project to desert tortoise impacts from increased raven numbers, SCE shall con-tribute to the USFWS Regional Raven Management Program. SCE shall:

1. Prepare and Implement a Raven Management Plan that shall include, but shall not be limited to the following components. The Plan shall be reviewed and approved by CPUC, BLM, USFWS, and CDFW prior to the start of construction activities.

a. Identify all potential project activities, structures, components, and other effects that could provide predator subsidies or attractants, including potential sources of food and water, and nesting materials, as well as nest or perch sites. These will include, but will not be limited to: waste food material, road-killed animals, water storage, potential pooling from leaks, dust control, or wastewater, debris from brush clearing, and perch or roost sites on project facilities and infrastructure.

b. Describe management practices to avoid or minimize conditions that might increase raven numbers and predatory activities.

c. Appoint a qualified biologist who will implement a monitoring schedule and field methods for the purpose of locating any ravens present the project vicinity and detecting any increase in raven numbers or activity.

d. Specify raven activity thresholds for implementation of control measures.

e. Describe control practices for ravens to be implemented as needed based on the monitoring results.

f. Address monitoring and nest removal during construction and for the life of the project.

g. Describe reporting schedules and requirements.

2. Contribute to the USFWS Regional Raven Management Program. No later than 30 days prior to the start of construction, SCE shall contribute to the USFWS Regional Raven Management Program by making a one-time payment of $105 per acre of long-term or permanent project disturbance to the national Fish and Wildlife Federation Renewable Energy Action Team raven control account.

Implementation locations: This mitigation measure applies on BLM lands and is recommended on all Morongo Tribal Lands. No suitable desert tortoise habitat is present within San Bernardino County and the WR-MSHCP; therefore, this mitigation measure does not apply in these jurisdictions. In the CV-MSHCP, this mitigation measure shall apply in its entirety regardless of SCE's PSE status.

SCE Comment:

The raven nesting opportunities currently present on the WOD corridor would be reduced by the Proposed Project. Implementation of this plan during construction and post-construction restoration along with the payment into the USFWS Regional Raven Management Program will more than adequately reduce the potential impact to less than significant, without requiring that this plan apply to O&M activities. Additionally, this measure should only apply to acreage impacts in suitable desert tortoise habitat. If SCE decides to become a PSE in CV-MSHCP, take of desert tortoise will be obtained and fees for impacts will have already been paid. This measure should not apply to the portion of the project in the CV-MSHCP.

The preparation and implementation of a Raven Management Plan is typically required as a conservation or mitigation measure to minimize impacts to desert tortoise in a USFWS Biological Opinion or CDFW Incidental

Comment Set F3: Southern California Edison Company (cont.)

Take Statement, due to raven predation. Due to the limited distribution of desert tortoise individuals and habitat along the West of Devers Corridor and the existing nesting opportunities available (i.e. existing towers, billboards, trees, etc.), the existing conditions should be taken into consideration when developing the plan. **F3-182 cont.**

For the reasons discussed above, please make the following revisions:

WIL-2b Prepare and implement Raven Monitoring, Management, and Control Plan. SCE shall pre-pare and implement a Raven Monitoring, Management, and Control Plan (Raven Plan) consistent with USFWS raven management guidelines and that meets the approval of the CPUC and BLM in consultation with USFWS, and CDFW. The purpose of the Raven Plan shall be to minimize project-related predator subsidies and prevent any increases in raven numbers or activity within desert tortoise habitat during construction, and restoration~~, and O&M~~ phases. The Plan shall address all project components and their potential effects on raven numbers and activity. The threshold for implementation of raven control measures shall be any increases in raven numbers from baseline conditions, as detected by monitoring to be implemented pursuant to the Plan. Regardless of raven monitoring results, SCE shall be responsible for all other aspects of raven management described in the Raven Plan, such as avoidance and minimization of project-related trash, water sources, or perch/roost/nest sites that could contribute to increased raven numbers. In addition, to offset the cumulative contributions of the project to desert tortoise impacts from increased raven numbers, SCE shall con-tribute to the USFWS Regional Raven Management Program. SCE shall:

1. Prepare and Implement a Raven Management Plan that may ~~shall~~ include, but ~~shall~~ may not be limited to the following components. The plan will outline clear objectives and take into consideration the existing raven nesting opportunities and low distribution of desert tortoise within and adjacent to the ROW. The Plan shall be reviewed and approved by CPUC, BLM, USFWS, and CDFW prior to the start of construction activities.

a. Identify all potential project activities, structures, components, and other effects that could provide predator subsidies or attractants, including potential sources of food and water, and nesting materials, as well as nest or perch sites. These will include, but will not be limited to: waste food material, road-killed animals, water storage, potential pooling from leaks, dust control, or wastewater, debris from brush clearing, and perch or roost sites on project facilities and infrastructure.

b. Describe management practices to avoid or minimize conditions that might increase raven numbers and predatory activities.

c. Appoint a qualified biologist who will implement a monitoring schedule and field methods for the purpose of locating any ravens present the project vicinity and detecting any increase in raven numbers or activity.

d. Specify raven activity thresholds for implementation of control measures.

e. Describe control practices for ravens to be implemented as needed based on the monitoring results. f. Address monitoring and nest removal during construction and for the life of the project.

g. Describe reporting schedules and requirements.

2. Contribute to the USFWS Regional Raven Management Program. No later than 30 days prior to the start of construction, SCE shall contribute to the USFWS Regional Raven Management Program by making a one-time payment of $105 per acre of long-term or permanent project disturbance to the national Fish and Wildlife Federation Renewable Energy Action Team raven control account.

Implementation locations: This mitigation measure applies to impacts to suitable habitat on BLM lands and is recommended for all impacts to suitable habitat on all Morongo Tribal Lands. No suitable desert tortoise habitat is present within San Bernardino County and the WR-MSHCP; therefore, this mitigation measure does not apply in these jurisdictions. ~~In the CV-MSHCP,~~ This mitigation measure shall apply in its entirety to the CV-MSHCP area if SCE chooses not to become a ~~regardless of SCE's~~ PSE.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

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DEIR/DEIS Text: F3-183

WIL-2c Conduct surveys and avoidance for threatened or endangered riparian birds.

Construction activities shall avoid suitable habitat for listed riparian birds. If suitable habitat cannot be avoided, SCE shall consult with CDFW and USFWS and obtain appropriate take authorizations or permits. SCE shall implement the conservation measures contained within these permits. If construction activities will occur during the breeding season potentially suitable habitat for listed riparian birds, a qualified biologist shall conduct protocol surveys of the project area and adjacent areas within 500 feet. USFWS protocol surveys shall be conducted for southwestern willow flycatcher, yellow-billed cuckoo, and least Bell's vireo. The surveys shall be of adequate duration to verify potential nest sites if work is scheduled to occur during the breeding season. Where protocol surveys determine that listed riparian birds are present, SCE shall conduct additional focused nest location surveys, to determine the locations of nests and territories. Survey areas shall include a 500-foot buffer around project disturbance areas.

Protocol surveys, shall be conducted within one year prior to the start of construction and shall continue annually during each nesting season until completion of construction and restoration activities. At a minimum, surveys shall be conducted from 15 May to 17 July for southwestern willow flycatcher, from 10 April to 31 July for least Bell's vireo, and from 1 June to 31 August for yellow-billed cuckoo.

These surveys may be modified through coordination with the USFWS, CDFW, BLM, and the CPUC based on the condition of habitat, the observation of the species, or avoidance of riparian areas during the breeding season. SCE shall submit documentation providing results of the protocol surveys for listed riparian birds to the CPUC and BLM for review and approval in consultation with USFWS and CDFW.

If an active breeding territory or nest is confirmed, the CPUC, BLM, USFWS, and CDFW shall be notified immediately. All active nests shall be monitored on a weekly basis until the nestlings fledge or the nest becomes inactive. SCE shall provide monitoring reports to the CPUC and BLM for review in consultation with USFWS and CDFW.

In coordination with the USFWS and CDFW, a 500-foot disturbance-free ground buffer and 1,000-foot vertical helicopter buffer shall be established around the active nest and demarcated by fencing or flagging. No construction or vehicle traffic shall occur within nest buffers.

If an active breeding territory or nest is confirmed within 500 feet of any project activity site, SCE shall prepare and implement a Wildlife Noise Monitoring Plan throughout construction and demolition activities taking place while listed riparian birds occupy the nesting territory. Sound levels at the nest sites shall not exceed 8 dBA above ambient levels or 70 dBA (hourly average Leq), whichever is greater. Ambient levels will be established prior to initiation of construction and demolition, using the same methodology that will be used to take noise measurements during monitoring.

If the hourly average noise threshold is exceeded, or if the biological monitor determines that construction activities are disturbing nesting birds, additional noise reduction techniques shall be implemented to reduce project noise below the thresholds. Additional noise monitoring will be conducted to verify the reduction of noise levels below the thresholds. Noise reduction techniques can include, but are not limited to:

- Temporary noise barriers or sound walls
- Noise pads or dampers
- Replace and update noisy equipment
- Moveable task noise barriers
- Queue trucks to distribute idling noise
- Locate vehicle access points and loading and shipping facilities away from the nest site
- Reduce the number of noisy activities that occur simultaneously
- Relocate noisy stationary equipment away from the nest sites

Implementation locations: This mitigation measure applies on BLM lands, throughout the WR-MSHCP and CV-MSHCP areas (regardless of SCE's PSE status), and within San Bernardino County, and is recommended on all Morongo Tribal Lands.

Comment Set F3: Southern California Edison Company (cont.)

SCE Comment: F3-183 cont.

If SCE obtains PSE Status, yearly protocol surveys may not be required, in addition conditions of the Certificate of Inclusion or the Biological opinion should apply to the project and supersede requirements outlined in this measure intended to protect the species.

WIL-2c Conduct surveys and avoidance for threatened or endangered riparian birds. Construction activities shall avoid suitable habitat for listed riparian birds. If suitable habitat cannot be avoided, SCE shall consult with CDFW and USFWS and obtain appropriate take authorizations or permits. SCE shall implement the conservation measures contained within these permits.

If construction activities will occur during the breeding season potentially suitable habitat for listed riparian birds, a qualified biologist shall conduct protocol surveys of the project area and adjacent areas within 500 feet. USFWS protocol surveys shall be conducted for southwestern willow flycatcher, yellow-billed cuckoo, and least Bell's vireo. The surveys shall be of adequate duration to verify potential nest sites if work is scheduled to occur du-ring the breeding season. Where protocol surveys determine that listed riparian birds are present, SCE shall conduct additional focused nest location surveys, to determine the locations of nests and territories. Survey areas shall include a 500-foot buffer around project disturbance areas.

Protocol surveys, shall be conducted within one year prior to the start of construction and shall continue annually during each nesting season until occupied habitat is established, or as otherwise required by USFWS or through WR-MSHCP participation.. ~~completion of construction and restoration activities. At a minimum, surveys shall be conducted from 15 May to 17 July for southwestern willow flycatcher, from 10 April to 31 July for least Bell's vireo, and from 1 June to 31 August for yellow-billed cuckoo.~~

These surveys may be modified through coordination with the USFWS, CDFW, BLM, and the CPUC based on the condition of habitat, the observation of the species, or avoidance of riparian areas during the breeding season. SCE shall submit documentation providing results of the protocol surveys for listed riparian birds to the CPUC and BLM for review and approval in consultation with USFWS and CDFW.

If an active breeding territory or nest is confirmed, the CPUC, BLM, USFWS, and CDFW shall be notified immediately. All active nests shall be monitored on a weekly basis or as otherwise required by USFWS, CDFW, or through WR-MSHCP participation, until the nestlings fledge or the nest becomes inactive. SCE shall provide monitoring reports to the CPUC and BLM for review in consultation with USFWS and CDFW.

In coordination with the USFWS and CDFW, a 500-foot disturbance-free ground buffer and ~~1,000~~ 500-foot vertical helicopter disturbance-free buffer shall be established around the active nest and demarcated by fencing or flagging. These buffers may be adjusted in consultation with USFWS and CDFW based on the type of work activity performed. No construction or vehicle traffic shall occur within nest buffers, except on existing paved public roads.

If an active breeding territory or nest is confirmed within 500 feet of any project activity site, SCE shall monitor the nesting bird to evaluate impacts to the bird. If the construction, and associated noise, impacts nesting in the opinion of the qualified nesting bird monitor, construction within 500 feet will discontinue. If construction is to continue, prepare and implement a Wildlife Noise Monitoring Plan throughout construction and demolition activities taking place while listed riparian birds occupy the nesting territory. Sound levels at the nest sites shall not exceed 8 dBA above ambient levels or 70 dBA (hourly average Leq), whichever is greater. Ambient levels will be established prior to initiation of construction and demolition, using the same methodology that will be used to take noise measurements during monitoring.

If the hourly average noise threshold is exceeded, or if the biological monitor determines that construction activities are disturbing nesting birds, additional noise reduction techniques shall be implemented to reduce project noise below the thresholds. Additional noise monitoring will be conducted to verify the reduction of noise levels below the thresholds. Noise reduction techniques can include, but are not limited to:

- Temporary noise barriers or sound walls
- Noise pads or dampers
- Replace and update noisy equipment
- Moveable task noise barriers
- Queue trucks to distribute idling noise
- Locate vehicle access points and loading and shipping facilities away from the nest site

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

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- Reduce the number of noisy activities that occur simultaneously
- Relocate noisy stationary equipment away from the nest sites

Implementation locations: ~~This mitigation measure applies on BLM lands, throughout the WR-MSHCP and CV-MSHCP areas (regardless of SCE's PSE status), and within San Bernardino County, and is recommended on all Morongo Tribal Lands.~~

This mitigation measure applies to all locations within San Bernardino County and on all BLM lands, and is recommended for implementation on all tribal lands. Within the WR-MSHCP and CV-MSHCP areas, if SCE does not obtain PSE status under the applicable MSHCP, this mitigation measure shall apply within the MSHCP area. If SCE obtains PSE status under either MSHCP, the project's impacts to threatened or endangered riparian birds will be mitigated according to the requirements of the MSHCP and this mitigation measure will not apply within the applicable MSHCP area.

Comment Set F3: Southern California Edison Company (cont.)

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DEIR/DEIS Text: F3-184

WIL-2e Conduct surveys and avoidance for coastal California gnatcatcher. SCE shall conduct proto-col level surveys for coastal California gnatcatchers (CAGN) in all areas of coastal sage scrub habitat that may be affected by the project. Survey areas will include a 500-foot buffer around project disturbance areas. Presence or absence of CAGN shall be determined prior to construction activities. In occupied CAGN habitat, SCE shall conduct additional focused nest location surveys to determine the locations of nests and territories. Survey areas shall include a 500-foot buffer around project disturbance areas.

Surveys shall be conducted by qualified and permitted biologists. Surveys shall be of adequate duration to verify potential nest sites if work is scheduled to occur during the breeding season. Prior to construction, SCE shall submit documentation providing the results of the pre-construction focused surveys for CAGN to the CPUC and BLM for review and approval in consultation with USFWS and CDFW.

Protocol or focused nest location surveys, as appropriate, shall be conducted within one year prior to the start of construction and shall continue annually until completion of construction and restoration activities.

If an active breeding territory or nest is confirmed, the CPUC, BLM, USFWS, and CDFW shall be notified immediately and the observation will be included in the daily monitoring report. All active nests shall be monitored on a weekly basis until the nestlings fledge or the nest becomes inactive. SCE shall provide monitoring reports to the CPUC and BLM for review on a weekly basis.

In coordination with the USFWS and CDFW, a 500-foot disturbance-free ground buffer and 1,000-foot vertical helicopter buffer shall be established around the active nest and demarcated by fencing or flagging. No construction or vehicle traffic shall occur within nest buffers.

If an active breeding territory or nest is confirmed within 500 feet of any project activity site, SCE shall prepare and implement a Wildlife Noise Monitoring Plan throughout construction and demolition activities taking place while CAGN occupy the nesting territory. Sound levels at the nest sites shall not exceed 8 dBA above ambient levels or 70 dBA (hourly average Leq), whichever is greater. Ambient levels will be established prior to initiation of construction and demolition, using the same methodology that will be used to take noise measurements during monitoring.

If the hourly average noise threshold is exceeded, or if the biological monitor determines that construction activities are disturbing nesting CAGN, additional noise reduction techniques shall be implemented to reduce project noise below the thresholds. Additional noise monitoring will be conducted to verify the reduction of noise levels below the thresholds. Noise reduction techniques can include, but are not limited to:

- Temporary noise barriers or sound walls
- Noise pads or dampers
- Replace and update noisy equipment
- Moveable task noise barriers
- Queue trucks to distribute idling noise
- Locate vehicle access points and loading and shipping facilities away from the nest site
- Reduce the number of noisy activities that occur simultaneously
- Relocate noisy stationary equipment away from the nest sites

Construction activities shall avoid suitable habitat for CAGN, to the extent feasible. If suit-able habitat cannot be avoided, SCE shall consult with CDFW and USFWS to obtain appropriate take authorization or permits. SCE shall implement the conservation measures contained within these permits.

Implementation locations: This mitigation measure shall apply within San Bernardino County, throughout the WR-MSHCP lands (regardless of SCE's PSE status), and is recommended within Morongo Tribal Lands. No suitable CAGN habitat is present in the CV-MSHCP portions of the ROW or on BLM land, so this mitigation measure shall not apply within those areas.

SCE Comment:

Participation in the WR-MSHCP as a PSE may result in different mitigation measure requirements. Language added to allow consistency with WR-MSHCP requirements if SCE becomes a PSE:

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

F3-184 cont.

WIL-2e Conduct surveys and avoidance for coastal California gnatcatcher. SCE shall conduct proto-col level surveys for coastal California gnatcatchers (CAGN) in all areas of coastal sage scrub habitat that may be affected by the project, unless otherwise required as a PSE under the WR-MSHCP or CV-MSHCP. Survey areas will include a 500-foot buffer around project disturbance areas. Presence or absence of CAGN shall be determined prior to construction activities. In occupied CAGN habitat, SCE shall conduct additional focused nest location surveys to determine the locations of nests and territories. Survey areas shall include a 500-foot buffer around project disturbance areas.

Surveys shall be conducted by qualified and permitted biologists. Surveys shall be of adequate duration to verify potential nest sites if work is scheduled to occur during the breeding season. Prior to construction, SCE shall submit documentation providing the results of the pre-construction focused surveys for CAGN to the CPUC and BLM for review and approval in consultation with USFWS and CDFW.

Protocol or focused nest location surveys, as appropriate, shall be conducted within one year prior to the start of construction and shall continue annually until completion of construction and restoration activities, or as otherwise required by USFWS or through WR-MSHCP participation.

If an active breeding territory or nest is confirmed, the CPUC, BLM, USFWS, and CDFW shall be notified immediately and the observation will be included in the daily monitoring report. All active nests shall be monitored on a weekly basis or as otherwise required by USFWS or through WR-MSHCP participation until the nestlings fledge or the nest becomes inactive. SCE shall provide monitoring reports to the CPUC and BLM for review on a weekly basis.

In coordination with the USFWS and CDFW, a 500-foot disturbance-free ground buffer and ~~1,000~~ 500-foot vertical helicopter disturbance-free buffer shall be established around the active nest and demarcated by fencing or flagging. These buffers may be adjusted in consultation with USFWS and CDFW based on type of work activity performed. No construction or vehicle traffic shall occur within nest buffers, except on existing paved public roads.

If an active breeding territory or nest is confirmed within 500 feet of any project activity site, SCE shall monitor the nesting bird to evaluate impacts to the bird. If the construction, and associated noise, impacts nesting in the opinion of the authorized nesting bird monitor, construction within 500 feet will discontinue. If construction is to continue, shall prepare and implement a Wildlife Noise Monitoring Plan throughout construction and demolition activities taking place while CAGN occupy the nesting territory. Sound levels at the nest sites shall not exceed 8 dBA above ambient levels or 70 dBA (hourly average Leq), whichever is greater. Ambient levels will be established prior to initiation of construction and demolition, using the same methodology that will be used to take noise measurements during monitoring.

If the hourly average noise threshold is exceeded, or if the biological monitor determines that construction activities are disturbing nesting CAGN, additional noise reduction techniques shall be implemented to reduce project noise below the thresholds. Additional noise monitoring will be conducted to verify the reduction of noise levels below the thresholds. Noise reduction techniques can include, but are not limited to:

- Temporary noise barriers or sound walls
- Noise pads or dampers
- Replace and update noisy equipment
- Moveable task noise barriers
- Queue trucks to distribute idling noise
- Locate vehicle access points and loading and shipping facilities away from the nest site
- Reduce the number of noisy activities that occur simultaneously
- Relocate noisy stationary equipment away from the nest sites

Construction activities shall avoid ~~suitable~~occupied habitat for CAGN, to the extent feasible. If ~~suitable~~occupied habitat cannot be avoided, SCE shall consult with CDFW and USFWS to obtain appropriate take authorization, ~~or~~ permits, and/or PSE Status. SCE shall implement the conservation measures contained within these permits.

Implementation locations: This mitigation measure shall apply within San Bernardino County, throughout the WR-MSHCP lands (regardless of SCE's PSE status), and is recommended within Morongo Tribal Lands. No suitable CAGN habitat is present in the CV-MSHCP portions of the ROW or on BLM land, so this mitigation measure shall not apply within those areas.

Comment Set F3: Southern California Edison Company (cont.)

This mitigation measure applies to all locations within San Bernardino County and on all BLM lands, and is recommended for implementation on all tribal lands. Within the WR-MSHCP and CV-MSHCP areas, if SCE does not obtain PSE status under the applicable MSHCP, this mitigation measure shall apply within the MSHCP area. If SCE obtains PSE status under either MSHCP, the project's impacts to CAGN will be mitigated according to the requirements of the MSHCP and this mitigation measure will not apply within the applicable MSHCP area. **F3-184**

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

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DEIR/DEIS Text: F3-185

WIL-2f Conduct surveys and avoidance for golden eagle. SCE shall implement the following measures to document golden eagle occurrence in the project area and surrounding mountains. Survey schedule and requirements will be as identified below unless otherwise authorized by the CPUC and BLM in consultation with the USFWS and CDFW.

- **Annual Winter and Nesting Season Surveys.** Beginning at least one year prior to the start of construction, and continuing throughout the construction phase of the project, SCE shall contract with a qualified and permitted biologist to conduct winter season and nesting season surveys of golden eagle habitat use within a 10-mile radius of the project area. Nesting season surveys will determine occupancy, productivity, and chronology of known or newly discovered nesting territories within the 10-mile radius. Survey methods for the inventory shall be either ground-based or helicopter-based, as described in the Golden Eagle Technical Guidance (Pagel et al., 2010) or more current guidance from the USFWS. Winter surveys will evaluate golden eagle occurrence and habitat use within the 10-mile radius during winter.
- **Winter Season Survey Data.** Data collected during winter season surveys shall include dates, times, locations, observation minutes, nest status, and weather conditions during field surveys; panoramic photographs from the survey locations, indicating areas viewed; and compilations of all golden eagle and other raptor observations for each survey date.
- **Nesting Season Inventory Data.** At a minimum, data collected during the nesting season surveys shall include the following: territory status (unknown, vacant, occupied, breeding successful, breeding unsuccessful); nest location, nest elevation; age class of golden eagles observed; nesting chronology; number of young at each visit; photographs; and substrate upon which nest is placed.
- **Determination of Unoccupied Territory Status.** A nesting territory or inventoried habitat shall be considered unoccupied by golden eagles only after completing at least two full surveys in a single breeding season.
- **Monitoring and Adaptive Management Plan.** If an occupied nest (as defined by Pagel et al., 2010) is detected within 10 miles of the project, SCE shall prepare and implement a Golden Eagle Monitoring and Management Plan for the duration of construction to ensure that project construction activities do not result in injury or disturbance to golden eagles. The monitoring shall implement the guidelines described in the Golden Eagle Technical Guidance (Pagel et al., 2010) or more current guidance from the USFWS. The Monitoring and Management Plan shall be implemented upon its approval by CPUC and BLM, in consultation with USFWS and CDFW. Triggers for adaptive management shall include any evidence of project-related disturbance to nesting golden eagles, including but not limited to: agitation behavior (displacement, avoidance, and defense); increased vigilance behavior at nest sites; changes in foraging and feeding behavior, or nest site abandonment. The Monitoring and Management Plan shall include a description of adaptive management actions, to include, but not be limited to, cessation of construction activities that are deemed by a qualified biologist to be the source of golden eagle disturbance.
- **Reporting.** Golden eagle survey data and, if applicable, nest activity monitoring results and any adaptive management actions taken, will be provided to CPUC, BLM, CDFW, and USFWS in monthly monitoring reports, as seasonal data becomes available and if specific nest monitoring or any adaptive management actions are taken, and summarized in annual project monitoring reports.

SCE Comment:

This measure has been written for a wind energy project rather than a transmission line project. The following edits to the plan have been made for the following reasons:

- Winter surveys are not required for transmission lines and should be removed from the mitigation measure. (Please consult with Ms. Heather Beeler at USFWS regarding this measure.)
- Transmission line projects are required to perform a 2 mile buffer survey on projects, as recommended by USFWS.
- There is no required permit to performing golden eagle surveys, just a biologist that meets the qualifications of USFWS to perform golden eagle surveys.
- A monitoring and adaptive management plan is not necessary for this project as SCE will implement a 1 mile line of sight, 1/2 mile no line of sight buffer for all active eagle nests as recommended by USFWS.

Comment Set F3: Southern California Edison Company (cont.)

F3-185 cont.

Please see below for suggested revisions:

WIL-2f Conduct surveys and avoidance for golden eagle. SCE shall implement the following measures to avoid impacts to ~~document~~ golden eagles ~~occurrence~~ in the project area and surrounding mountains. Survey schedule and requirements will be as identified below unless otherwise authorized by the CPUC and BLM in consultation with the USFWS and CDFW.

- **Annual ~~Winter and~~ Nesting Season Surveys.** Beginning at least one year prior to the start of construction, and continuing throughout the construction phase of the project, SCE shall contract with a qualified ~~and permitted~~ biologist to conduct ~~winter season and~~ nesting season surveys of golden eagle habitat use within a 2~~10~~-mile radius of the project area. Nesting season surveys will determine occupancy, productivity, and chronology of known or newly discovered nesting territories within the 2 ~~10~~-mile radius. Survey methods for the inventory shall be either ground-based or helicopter-based, as described in the Golden Eagle Technical Guidance (Pagel et al., 2010) or more current guidance from the USFWS. ~~Winter surveys will evaluate golden eagle occurrence and habitat use within the 10-mile radius during winter.~~
- ~~**Winter Season Survey Data.** Data collected during winter season surveys shall include dates, times, locations, observation minutes, nest status, and weather conditions during field surveys; panoramic photographs from the survey locations, indicating areas viewed; and compilations of all golden eagle and other raptor observations for each survey date.~~
- **Nesting Season Inventory Data.** At a minimum, data collected during the nesting season surveys shall include the following: territory status (unknown, vacant, occupied, breeding successful, breeding unsuccessful); nest location, nest elevation; age class of golden eagles observed; nesting chronology; number of young at each visit; photographs; and substrate upon which nest is placed.
- **Determination of Unoccupied Territory Status.** A nesting territory or inventoried habitat shall be considered unoccupied by golden eagles only after completing at least two full surveys in a single breeding season.
- **Monitoring and Avoidance ~~Adaptive Management Plan~~.** If an occupied nest (as defined by Pagel et al., 2010) is detected within 2 miles of the project, SCE shall implement a 1 mile line of sight avoidance buffer, or 1/2 mile non line of sight avoidance buffer for all active eagle nests, as recommended by USFWS. The nest will be monitored weekly when active construction activities occur within 2 miles of the nest. The buffer will be implemented around the occupied nest until a qualified biologist determines the nest is no longer occupied. This buffer may be modified in consultation with CPUC, BLM and USFWS.
- ~~**Monitoring and Adaptive Management Plan.** If an occupied nest (as defined by Pagel et al., 2010) is detected within 10 miles of the project, SCE shall prepare and implement a Golden Eagle Monitoring and Management Plan for the duration of construction to ensure that project construction activities do not result in injury or disturbance to golden eagles. The monitoring shall implement the guidelines described in the Golden Eagle Technical Guidance (Pagel et al., 2010) or more current guidance from the USFWS. The Monitoring and Management Plan shall be implemented upon its approval by CPUC and BLM, in consultation with USFWS and CDFW. Triggers for adaptive management shall include any evidence of project-related disturbance to nesting golden eagles, including but not limited to: agitation behavior (displacement, avoidance, and defense); increased vigilance behavior at nest sites; changes in foraging and feeding behavior, or nest site abandonment. The Monitoring and Management Plan shall include a description of adaptive management actions, to include, but not be limited to, cessation of construction activities that are deemed by a qualified biologist to be the source of golden eagle disturbance.~~
- **Reporting.** Golden eagle survey data and, if applicable, nest activity monitoring results and any adaptive management actions taken, will be provided to CPUC, BLM, CDFW, and USFWS in monthly monitoring reports, as seasonal data becomes available and if specific nest monitoring or any adaptive management actions are taken, and summarized in annual project monitoring reports.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

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DEIR/DEIS Text: F3-186

WIL-2g: Conduct surveys and avoidance for burrowing owl

Paragraph 2

"If active burrowing owl burrows are located within project work areas, SCE may passively relocate the owls, outside the nesting season only, by preparing and implementing a Burrowing Owl Passive Relocation Plan, as described below."

An occupied burrow may not be disturbed during the nesting season (generally, but not limited to, February 1 to August 31), unless a qualified biologist determines, by non-invasive methods, that it is not occupied by a mated pair.

SCE Comment:

Clarification to burrowing owl relocation methods below.

Suggested Revision:

If active burrowing owl burrows are located within project work areas, SCE may passively relocate the owls, outside the nesting season only, by preparing and implementing a Burrowing Owl Passive Relocation Plan, as described below. The active burrowing owl burrow may be relocated during nesting season if a qualified biologist determines, by non-invasive methods, that it is not occupied by a mated pair.

Page D.5-57

DEIR/DEIS Text: F3-187

Wil-2i. Conduct surveys and avoidance for bats.

Non-special status bats.

Any active bat roosts will be identified and clearly marked. An exclusion area will be established 165 feet from any active roost, and these areas will be avoided during construction.

Conduct surveys and avoidance for bats

Special status bats.

If special-status bat species occur at these roosting/nursery sites, then construction activities shall avoid these sites and a surrounding buffer distance of 300 feet.

SCE Comment:

In order to clarify the description of "active bat roost," please make the following revisions:

Wil-2i. Conduct surveys and avoidance for bats.

Non-special status bats.

Any active bat maternity roosts and occupied hibernaculum will be identified and clearly marked. An exclusion area will be established 165 feet from any active roost, and these areas will be avoided during construction.

Conduct surveys and avoidance for bats. Special status bats.

If special-status bat species maternity roosts or occupied hibernaculum occur ~~at these roosting/nursery sites~~, then construction activities shall avoid these sites and a surrounding buffer distance of 300 feet.

Comment Set F3: Southern California Edison Company (cont.)

Page D.5-57

DEIR/DEIS Text: F3-188

WIL-2h Conduct surveys and avoidance for special-status terrestrial herpetofauna. Biological monitors shall conduct clearance surveys for terrestrial herpetofauna prior to construction each day, monitor construction activities for compliance, and submit monitoring reports to the CPUC and BLM for review on a weekly basis. Following the clearance surveys, either (1) exclusion fencing will be erected or (2) a biological monitor will be on the site during construction activities, to prevent take of special-status herpetofauna. If the installation of exclusion fencing is deemed necessary, the biological monitor shall direct the installation of the fence.

If any terrestrial herpetofauna are found on the construction site, the animal will be allowed to move away from the construction site on its own, or a qualified biologist will relocate it nearby suitable habitat outside the construction area and place it in the shade of a shrub. If potentially suitable burrows or rock piles are found, they will be checked for occupancy. Occupied burrows will be flagged and avoided (employing a 50-foot buffer) during construction. If the burrow cannot be avoided, it will be excavated and the occupant relocated to an unoccupied burrow outside the construction area and of approximately the same size as the one from which it was removed. If an existing burrow is unavailable, the biologist will construct or direct the construction of a burrow of similar shape, size, depth, and orientation as the original.

SCE Comment:

This measure should only apply in areas with suitable habitat for special-status terrestrial herpetofauna. The following revisions are suggested:

WIL-2h Conduct surveys and avoidance for special-status terrestrial herpetofauna. Biological monitors shall conduct clearance surveys in <u>areas with suitable habitat for special-status</u> terrestrial herpetofauna prior to construction each day, monitor construction activities for compliance, and submit monitoring reports to the CPUC and BLM for review on a weekly basis. Following the clearance surveys, either (1) exclusion fencing will be erected or (2) a biological monitor will be on the site during construction activities, to prevent take of special-status herpetofauna. If the installation of exclusion fencing is deemed necessary, the biological monitor shall direct the installation of the fence.

If any terrestrial herpetofauna are found on the construction site, the animal will be allowed to move away from the construction site on its own, or a qualified biologist will relocate it nearby suitable habitat outside the construction area and place it in the shade of a shrub. If potentially suitable burrows or rock piles are found, they will be checked for occupancy. Occupied burrows will be flagged and avoided (employing a 50-foot buffer) during construction. If the burrow cannot be avoided, it will be excavated and the occupant relocated to an unoccupied burrow outside the construction area and of approximately the same size as the one from which it was removed. If an existing burrow is unavailable, the biologist will construct or direct the construction of a burrow of similar shape, size, depth, and orientation as the original.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

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DEIR/DEIS Text: F3-189

WIL-2j Conduct surveys and avoidance for special-status small mammals. SCE shall implement pre-construction surveys for special-status small mammals including San Diego black-tailed jackrabbit, northwestern San Diego pocket, pallid San Diego pocket mouse, Palm Springs pocket mouse, Los Angeles pocket mouse, Palm Springs round-tailed ground squirrel, and San Diego desert woodrat in suitable habitats. SCE shall submit documentation providing pre-construction survey results to the CPUC and BLM for review and approval in consultation with CDFW and USFWS. Prior to initiating construction-related activities, SCE shall pre-pare and implement construction minimization measures and habitat conservation measures for review and approval by CPUC and BLM in consultation with USFWS and CDFW to minimize habitat loss and potential take.

Active woodrat nests that may be occupied by *Neotoma lepida* shall be flagged and ground-disturbing activities shall be avoided within a minimum of 10 feet surrounding each active nest unless otherwise authorized by the CDFW and CPUC. If avoidance is not possible, SCE shall take the following sequential steps: (1) all understory vegetation will be cleared in the area immediately surrounding active nests followed by a period of one night without further disturbance to allow woodrats to vacate the nest, (2) each occupied nest will then be disturbed by a qualified wildlife biologist until all woodrats leave the nest and seek refuge off-site, and (3) the nest sticks shall be removed from the project site and piled at the base of a nearby shrub or tree. Relocated nests shall not be spaced closer than 100 feet apart, unless a qualified wildlife biologist has determined that a specific habitat can support a higher density of nests. SCE shall document all woodrat nests moved in weekly monitoring reports, and will include a written summary in each annual report to the CPUC, BLM, and CDFW. The resumes of the qualified biologists shall be provided to the CPUC and BLM (as appropriate) for concurrence.

Implementation locations: This mitigation measure shall apply within San Bernardino County, on BLM lands, within the WR-MSHCP and CV-MSHCP areas (regardless of SCE's PSE status), and is recommended within Morongo Tribal Lands.

SCE Comment:

To clarify the instance of the San Diego desert Woodrat, please make the following revision:

WIL-2j Conduct surveys and avoidance for special-status small mammals. SCE shall implement pre-construction surveys for special-status small mammals including San Diego black-tailed jackrabbit, northwestern San Diego pocket, pallid San Diego pocket mouse, Palm Springs pocket mouse, Los Angeles pocket mouse, Palm Springs round-tailed ground squirrel, and San Diego desert woodrat in suitable habitats. SCE shall submit documentation providing pre-construction survey results to the CPUC and BLM for review and approval in consultation with CDFW and USFWS. Prior to initiating construction-related activities, SCE shall pre-pare and implement construction minimization measures and habitat conservation measures for review and approval by CPUC and BLM in consultation with USFWS and CDFW to minimize habitat loss and potential take.

Active woodrat nests that may be occupied by <u>San Diego desert woodrat *(Neotoma lepida intermedia)*</u> shall be flagged and ground-disturbing activities shall be avoided within a minimum of 10 feet surrounding each active nest unless otherwise authorized by the CDFW and CPUC. If avoidance is not possible, SCE shall take the following sequential steps: (1) all understory vegetation will be cleared in the area immediately surrounding active nests followed by a period of one night without further disturbance to allow woodrats to vacate the nest, (2) each occupied nest will then be disturbed by a qualified wildlife biologist until all woodrats leave the nest and seek refuge off-site, and (3) the nest sticks shall be removed from the project site and piled at the base of a nearby shrub or tree. Relocated nests shall not be spaced closer than 100 feet apart, unless a qualified wildlife biologist has determined that a specific habitat can support a higher density of nests. SCE shall document all woodrat nests moved in weekly monitoring reports, and will include a written summary in each annual report to the CPUC, BLM, and CDFW. The resumes of the qualified biologists shall be provided to the CPUC and BLM (as appropriate) for concurrence. <u>The San Diego desert woodrat is a covered species under the WR-MSHCP. If SCE becomes a PSE under the WR-MSHCP, woodrat nest avoidance would be implemented where practicable, however, this mitigation would not be required, as is consistent with the WR-MSHCP.</u>

Implementation locations: This mitigation measure shall apply within San Bernardino County, on BLM lands, within the WR-MSHCP <u>(only if SCE does not obtain PSE status),</u> and CV-MSHCP areas (regardless of SCE's PSE status), and is recommended within Morongo Tribal Lands

Comment Set F3: Southern California Edison Company (cont.)

Page D.5-59

DEIR/DEIS Text: F3-190

WIL-2k. Conduct surveys and avoidance for American badger, ringtail, and desert kit fox.

Active dens shall be flagged and project activities within 200 feet (non-natal dens) or 500 feet (natal dens, or any active den during the breeding season) shall be avoided.

SCE Comment:

200 feet and 500 feet are excessive buffers. Recent projects have successfully implemented a 100ft buffer. SCE suggests the following revisions:

WIL-2k. Conduct surveys and avoidance for American badger, ringtail, and desert kit fox.

Active dens shall be flagged and project construction activities within ~~200 feet (non-natal dens) or 500~~ 100 feet (non-natal den, natal dens, or any active den during the breeding season) shall be avoided. Ingress/egress of construction equipment through buffers and low intensity activities such as BMP maintenance shall be exempt from the buffer restrictions.

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DEIR/DEIS Text: F3-191

WIL-2k: Conduct surveys and avoidance for American badger, ringtail, and desert kit fox

Paragraph 4

Active and potentially active non-natal dens. Outside the breeding season, any potentially active dens that would be directly impacted by construction activities shall be monitored by a qualified mammologist or biologist for three consecutive nights using a tracking medium (such as diatomaceous earth or fire clay) or infrared camera stations at the entrance. If no tracks are observed in the tracking medium or no photos of the target species are captured after three nights, the den may be excavated and backfilled by hand. If tracks are observed, the den may be progressively blocked with natural materials (rocks, dirt, sticks, and vegetation piled in front of the entrance) for the next three to five nights to discourage continued use. After verification that the den is no longer active, the den may be excavated and back-filled by hand.

SCE Comment:

For additional clarification, please make the following revision::

Active and potentially active non-natal dens. Outside the breeding season, any potentially active dens that would be directly impacted by construction activities shall be monitored by a qualified mammologist or biologist for three consecutive nights using a tracking medium (such as diatomaceous earth or fire clay) or infrared camera stations at the entrance. If no tracks are observed in the tracking medium or no photos of the target species are captured after three nights, the den may be excavated and backfilled by hand. If tracks are observed, the den may be progressively blocked with natural materials (rocks, dirt, sticks, and vegetation piled in front of the entrance) or a one-way door installed over the den entrance for the next three to five nights to discourage continued use. After verification that the den is no longer active, the den may be excavated and back-filled by hand.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.5-83

DEIR/DEIS Text: F3-192

Table D.5-6. Mitigation Monitoring Program – Biological Resources, Wildlife

Effectiveness Criteria	Avoid take of desert tortoise.
Responsible Agency	CPUC; BLM Palm Springs–South Coast Field Office in coordination with CDFW and USFWS.
Timing	Within 14 days prior to construction, and during construction.
MITIGATION MEASURE	**WIL-2b: Prepare and implement Raven Monitoring, Management, and Control Plan (full text in Section D.5.3.3)**
Location	All areas with suitable desert tortoise habitat.
Monitoring / Reporting Action	SCE submits a Raven Monitoring, Management, and Control Plan; CPUC/BLM monitor approves report format and contents in consultation with CDFW and USFWS.
Effectiveness Criteria	Minimize project-related predator subsidies and prevent increases in raven numbers or activity within desert tortoise habitat.
Responsible Agency	CPUC; BLM Palm Springs–South Coast Field Office in coordination with CDFW and USFWS.
Timing	Prior to the start of construction, and during construction, restoration, and O&M phases.

SCE Comment:

The raven nesting opportunities currently present on the WOD corridor would be reduced by the Proposed Project. Implementation of this plan during construction and post-construction restoration along with the payment into the USFWS Regional Raven Management Program will more than adequately reduce the potential impact to less than significant without requiring this plan to apply to O&M activities.

Please make the following revision:

Table D.5-6. Mitigation Monitoring Program – Biological Resources, Wildlife

Effectiveness Criteria	Avoid take of desert tortoise.
Responsible Agency	CPUC; BLM Palm Springs–South Coast Field Office in coordination with CDFW and USFWS.
Timing	Within 14 days prior to construction, and during construction.
MITIGATION MEASURE	**WIL-2b: Prepare and implement Raven Monitoring, Management, and Control Plan (full text in Section D.5.3.3)**
Location	All areas with suitable desert tortoise habitat.
Monitoring / Reporting Action	SCE submits a Raven Monitoring, Management, and Control Plan; CPUC/BLM monitor approves report format and contents in consultation with CDFW and USFWS.
Effectiveness Criteria	Minimize project-related predator subsidies and prevent increases in raven numbers or activity within desert tortoise habitat.
Responsible Agency	CPUC; BLM Palm Springs–South Coast Field Office in coordination with CDFW and USFWS.
Timing	Prior to the start of construction, and during construction, <u>and</u> restoration~~, and O&M~~ phases.

Responses to Comment Set F3 – Section D.5 Biological Resources – Wildlife

F3-172 The commenter states that there is no natural nesting golden eagle habitat present within 4 miles of Segment 2. Golden eagles historically nested in the Box Springs Mountains. Although nesting has not been observed in recent years, habitat is present and could be occupied by nesting golden eagles. Portions of the Box Springs Mountains are within 4 miles of Segment 2. No revisions to the Final EIS were made.

F3-173 The commenter states that there is no natural nesting golden eagle habitat present within 4 miles of Segment 3. Please see Response to Comment F3-172. Portions of the Box Springs Mountains are within 4 miles of Segment 3.

F3-174 The commenter states that the EIS should note that all California Natural Diversity Database (CNDDB) records for Sierra Madre (mountain) yellow-legged frog are listed as extirpated or potentially extirpated.

Regarding the Sierra Madre (mountain) yellow-legged frog, Section D.5.3.3.2 of the Draft EIR/EIS states, "The U.S. Geological Survey has done exhaustive surveys to locate any remaining populations of this species and none have been reported from the project area. There is no suitable habitat in the project area for Sierra Madre yellow-legged frog, and no impacts are expected." The text has not been revised.

F3-175 The commenter states that the Draft EIR/EIS should note that all CNDDB records for Sierra Madre (mountain) yellow-legged frog are listed as extirpated or potentially extirpated. Please see Response to Comment F3-174.

F3-176 **a.** The commenter states that a 500-foot survey buffer for most wildlife and some project features is unreasonable, and it may not be possible to complete pre-construction surveys within a 500-foot buffer of existing access roads within 10 days of construction.

Mitigation Measure WIL-1a (Conduct pre-construction biological resources surveys) requires that qualified biologists perform pre-construction biological surveys at each project work area and access route, and in the 500-foot area surrounding each work site or access route. Text of Mitigation Measure WIL-1a has been revised in the Final EIS to state that survey buffers will vary, as appropriate, based on target species and as stipulated by project work plans and mitigation plans, but will be no less than 300 feet surrounding each work site and access route being improved. The survey distance will be 100 feet surrounding other access routes or access routes that have been improved. Where suitable nest sites for raptors are present, the pre-construction surveys for raptor nests will extend to a 500-foot area surrounding the work area.

b. The commenter states that only access roads that require heavy road improvement will have pre-construction surveys. Access roads will not be surveyed if they are only being used to travel between work areas.

Sensitive biological resources may be located adjacent to or within the boundaries of access roads, including roads that would not be improved for the project. Some examples are special-status plants, bird nests in adjacent or overhanging vegetation or on the ground, burrowing owl burrows, and desert tortoise burrows. Without pre-construction surveys to identify these resources and establish protective buffers, or take other measures as appropriate, these resources could be impacted. Mitigation Measure WIL-1a requires pre-

construction surveys of access roads, including those that are only being used to travel between work areas. The measure was not revised in response to this comment's suggestion.

F3-177 The commenter requests revisions to Mitigation Measure WIL-1b (Ensure wildlife impact avoidance and minimization) to make the requirement for daily inspections of wildlife exclusion netting consistent with the project's Nesting Bird Management Plan (NBMP). The text of Mitigation Measure WIL-1b has been revised in the Final EIS to require inspections of wildlife netting installed within established material yards to be conducted at least once daily.

F3-178 The commenter requests that Mitigation Measure WIL-1b (Ensure wildlife impact avoidance and minimization) be revised to state that dead animals found only on *unpaved* project roads require a report to animal control agencies or CDFW. The text of Mitigation Measure WIL-1b has been revised in the Final EIS to state that dead animals found only on *unpaved* project roads require a report to animal control agencies or CDFW.

F3-179 The commenter states that SCE should only be responsible for project-related wildlife injuries. Mitigation Measure WIL-1b (Ensure wildlife impact avoidance and minimization) requires SCE to create and implement guidelines for dealing with injured wildlife found on or near project roads, work areas, or the ROW, and to bear the costs of veterinary treatment or wildlife rehabilitation for the injured animal. While it is acknowledged that SCE should only be responsible for project-related wildlife injuries, if an injured wild animal is found on or near project roads or work areas, it may be difficult to determine if the injuries were project-related. Text of Mitigation Measure WIL-1b has been revised in the Final EIS to exclude from this requirement any injured wildlife whose injuries are clearly not project-related, as determined by a qualified biologist.

F3-180 The commenter states that the mitigation requirement to prepare and implement rattlesnake guidelines does not mitigate a specific significant impact and WEAP training regarding rattlesnakes is sufficient. Mitigation Measure WIL-1b (Ensure wildlife impact avoidance and minimization) requires SCE to create and implement guidelines for dealing with rattlesnakes found in or near project work areas and access roads. As a venomous reptile that tends to coil and buzz when startled, rather than flee, rattlesnakes are much more likely than other wildlife on the project to be intentionally harmed or killed, and also pose a serious safety hazard to personnel.

The red-diamond rattlesnake, a California Species of Special Concern, is present on Segments 3 through 6 of the project, and has a moderate potential to occur on Segments 1 and 2. If a rattlesnake hibernaculum is present in a work area, there is the potential to impact a large number of individuals in a single location. Having rattlesnake guidelines in place will provide direction to personnel in the appropriate response to rattlesnakes, decrease the likelihood that rattlesnakes will be intentionally harmed or killed, and help to avoid and minimize direct impacts to a special-status rattlesnake species. The measure was not revised.

F3-181 The commenter requests revisions to mitigation measure to avoid conflicts with the Nesting Bird Management Plan (NBMP), addition of default nest buffers in the event that the NBMP is not approved prior to the start of construction or pre-construction activities, and a refinement of the specified nesting survey dates.

Mitigation Measure WIL-1c (Prepare and implement a Nesting Bird Management Plan) requires preparation of a project-specific NBMP and specifies the contents and requirements of that NBMP. In order to ensure timely completion of the NBMP, CPUC and SCE convened a technical working group (TWG) of SCE, BLM, CPUC, CDFW, and USFWS biologists to prepare the NBMP. The TWG held a series of meetings to outline the necessary NBMP contents, and then to review and revise several working draft versions of the NBMP. The final NBMP is appended to the Final EIS as Appendix 14. The final NBMP reflects the input and discussion of each TWG member to effectively manage nesting birds. The final NBMP includes some minor departures from Mitigation Measure WIL-1c as presented in the Draft EIR/EIS. Text of Mitigation Measure WIL-1c has been revised in the Final EIS to add default nest buffers and ensure conformance with the NBMP.

The breeding period listed in Mitigation Measure WIL-1c (January 1 to August 31) is appropriate, as some species (e.g., raptors, hummingbirds) begin nesting and breeding activities early.

F3-182 The commenter requests revisions to mitigation regarding ravens because the proposed project would reduce raven nesting opportunities, and potential impacts would be reduced to less than significant without requiring the Raven Management Plan to apply to O&M activities.

Newly constructed transmission towers may provide artificial perches and nest sites for ravens, which prey on young desert tortoises. The Proposed Project would result in a net decrease in the overall number of transmission structures in desert tortoise habitat, but most of the new towers would be steel lattice, whereas many of the existing structures to be removed are wooden “H-frame” design. Steel lattice towers provide more horizontal and diagonal surfaces that can support raven nesting and perching. Due to these design differences, the Proposed Project would increase the availability of suitable raven nesting and perching sites. The portion of the Proposed Project route within desert tortoise habitat is near the I-10 Freeway, where numerous other structures are present that provide raven nesting opportunities.

Mitigation Measure WIL-2b (Prepare and implement raven monitoring, management, and control plan) requires implementation of a plan to minimize project-related predator subsidies and prevent any increases in raven numbers or activity within desert tortoise habitat. Mitigation Measure WIL-2b also requires a one-time payment to the U.S. Fish and Wildlife Service (USFWS) Regional Raven Management Program.

The transmission towers will provide increased raven nesting and perching opportunities throughout the life of the project and the Raven Management Plan is therefore required during the O&M phase. The requested revisions were not made.

The commenter states that acreage impacts for calculation of payment to the USFWS Regional Raven Management Program should only apply in suitable desert tortoise habitat.

Mitigation Measure WIL-2b (Prepare and implement raven monitoring, management, and control plan) requires a one-time payment to the USFWS Regional Raven Management Program and this payment is calculated based on long-term or permanent project disturbance. It is acknowledged that this payment should apply to long-term or permanent project disturbance within the geographic range of the desert tortoise. Text of Mitigation Measure

WIL-2b has been revised in the Final EIS to state that that this payment should apply to long-term or permanent project disturbance within the geographic range of the desert tortoise.

The commenter states that Mitigation Measure WIL-2b should not apply to the portion of the project within the Coachella Valley MSHCP if SCE becomes a participating special entity in the MSHCP.

Mitigation Measure WIL-2b (Prepare and implement raven monitoring, management, and control plan) would require management of common ravens on the ROW, within the geographic range of the desert tortoise. The Coachella Valley MSHCP identifies raven management as strategy for desert tortoise conservation within the plan area, but raven control and management have not been implemented under the plan. Therefore, Mitigation Measure WIL-2b is necessary to mitigate the project's effects of raven nest site subsidies and potential raven predation on desert tortoise, as described in Impact WIL-2.

F3-183 The commenter requests revisions to Mitigation Measure WIL-2c (Conduct surveys and avoidance for threatened or endangered riparian birds) to ensure consistency with USFWS guidance and MSHCP requirements regarding surveys and avoidance for threatened or endangered riparian birds.

Mitigation Measure WIL-2c would require agency protocol field surveys and avoidance for listed threatened or endangered birds. If suitable habitat cannot be avoided, SCE is to consult with CDFW and USFWS and obtain appropriate take authorizations or permits and then implement the conservation measures contained within these permits. Habitat loss and consequent take of these birds are covered under the Western Riverside County MSHCP. However, Mitigation Measure WIL-2c would mitigate impacts, by minimizing project effects to nesting territories. The requested revision was not made.

The surveys and avoidance would mitigate the project's potential impacts to listed species. The requested revision was not made.

F3-184 The commenter requests revisions to Mitigation Measure WIL-2e to ensure consistency with MSHCP requirements regarding surveys and avoidance for coastal California gnatcatcher.

Mitigation Measure WIL-2e (Conduct Surveys and avoidance for coastal California gnatcatcher) would require agency protocol field surveys and avoidance for the listed threatened California gnatcatcher. Habitat loss and consequent take of California gnatcatcher are covered under the Western Riverside County MSHCP. However, Mitigation Measure WIL-2e would mitigate impacts, by minimizing project effects to occupied habitat and nesting territories. The text of Mitigation Measure WIL-2e was revised in the Final EIS to clarify that no construction or vehicle traffic shall occur within nest buffers, *except on existing paved public roads.* Other requested revisions were not made.

F3-185 The commenter requests revisions to Mitigation Measure WIL-2f regarding surveys and avoidance for golden eagle because winter surveys are not required for transmission line projects, a 2-mile survey buffer is recommended by USFWS, permits are not required to perform golden eagle surveys, and a monitoring and adaptive management plan is not needed as SCE will implement a one mile line-of-sight and one-half mile no line-of-sight buffer for active eagle nests as recommended by USFWS.

After consultation with USFWS, it was confirmed that the requested revisions are consistent with USFWS direction. The text of Mitigation Measure WIL-2f (Conduct surveys and avoidance for golden eagle) in the Final EIS has been revised to remove the requirement for winter surveys, reduce the survey buffer to 2 miles on either side of the transmission line, delete the permit requirement, and remove the requirement for a monitoring and adaptive management plan. A requirement for a one mile line-of-sight and one-half mile no line-of-sight buffer for active eagle nests has been added to Mitigation Measure WIL-2f.

F3-186 The commenter suggests minor revisions to Mitigation Measure WIL-2g, addressing burrowing owl mitigation, to clarify that relocation of burrowing owls during nesting season is allowed if a qualified biologist determines that the burrow is not occupied by a mated pair.

Mitigation Measure WIL-2g (Conduct surveys and avoidance for burrowing owl) allows passive relocation of burrowing owls during breeding season if a qualified biologist determines that an occupied burrow is not occupied by a mated pair. However, language earlier in the measure indicates that relocation may only be done outside of the breeding season. Mitigation Measure WIL-2g has been revised in the Final EIS to resolve this conflict and clarify that relocation during breeding season is permissible under the conditions noted above.

F3-187 The commenter requests minor revisions to Mitigation Measure WIL-2i to clarify the definition of "active bat roost." Mitigation Measure WIL-2i (Conduct surveys and avoidance for bats) specifies avoidance buffers for active bat roosts. Mitigation Measure WIL-2i has been revised in the Final EIS to define active bat roosts as occupied day roosts, maternity roosts, and hibernacula.

F3-188 The commenter requests minor revision to Mitigation Measure WIL-2h to clarify that clearance surveys for terrestrial herpetofauna are required only in areas with suitable habitat. The intent of Mitigation Measure WIL-2h (Conduct surveys and avoidance for special-status terrestrial herpetofauna) is to require surveys only in areas with suitable habitat. Text of Mitigation Measure WIL-2h has been revised in the Final EIS to state that surveys are required in areas with suitable habitat.

F3-189 The commenter requests revisions to Mitigation Measure WIL-2j to specify that it applies only to active woodrat nests that may be occupied by San Diego desert woodrat and that this mitigation does not apply within the Western Riverside County MSHCP area.

Mitigation Measure WIL-2j (Conduct surveys and avoidance for special-status small mammals) requires salvage and relocation of desert woodrat nests. It cannot be determined from the nest which woodrat species is present, and the range boundaries and taxonomy of desert woodrat in the project area are currently unclear. Even nests not currently occupied by San Diego desert woodrat are important habitat components that may be occupied in the future. Therefore, Mitigation Measure WIL-2j requires salvage and relocation of all desert woodrat nests to ensure that impacts to San Diego desert woodrat are avoided and minimized.

Habitat loss and take of individual San Diego desert woodrat are covered under the Western Riverside County MSHCP. However, Mitigation Measure WIL-2j would mitigate impacts to San Diego desert woodrat, by minimizing loss of important habitat components (i.e., nests) and minimizing take of individual woodrats. The requested revision was not made.

F3-190 The commenter suggests revisions to Mitigation Measure WIL-2k to reduce avoidance buffers for badger, ringtail, and desert kit fox and allow ingress/egress of construction equipment and low intensity activities to take place within buffers. Comment states that the buffers required by Mitigation Measure WIL-2k (200 feet for non-natal dens and 500 feet for natal dens, or any active den during the breeding season) are excessive and recent projects have successfully implemented 100-foot buffers.

Mitigation Measure WIL-2k (Conduct surveys and avoidance for American badger, ringtail, and desert kit fox) requires establishment of buffers around active natal and non-natal dens. It is acknowledged that recent projects have successfully implemented 100-foot buffers. After reviewing mitigation requirements for similar projects, it was concluded that a 100-foot buffer is adequate to protect non-natal dens. Text of Mitigation Measure WIL-2k in the Final EIS has been revised to implement 100-foot buffers for non-natal dens. The 500-foot buffer for natal dens was not revised.

The text of Mitigation Measure WIL-2k in the Final EIS has also been revised to specify that ingress/egress and low intensity activities may take place within buffers if a qualified biologist determines that these activities will not impact the den or denning animals.

F3-191 The commenter suggests revision to Mitigation Measure WIL-2k to allow use of a one-way door installed over the den entrance.

Mitigation Measure WIL-2k (Conduct surveys and avoidance for American badger, ringtail, and desert kit fox) allows natural materials to be used to progressively block the entrance of an active non-natal den over three to five nights to discourage continued use. Installation of a one-way door would immediately prevent access to the den and would not accomplish the required objective of gradual discouragement. The requested revision was not made.

F3-192 The commenter states that potential project impacts due to raven subsidies would be reduced to less than significant without requiring the raven plan to apply to O&M activities. Please see Response to Comment F3-182.

Comment Set F3: Southern California Edison Company (cont.)

Section D.6 Climate Change

Page D.6-9 through 10

DEIR/DEIS Text: F3-193

The non-recurring construction emissions applied over the anticipated 30-year service life of the Proposed Project results in an average rate of roughly 1,600 MTCO2e per year. This level of amortized construction GHG emissions would be under the threshold level of 10,000 metric tons that applies to electric generating facilities for annual mandatory reporting of GHG (17 CCR 95101), and these emissions would also be below a threshold level of 10,000 metric tons that applies to annually recurring emissions (SCAQMD, 2011).

SCE Comment:

The SCAQMD GHG threshold of 10,000 MTCO2e/yr is should be compared to construction GHG emissions amortized over 30 years and added to operational GHG emissions, in order to represent an annual amortization of total GHG emissions.

The DEIR currently compares only amortized construction emissions to the 10,000 MTCO2e/yr threshold, then also compares estimated operational emissions to the threshold separately.

SCE recommends adding amortized construction emissions to annual operational emissions, and comparing the total to the SCAQMD threshold (i.e. 1,600 + 49).

Page D.6-9

DEIR/DEIS Text: F3-194

This level of amortized construction GHG emissions would be under the threshold level of 10,000 metric tons that applies to electric generating facilities for annual mandatory reporting of GHG (17 CCR 95101), and these emissions would also be below a threshold level of 10,000 metric tons that applies to annually recurring emissions (SCAQMD, 2011).

SCE Comment:

SCE concurs that no mitigation is necessary to minimize GHG emissions. However, it may be beneficial to point out that Air Quality Mitigation Measures AQ-1b and AQ-1c would also reduce GHG emissions. The following language is suggested:

This level of amortized construction GHG emissions would be under the threshold level of 10,000 metric tons that applies to electric generating facilities for annual mandatory reporting of GHG (17 CCR 95101), and these emissions would also be below a threshold level of 10,000 metric tons that applies to annually recurring emissions (SCAQMD, 2011). <u>Furthermore, Air Quality Mitigation Measures AQ-1b, Control Off-Road Equipment Emissions and AQ-1c, Control Helicopter Emissions, which were intended to minimize criteria pollutant emissions, would also reduce GHG emissions during construction.</u>

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.6-10

DEIR/DEIS Text: F3-195

Table D.6-4. Operation-Related GHG Emissions (MTCO2e/yr)

Table D.6-4. Operation-Related GHG Emissions (MTCO2e/yr)

Source	SF6	Total CO2e
SF6 Losses from Circuit Breakers	25	25
Maintenance Trucks	—	1
Helicopters	—	9
Pickup Trucks	—	2
Boom/Crane Trucks	—	12
Operations and Maintenance	**25**	**49**

SCE Comment:

Recommend revising "SF6" from the "Source" row of Table D.6-4 to read "SF6 as CO2e" for clarity.

Table D.6-4. Operation-Related GHG Emissions (MTCO2e/yr)

Source	SF6 as CO2e	Total CO2e
SF6 Losses from Circuit Breakers	25	25
Maintenance Trucks	—	1
Helicopters	—	9
Pickup Trucks	—	2
Boom/Crane Trucks	—	12
Operations and Maintenance	**25**	**49**

Page D.6-15 through D.6-17

DEIR/DEIS Text: F3-196

D.6.4.3 Phased Build Alternative

Impact GHG-1, GHG-2

SCE Comment:

As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional study and associated additional impact analysis. The additional disturbance areas and the increased duration for construction activities would result in additional emissions impacts beyond those analyzed for the Phased Build Alternative in the document and could be greater than those identified for the Proposed Project.

Responses to Comment Set F3 – Section D.6 Climate Change

F3-193 The comment recommends adding the amortized construction emissions to the annual operational emissions for comparison with SCAQMD thresholds. No revision is necessary as the separate phases do not overlap, and if they were presumed to be, the resulting sums would also be well below the threshold.

F3-194 The commenter notes that while no mitigation measures are needed to minimize GHG, the beneficial effects of GHG reductions through Mitigation Measures AQ-1b (Control off-road equipment emissions) and AQ-1c (Control helicopter emissions) should be acknowledged. A sentence to this effect is added in Section D.6.3.3 (Climate Change, Impacts and Mitigation Measures).

F3-195 The commenter recommends a clarification in Table D.6-4 (Operation-Related GHG Emissions (MTCO2e/yr)) that SF_6 emission rates have been converted to CO_2-equivalent, so that SF_6 appears in the units of CO2e. This change has been made.

F3-196 The commenter states that there are additional impacts associated with the Phased Build Alternative that were not addressed in the Draft EIR/EIS. Please see General Response GR-4.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Section D.7 Cultural Resources

Page D.7-1

DEIR/DEIS Text: F3-197

First paragraph

…, along with archaeological survey and evaluation reports prepared on SCE's behalf by LSA Associates, Inc. (LSA) and ASM Affiliates (ASM).

SCE Comment:

Please change for accuracy:

along with archaeological survey and evaluation reports prepared on SCE's behalf by LSA Associates, Inc. (LSA) ~~and~~ ASM Affiliates (ASM), and SCE.

Page D.7-2

DEIR/DEIS Text: F3-198

3rd Paragraph

ASM 2014

SCE Comment:

Please correct this citation:

~~AMS 2014~~ DeCarlo and Winslow, 2015a

Page D.7-2

DEIR/DEIS Text: F3-199

4th Paragraph

surface observations and using intensive archival research

SCE Comment:

Please correct the methods and citations:

surface observations, ~~using~~ intensive archival research and/or test excavations (DeCarlo and Winslow 2015a, 2015b, 2015c; LSA and Williams 2014; Williams and Belcourt 2015)

Page D.7-3

DEIR/DEIS Text: F3-200

2nd Paragraph

(McLean et al. 2013 and ASM, 2014)

SCE Comment:

Please correct the citations:

(McLean et al., 2013 ~~and ASM, 2014)~~DeCarlo and Winslow, 2015a, 2015b, 2015c; LSA and Williams, 2014; Williams and Belcourt, 2015)

Comment Set F3: Southern California Edison Company (cont.)

Page D.7-3

DEIR/DEIS Text:

Throughout this section:
Williams and Belcourt (2014)

SCE Comment:

In the DEIR/DEIS, the citation is used as the primary citation from pages 3-10. Because Williams and Belcourt are not the primary authors of the information provided, SCE recommends adding primary references as used in Williams and Belcourt. The next 41 comments add the primary references.

F3-201

Page D.7-3

DEIR/DEIS Text:

10,000 years of human cultural development and environmental adaptation. For the Colorado Desert region, resolution of chronological sequencing, the general rarity of cultural deposits dating to the archaic periods, the abundance of diversity of adaptive patterns and the chronology of occupation associated with Lake Cahuilla are issues that challenge modern researchers (Williams and Belcourt, 2014:7).

SCE Comment:

Please revise as follows:

10,000 years of human cultural development and environmental adaptation. (Crabtree 1981; Warren 1984; Schaefer 1994; Schaefer and Laylander 2007; Sutton et al. 2007). For the Colorado Desert region, resolution of chronological sequencing, the general rarity of cultural deposits dating to the archaic periods, the abundance of diversity of adaptive patterns and the chronology of occupation associated with Lake Cahuilla are issues that challenge modern researchers ~~(Williams and Belcourt, 2014:7).~~

F3-202

Page D.7-3

DEIR/DEIS Text:

However, an Early Pleistocene occupation of the California deserts has not been demonstrated, and current consensus recognizes Clovis as the earliest cultural complex represented (Williams and Belcourt, 2014:7).

SCE Comment:

Please revise as follows:

However, an Early Pleistocene occupation of the California deserts has not been demonstrated, and current consensus recognizes Clovis as the earliest cultural complex represented ~~(Williams and Belcourt, 2014:7)~~.(Moratto 1984).

F3-203

Page D.7-3

DEIR/DEIS Text:

Approximately 12,000–7000 before present (BP) during the Early Holocene, the area between San Bernardino and San Gorgonio Pass was occupied by Native American people.

SCE Comment:

Please revise as follows:

Approximately 12,000–7000 before present (BP) during the Early Holocene, the area between San Bernardino and San Gorgonio Pass was occupied by Native American people (Moratto 1984:110–113).

F3-204

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.7-3

DEIR/DEIS Text: F3-205

The occurrence of extremely large and occasionally fluted bifaces associated with the use of the spear and atlatl marks sites from this time (Williams and Belcourt, 2014:7).

SCE Comment:

Please revise as follows:

The occurrence of extremely large and occasionally fluted bifaces associated with the use of the spear and atlatl marks sites from this time (~~Williams and Belcourt, 2014:7)~~ (Moratto 1984:81).

Page D.7-3

DEIR/DEIS Text: F3-206

In general, the WPLT toolkit commonly includes crescentics, large flake and core scrapers, choppers, scraper planes, hammerstones, different core types, drills, and gravers. A primary characteristic of WPLT sites is their location on the shores of pluvial lakes from northern central California to southern California. The Lake Mojave Complex is one of the best known expressions of the WPLT (Williams and Belcourt, 2014:7, 9).

SCE Comment:

Please revise as follows:

In general, the WPLT toolkit commonly includes crescentics, large flake and core scrapers, choppers, scraper planes, hammerstones, different core types, drills, and gravers (Moratto 1984:93). A primary characteristic of WPLT sites is their location on the shores of pluvial lakes from northern central California to southern California (Moratto 1984:81, 103). The Lake Mojave Complex is one of the best known expressions of the WPLT ~~(Williams and Belcourt, 2014:7, 9).~~

Page D.7-4

DEIR/DEIS Text: F3-207

comparative unit for Early Man in the Mojave Desert.

SCE Comment:

Please revise as follows:

comparative unit for Early Man in the Mojave Desert (Warren and Crabtree 1986:184).

Page D.7-4

DEIR/DEIS Text: F3-208

Flaked stone artifacts include large stemmed Lake Mojave and Silver Lake projectile points, leaf-shaped bifaces, bifacial cores, crescentics, domed and keeled scrapers, shaft straighteners, and large core-cobble tools (Williams and Belcourt, 2014:9).

SCE Comment:

Please revise as follows:

Flaked stone artifacts include large stemmed Lake Mojave and Silver Lake projectile points, leaf-shaped bifaces, bifacial cores, crescentics, domed and keeled scrapers, shaft straighteners, and large core-cobble tools ~~(Williams and Belcourt, 2014:9)~~ (Hall 1993:19; Horne and McDougall 1997:9).

Comment Set F3: Southern California Edison Company (cont.)

Page D.7-4

DEIR/DEIS Text: F3-209

Pinto cultural complex has been demonstrated.

SCE Comment:

Please revise as follows:

Pinto cultural complex has been demonstrated (Crabtree 1981:40; Sutton et al. 2007:238).

Page D.7-4

DEIR/DEIS Text: F3-210

indicate an increased reliance on seed processing

SCE Comment:

Please revise as follows:

indicate an increased reliance on seed processing (Hall 1993:21; Horne and McDougall 1997:9)

Page D.7-4

DEIR/DEIS Text: F3-211

before 7000 years B.P., before the onset of severe Middle Holocene desiccation (Williams and Belcourt, 2014:9, 10).

SCE Comment:

Please revise as follows:

before 7000 years B.P., before the onset of severe Middle Holocene desiccation ~~(Williams and Belcourt, 2014:9, 10).~~(Sutton et al. 2007)

Page D.7-4

DEIR/DEIS Text: F3-212

Both lacustrine and terrestrial biotic economic resources were also identified (Williams and Belcourt, 2014: 10).

SCE Comment:

Please revise as follows:

Both lacustrine and terrestrial biotic economic resources were also identified ~~(Williams and Belcourt, 2014: 10).~~ (McDonald 1992:131).

Page D.7-4

DEIR/DEIS Text: F3-213

Milling equipment in the assemblage consists mostly of broken and fire-affected manos and metates that were often recycled as hammerstones, cooking stones, and as construction material in cache pits and hearths (Williams and Belcourt, 2014: 10).

SCE Comment:

Please revise as follows:

Milling equipment in the assemblage consists mostly of broken and fire-affected manos and metates that were often recycled as hammerstones, cooking stones, and as construction material in cache pits and hearths ~~(Williams and Belcourt, 2014: 10).~~ (McDonald 1992:240).

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.7-4

DEIR/DEIS Text: F3-214

northern margins of the Lake Cahuilla basin going back at least 3,000 years (Williams and Belcourt, 2014: 10, 11).

SCE Comment:

Please revise as follows:

northern margins of the Lake Cahuilla basin going back at least 3,000 years ~~(Williams and Belcourt, 2014: 10, 11).~~ (Love and Dahdul 2002)

Page D.7-5

DEIR/DEIS Text: F3-215

transition zone occupied by both the Cahuilla and Luiseño. During the ethnohistoric period, the Serrano were also present in the San Gorgonio Pass, and the Cahuilla were present in the San Jacinto Valley and San Timoteo Canyon (Williams and Belcourt, 2014: 11).

SCE Comment:

Please revise as follows:

transition zone occupied by both the Cahuilla and Luiseño (Bean and Vane 1978). During the ethnohistoric period, the Serrano were also present in the San Gorgonio Pass, and the Cahuilla were present in the San Jacinto Valley and San Timoteo Canyon ~~(Williams and Belcourt, 2014: 11)~~.

Page D.7-5

DEIR/DEIS Text: F3-216

The Cahuilla, Luiseño, and Serrano, are Takic-speaking people of the Uto-Aztecan linguistic stock. The Cahuilla and Luiseño are of the Cupan sub-group, while the Serrano (and Gabrielino) are of the Serrano-Gabrielino sub-group. Before the more recent Takic linguistic grouping, the Cahuilla, Luiseño, Gabrielino, and Serrano were included within the southern Californian branch of the Shoshonean family. Cahuilla, Serrano, and Luiseño settlement patterns and culture are further addressed in the following Ethno-graphic section (Williams and Belcourt, 2014: 11).

SCE Comment:

Please revise as follows:

The Cahuilla, Luiseño, and Serrano, are Takic-speaking people of the Uto-Aztecan linguistic stock (Bean and Vane 1979, Miller 1984). The Cahuilla and Luiseño are of the Cupan sub-group, while the Serrano (and Gabrielino) are of the Serrano-Gabrielino sub-group (Miller 1984). Before the more recent Takic linguistic grouping, the Cahuilla, Luiseño, Gabrielino, and Serrano were included within the southern Californian branch of the Shoshonean family by Kroeber (1907, 1925). Cahuilla, Serrano, and Luiseño settlement patterns and culture are further addressed in the following Ethno-graphic section ~~(Williams and Belcourt, 2014: 11)~~.

Page D.7-5

DEIR/DEIS Text: F3-217

Speakers of the Uto-Aztecan family were located in the Great Basin, southern California, and an area stretching from southern Arizona into northwest and central Mexico

SCE Comment:

Please revise as follows:

Speakers of the Uto-Aztecan family were located in the Great Basin, southern California, and an area stretching from southern Arizona into northwest and central Mexico (Miller 1984).

Comment Set F3: Southern California Edison Company (cont.)

Page D.7-5

DEIR/DEIS Text: F3-218

Additionally, after A.D. 1600, the desiccation of Lake Cahuilla resulted in an intensification of land use in the San Gorgonio Pass, the San Jacinto Plain, and Perris Valley regions that was reflected into the ethnohistoric period (Williams and Belcourt, 2014: 11, 12).

SCE Comment:

Please revise as follows:

Additionally, after A.D. 1600, the desiccation of Lake Cahuilla resulted in an intensification of land use in the San Gorgonio Pass, the San Jacinto Plain, and Perris Valley regions that was reflected into the ethnohistoric period ~~(Williams and Belcourt, 2014: 11, 12).~~ (Bean et al. 1991; Wilke 1974, 1978; Schaefer 1994).

Page D.7-5

DEIR/DEIS Text: F3-219

a time characterized by warm and arid conditions referred to as the Medieval Warm Period (approximately A.D 800 to 1350) (Williams and Belcourt, 2014: 12).

SCE Comment:

Please revise as follows:

a time characterized by warm and arid conditions referred to as the Medieval Warm Period (approximately A.D 800 to 1350) ~~(Williams and Belcourt, 2014: 12).~~ (Sutton et al. 2007).

Page D.7-5

DEIR/DEIS Text: F3-220

According to some, the shoreline of Lake Cahuilla fluctuated, the habitats were unstable and unreliable, and lakeshore settlement patterns must have been seasonal. Others argue that Lake Cahuilla was stable and supported year-round, or nearly year-round, settlement bases (Williams and Belcourt, 2014: 12).

SCE Comment:

Please revise as follows:

According to ~~some~~ Weide (1974), the shoreline of Lake Cahuilla fluctuated, the habitats were unstable and unreliable, and lakeshore settlement patterns must have been seasonal. ~~Others~~ Wilke (1978) argue that Lake Cahuilla was stable and supported year-round, or nearly year-round, settlement bases ~~(Williams and Belcourt, 2014: 12).~~

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.7-5 & 6

DEIR/DEIS Text: F3-221

Based on the concept of Lake Cahuilla providing a stable habitat that supported year-round settlement, it was inferred that the sudden drying up of Lake Cahuilla resulted in the permanent shift of populations from the lakeshore to locations of low desert or upland resources, such as Coachella Valley or the Peninsular Range. However, it is unclear if the shift in lakeshore populations after the final recession of the lake reflects a more subtle, rather than a major, readjustment in settlement change. If the hypothesis of Lake Cahuilla being used more as a secondary, seasonal resource is taken into account, then the drying up of the lake would not have had such a dramatic effect on regional settlement patterns (Williams and Belcourt, 2014: 12).

SCE Comment:

Please revise as follows:

Based on the concept of Lake Cahuilla providing a stable habitat that supported year-round settlement, Wilke (1978) inferred that the sudden drying up of Lake Cahuilla resulted in the permanent shift of populations from the lakeshore to locations of low desert or upland resources, such as Coachella Valley or the Peninsular Range. However, it is unclear if the shift in lakeshore populations after the final recession of the lake reflects a more subtle, rather than a major, readjustment in settlement change. If the hypothesis of Lake Cahuilla being used more as a secondary, seasonal resource is taken into account, then the drying up of the lake would not have had such a dramatic effect on regional settlement patterns Wilke (1978; Schaefer 1994). ~~(Williams and Belcourt, 2014: 12)~~.

Page D.7-6

DEIR/DEIS Text: F3-222

The studies further hypothesized that settlements may have been clustered at more reliable water sources during this time, such as the coast, Lake Cahuilla, or Lake Elsinore (Williams and Belcourt, 2014: 13).

SCE Comment:

Please revise as follows:

The studies further hypothesized that settlements may have been clustered at more reliable water sources during this time, such as the coast, Lake Cahuilla, or Lake Elsinore ~~(Williams and Belcourt, 2014: 13)~~ (Goldberg 2001).

Page D.7-6

DEIR/DEIS Text: F3-223

On the other hand, the Eastside Reservoir Project's Late Prehistoric (A.D. 1200 to 1540) and Protohistoric (A.D. 1540 to 1770s) periods coincide with the Little Ice Age, generally dated from A.D. 1400 to 1875. During these periods, the climate was cooler and moister, and the sites identified within the Eastside Reservoir Project area reflect a substantial increase in diversity and number, longer occupation periods, and more sedentary land use. Intensification of land use also occurred in neighboring San Gorgonian Pass and Perris Valley. However, the role that the desiccation of Lake Cahuilla played in the population growth and in the intensification of land use in these areas is still not entirely clear (Williams and Belcourt, 2014: 13).

SCE Comment:

Please revise as follows:

On the other hand, the Eastside Reservoir Project's Late Prehistoric (A.D. 1200 to 1540) and Protohistoric (A.D. 1540 to 1770s) periods coincide with the Little Ice Age, generally dated from A.D. 1400 to 1875 (Goldberg 2001; Sutton et al. 2007). During these periods, the climate was cooler and moister, and the sites identified within the Eastside Reservoir Project area reflect a substantial increase in diversity and number, longer occupation periods, and more sedentary land use. Intensification of land use also occurred in neighboring San Gorgonian Pass and Perris Valley (Bean et al. 1991, Wilke 1974). However, the role that the desiccation of Lake Cahuilla played in the population growth and in the intensification of land use in these areas is still not entirely clear ~~(Williams and Belcourt, 2014: 13)~~. (Schaefer 1994; Laylander 2006).

Comment Set F3: Southern California Edison Company (cont.)

Page D.7-6

DEIR/DEIS Text: F3-224

Due to the inland geographical location of the Cahuilla and Serrano territories, the Spanish institutions did not directly affect them as much (Williams and Belcourt, 2014:13).

SCE Comment:

Please revise as follows:

Due to the inland geographical location of the Cahuilla and Serrano territories, the Spanish institutions did not directly affect them as much ~~(Williams and Belcourt, 2014:13~~). (Strong 1929; Bean 1978).

Page D.7-7

DEIR/DEIS Text: F3-225

The Cahuilla relied on hunting rabbits and other small game, and gathering acorns, mesquite and screw beans, pinyon nuts, and cactus bulbs for subsistence. In addition, Cahuilla practiced proto-agriculture where corn, beans, squash, and melon were harvested. Cahuilla used stone mortars and pestles, manos and metates, wooden mortars, baskets, pottery, arrow shaft straighteners, willow and mesquite bows and arrows, and numerous ceremonial instruments (Williams and Belcourt, 2014:14).

SCE Comment:

Please revise as follows:

The Cahuilla relied on hunting rabbits and other small game, and gathering acorns, mesquite and screw beans, pinyon nuts, and cactus bulbs for subsistence. In addition, Cahuilla practiced proto-agriculture where corn, beans, squash, and melon were harvested. Cahuilla used stone mortars and pestles, manos and metates, wooden mortars, baskets, pottery, arrow shaft straighteners, willow and mesquite bows and arrows, and numerous ceremonial instruments ~~(Williams and Belcourt, 2014:14)~~. (Bean 1972, 1978; Caricco et al. 1982).

Page D.7-7

DEIR/DEIS Text: F3-226

Sedentary villages were located in diverse ecological zones, and exploitation of resource areas was strictly controlled by owner-ship of resource territories along family, lineage, and village lines (Williams and Belcourt, 2014:14).

SCE Comment:

Please revise as follows:

Sedentary villages were located in diverse ecological zones, and exploitation of resource areas was strictly controlled by owner-ship of resource territories along family, lineage, and village lines ~~(Williams and Belcourt, 2014:14).~~ (Strong 1929).

Page D.7-7

DEIR/DEIS Text: F3-227

These summer-fall camps were also subdivisions of the primary winter camp, being occupied by smaller clan subdivisions of the larger clan-group (Williams and Belcourt, 2014:14, 15).

SCE Comment:

Please revise as follows:

These summer-fall camps were also subdivisions of the primary winter camp, being occupied by smaller clan subdivisions of the larger clan-group ~~(Williams and Belcourt, 2014:14, 15).~~ (Bean and Shipek 1978; White 1963).

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.7-7

DEIR/DEIS Text: F3-228

Researchers document the Serrano as highly mobile, utilitarian-based societies, residing in permanent villages with satellite camps spread throughout their territories. Plant and animal resources were widely dispersed across the landscape. Therefore, many collecting and food processing areas were used throughout the year as different resources became available in various life zones. The Serrano were loosely organized into exogamous clans that served as the largest autonomous political and landholding unit. There was no form of pan-tribal political union among the clans, all bonds being strictly ceremonial in nature with alignments arising along lines of economic, marital, or ceremonial reciprocity. In addition to forming bonds with other Serrano clans, they also formed alliances with Cahuilla, Chemehuevi, Gabrielino, and Cupeño groups (Williams and Belcourt, 2014: 15)

SCE Comment:

Please revise as follows:

Researchers document the Serrano as highly mobile, utilitarian-based societies, residing in permanent villages with satellite camps spread throughout their territories (Bean et al. 1981; Kroeber 1925). Plant and animal resources were widely dispersed across the landscape. Therefore, many collecting and food processing areas were used throughout the year as different resources became available in various life zones (Davis 1974). The Serrano were loosely organized into exogamous clans that served as the largest autonomous political and landholding unit (Strong 1929). There was no form of pan-tribal political union among the clans, all bonds being strictly ceremonial in nature with alignments arising along lines of economic, marital, or ceremonial reciprocity. In addition to forming bonds with other Serrano clans, they also formed alliances with Cahuilla, Chemehuevi, Gabrielino, and Cupeño groups ~~(Williams and Belcourt, 2014: 15)~~ (Bean and Smith 1978:572).

Page D.7-7

DEIR/DEIS Text: F3-229

Serrano subsistence included gathering, hunting, and (occasionally) fishing. Material culture included a wide variety of implements, including baskets; pottery; stone milling equipment; stone, wood, and bone implements; rabbit skin blankets; and woven nets and storage pouches.

SCE Comment:

Please revise as follows:

Serrano subsistence included gathering, hunting, and (occasionally) fishing. Material culture included a wide variety of implements, including baskets; pottery; stone milling equipment; stone, wood, and bone implements; rabbit skin blankets; and woven nets and storage pouches (Drucker 1937).

Page D.7-7

DEIR/DEIS Text: F3-230

The primary factor for village choice was proximity to a year-round water source (Williams and Belcourt, 2014:15).

SCE Comment:

Please revise as follows:

The primary factor for village choice was proximity to a year-round water source ~~(Williams and Belcourt, 2014:15).~~ (Strong 1929; Bean and Smith 1978).

Page D.7-8

DEIR/DEIS Text: F3-231

In the pursuit of deserted soldiers, Fages traveled from San Diego east to the desert in Imperial County and then northwest through the San Jacinto Mountains and San Jacinto Valley towards Riverside.

SCE Comment:

Please revise as follows:

In the pursuit of deserted soldiers, Fages traveled from San Diego east to the desert in Imperial County and then northwest through the San Jacinto Mountains and San Jacinto Valley towards Riverside (Leech 2004).

Comment Set F3: Southern California Edison Company (cont.)

Page D.7-8

DEIR/DEIS Text: F3-232

Once reaching the Peninsular Range, the expeditions headed north-northwest, with Anza's route following a similar one as Fages' from the San Jacinto Mountains and northwest through Bautista Canyon into the San Jacinto Valley (Williams and Belcourt, 2014: 16).

SCE Comment:

Please revise as follows:

Once reaching the Peninsular Range, the expeditions headed north-northwest, with Anza's route following a similar one as Fages' from the San Jacinto Mountains and northwest through Bautista Canyon into the San Jacinto Valley ~~(Williams and Belcourt, 2014: 16).~~ (Bulton 1930; Rolle 1963).

Page D.7-9

DEIR/DEIS Text: F3-233

after a decline in mission activity occurred followed by the secularization of the missions in the 1830s (Williams and Belcourt, 2014: 16, 17).

SCE Comment:

Please revise as follows:

after a decline in mission activity occurred followed by the secularization of the missions in the 1830s ~~(Williams and Belcourt, 2014: 16, 17).~~(Leech 2004).

Page D.7-9

DEIR/DEIS Text: F3-234

This portion, the northern half of the San Jacinto Viejo Rancho, became known as the *Rancho San Jacinto Nuevo y Potrero* (Williams and Belcourt, 2014:17).

SCE Comment:

Please revise as follows:

This portion, the northern half of the San Jacinto Viejo Rancho, became known as the *Rancho San Jacinto Nuevo y Potrero* ~~(Williams and Belcourt, 2014:17).~~ (Leach 2004).

Page D.7-9

DEIR/DEIS Text: F3-235

As was the case with many early Spanish, Mexican, and American overland routes, the famed Coco-Maricopa Trail that began as an Indian trail served as a mail route between Sonora Mexico and Alta California and then later as the Bradshaw Trail (Williams and Belcourt, 2014:17)

SCE Comment:

Please revise as follows:

As was the case with many early Spanish, Mexican, and American overland routes, the famed Coco-Maricopa Trail that began as an Indian trail served as a mail route between Sonora Mexico and Alta California and then later as the Bradshaw Trail ~~(Williams and Belcourt, 2014:17)~~ (Bean and Mason 1962).

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.7-9

DEIR/DEIS Text: F3-236

Southern California was increasingly developed and occupied as more Americans migrated to the region in pursuit of land, gold and other minerals, agriculture, and speculation interests (Williams and Belcourt, 2014:17).

SCE Comment:

Please revise as follows:

Southern California was increasingly developed and occupied as more Americans migrated to the region in pursuit of land, gold and other minerals, agriculture, and speculation interests ~~(Williams and Belcourt, 2014:17).~~ (Leach 2004).

Page D.7-10

DEIR/DEIS Text: F3-237

Known as the Bradshaw Trail, the route followed ancient Cahuilla and Maricopa trails that linked wells and springs located throughout the desert (Williams and Belcourt, 2014:18).

SCE Comment:

Please revise as follows:

Known as the Bradshaw Trail, the route followed ancient Cahuilla and Maricopa trails that linked wells and springs located throughout the desert ~~(Williams and Belcourt, 2014:18).~~ (Vredenburgh et al. 1981).

Page D.7-10

DEIR/DEIS Text: F3-238

Until the coming of paved roads and automobiles in the 1930s, the railroad served as the major transportation artery across the deserts (Williams and Belcourt, 2014:18).

SCE Comment:

Please revise as follows:

Until the coming of paved roads and automobiles in the 1930s, the railroad served as the major transportation artery across the deserts ~~(Williams and Belcourt, 2014:18).~~ (Fickwirth 1992; Myrick 1962).

Page D.7-10

DEIR/DEIS Text: F3-239

Much of the old U.S. 60 is still preserved, with some sections in the desert remaining virtually untouched since it ceased to be a legislative route. Additional evidence of U.S. 60 can still be seen in stacks of highway survey monuments used by construction workers while upgrading the road to federal conditions as dictated by the 1926 mandate (Williams and Belcourt, 2014:18).

SCE Comment:

Please revise as follows:

Much of the old U.S. 60 is still preserved, with some sections in the desert remaining virtually untouched because it ceased to be a legislative route. Additional evidence of U.S. 60 can still be seen in stacks of highway survey monuments used by construction workers while upgrading the road to federal conditions as dictated by the 1926 mandate ~~(Williams and Belcourt, 2014:18).~~(Cooper 2004).

Comment Set F3: Southern California Edison Company (cont.)

Page D.7-10

DEIR/DEIS Text: F3-240

The MWD also established better infrastructure in the desert with the grading of new roads, a water supply system, power lines, and telephone lines, leading to new towns associated with the construction of the CRA (Williams and Belcourt, 2014:18, 19).

SCE Comment:

Please revise as follows:

The MWD also established better infrastructure in the desert with the grading of new roads, a water supply system, power lines, and telephone lines, leading to new towns associated with the construction of the CRA ~~(Williams and Belcourt, 2014:18, 19).~~ (Gruen 1988).

Page D.7-30

DEIR/DEIS Text: F3-241

The following significance criteria apply to cultural resources:

- The Proposed Project would cause an adverse effect or substantial adverse change in the characteristic of a historic property or Traditional Cultural Property as defined by federal guidelines.
- The Proposed Project would cause a substantial adverse change in the characteristics of a significant cultural resource or unique archaeological site as defined b oh y State of California guidelines.
- The Proposed Project would cause a substantial adverse change in the characteristics of a cultural resource included in a local register of historical resources.

SCE Comment:

Because impacts are likely but not inevitable, SCE recommends the following revisions: The following significance criteria apply to cultural resources:

- The Proposed Project ~~would~~ could cause an adverse effect or substantial adverse change in the characteristic of a historic property or Traditional Cultural Property as defined by federal guidelines.
- The Proposed Project ~~would~~ could cause a substantial adverse change in the characteristics of a significant cultural resource or unique archaeological site as defined by State of California guidelines.
- The Proposed Project ~~would~~ could cause a substantial adverse change in the characteristics of a cultural resource included in a local register of historical resources.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Pages D.7-30 through 31

DEIR/DEIS Text: F3-242

The following significance criteria apply to cultural resources:

- The Proposed Project would cause a substantial adverse effect or substantial adverse change in the characteristic of a historic property or Traditional Cultural Property as defined by federal guidelines.
- The Proposed Project would cause a substantial adverse change in the characteristics of a significant cultural resource or unique archaeological site as defined by State of California guidelines.
- The Proposed Project would cause a substantial adverse change in the characteristics of a cultural resource included in a local register of historical resources.
- The Proposed Project could uncover, expose, and/or damage Native American human remains.

Under all of these criteria, adverse changes and impacts include the following:

- Physical, visual, or audible disturbance resulting from construction, operation, and development would affect the integrity of a resource or the qualities that make it eligible for the NRHP or CRHR;
- Exposure of cultural resources to vandalism or unauthorized collecting;
- A substantial increase in the potential for erosion or other natural processes that could affect cultural resources; or
- Neglect of a cultural resource that causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to a Native American tribe.

SCE Comment:

For accuracy, please revise as follows:

The following significance criteria apply to cultural resources: According to the CEQA Checklist and Section 106, a project causes a potentially significant impact when the project will:

- ~~The Proposed Project would~~ cause an adverse effect or substantial adverse change in the characteristic of a historic property or Traditional Cultural Property as defined by federal guidelines.
- ~~The Proposed Project would~~ cause a substantial adverse change in the characteristics of a significant cultural resource or unique archaeological site as defined by State of California guidelines.
- ~~The Proposed Project would~~ cause a substantial adverse change in the characteristics of a cultural resource included in a local register of historical resources.
- ~~The Proposed Project could~~ uncover, expose, and/or damage Native American human remains. Under all of these criteria, adverse changes and impacts include the following:
- Cause a physical, visual, or audible disturbance resulting from construction, operation, and development that would affect the integrity of a resource or the qualities that make it eligible for the NRHP or CRHR;
- ~~Exposure of~~ expose cultural resources to vandalism or unauthorized collecting;
- Cause a substantial increase in the potential for erosion or other natural processes that could affect cultural resources; or
- Cause neglect of a cultural resource that causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to a Native American tribe

Page D.7-33

DEIR/DEIS Text: F3-243

Impact CL-1: Construction, operation and maintenance, and restoration would cause an adverse change to known historic properties

SCE Comment:

No direct impacts to known historic properties were identified in the DEIR/DEIS. Please revise as follows:

Impact CL-1: Construction, operation and maintenance, and restoration ~~would~~ could cause an adverse change to known historic properties

Comment Set F3: Southern California Edison Company (cont.)

Page D.7-33

DEIR/DEIS Text: F3-244

Mitigation Measures for Impact CL-1: Construction, operation and maintenance, and restoration would cause an adverse change to known historic properties

SCE Comment:

No direct impacts to known historic properties were identified in the DEIR/DEIS. Please revise as follows:

Mitigation Measures for Impact CL-1: Construction, operation and maintenance, and restoration ~~would~~ could cause an adverse change to known historic properties

Page D.7-33

DEIR/DEIS Text: F3-245

Impact CL-1: Construction, operation and maintenance, and restoration would cause an adverse change to known historic properties

SCE Comment:

Impacts are possible, but not inevitable. Please revise as follows:

Impact CL-1: Construction, operation and maintenance, and restoration ~~would~~ could cause an adverse change to known historic properties

Page D.7-33

DEIR/DEIS Text: F3-246

Mitigation Measures for Impact CL-1: Construction, operation and maintenance, and restoration would cause an adverse change to known historic properties

SCE Comment:

Impacts are possible, but not inevitable. Please revise as follows:

Mitigation Measures for Impact CL-1: Construction, operation and maintenance, and restoration ~~would~~ could cause an adverse change to known historic properties

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.7-33

DEIR/DEIS Text: F3-247

Avoid environmentally sensitive areas. SCE shall perform focused pre-construction surveys for any project areas not yet surveyed (e.g. new or modified staging areas, pull sites, or other work areas). Resources discovered during the surveys would be subject to Mitigation Measures CL-1b (Develop Cultural Resource Management Plan [CRMP]) and CL-1d (Conduct construction monitoring). Where operationally feasible, all NRHP- and CRHR-eligible resources shall be protected from direct project impacts by project redesign (i.e., relocation of the line, ancillary facilities, or temporary facilities or work areas). In addition, all historic properties/historic resources shall be avoided by all project construction, operation and maintenance, and restoration activities. Avoidance mechanisms shall include fencing off such areas as Environ-mentally Sensitive Areas (ESAs) for the duration of the Proposed Project

SCE Comment:

This measure addresses two different but separate activities - conducting surveys and protecting resources. Consistent with the heading, and because surveys are a standard regulatory requirement, please revise as follows:

Avoid environmentally sensitive areas. ~~SCE shall perform focused pre-construction surveys for any project areas not yet surveyed (e.g. new or modified staging areas, pull sites, or other work areas). Resources discovered during the surveys would be subject to Mitigation Measures CL-1b (Develop Cultural Resource Management Plan [CRMP]) and CL-1d (Conduct construction monitoring).~~ Where operationally feasible, all NRHP- and CRHR-eligible resources shall be protected from direct project impacts by project redesign (i.e., relocation of the line, ancillary facilities, or temporary facilities or work areas). In addition, ~~all historic properties/historic~~ these resources shall be avoided by all project construction, operation and maintenance, and restoration activities. Avoidance mechanisms shall include fencing off such areas as Environ-mentally Sensitive Areas (ESAs) for the duration of the Proposed Project or as outlined in the Cultural Resource Management Plan.

Page D.7-34

DEIR/DEIS Text: F3-248

CL-1c

Any excavation contract (or contracts for other activities that may have subsurface soil impacts) shall include clauses that require construction personnel to attend training so they are aware of the potential for inadvertently exposing buried archaeological deposits.

SCE Comment:

Please revise as follows:

Any excavation contract (or contracts for other activities that may have subsurface soil impacts) shall include clauses that require construction personnel to attend the Worker's Environmental Training Program ~~training~~ so they are aware of the potential for inadvertently exposing buried archaeological deposits.

~~CL-1c~~

~~Any excavation contract (or contracts for other activities that may have subsurface soil impacts) shall include clauses that require construction personnel to attend training so they are aware of the potential for inadvertently exposing buried archaeological deposits.~~

Comment Set F3: Southern California Edison Company (cont.)

Page D.7-35

DEIR/DEIS Text: F3-249

Impact CL-2: Construction, operation and maintenance, and restoration would cause an adverse change to unknown buried prehistoric and historical archaeological sites or buried Native American human remains

SCE Comment:

The DEIR/DEIS incorrectly assumes that the Proposed Project will have unanticipated discoveries and that resource could not be avoided, please revise as follows:

Impact CL-2: Construction, operation and maintenance, and restoration ~~would~~ could cause an adverse change to unknown buried prehistoric and historical archaeological sites or buried Native American human remains

Page D.7-35

DEIR/DEIS Text: F3-250

Mitigation Measures for Impact CL-2: Construction, operation and maintenance, and restoration would cause an adverse change to unknown buried prehistoric and historical archaeological sites or buried Native American human remains

SCE Comment:

The DEIR/DEIS incorrectly assumes that the Proposed Project will have unanticipated discoveries and that resource could not be avoided, please revise as follows:

Mitigation Measures for Impact CL-2: Construction, operation and maintenance, and restoration ~~would~~ could cause an adverse change to unknown buried prehistoric and historical archaeological sites or buried Native American human remains

Page D.7-36

DEIR/DEIS Text: F3-251

Impact CL-1: Construction, operation and maintenance, and restoration would cause an adverse change to known historic properties

SCE Comment:

The DEIR/DEIS incorrectly assumes that the Proposed Project will have unanticipated discoveries and that resource could not be avoided, please revise as follows:

Impact CL-1: Construction, operation and maintenance, and restoration ~~would~~ could cause an adverse change to known historic properties

Page D.7-36

DEIR/DEIS Text: F3-252

Impact CL-2: Construction, operation and maintenance, and restoration would cause an adverse change to unknown buried prehistoric and historical archaeological sites or buried Native American human remains

SCE Comment:

The DEIR/DEIS incorrectly assumes that the Proposed Project will have unanticipated discoveries and that resource could not be avoided, please revise as follows:

Impact CL-2: Construction, operation and maintenance, and restoration ~~would~~ could cause an adverse change to unknown buried prehistoric and historical archaeological sites or buried Native American human remains

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.7-36

DEIR/DEIS Text: F3-253

Impact CL-1: Construction, operation and maintenance, and restoration would cause an adverse change to known historic properties (Class II)

SCE Comment:

The DEIR/DEIS incorrectly assumes that the Proposed Project will have unanticipated discoveries and that resource could not be avoided, please revise as follows:

Impact CL-1: Construction, operation and maintenance, and restoration ~~would~~ could cause an adverse change to known historic properties (Class II)

Page D.7-36

DEIR/DEIS Text: F3-254

The DEIR/DEIS should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

SCE Comment:

The DEIR/DEIS should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

Page D.7-37

DEIR/DEIS Text: F3-255

Impact CL-2: Construction, operation and maintenance, and restoration would cause an adverse change to unknown buried prehistoric and historical archaeological sites or buried Native American human remains (Class I)

SCE Comment:

The DEIR/DEIS incorrectly assumes that the Proposed Project will have unanticipated discoveries and that resource could not be avoided, please revise as follows:

Impact CL-2: Construction, operation and maintenance, and restoration ~~would~~ could cause an adverse change to unknown buried prehistoric and historical archaeological sites or buried Native American human remains (Class I)

Page D.7-37

DEIR/DEIS Text: F3-256

Impact CL-2: Construction, operation and maintenance, and restoration would cause an adverse change to unknown buried prehistoric and historical archaeological sites or buried Native American human remains (Class I)

For the connected actions in the Desert Center and Blythe areas, unknown buried resources could be inadvertently unearthed during ground-disturbing activities. Destruction of potentially significant cultural resources would be a significant impact. In the event that a previously unknown archaeological resource is discovered, the implementation of mitigation measures similar Mitigation Measure CL-2a (Treatment of previously unidentified cultural resources) would ensure that impacts are reduced to a less than significant level (Class II). As well, unmarked burials could be inadvertently unearthed and would have to be properly treated in accordance with federal and state regulations. Nonetheless, the effect would be considered adverse under the regulations in the NHPA, and therefore, treatment of the remains other than protection in place, would not reduce the impacts to a less than significant level. Impacts would remain significant (Class I).

SCE Comment:

The DEIR/DEIS should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

Comment Set F3: Southern California Edison Company (cont.)

Page D.7-38

DEIR/DEIS Text: F3-257

Two impacts related to cultural resources were identified for the Proposed Project.

SCE Comment:

Please revise as follows:

~~Two~~ Impact CL-1 and CL-2 ~~impacts~~ related to cultural resources were identified for the Proposed Project.

Page D.7-39

DEIR/DEIS Text: F3-258

Two impacts related to cultural resources were identified for the Proposed Project.

SCE Comment:

Please revise as follows:

~~Two~~ Impact CL-1 and CL-2 ~~impacts~~ related to cultural resources were identified for the Proposed Project.

Page D.7-40

DEIR/DEIS Text: F3-259

Two impacts related to cultural resources were identified for the Proposed Project.

SCE Comment:

Please revise as follows:

~~Two~~ Impact CL-1 and CL-2 ~~impacts~~ related to cultural resources were identified for the Proposed Project.

Page D.7-41

DEIR/DEIS Text: F3-260

D.7.4.3 Phased Build Alternative

Impact CL-1: Construction, operation and maintenance, and restoration would cause an adverse change to known historic properties

Impact CL-2: Construction, operation and maintenance, and restoration would cause an adverse change to unknown buried prehistoric and historical archaeological sites or buried Native American human remains

SCE Comment:

As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional survey and associated additional impact analysis. The additional disturbance areas for construction activities could result in additional cultural impacts beyond those analyzed for the Phased Build Alternative in the document, and could be greater than those identified for the Proposed Project.

Page D.7-43

DEIR/DEIS Text: F3-261

Table D.7-14. Mitigation Monitoring Program – Cultural Resources

SCE Comment:

Please update these measures with the recommended changes listed above.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.7-44

DEIR/DEIS Text: F3-262

CL-1a: Avoid environmentally sensitive areas. SCE shall perform focused pre-construction surveys for any project areas not yet surveyed (e.g. new or modified staging areas, pull sites, or other work areas). Resources discovered during the surveys would be subject to Mitigation Measures CL-1b (Develop Cultural Resource Management Plan [CRMP]) and CL-1d (Conduct construction monitoring). Where operationally feasible, all NRHP- and CRHR-eligible resources shall be protected from direct project impacts by project redesign (i.e., relocation of the line, ancillary facilities, or temporary facilities or work areas). In addition, all historic properties/historic resources shall be avoided by all project construction, operation and maintenance, and restoration activities. Avoidance mechanisms shall include fencing off such areas as Environ-mentally Sensitive Areas (ESAs) for the duration of the Proposed Project

SCE Comment:

This measure addresses two different but separate activities - conducting surveys and protecting resources. Consistent with the heading, and because surveys are a standard regulatory requirement, please revise as follows:

CL-1a: Avoid environmentally sensitive areas. ~~SCE shall perform focused pre-construction surveys for any project areas not yet surveyed (e.g. new or modified staging areas, pull sites, or other work areas). Resources discovered during the surveys would be subject to Mitigation Measures CL-1b (Develop Cultural Resource Management Plan [CRMP]) and CL-1d (Conduct construction monitoring).~~ Where operationally feasible, all NRHP- and CRHR-eligible resources shall be protected from direct project impacts by project redesign (i.e., relocation of the line, ancillary facilities, or temporary facilities or work areas). In addition, ~~all historic properties/historic~~ these resources shall be avoided by all project construction, operation and maintenance, and restoration activities. Avoidance mechanisms shall include fencing off such areas as Environ-mentally Sensitive Areas (ESAs) for the duration of the Proposed Project or as outlined in the Cultural Resource Management Plan.

Page D.7-44

DEIR/DEIS Text: F3-263

CL-1c

Any excavation contract (or contracts for other activities that may have subsurface soil impacts) shall include clauses that require construction personnel to attend training so they are aware of the potential for inadvertently exposing buried archaeological deposits.

SCE Comment:

Please revise as follows:

Any excavation contract (or contracts for other activities that may have subsurface soil impacts) shall include clauses that require construction personnel to attend the Worker's Environmental Training Program ~~training~~ so they are aware of the potential for inadvertently exposing buried archaeological deposits.

Pages D.7-45 through 47

DEIR/DEIS Text: F3-264

None-Missing Reference

SCE Comment:

Please add the following:

Bean, Lowell J. 1972. Mukat's People: The Cahuilla Indians of Southern California. University of California Press, Berkeley and Los Angeles.

1978. Cahuilla. In California, edited by R.F. Heizer, pp. 575–587. Handbook of North American Indians, Vol. 8, W.C. Sturtevant, general editor. Smithsonian Institution, Washington D.C.

Comment Set F3: Southern California Edison Company (cont.)

Pages D.7-45 through 47

DEIR/DEIS Text: F3-265

None-Missing Reference

SCE Comment:

Please add the following:

Bean, Lowell J., and William Marvin Mason. 1962. Diaries and Accounts of the Romero Expeditions in Arizona and California, 1823-26. W. Ritchie Press, Los Angeles.

Pages D.7-45 through 47

DEIR/DEIS Text: F3-266

None-Missing Reference

SCE Comment:

Please add the following:

Bean, Lowell J., and Florence C. Shipek. 1978. Luiseño. In California, edited by R.F. Heizer, pp. 550–563. Handbook of North American Indians, vol. 8, W.C. Sturtevant, general editor. Smithsonian Institution, Washington, D.C.

Pages D.7-45 through 47

DEIR/DEIS Text: F3-267

None-Missing Reference

SCE Comment:

Please add the following:

Bean, Lowell John, and Charles R. Smith. 1978. Gabrielino. In California, edited by R.F. Heizer, pp 538-549. Handbook of North American Indians, vol. 8, W.C. Sturtevant, general editor. Smithsonian Institution, Washington, D.C.

Pages D.7-45 through 47

DEIR/DEIS Text: F3-268

None-Missing Reference

SCE Comment:

Please add the following:

Bean, Lowell J. and Sylvia B. Vane, eds. 1978. Persistence and Power: A Study of Native American Peoples in the Sonoran Desert and the Devers-Palo Verde High Voltage Transmission Line. With contributions by Lowell John Bean, Henry F. Dobyns, M. Kay Martin, Richard W. Stoffle, Sylvia Brakke Vane, and David R. M. White. Prepared by Cultural Systems Research, Inc. for Southern California Edison, Rosemead, California. California Historical Resources Information System, Eastern Information Center, University of California, Riverside.

_____.1979. Native Americans of Western Riverside County California and the Devers-Mira Loma 500kV Transmission Line Route (Lamb-Canyon-Mira Loma Section). Prepared by Cultural Systems Research, Inc., Menlo Park, California, for Southern California Edison Company, Rosemead, California.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Pages D.7-45 through 47

DEIR/DEIS Text: F3-269

None-Missing Reference

SCE Comment:

Please add the following:

Bean, Lowell J. Sylvia B. Vane, Michael Lerch, and Jackson Young. 1981. Native American Places in the San Bernardino National Forest, San Bernardino and Riverside Counties, California. Report prepared by Cultural Systems Research, Inc., Menlo Park, for the US Forest Service, South Zone Contracting Office, Arcadia, California.

Pages D.7-45 through 47

DEIR/DEIS Text: F3-270

None-Missing Reference

SCE Comment:

Please add the following:

Bean, Lowell J., Sylvia B. Vane, and Jackson Young. 1991. The Cahuilla Landscape: The Santa Rosa and San Jacinto Mountains. Menlo Park, CA: Ballena Press.

Pages D.7-45 through 47

DEIR/DEIS Text: F3-271

None-Missing Reference

SCE Comment:

Please add the following:

Bolton, Herbert E. 1930. Anza's California Expeditions, Vols. I–IV. University of California Press, Berkeley.

Pages D.7-45 through 47

DEIR/DEIS Text: F3-272

None-Missing Reference

SCE Comment:

Please add the following:

Cooper, Casey. 2004. U.S. Highway 60. In, Historic California U.S. Highways. Electronic document, http://gbcnet.com/ushighways/US60/US60.html, accessed April 2005.

Pages D.7-45 through 47

DEIR/DEIS Text: F3-273

None-Missing Reference

SCE Comment:

Please add the following:

Crabtree, Robert H. 1981. Archaeology. In A Cultural Resources Overview of the Colorado Desert Planning Units. Eric W. Ritter, Series editor. Report on file, PSSCFO, BLM, Palm Springs, CA.

Comment Set F3: Southern California Edison Company (cont.)

Pages D.7-45 through 47

DEIR/DEIS Text: F3-274

None-Missing Reference

SCE Comment:

Please add the following:

Davis, James T. 1974. Trade Routes and Economic Exchange Among the Indians of California. Publications in Archaeology, Ethnology, and History 3. Ballena Press, Ramona, California.

Pages D.7-45 through 47

DEIR/DEIS Text: F3-275

None-Missing Reference

SCE Comment:

Please add the following:

DeCarlo, Matthew M., and Diane L. Winslow. 2015a. With contributions by Audry Williams and Andrew Belcourt. Engineering Refinements Survey and Recommendation of Eligibility for Cultural Resources with Southern California Edison Company's West of Devers Upgrade Project, Riverside and San Bernardino Counties, California.

_____ 2015b. With contributions by Audry Williams and Andrew Belcourt. Results of Archaeological Testing at Guachama Rancheria, P-36-002311; CA-SBR-2311H, for the Southern California Edison Company's West of Devers Upgrade Project, San Bernardino County, California.

_____ 2015c. With contributions by Audry Williams and Andrew Belcourt. Cultural Resources Impact Assessment and Evaluation Status for the Southern California Edison Company's West of Devers Upgrade Project, Riverside and San Bernardino Counties, California.

Pages D.7-45 through 47

DEIR/DEIS Text: F3-276

None-Missing Reference

SCE Comment:

Please add the following:

Drucker, Philip. 1937. Culture Element Distributions: V, Southern California. University of California Anthropological Records 1(1).

Pages D.7-45 through 47

DEIR/DEIS Text: F3-277

None-Missing Reference

SCE Comment:

Please add the following:

Fickewirth, A.A. 1992. California Railroads. Golden West Books, San Marino, California.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Pages D.7-45 through 47

DEIR/DEIS Text: F3-278

None-Missing Reference

SCE Comment:

Please add the following:

Goldberg, Susan. 2001. Land Use, Mobility, and Intensification Evaluation and Refinement of the Model. In Metropolitan Water District of Southern California, Eastside Reservoir Project, Final Report of Archaeological Investigations, Volume IV: Prehistoric Archaeology Synthesis of Findings, edited by S. K. Goldberg, Chapt. 14. Report prepared by Applied Earthworks, Hemet, California for Metropolitan Water District of Southern California, Los Angeles.

Pages D.7-45 through 47

DEIR/DEIS Text: F3-279

None-Missing Reference

SCE Comment:

Please add the following:

Gruen, J. Philip. 1998. Historic American Engineering Record, Colorado River Aqueduct from Colorado River to Lake Mathews, Parker Dam Vicinity, San Bernardino County, California. HAER CA-226. National Park Service, Washington, D.C.

Pages D.7-45 through 47

DEIR/DEIS Text: F3-280

None-Missing Reference

SCE Comment:

Please add the following:

Hall, Matt E. 1993. Archaeology of Seven Prehistoric Sites in Tiefort Basin, Fort Irwin, San Bernardino County, California.

Pages D.7-45 through 47

DEIR/DEIS Text: F3-281

None-Missing Reference

SCE Comment:

Please add the following:

Horne, Melinda C., and Dennis P. McDougall. 1997. Cultural Resource Survey in the Southern Portion of the National Training Center, Fort Irwin, San Bernardino County, California.

Pages D.7-45 through 47

DEIR/DEIS Text: F3-282

None-Missing Reference

SCE Comment:

Please add the following:

Kroeber, Alfred L. 1907. Shoshonean Dialects of California. University of California Publications in American Archaeology and Ethnology 4(3):66–165.

_____.1925. Handbook of the Indians of California. American Bureau of Ethnology Bulletin 78. Washington, D.C.

Comment Set F3: Southern California Edison Company (cont.)

Pages D.7-45 through 47

DEIR/DEIS Text: F3-283

None-Missing Reference

SCE Comment:

Please add the following:

Laylander, Don. 2006. The Regional Consequences of Lake Cahuilla. San Diego State University Occasional Archaeology Papers 1:59-77. http://soap.edu/Volume1/Lake Cahuilla/cahuilla.htm

Pages D.7-45 through 47

DEIR/DEIS Text: F3-284

None-Missing Reference

SCE Comment:

Please add the following:

Love, Bruce, and Marian Dahdul. 2002. Desert Chronologies and the Archaic Period in the Coachella Valley. Pacific Coast Archaeology Society Quarterly 38(1–2).

Pages D.7-45 through 47

DEIR/DEIS Text: F3-285

None-Missing Reference

SCE Comment:

Please add the following:

Lech, Steve. 2004. Along the Old Roads: A History of the Portion of Southern California That Became Riverside County, 1772–1893. Steve Lech, Riverside, California

Pages D.7-45 through 47

DEIR/DEIS Text: F3-286

None-Missing Reference

SCE Comment:

Please add the following:

McDonald, A. Meg. 1992. Indian Hill Rockshelter and Aboriginal Cultural Adaptation in Anza-Borrego Desert State Park, southeastern California. Unpublished Ph.D. dissertation, Department of Anthropology, University of California, Riverside.

Pages D.7-45 through 47

DEIR/DEIS Text: F3-287

None-Missing Reference

SCE Comment:

Please add the following:

Miller, Wick R. 1984. The Classification of the Uto-Aztecan Languages Based on Lexical Evidence. International Journal of American Linguistics 50(1):1–24.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Pages D.7-45 through 47

DEIR/DEIS Text: F3-288

None-Missing Reference

SCE Comment:

Please add the following:

Moratto, Michael J. 1984. California Archaeology. Academic Press.

Pages D.7-45 through 47

DEIR/DEIS Text: F3-289

None-Missing Reference

SCE Comment:

Please add the following:

Myrick, David F. 1962. Railroads of Nevada and Eastern California. Howell-North Books, Berkeley.

Pages D.7-45 through 47

DEIR/DEIS Text: F3-290

None-Missing Reference

SCE Comment:

Please add the following:

Rolle, A. F. 1963. California: A History. Thomas Y. Crowell Company, New York, New York.

Pages D.7-45 through 47

DEIR/DEIS Text: F3-291

None-Missing Reference

SCE Comment:

Please add the following:

Schaefer, Jerry. 1994. The Challenge of Archaeological Research in the Colorado Desert: Recent Approaches and Discoveries. Journal of California and Great Basin Anthropology 16(1):60–80.

Pages D.7-45 through 47

DEIR/DEIS Text: F3-292

None-Missing Reference

SCE Comment:

Please add the following:

Schaefer, Jerry and Don Laylander. 2007. The Colorado Desert: Ancient Adaptations to Wetlands and Wastelands. In, California Prehistory: Colonization, Culture, and Complexity, edited by T. L. Jones and K. A. Klar, pp. 247–257. Alta Mira Press.

Comment Set F3: Southern California Edison Company (cont.)

Pages D.7-45 through 47

DEIR/DEIS Text: F3-293

None-Missing Reference

SCE Comment:

Please add the following:

Strong, William D. 1929. Aboriginal Society in Southern California. University of California Publications in American Archaeology and Ethnology 26(1):1–358. Berkeley.

Pages D.7-45 through 47

DEIR/DEIS Text: F3-294

None-Missing Reference

SCE Comment:

Please add the following:

Sutton, Mark Q., Mark E. Basgall, Jill K. Gardner, and Mark W. Allen. 2007. Advances in Understanding Mojave Desert Prehistory. In, California Prehistory: Colonization, Culture, and Complexity. Edited by Terry L. Jones and Kathryn A. Klar, pp. 229–245. Alta Mira Press.

Pages D.7-45 through 47

DEIR/DEIS Text: F3-295

None-Missing Reference

SCE Comment:

Please add the following:

Vredenburgh, Larry M., Gary L. Shumway, and Russell D. Hartill. 1981. Desert Fever: An Overview of Mining in the California Desert Living West Press, Canoga Park, California.

Pages D.7-45 through 47

DEIR/DEIS Text: F3-296

None-Missing Reference

SCE Comment:

Please add the following:

Warren, Claude N. 1984. The Desert Region. In California Archaeology, edited by M. J. Moratto, pp. 339–430.Academic Press, Orlando, Florida.

Pages D.7-45 through 47

DEIR/DEIS Text: F3-297

None-Missing Reference

SCE Comment:

Please add the following:

Warren, Claude N., and Robert H. Crabtree. 1986. Prehistory of the Southwestern Area. In Great Basin, edited by W. L. D'Azevedo, pp.183–193. Handbook of the North American Indians, Vol. 11. W.C. Sturtevant, general editor. Smithsonian Institution, Washington, D.C.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Pages D.7-45 through 47

DEIR/DEIS Text: F3-298

None-Missing Reference

SCE Comment:

Please add the following:

Weide, David L. 1974. Regional Environmental History of the Yuha Desert. In Background to Prehistory of the Yuha Desert Region, edited by P.J. Wilke, pp. 9-20. Ballen Press Anthropological Papers 5. Ramona.

Pages D.7-45 through 47

DEIR/DEIS Text: F3-299

None-Missing Reference

SCE Comment:

Please add the following:

White, Raymond C. 1963. Luiseño Social Organization. University of California Publications in American Archaeology and Ethnology 48(2):91–194.

Pages D.7-45 through 47

DEIR/DEIS Text: F3-300

None-Missing Reference

SCE Comment:

Please add the following:

Wilke, Philip. 1974. Settlement and Subsistence at Perris Reservoir: A Summary of Archaeological Investigations. In Perris Reservoir Archaeology, edited by J. F. O'Connell, P. J. Wilke, T. F. King, and C. L. Mix, pp. 20–30. California Department of Parks and Recreation Reports No. 14. Sacramento.

_____.1978. Late Prehistoric Human Ecology at Lake Cahuilla, Coachella Valley, California. Contributions of the University of California Archaeological Research Facility 38. University of California, Berkeley.

Pages D.7-45 through 47

DEIR/DEIS Text: F3-301

SCE (Southern California Edison). 2014. Archival Research and Evaluation Results of 33 Cultural Resources for Southern California Edison Company's West of Devers Upgrade Project, Riverside and San Bernardino Counties, California. Assembled by Williams, Audry, and Andrew Belcourt, with contributions by Roderic McLean, Katie Vallaire, Natalie Brodie, and Jacqueline Hall. August.

SCE Comment:

Please add the following:

~~SCE (Southern California Edison)~~ Williams, Audry, and Andrew Belcourt. 2014. With contributions by Roderic McLean, Katie Vallaire, Natalie Brodie, and Jacqueline Hall. ~~2014.~~ Archival Research and Evaluation Results of 33 Cultural Resources for Southern California Edison Company's West of Devers Upgrade Project, Riverside and San Bernardino Counties, California. Prepared by SCE. ~~Assembled by Williams, Audry, and Andrew Belcourt, with contributions by Roderic McLean, Katie Vallaire, Natalie Brodie, and Jacqueline Hall.~~ August.

Responses to Comment Set F3 – Section D.7 Cultural Resources

F3-197 The commenter suggests including an additional citation in the text for accuracy. We agree with the commenter's suggestion and we have modified Section D.7 (Cultural Resources) to include citation to ASM Affiliates (ASM).

F3-198 The commenter suggests correcting the citation for accuracy. We agree with the commenter's suggestion and we have modified Section D.7.1.1 (Cultural Resources, Regional Setting and Approach to Data Collection) to include citation to DeCarlo and Winslow, 2015a.

F3-199 The commenter suggests revising the text and including additional citations for accuracy. We agree with the commenter's suggestion and we have modified Section D.7.1.1 to include citation to DeCarlo and Winslow, LSA and Williams, and Williams and Belcourt.

F3-200 The commenter suggests including an additional citation for accuracy. We agree with the commenter's suggestion and we have modified Section D.7.1.1 to include the citations, which are the same as Comment F3-199.

F3-201 The commenter suggests using the primary citation, instead of Williams and Belcourt (2014) throughout the Environmental Setting section (D.7.1.2). We agree with the commenter's suggestion and have modified Section D.7.1.2 to include the primary references. Other suggestions for citations identified in Comments F3-202 through F3-240 have also been included in the EIR. These are not individually enumerated here. The changes are in Section D.7.1.2 (Cultural Resources, Environmental Setting).

F3-202 See Response to Comment F3-201.

F3-203 See Response to Comment F3-201.

F3-204 See Response to Comment F3-201.

F3-205 See Response to Comment F3-201.

F3-206 See Response to Comment F3-201.

F3-207 See Response to Comment F3-201.

F3-208 See Response to Comment F3-201.

F3-209 See Response to Comment F3-201.

F3-210 See Response to Comment F3-201.

F3-211 See Response to Comment F3-201.

F3-212 See Response to Comment F3-201.

F3-213 See Response to Comment F3-201.

F3-214 See Response to Comment F3-201.

F3-215 See Response to Comment F3-201.

F3-216 See Response to Comment F3-201.

F3-217 See Response to Comment F3-201.

F3-218 See Response to Comment F3-201.

F3-219 See Response to Comment F3-201.

F3-220 See Response to Comment F3-201.

F3-221 See Response to Comment F3-201.

F3-222 See Response to Comment F3-201.

F3-223 See Response to Comment F3-201.

F3-224 See Response to Comment F3-201.

F3-225 See Response to Comment F3-201.

F3-226 See Response to Comment F3-201.

F3-227 See Response to Comment F3-201.

F3-228 See Response to Comment F3-201.

F3-229 See Response to Comment F3-201.

F3-230 See Response to Comment F3-201.

F3-231 See Response to Comment F3-201.

F3-232 See Response to Comment F3-201.

F3-233 See Response to Comment F3-201.

F3-234 See Response to Comment F3-201.

F3-235 See Response to Comment F3-201.

F3-236 See Response to Comment F3-201.

F3-237 See Response to Comment F3-201.

F3-238 See Response to Comment F3-201.

F3-239 See Response to Comment F3-201.

F3-240 See Response to Comment F3-201.

F3-241 The commenter recommends revising the significance criteria in Section D.7.3.2.1 to reflect that impacts to cultural resources are likely, but not inevitable. Significance criteria relate to impact determinations under CEQA, not NEPA. However, we agree that Project-related impacts to cultural resources are likely, not inevitable. It the CPUC's Final EIR, the wording of the significance criteria was slightly revised to reflect potential impacts by explaining when the project would cause a potentially significant impact rather than stating that the Proposed Project would cause one. See also Final EIS Section D.7.3.2 (Cultural Resources, Impact Criteria).

F3-242 The commenter suggests revising the significance criteria in Section D.7.3.2.1 for accuracy. The commenter's suggestion helps to clarify significance criteria; therefore, the text in Section D.7.3.2.1 has been modified to include the suggested revisions. See also Response to Comment F3-241.

F3-243 The commenter suggests revising Impact CL-1 in Section D.7.3.3 to reflect that no direct impacts to known historic properties were identified. The commenter's suggestion helps to clarify Impact CL-1; therefore, the impact statement has been modified to include the suggested revision, changing "would" to "could." See Section D.7.3.3 (Cultural Resources, Impacts and Mitigation Measures). Comments F3-244 through F3-246 repeat this comment.

F3-244 See Response to Comment F3-243.

F3-245 See Response to Comment F3-243.

F3-246 See Response to Comment F3-243.

F3-247 The commenter suggests revising Mitigation Measure CL-1a in Section D.7.3.3 to remove the pre-construction surveys, noting that the surveys are a standard regulatory requirement. The commenter also suggests revising Mitigation Measure CL-1a to reference the Cultural Resource Management Plan (CRMP) for details. The commenter's suggestions are noted; however, we disagree with the removal of pre-construction surveys from Mitigation Measure CL-1a (Avoid environmentally sensitive areas). The language will remain in Mitigation Measure CL-1a to ensure the surveys are completed and become part of the CRMP. However, the commenter's suggestion to reference the CRMP helps to clarify Mitigation Measure CL-1a; therefore, the Mitigation Measure has been modified to include the suggested reference to the CRMP.

F3-248 The commenter suggests revising Mitigation Measure CL-1c in Section D.7.3.3 to include specifically the Worker's Environmental Training Program. The commenter's suggestion helps to clarify Mitigation Measure CL-1c; therefore, the Mitigation Measure has been modified to include the suggested revision, specifying the WETP.

F3-249 The commenter notes that Impact CL-2 incorrectly assumes that the proposed Project will have unanticipated discoveries and that resources could not be avoided and recommends revising Impact CL-2 for clarification. The commenter's suggestion helps to clarify Impact CL-2; therefore, the impact statement has been modified to include the suggested revision, changing "would" to "could." Comments F3-250 through F3-253 and F3-255 repeat this revision request for Impacts CL-1 or CL-2, and the revisions has been made in the EIR/EIS.

F3-250 See Response to Comment F3-249.

F3-251 See Response to Comment F3-243.

F3-252 See Response to Comment F3-249.

F3-253 See Response to Comment F3-243.

F3-254 See Response to Comment F3-102 with regard to mitigation for connected actions.

F3-255 See Response to Comment F3-249.

F3-256 See Response to Comment F3-102 with regard to mitigation for connected actions.

F3-257 The commenter suggests revising the text in Section D.7.4 to include Impact numbers. The commenter's suggestion helps to clarify the alternatives section; therefore, the text in Section D.7.4 (Cultural Resources, Environmental Impacts of Project Alternatives) has been modified to include the suggested revision, adding Impact numbers. Comments F3-258 and F3-259 are similar in nature, and the revision has been made.

F3-258 See Response to Comment F3-257.

F3-259 See Response to Comment F3-257.

F3-260 The commenter suggests construction requirements for the Phased Build Alternative were not addressed or were understated in the DEIR/DEIS and that additional cultural impacts could occur. See Responses to Comments F1-1, F1-10, and F1-14.

F3-261 The commenter suggests revising Mitigation Measure CL-1a and Mitigation Measure CL-1c in Table D.7-14 consistent with the revisions in the text. The Mitigation Measures in the table have been revised to be consistent with the text revisions (see Responses to Comment F3-262 and F3-263 below).

F3-262 Regarding Table D.7-14, the commenter suggests revising Mitigation Measure CL-1a in Section D.7.6 to remove the pre-construction surveys noting that the surveys are a standard regulatory requirement. The commenter also suggests revising Mitigation Measure CL-1a to reference the Cultural Resource Management Plan (CRMP) for details. The commenter's suggestion is noted; however, we disagree with the removal of pre-construction surveys from Mitigation Measure CL-1a. The language will remain in Mitigation Measure CL-1a to ensure the surveys are completed and become part of the CRMP. However, the commenter's suggestion to reference the CRMP helps to clarify Mitigation Measure CL-1a; therefore, the Mitigation Measure has been modified to include the suggested revision.

F3-263 Regarding Table D.7-14, the commenter suggests revising Mitigation Measure CL-1c in Section D.7.6 to include Worker's Environmental Training. The commenter's suggestion helps to clarify Mitigation Measure CL-1c; therefore, the Mitigation Measure has been modified to include the suggested revision.

F3-264 The commenter requests that the missing primary references be included in the References cited section. We agree with the commenter's suggestion and have modified Section D.7.7 (Cultural Resources, References) to include the primary references. Comments F3-265 through F3-301 provide additional references, which have been included in Section D.7.7.

F3-265 See Response to Comment F3-264.

F3-266 See Response to Comment F3-264.

F3-267 See Response to Comment F3-264.

F3-268 See Response to Comment F3-264.

F3-269 See Response to Comment F3-264.

F3-270 See Response to Comment F3-264.

F3-271 See Response to Comment F3-264.

F3-272 See Response to Comment F3-264.

F3-273 See Response to Comment F3-264.

F3-274 See Response to Comment F3-264.

F3-275 See Response to Comment F3-264.

F3-276 See Response to Comment F3-264.

F3-277 See Response to Comment F3-264.

F3-278 See Response to Comment F3-264.

F3-279 See Response to Comment F3-264.

F3-280 See Response to Comment F3-264.

F3-281 See Response to Comment F3-264.

F3-282 See Response to Comment F3-264.

F3-283 See Response to Comment F3-264.

F3-284 See Response to Comment F3-264.

F3-285 See Response to Comment F3-264.

F3-286 See Response to Comment F3-264.

F3-287 See Response to Comment F3-264.

F3-288 See Response to Comment F3-264.

F3-289 See Response to Comment F3-264.

F3-290 See Response to Comment F3-264.

F3-291 See Response to Comment F3-264.

F3-292 See Response to Comment F3-264.

F3-293 See Response to Comment F3-264.

F3-294 See Response to Comment F3-264.

F3-295 See Response to Comment F3-264.

F3-296 See Response to Comment F3-264.

F3-297 See Response to Comment F3-264.

F3-298 See Response to Comment F3-264.

F3-299 See Response to Comment F3-264.

F3-300 See Response to Comment F3-264.

F3-301 See Response to Comment F3-264.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Section D.8 Socioeconomics and Environmental Justice

Page D.8-1

DEIR/DEIS Text: F3-302

In addition to the 220 kV upgrades, the Proposed Project includes:

- Upgrading substation equipment for 220 kV lines (Devers, El Casco, Etiwanda, San Bernardino, and Vista Substations) and 66 kV lines (Timoteo and Tennessee Substations)

SCE Comment:

As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.

In addition to the 220 kV upgrades, the Proposed Project includes:

- Upgrading substation equipment for 220 kV lines (Devers, El Casco, Etiwanda, San Bernardino, and Vista Substations) ~~and 66 kV lines (Timoteo and Tennessee Substations)~~

Page D.8-2

DEIR/DEIS Text: F3-303

Substation Upgrades. The work required inside Etiwanda, Timoteo, and Tennessee Substations would consist of upgrades to and/or replacement of existing equipment.

SCE Comment:

As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations:

Substation Upgrades. The work required inside Etiwanda~~, Timoteo, and Tennessee~~ Substation~~s~~ would consist of upgrades to and/or replacement of existing equipment.

Responses to Comment Set F3 – Section D.8 Socioeconomics and Environmental Justice

F3-302 The commenter states that additional engineering analysis shows Timoteo and Tennessee Substations are no long needed to support the Project (see Response to Comment F3-65). Similar to throughout the Final EIS, in Section D.8 (Socioeconomics and Environmental Justice) the first bullet in Section D.8.1.1.2 has been revised, deleting these two substations.

F3-303 This comment is similar to Comment F3-302 regarding substation upgrades. The text in paragraph In Section D.8.1.1.2 on Substation Upgrades has been revised to delete these two substations.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Section D.9 Geology and Soils

Pages D.9-27 through 28

DEIR/DEIS Text: F3-304

Impact G-1: Project structures could be damaged by surface fault rupture at crossings of active and potentially active faults (Class II)

For solar projects in the Desert Center and Blythe areas, regional seismic events could expose facilities to damage. Implementation of designs that comply with state and local building codes and other regulations would reduce seismic effects by ensuring that occupied buildings are constructed to withstand seismic shaking. Consistent with regulations and facility design standards (e.g., California Building Code, Title 24, Part 2), solar projects would implement measures that would reduce the likelihood of structural failure in the event of an earthquake. This impact is less than significant with mitigation (Class II).

SCE Comment:

The DEIR/DEIS should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

Page D.9-28

DEIR/DEIS Text: F3-305

Impact G-3: Erosion could be triggered or accelerated due to construction activities (Class II)

For the identified connected action projects, disturbance of existing soil and/or desert pavement could result in a substantial increase in on-site wind- and waterborne soil erosion. However, project design features, compliance with regulatory requirement related to fugitive dust control, and standard SWPPP BMPs would ensure that erosion due to project construction activities is minimized. For example, the Desert Harvest Project would implement Mitigation Measures MM AIR-1 (Fugitive Dust Control Plan), MM AIR-2 (Fugitive Dust Control of Unpaved Roads), and MM WAT-4 (Surface Water Protection Plan and Drainage Design Specifications) and the Palen Project has similar requirements regarding compliance with air quality and water regulations. Comparable measures would apply to other solar projects. Compliance with applicable regulations and mitigation measures of known projects would ensure that impacts are at a less than significant level with mitigation (Class II).

SCE Comment:

The DEIR/DEIS should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

Page D.9-29

DEIR/DEIS Text: F3-306

Impact G-5: Project structures could be damaged by problematic soils exposing people or structures to hazards (Class II)

For solar facilities identified as connected actions, potential hazards could be effectively mitigated by incorporating recommendations contained in required project geotechnical evaluation. As well, structures must meet the requirements of all applicable federal, State, and county permits and building codes. Application of standard design and construction practices and implementation of typical mitigation measures would help avoid damage to project structures as result of problematic soils. Impacts would be less than significant with mitigation (Class II).

SCE Comment:

The DEIR/DEIS should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

Comment Set F3: Southern California Edison Company (cont.)

Pages D.9-33 through 35

DEIR/DEIS Text: F3-307

D.9.4.3 Phased Build Alternative

Impact G-1: Project structures could be damaged by surface fault rupture at crossings of active and potentially active faults

Impact G-2: Project structures could be damaged by seismically induced groundshaking and/or ground failures, such as landslides and liquefaction-related phenomena, exposing people or structures to hazards

Impact G-3: Erosion could be triggered or accelerated due to construction activities

Impact G-4: Slope instability, such as landslides, could be triggered or accelerated due to construction activities

Impact G-5: Project structures could be damaged by problematic soils exposing people or structures to hazards

SCE Comment:

As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional study and associated additional impact analysis. The additional disturbance areas and the increased duration could result in additional geology impacts beyond those analyzed for the Phased Build Alternative (in the DEIR/DEIS), and could be greater than those identified for the Proposed Project.

Responses to Comment Set F3 – Section D.9 Geology and Soils

F3-304 This comment requests clarification in the EIS that mitigation referenced for Connected Actions is not imposed on SCE. See Response to Comment F3-102 with regard to mitigation for connected actions.

F3-305 This comment is similar to Comment F3-304. See Response to Comment F3-102 with regard to mitigation for connected actions.

F3-306 This comment is similar to CommentF3-304. See Response to Comment F3-102 with regard to mitigation for connected actions.

F3-307 Please see General Response GR-4 regarding the future construction impacts of the Phased Build Alternative.

Comment Set F3: Southern California Edison Company (cont.)

Section D.10 Hazards and Hazardous Materials

Page D.10-4

DEIR/DEIS Text: F3-308

Hazardous substances are defined by federal and State regulations to protect public health and the environment.

SCE Comment:

For accuracy, please make the following revisions:

Hazardous substances are defined by federal and State regulations **in order** to protect **human** health and the environment.

Page D.10-5

DEIR/DEIS Text: F3-309

Clean Water Act

The United States Environmental Protection Agency (EPA) implements provisions of the CWA through a variety of regulations, including the National Contingency Plan and the Oil Pollution and Prevention Regulations.

SCE Comment:

For clarity, please make the following revision:

The United States Environmental Protection Agency (EPA) implements provisions of the CWA through a variety of regulations, including the National Contingency Plan (NCP) and the Oil Pollution and Prevention Regulations.

Page D.10-6

DEIR/DEIS Text: F3-310

Oil Pollution and Prevention Regulation

The oil pollution regulation contains two major types of requirements: prevention requirements (SPCC Rule) and Facility Response Plan (FRP) requirements.

SCE Comment:

SPCC was not previously defined in Section D.10, although it may be defined in previous sections. Please make the following revision:

The oil pollution regulation contains two major types of requirements: prevention requirements (Spill Prevention, Countermeasures, and Control (SPCC)) and Facility Response Plan (FRP) requirements.

Page D.10-6

DEIR/DEIS Text: F3-311

Porter-Cologne Water Quality Control Act

Porter-Cologne designated the State Water Resources Control Board as the ultimate authority over State water rights and water quality policy and established nine Regional Water Quality Control Boards (RWQCBs) to oversee water quality on a day-to-day basis at the local/regional level.

SCE Comment:

This is the first appearance of State Water Resources Control Board, which is later defined as SWRCB. It should be defined at this initial usage, please make the following revision:

Porter-Cologne designated the State Water Resources Control Board (SWRCB) as the ultimate authority over State water rights and water quality policy and established nine Regional Water Quality Control Boards (RWQCBs) to oversee water quality on a day-to-day basis at the local/regional level.

Comment Set F3: Southern California Edison Company (cont.)

Page D.10-10

DEIR/DEIS Text: F3-312

D.10.3.2 CEQA Significance Criteria

The significance criteria for assessing the impacts to hazardous materials are based on the Environmental Checklist in Appendix G of the CEQA guidelines. An impact would be considered significant if project construction or operation would:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. The routine storage and use of hazardous materials, principally fuels, lubricants, solvents, and paints at project staging areas, construction sites and substations could result in spills and leaks and the subsequent cleanup and disposal.
- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Spills and accidental releases of fuel, oil, solvents and other hazardous materials could occur in staging yards, construction sites, substations, and along the transmission line during maintenance that could expose workers and the public to hazardous conditions.
- Be located on a site, which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment. Project construction of new access roads, transmission structures, and substation upgrades could encounter pre-existing contaminated soil at known hazardous waste sites or at previously unknown spill or waste sites.
- Create a significant hazard to workers that encounter residual pesticides and/or herbicides during grading or excavation in agricultural areas. Project construction on historic, recent or active agricultural land where the presence of residual pesticide and herbicide contamination of the soil could represent a potential health hazard associated with exposure of construction workers and the public to contaminated soil.

SCE Comment:

Significance criteria not found in the California Environmental Quality Act (CEQA) guidelines are not appropriate for inclusion in an analysis of CEQA Significance Criteria. As such, please remove the following:

- ~~Create a significant hazard to workers that encounter residual pesticides and/or herbicides during grading or excavation in agricultural areas. Project construction on historic, recent or active agricultural land where the presence of residual pesticide and herbicide contamination of the soil could rep-resent a potential health hazard associated with exposure of construction workers and the public to contaminated soil.~~

Comment Set F3: Southern California Edison Company (cont.)

Page D.10-11

DEIR/DEIS Text:

HH-1a: Prepare a Hazardous Materials and Waste Management Plan. … F3-313

Fueling and Maintenance of Construction Equipment: Written procedures for fueling and maintenance of construction equipment would be prepared prior to construction. Refueling and maintenance procedures may require vehicles and equipment to be refueled on site or by tanker trucks. Procedures will require the use of drop cloths made of plastic, drip pans and trays to be placed under refilling areas to ensure that chemicals do not come into contact with the ground. Refueling stations would be located in designated areas where absorbent pad and trays would be available. The fuel tanks would also contain a lined area to ensure that accidental spillage does not occur. Drip pans or other collection devices would be placed under the equipment at night to capture drips or spills. Equipment would be inspected daily for potential leakage or failures. Hazardous materials such as paints, solvents, and penetrants would be kept in an approved locker or storage cabinet.

Fueling and Maintenance of Helicopters: Written procedures for fueling and maintenance of helicopters would be prepared prior to construction. Procedures may require helicopters be refueled at helicopter staging areas or local airports. Procedures would include the use of drop cloths made of plastic, drip pans and trays to be placed under refilling areas to ensure that chemicals do not come into contact with the ground. Refueling areas would be located in designated areas where absorbent pad and trays are available.

Emergency Release Response Procedures: An Emergency Response Plan detailing responses to releases of hazardous materials would be developed prior to construction activities. The plan must prescribe hazardous materials handling procedures for reducing the potential for a spill during construction, and would include an emergency response program to ensure quick and safe cleanup of accidental spills. Hazardous materials shall not be stored near drains or waterways. Fueling shall not take place within 500 feet of drains or waterways. All construction personnel, including environmental monitors, would be made aware of state and federal emergency response reporting guidelines for accidental spills.

SCE Comment:

Please make the following clarifying revisions, including the reduction of the limitation from waters from 500 feet to 50 feet, as is typical for construction projects.

HH-1a: Prepare a Hazardous Materials and Waste Management Plan. …

Fueling and Maintenance of Construction Equipment: Written procedures for fueling and maintenance of construction equipment would be prepared prior to construction. Refueling and maintenance procedures may require vehicles and equipment to be refueled on site or by tanker trucks. Procedures will require the use of drop cloths made of plastic, drip pans and trays to be placed under refilling areas to ensure that chemicals do not come into contact with the ground. Refueling ~~stations~~ would be located in ~~designated~~ areas where absorbent pad and trays would be available. The fuel tanks would also contain a lined area to ensure that accidental spillage does not occur. Drip pans or other collection devices would be placed under the equipment at night to capture drips or spills. Equipment would be inspected daily for potential leakage or failures. Hazardous materials such as paints, solvents, and penetrants would be kept in an approved locker or storage cabinet.

Fueling and Maintenance of Helicopters: Written procedures for fueling and maintenance of helicopters would be prepared prior to construction. Procedures may require helicopters be refueled at <u>construction work areas,</u> helicopter staging areas or local airports. Procedures would include the use of drop cloths made of plastic, drip pans and trays to be placed under refilling areas to ensure that chemicals do not come into contact with the ground. Refueling areas would be located in ~~designated~~ areas where absorbent pad and trays are available.

Emergency Release Response Procedures: An Emergency Response Plan detailing responses to releases of hazardous materials would be developed prior to construction activities. The plan must prescribe hazardous materials handling procedures for reducing the potential for a spill during construction, and would include an emergency response program to ensure quick and safe cleanup of accidental spills. Hazardous materials shall not be stored near drains or waterways. Fueling shall not take place within 50~~0~~ feet of drains or waterways. All construction personnel, including environmental monitors, would be made aware of state and federal emergency response reporting guidelines for accidental spills.

Comment Set F3: Southern California Edison Company (cont.)

Page D.10-13

DEIR/DEIS Text:

F3-314

HH-2a: Prepare a Soil Management Plan. A Soil Management Plan shall be developed and implemented for construction of the Proposed Project. The objective of the Soil Management Plan is to provide guidance for the proper handling, onsite management, and disposal of impacted soil that might be encountered during construction activities. The plan would include practices that are consistent with the California Title 8, Occupational Safety and Health Administration (Cal-OSHA) regulations, as well as appropriate remediation standards that are protective of the planned use. Appropriately trained professionals would be on site during preparation, grading, and related earthwork activities to monitor soil conditions encountered. The Soil Management Plan would provide guidelines for the following:

- Identifying impacted soil
- Assessing impacted soil
- Soil excavation
- Impacted soil storage
- Verification sampling
- Impacted soil characterization and disposal

The plan shall outline how Project construction crews would identify, handle, and dispose of potentially contaminated soil; identify the qualifications of the appropriately trained professionals that would monitor soil conditions and conduct soil sampling during construction; coordinate laboratory testing; and oversee disposal. The Plan shall identify the anticipated field screening methods and appropriate regulatory limits to be applied to determine proper handling and disposal. The Soil Management Plan shall also include requirements for documenting and reporting incidents of encountered contaminants, such as documenting locations of occurrence, sampling results, and reporting actions taken to dispose of contaminated materials. In the event that potentially contaminated soils were encountered within the footprint of construction, soils would be tested and stockpiled. The appropriate Certified Unified Program Agency (CUPA) or RWQCB would determine whether further assessment is warranted.

The Soil Management Plan shall be submitted to the CPUC and BLM 30 days prior to the start of construction for review and approval.

SCE Comment:

The mitigation measure to prepare a soil management plan is redundant of state, federal, and local requirements already in place. Please replace with the following as an alternative:

~~HH-2a: Prepare a Soil Management Plan. A Soil Management Plan shall be developed and implemented for construction of the Proposed Project. The objective of the Soil Management Plan is to provide guidance for the proper handling, onsite management, and disposal of impacted soil that might be encountered during construction activities. The plan would include practices that are consistent with the California Title 8, Occupational Safety and Health Administration (Cal-OSHA) regulations, as well as appropriate remediation standards that are protective of the planned use. Appropriately trained professionals would be on site during preparation, grading, and related earthwork activities to monitor soil conditions encountered. The Soil Management Plan would provide guidelines for the following: • Identifying impacted soil • Assessing impacted soil • Soil excavation • Impacted soil storage • Verification sampling • Impacted soil characterization and disposal The plan shall outline how Project construction crews would identify, handle, and dispose of potentially contaminated soil; identify the qualifications of the appropriately trained professionals that would monitor soil conditions and conduct soil sampling during construction; coordinate laboratory testing; and oversee disposal. The Plan shall identify the anticipated field screening methods and appropriate regulatory limits to be applied to determine proper handling and disposal. The Soil Management Plan shall also include requirements for documenting and reporting incidents of encountered contaminants, such as documenting locations of occurrence, sampling results, and reporting actions taken to dispose of contaminated materials. In the event that potentially contaminated soils were encountered within the footprint of construction, soils would be tested and stockpiled. The appropriate Certified Unified Program Agency (CUPA) or RWQCB would determine whether~~

Comment Set F3: Southern California Edison Company (cont.)

~~further assessment is warranted. The Soil Management Plan shall be submitted to the CPUC and BLM 30 days prior to the start of construction for review and approval.~~ **F3-314 cont.**

HH-2a: Observe exposed soil for evidence of contamination. During grading or excavation work, the construction contractor shall observe the exposed soil for visual evidence of contamination. If visual contamination indicators are observed during construction, the contractor shall stop work until the material is properly characterized and appropriate measures are taken to protect human health and the environment. The contractor shall comply with all local, state, and federal requirements for sampling and testing, and subsequent removal, transport, and disposal of hazardous materials. Additionally, in the event that evidence of contamination is observed, the contractor shall document the exact location of the contamination and shall notify the CPUC or BLM, describing proposed actions. A weekly report listing encounters with contaminated soils and describing actions taken shall be submitted to the CPUC or BLM.

Comment Set F3: Southern California Edison Company (cont.)

Page D.10-14

DEIR/DEIS Text: F3-315

HH-3a: Identify pesticide/herbicide contamination. Prior to construction, soil samples shall be collected in construction areas that where the land has historically or is currently being used for agriculture and would be subject to ground disturbance by the project. The sampling is to identify the possible presence of and to delineate the extent of pesticide and/or herbicide contamination. Excavated materials containing elevated levels of pesticide or herbicide will require special handling and disposal procedures consistent with the requirements of Mitigation Measure HH-2a (Prepare a soils management plan). As appropriate, State, Riverside County and San Bernardino County regulatory agencies shall be contacted to provide oversight regarding the handling, treatment, and/or disposal options. In the event pesticide or herbicide contamination is found, CPUC/BLM shall be notified of the event and shall be kept apprised of the steps taken to address the problem.

SCE Comment:

To clarify that SCE is only responsible for excavated materials impacted by the project, and to remove redundancies, as the regulatory agencies would be notified of the existence of hazardous materials by the hazardous wastes manifests, SCE suggests the following edits:

HH-3a: Identify pesticide/herbicide contamination. Prior to construction, soil samples shall be collected in construction areas that where the land has historically or is currently being used for agriculture and would be subject to ground disturbance by the project. The sampling is to identify the possible presence of and to delineate the extent of pesticide and/or herbicide contamination. Excavated project materials containing elevated levels of pesticide or herbicide will require special handling and disposal ~~procedures consistent with the requirements of Mitigation Measure HH-2a (Prepare a soils management plan). As appropriate, State, Riverside County and San Bernardino County regulatory agencies shall be contacted to provide oversight regarding the handling, treatment, and/or disposal options.~~ In the event pesticide or herbicide contamination is found, CPUC/BLM shall be notified of the event and shall be kept apprised of the steps taken to address the problem.

Page D.10-16

DEIR/DEIS Text: F3-316

Impact HH-1: Improper handling, storage, or accidental spills or releases of hazardous materials could result in harm to the public, project workers, or the environment (Class II)

For connected solar projects in the Desert Center and Blythe areas, the potential for improper handling, storage, or accidental spills or releases of hazardous materials to harm to the public, project workers, or the environment would be reduced by implementation of typical mitigation measures. For both the Palen and Desert Harvest projects (CEC, 2014 and BLM, 2012), this impact was found to be less than significant with mitigation (Class II). With implementation of typical mitigation, Impact HH-1 also would be less than significant with mitigation for connected solar PV projects (Class II).

SCE Comment:

The DEIR/DEIS should clarify that the potential mitigation measures referenced for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

Comment Set F3: Southern California Edison Company (cont.)

Page D.10-16 – 17

DEIR/DEIS Text: F3-317

Impact HH-2: Ground disturbance could result in mobilization of contaminants currently existing in the soil, creating potential pathways of exposure to humans or other sensitive receptors (Class II for Proposed Project; Class II or Class III for Connected Actions)

For the connected actions in the Desert Center area, based on the Phase I Environmental Site Assessment for the Palen Solar Power Project, this impact was found to be less than significant (Class III). For the Desert Harvest Solar Project, this impact was found to be less than significant with mitigation (Class II). For the other connected solar projects in the Desert Center and Blythe areas, Phase I Environ-mental Site Assessments would be required. The findings of the assessments would establish measures to treat any existing contamination discovered. This impact would be less than significant impact with typical mitigation applied (Class II).

SCE Comment:

The DEIR/DEIS should clarify that the potential mitigation measures referenced for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

Page D.10-17

DEIR/DEIS Text: F3-318

Impact HH-3: Ground disturbance could result in mobilization of pesticides and herbicides in agricultural soils, creating potential pathways of exposure to humans or other sensitive receptors (Class II)

For connected solar projects, Phase I Site Assessments and implementation of mitigation measures similar to those for the Proposed Project (see Section D.10.3.3) would reduce this impact to less than significant with mitigation (Class II).

SCE Comment:

The DEIR/DEIS should clarify that the potential mitigation measures referenced for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

Pages D.10-20 through 21

DEIR/DEIS Text: F3-319

D.10.4.3 Phased Build Alternative

Impact HH-1: Improper handling, storage, or accidental spills or releases of hazardous materials could result in harm to the public, project workers, or the environment

Impact HH-2: Ground disturbance could result in mobilization of contaminants currently existing in the soil, creating potential pathways of exposure to humans or other sensitive receptors

Impact HH-3: Ground disturbance could result in mobilization of pesticides and herbicides in agricultural soils, creating potential pathways of exposure to humans or other sensitive receptors

SCE Comment:

As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional study and associated additional impact analysis. The additional disturbance areas and the increased duration could result in additional hazards and hazardous materials impacts beyond those analyzed for the Phased Build Alternative and could be greater than those identified for the Proposed Project.

Comment Set F3: Southern California Edison Company (cont.)

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Table D.10-1. Mitigation Monitoring Program – Hazards and Hazardous Materials F3-320

HH-1a: Prepare a Hazardous Materials and Waste Management Plan. …

- **Fueling and Maintenance of Construction Equipment:** Written procedures for fueling and maintenance of construction equipment would be prepared prior to construction. Refueling and maintenance procedures may require vehicles and equipment to be refueled on site or by tanker trucks. Procedures will require the use of drop cloths made of plastic, drip pans and trays to be placed under refilling areas to ensure that chemicals do not come into contact with the ground. Refueling stations would be located in designated areas where absorbent pad and trays would be available. The fuel tanks would also contain a lined area to ensure that accidental spillage does not occur. Drip pans or other collection devices would be placed under the equipment at night to capture drips or spills. Equipment would be inspected daily for potential leakage or failures. Hazardous materials such as paints, solvents, and penetrants would be kept in an approved locker or storage cabinet.
- **Fueling and Maintenance of Helicopters:** Written procedures for fueling and maintenance of helicopters would be prepared prior to construction. Procedures may require helicopters be refueled at helicopter staging areas or local airports. Procedures would include the use of drop cloths made of plastic, drip pans and trays to be placed under refilling areas to ensure that chemicals do not come into contact with the ground. Refueling areas would be located in designated areas where absorbent pad and trays are available.
- **Emergency Release Response Procedures:** An Emergency Response Plan detailing responses to releases of hazardous materials would be developed prior to construction activities. The plan must prescribe hazardous materials handling procedures for reducing the potential for a spill during construction, and would include an emergency response program to ensure quick and safe cleanup of accidental spills. Hazardous materials shall not be stored near drains or waterways. Fueling shall not take place within 500 feet of drains or waterways. All construction personnel, including environmental monitors, would be made aware of state and federal emergency response reporting guidelines for accidental spills.

SCE Comment:

Please see recommended clarifying edits, including the reduction of the limitation from waters from 500 feet to 50 feet, as is typical for construction projects:

Table D.10-1. Mitigation Monitoring Program – Hazards and Hazardous Materials

HH-1a: Prepare a Hazardous Materials and Waste Management Plan. …

- **Fueling and Maintenance of Construction Equipment:** Written procedures for fueling and maintenance of construction equipment would be prepared prior to construction. Refueling and maintenance procedures may require vehicles and equipment to be refueled on site or by tanker trucks. Procedures will require the use of drop cloths made of plastic, drip pans and trays to be placed under refilling areas to ensure that chemicals do not come into contact with the ground. Refueling ~~stations~~ would be located in ~~designated~~ areas where absorbent pad and trays would be available. The fuel tanks would also contain a lined area to ensure that accidental spillage does not occur. Drip pans or other collection devices would be placed under the equipment at night to capture drips or spills. Equipment would be inspected daily for potential leakage or failures. Hazardous materials such as paints, solvents, and penetrants would be kept in an approved locker or storage cabinet.
- **Fueling and Maintenance of Helicopters:** Written procedures for fueling and maintenance of helicopters would be prepared prior to construction. Procedures may require helicopters be refueled at <u>construction work areas,</u> helicopter staging areas or local airports. Procedures would include the use of drop cloths made of plastic, drip pans and trays to be placed under refilling areas to ensure that chemicals do not come into contact with the ground. Refueling areas would be located in ~~designated~~ areas where absorbent pad and trays are available.
- **Emergency Release Response Procedures:** An Emergency Response Plan detailing responses to releases of hazardous materials would be developed prior to construction activities. The plan must prescribe hazardous materials handling procedures for reducing the potential for a spill during construction, and would include an emergency response program to ensure quick and safe cleanup of accidental spills. Hazardous materials shall not be stored near drains or waterways. Fueling shall not take place within 50~~0~~ feet of drains or waterways. All construction personnel, including environmental monitors, would be made aware of state and federal emergency response reporting guidelines for accidental spills.

Comment Set F3: Southern California Edison Company (cont.)

Page D.10-24

HH-2a: Prepare a Soil Management Plan. A Soil Management Plan shall be developed and implemented for construction of the Proposed Project. The objective of the Soil Management Plan is to provide guidance for the proper handling, onsite management, and disposal of impacted soil that might be encountered during construction activities. The plan would include practices that are consistent with the California Title 8, Occupational Safety and Health Administration (Cal-OSHA) regulations, as well as appropriate remediation standards that are protective of the planned use. Appropriately trained professionals would be on site during preparation, grading, and related earthwork activities to monitor soil conditions encountered. The Soil Management Plan would provide guidelines for the following: F3-321

- Identifying impacted soil
- Assessing impacted soil
- Soil excavation
- Impacted soil storage
- Verification sampling
- Impacted soil characterization and disposal

The plan shall outline how Project construction crews would identify, handle, and dispose of potentially contaminated soil; identify the qualifications of the appropriately trained professionals that would monitor soil conditions and conduct soil sampling during construction; coordinate laboratory testing; and oversee disposal. The Plan shall identify the anticipated field screening methods and appropriate regulatory limits to be applied to determine proper handling and disposal. The Soil Management Plan shall also include requirements for documenting and reporting incidents of encountered contaminants, such as documenting locations of occurrence, sampling results, and reporting actions taken to dispose of contaminated materials. In the event that potentially contaminated soils were encountered within the footprint of construction, soils would be tested and stockpiled. The appropriate Certified Unified Program Agency (CUPA) or RWQCB would determine whether further assessment is warranted.

The Soil Management Plan shall be submitted to the CPUC and BLM 30 days prior to the start of construction for review and approval.

SCE Comment:

The mitigation measure to prepare a soil management plan is redundant of state, federal and local requirements already in place. Please replace with the following as an alternative:

~~HH-2a: Prepare a Soil Management Plan. A Soil Management Plan shall be developed and implemented for construction of the Proposed Project. The objective of the Soil Management Plan is to provide guidance for the proper handling, onsite management, and disposal of impacted soil that might be encountered during construction activities. The plan would include practices that are consistent with the California Title 8, Occupational Safety and Health Administration (Cal-OSHA) regulations, as well as appropriate remediation standards that are protective of the planned use. Appropriately trained professionals would be on site during preparation, grading, and related earthwork activities to monitor soil conditions encountered. The Soil Management Plan would provide guidelines for the following:~~

~~• Identifying impacted soil~~
~~• Assessing impacted soil~~
~~• Soil excavation~~
~~• Impacted soil storage~~
~~• Verification sampling~~
~~• Impacted soil characterization and disposal~~

~~The plan shall outline how Project construction crews would identify, handle, and dispose of potentially contaminated soil; identify the qualifications of the appropriately trained professionals that would monitor soil conditions and conduct soil sampling during construction; coordinate laboratory testing; and oversee disposal. The Plan shall identify the anticipated field screening methods and appropriate regulatory limits to be applied to determine proper handling and disposal. The Soil Management Plan shall also include requirements for documenting and reporting incidents of encountered contaminants, such as documenting locations of~~

Comment Set F3: Southern California Edison Company (cont.)

F3-321 cont.

~~occurrence, sampling results, and reporting actions taken to dispose of contaminated materials. In the event that potentially contaminated soils were encountered within the footprint of construction, soils would be tested and stockpiled. The appropriate Certified Unified Program Agency (CUPA) or RWQCB would determine whether further assessment is warranted.~~

~~The Soil Management Plan shall be submitted to the CPUC and BLM 30 days prior to the start of construction for review and approval.~~

HH-2a: Observe exposed soil for evidence of contamination. During grading or excavation work, the construction contractor shall observe the exposed soil for visual evidence of contamination. If visual contamination indicators are observed during construction, the contractor shall stop work until the material is properly characterized and appropriate measures are taken to protect human health and the environment. The contractor shall comply with all local, state, and federal requirements for sampling and testing, and subsequent removal, transport, and disposal of hazardous materials. Additionally, in the event that evidence of contamination is observed, the contractor shall document the exact location of the contamination and shall notify the CPUC or BLM, describing proposed actions. A weekly report listing encounters with contaminated soils and describing actions taken shall be submitted to the CPUC or BLM.

Comment Set F3: Southern California Edison Company (cont.)

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DEIR/DEIS Text: F3-322

HH-3a: Identify pesticide/herbicide contamination. Prior to construction, soil samples shall be collected in construction areas that where the land has historically or is currently being used for agriculture and would be subject to ground disturbance by the project. The sampling is to identify the possible presence of and to delineate the extent of pesticide and/or herbicide contamination. Excavated materials containing elevated levels of pesticide or herbicide will require special handling and disposal procedures consistent with the requirements of Mitigation Measure HH-2a (Prepare a soils management plan). As appropriate, State, Riverside County and San Bernardino County regulatory agencies shall be contacted to provide oversight regarding the handling, treatment, and/or disposal options. In the event pesticide or herbicide contamination is found, CPUC/BLM shall be notified of the event and shall be kept apprised of the steps taken to address the problem.

SCE Comment:

To clarify that SCE is only responsible for excavated materials impacted by the project, and to remove redundancies, as the regulatory agencies would be notified of the existence of hazardous materials by the hazardous wastes manifests, please make the following revisions:

HH-3a: Identify pesticide/herbicide contamination. Prior to construction, soil samples shall be collected in construction areas that where the land has historically or is currently being used for agriculture and would be subject to ground disturbance by the project. The sampling is to identify the possible presence of and to delineate the extent of pesticide and/or herbicide contamination. Excavated project materials containing elevated levels of pesticide or herbicide will require special handling and disposal procedures ~~consistent with the requirements of Mitigation Measure HH-2a (Prepare a soils management plan).As appropriate, State, Riverside County and San Bernardino County regulatory agencies shall be contacted to provide oversight regarding the handling, treatment, and/or disposal options.~~ In the event pesticide or herbicide contamination is found, CPUC/BLM shall be notified of the event and shall be kept apprised of the steps taken to address the problem.

Responses to Comment Set F3 – Section D.10 Hazards and Hazardous Materials

F3-308 The commenter suggests a minor edit in the first sentence of Section D.10.2 (Hazards and Hazardous Materials, Applicable Regulations, Plans, and Standards). The edit, namely changing "public" to "human" health, has been made in the EIS.

F3-309 The commenter suggests inserting an acronym in the Clean Water Act discussion in Section D.10.2.1. The textual edit has been made in the EIS.

F3-310 The commenter suggests spelling out an acronym in the Oil Pollution and Prevention Regulation discussion in Section D.10.2.1. The textual edit has been made in the EIS.

F3-311 The commenter suggests inserting an acronym in Porter-Cologne Water Quality Control Act discussion in Section D.10.2.2. The textual edit has been made in the EIS.

F3-312 The commenter questions the validity of significance criteria that are not found in Appendix G of the CEQA Guidelines, including the specific criterion in Section D.10.3.2 (CEQA Significance Criteria) of the Draft EIR/EIS related to encountering residual pesticides and/or herbicides in agricultural areas. See Response to Comment F3-95 with regard to the use of significance criteria.

F3-313 The commenter requests revisions in Section D.10 (Hazards and Hazardous Materials) to Mitigation Measure HH-1a (Prepare a Hazardous Materials and Waste Management Plan). The suggested edits for clarity have been made in the mitigation measure. The request to reduce the distance between fueling locations and drains or waterways to 50 feet was considered but not accepted. However, the original 500-foot separation distance is revised in Mitigation Measure HH-1a to 75 feet from dry drains and waterways and 200 feet from drains and waterways with flowing water.

F3-314 The commenter requests deletion of Mitigation Measure HH-2a (Prepare a Soil Management Plan) and offers a substitute. The commenter is correct in stating that there are state, federal, and local requirements in place to address the subject of hazardous materials. However, Mitigation Measure HH-2a provides for a Plan that would identify how these would be applied to the Proposed Project, and the Plan provides a single reference and guide for managing contaminated soil, if encountered. Mitigation Measure HH-2a is unchanged.

F3-315 The commenter requests revisions to Mitigation Measure HH-3a (Identify pesticide/herbicide contamination). The request is to delete reference to Mitigation Measure HH-2a (Prepare a Soil Management Plan) and to contact various agencies for oversight on handling, treatment, and/or disposal options. The reference to Mitigation Measure HH-2a remains. However, because of the requirement in Mitigation Measure HH-2a and existing state and local regulations, the requirement for contacting agencies is deleted as being redundant.

F3-316 This comment requests clarification in the EIS that mitigation referenced for Connected Actions is not imposed on SCE. See Response to Comment F3-102 with regard to mitigation for connected actions.

F3-317 This comment is similar to Comment F3-316. See Response to Comment F3-102 with regard to mitigation for connected actions.

F3-318 This comment is similar to Comment F3-316. See Response to Comment F3-102 with regard to mitigation for connected actions.

F3-319 Please see General Response GR-4 regarding the future construction impacts of the Phased Build Alternative.

F3-320 This comment is similar to Comment F3-313. See Response to Comment F3-313 regarding Mitigation Measure HH-1a.

F3-321 This comment is similar to Comment F3-314. See Response to Comment F3-314 regarding Mitigation Measure HH-2a.

F3-322 This comment is similar to Comment F3-315. See Response to Comment F3-315 regarding Mitigation Measure HH-3a.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Section D.11 Land Use and BLM Realty

Page D.11-2

DEIR/DEIS Text: F3-323

Table D.11-2. General Plan Land Uses for the Proposed Project by Jurisdiction (acres)

Jurisdiction	Agricult	Commer	Industri	Offic	Ope n Spa	Publi c Facilit	Resident	Speci fic Plan	Transp or-tation	Total
Banning	81.6	7.6	36.2	44.4	152.3	4.6	155.3	0.0	0.0	482.0
Beaumont	0.0	9.3	0.0	0.0	123.4	0.0	115.9	0.6	0.0	249.3
Calimesa	0.0	7.6	0.0	0.0	0.0	0.0	20.2	111.3	0.0	139.1
Colton	0.0	0.0	0.0	0.0	0.0	0.0	0.0	71.3	0.0	71.3
Grand Terrace	0.0	0.0	0.0	0.0	0.0	0.0	5.9	0.0	0.0	5.9
Loma Linda	0.0	7.9	1.6	9.6	141.9	0.0	15.7	153.9	3.8	334.4
Palm Springs	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Rancho	0.0	0.0	12.7[1]	0.0	0.0	0.0	0.0	0.0	0.0	12.7
Redlands	0.8	55.6	2.1	0.0	133.4	14.9	0.0	0.0	0.0	206.7
San Bernardino	0.0	0.0	0.0	0.0	0.0	0.0	3.1	0.0	0.0	3.1
Yucaipa	0.0	0.0	0.0	0.0	0.0	0.0	1.9[2]	0.0	0.0	1.9
County of	0.0	20.4	307.1	0.0	937.0	245.3	424.8	0.2	3.1	1,937.
County of San	0.0	67.2	38.4	3.8	16.7	1.8	53.3	0.0	3.3	184.5
TOTAL	82.4	175.5	385.4	57.8	1,504.	266.5	794.2	337.3	10.2	3,611.

1 - Acreage of Etiwanda Substation
2 - Acreage of Tennessee Substation

SCE Comment:

Please remove the following references to Tennessee Substation and Yucaipa.

Table D.11-2. General Plan Land Uses for the Proposed Project by Jurisdiction (acres)

Jurisdiction	Agricultura	Commercia	Industrial	Office	Open Space	Public Facilitie s	Residentia	Specifi c Plan	Transpor - tation	Total
Banning	81.6	7.6	36.2	44.4	152.3	4.6	155.3	0.0	0.0	482.0
Beaumont	0.0	9.3	0.0	0.0	123.4	0.0	115.9	0.6	0.0	249.3
Calimesa	0.0	7.6	0.0	0.0	0.0	0.0	20.2	111.3	0.0	139.1
Colton	0.0	0.0	0.0	0.0	0.0	0.0	0.0	71.3	0.0	71.3
Grand Terrace	0.0	0.0	0.0	0.0	0.0	0.0	5.9	0.0	0.0	5.9
Loma Linda	0.0	7.9	1.6	9.6	141.9	0.0	15.7	153.9	3.8	334.4
Palm Springs	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Rancho Cucamonga	0.0	0.0	12.7[1]	0.0	0.0	0.0	0.0	0.0	0.0	12.7
Redlands	0.8	55.6	2.1	0.0	133.4	14.9	0.0	0.0	0.0	206.7
San Bernardino	0.0	0.0	0.0	0.0	0.0	0.0	3.1	0.0	0.0	3.1
~~Yucaipa~~	~~0.0~~	~~0.0~~	~~0.0~~	~~0.0~~	~~0.0~~	~~0.0~~	~~1.9[2]~~	~~0.0~~	~~0.0~~	~~1.9~~
County of Riverside	0.0	20.4	307.1	0.0	937.0	245.3	424.8	0.2	3.1	1,937.9
County of San Bernardino	0.0	67.2	38.4	3.8	16.7	1.8	53.3	0.0	3.3	184.5
TOTAL	82.4	175.5	385.4	57.8	1,504.7	266.5	794.2	337.3	10.2	3,611.0

1 - Acreage of Etiwanda Substation
2 - ~~Acreage of Tennessee Substation~~

Comment Set F3: Southern California Edison Company (cont.)

Page D.11-11

F3-324

LU-1a: Prepare construction notification plan. Sixty days prior to construction, SCE shall prepare and submit a Construction Notification Plan to the CPUC and BLM for approval. The Plan shall identify the procedures to ensure that SCE will inform property and business owners of the location and duration of construction, identify approvals that are needed prior to posting or publication of construction notices, and include template copies of public notices and advertisements (i.e., formatted text). The details of notification, as described below, may be modified in consultation with CPUC and BLM as warranted by circumstances. To ensure effective notification of construction activities, the plan shall address at a minimum the following components:

Public notice mailer. No less than 15 days prior to construction that would affect property access, a public notice mailer shall be distributed. The notice shall identify construction activities that would restrict, block, or require a detour to access existing residential properties, retail and commercial businesses, wilderness and recreation facilities, and public facilities (e.g., schools and memorial parks). The notice shall state the type of construction activities that will be conducted, and the location and duration of construction. SCE shall mail the notice to all residents or property owners within 300 feet of the right-of-way and to specific public agencies with facilities that could be impacted by construction. If construction delays of more than seven days occur, an additional notice shall be prepared and distributed.

Newspaper advertisements. Fifteen days prior to construction, within a route segment a newspaper advertisement shall be placed in local newspapers and bulletins of general circulation in the area. The advertisement shall state when and where construction will occur and provide information on the public liaison person and hotline identified below. If construction is delayed as noted above, an additional round of newspaper ads shall be placed to discuss the status and schedule of construction. Public venue notices. Thirty days prior to construction, notice of construction shall be posted at public venues such as trail crossings, rest stops, desert centers, resource management offices (e.g., Bureau of Land Management field offices, San Bernardino National Forest Ranger Station), and other public venues to inform residents and visitors of the purpose and schedule of construction activities. For public trail closures, SCE shall post information regarding the closure and any related trail detour at applicable resource management offices and post the notice within 2 miles north and south of any such point of trail closure and detour. For recreation facilities, the notice shall be posted along the access routes to known recreational destinations that would be restricted, blocked, or detoured and shall provide information on alternative recreation areas that may be used during the closure of these facilities.

Public liaison person and toll-free information hotline. SCE shall identify and provide a public liaison person before and during construction to respond to concerns of neighboring property owners about noise, dust, and other construction disturbance. Procedures for reaching the public liaison officer via telephone or in person shall be included in notices distributed to the public. SCE shall also establish a toll-free telephone number for receiving questions or complaints during construction and shall develop procedures for responding to callers. Procedures for handling and responding to calls shall be addressed in the Construction Notification Plan. SCE shall provide CPUC and BLM an itemized monthly summary of complaints and inquiries received and their resolution. This shall include the name and telephone number of the caller, if provided, and the location and resolution of the complaint or inquiry.

SCE Comment:

To ensure that the mitigation measure can be implemented successfully, please make the following revisions:

LU-1a Prepare construction notification plan. ~~Sixty~~ Forty-five days prior to construction, SCE shall prepare and submit a Construction Notification Plan to the CPUC and BLM for approval. The Plan shall identify the procedures to ensure that SCE will inform property and business owners of the location and duration of construction, identify approvals that are needed prior to posting or publication of construction notices, and include template copies of public notices and advertisements (i.e., formatted text). The details of notification, as described below, may be modified in consultation with CPUC and BLM as warranted by circumstances. To ensure effective notification of construction activities, the plan shall address at a minimum the following components: **Public notice mailer.** No less than 15 days prior to construction that would affect property access, a public notice mailer shall be distributed. The notice shall identify construction activities that would restrict, block, or require a detour to access existing residential proper-ties, retail and commercial businesses, wilderness and recreation facilities, and public facilities (e.g., schools and memorial parks). The notice shall state the type of

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

construction active-ties that will be conducted, and the location and duration of construction. SCE shall mail the notice to all residents or property owners within 300 feet of the right-of-way and to specific public agencies with facilities that could be impacted by construction. ~~If construction delays of more than seven days occur, an additional notice shall be prepared and distributed.~~ Newspaper advertisements. Fifteen days prior to construction, within a route segment a newspaper advertisement shall be placed in local newspapers and bulletins of general circulation in the area. The advertisement shall state when and where construction will occur and provide information on the public liaison person and hotline identified below. If construction is delayed as noted above, an additional round of newspaper ads shall be placed to discuss the status and schedule of construction. **F3-324 cont.**

Public venue notices. Thirty days prior to construction, notice of construction shall be posted at public venues such as trail crossings, rest stops, desert centers, resource management offices (e.g., Bureau of Land Management field offices, San Bernardino National Forest Ranger Station), and other public venues to inform residents and visitors of the purpose and schedule of construction activities. For public trail closures, SCE shall post information regarding the closure and any related trail detour at applicable resource management offices and post the notice within 2 miles north and south of any such point of trail closure and detour. For recreation facilities, the notice shall be posted along the access routes to known recreational destinations that would be restricted, blocked, or detoured and shall provide information on alternative recreation areas that may be used during the closure of these facilities. Public liaison person and toll-free information hotline. SCE shall identify and provide a public liaison person before and during construction to respond to concerns of neighboring property owners about noise, dust, and other construction disturbance. Procedures for reaching the public liaison officer via telephone or in person shall be included in notices distributed to the public. SCE shall also establish a toll-free telephone number for receiving questions or complaints during construction and shall develop procedures for responding to callers. Procedures for handling and responding to calls shall be addressed in the Construction Notification Plan. SCE shall provide CPUC and BLM an itemized monthly summary of complaints and inquiries received and their resolution. This shall include the name and telephone number of the caller, if provided, and the location and resolution of the complaint or inquiry.

Comment Set F3: Southern California Edison Company (cont.)

Page D.11-10

DEIR/DEIS Text: F3-325

For the purposes of this Land Use analysis, land use impacts may be significant if the Proposed Project would:

- Directly or indirectly disrupt an established or recently approved land use

SCE Comment:

Significance criteria not found in the California Environmental Quality Act (CEQA) guidelines are not appropriate for inclusion in an analysis of CEQA Significance Criteria. As such, please remove the following:

~~• Directly or indirectly disrupt an established or recently approved land use~~

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DEIR/DEIS Text: F3-326

Impact LU-1: Project would disrupt an established or recently approved land use (Class II)

Construction and operation of the connected solar projects could temporarily disrupt some existing land uses, including recreation and agriculture, and would cause temporary impacts related to traffic, noise, and aesthetics. With implementation of Mitigation Measure LU-1a (Prepare construction notification plan) and the mitigation measures identified above, this impact would be less than significant (Class II).

SCE Comment:

The DEIR should clarify that the potential mitigation measures referenced for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

Pages D.11-15 through 16

DEIR/DEIS Text: F3-327

D.11.4.3 Phased Build Alternative

Impact LU-1: Project would disrupt an established or recently approved land use

SCE Comment:

As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional study. The additional disturbance areas and the increased duration could result in additional land use impacts beyond those analyzed for the PBA in the document and could be greater than those identified for the Proposed Project.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.11-18

DEIR/DEIS Text: F3-328

LU-1a: Prepare construction notification plan. Sixty days prior to construction, SCE shall prepare and submit a Construction Notification Plan to the CPUC and BLM for approval. The Plan shall identify the procedures to ensure that SCE will inform property and business owners of the location and duration of construction, identify approvals that are needed prior to posting or publication of construction notices, and include template copies of public notices and advertisements (i.e., formatted text). The details of notification, as described below, may be modified in consultation with CPUC and BLM as warranted by circumstances. To ensure effective notification of construction activities, the plan shall address at a minimum the following components:

Public notice mailer. No less than 15 days prior to construction that would affect property access, a public notice mailer shall be distributed. The notice shall identify construction activities that would restrict, block, or require a detour to access existing residential properties, retail and commercial businesses, wilderness and recreation facilities, and public facilities (e.g., schools and memorial parks). The notice shall state the type of construction activities that will be conducted, and the location and duration of construction. SCE shall mail the notice to all residents or property owners within 300 feet of the right-of-way and to specific public agencies with facilities that could be impacted by construction. If construction delays of more than seven days occur, an additional notice shall be prepared and distributed.

Newspaper advertisements. Fifteen days prior to construction, within a route segment a newspaper advertisement shall be placed in local newspapers and bulletins of general circulation in the area. The advertisement shall state when and where construction will occur and provide information on the public liaison person and hotline identified below. If construction is delayed as noted above, an additional round of newspaper ads shall be placed to discuss the status and schedule of construction. Public venue notices. Thirty days prior to construction, notice of construction shall be posted at public venues such as trail crossings, rest stops, desert centers, resource management offices (e.g., Bureau of Land Management field offices, San Bernardino National Forest Ranger Station), and other public venues to inform residents and visitors of the purpose and schedule of construction activities. For public trail closures, SCE shall post information regarding the closure and any related trail detour at applicable resource management offices and post the notice within 2 miles north and south of any such point of trail closure and detour. For recreation facilities, the notice shall be posted along the access routes to known recreational destinations that would be restricted, blocked, or detoured and shall provide information on alternative recreation areas that may be used during the closure of these facilities.

Public liaison person and toll-free information hotline. SCE shall identify and provide a public liaison person before and during construction to respond to concerns of neighboring property owners about noise, dust, and other construction disturbance. Procedures for reaching the public liaison officer via telephone or in person shall be included in notices distributed to the public. SCE shall also establish a toll-free telephone number for receiving questions or complaints during construction and shall develop procedures for responding to callers. Procedures for handling and responding to calls shall be addressed in the Construction Notification Plan. SCE shall provide CPUC and BLM an itemized monthly summary of complaints and inquiries received and their resolution. This shall include the name and telephone number of the caller, if provided, and the location and resolution of the complaint or inquiry.

SCE Comment:

To ensure that the mitigation measure can successfully be implemented, please make the following revisions:

LU-1a Prepare construction notification plan. ~~Sixty~~ Forty-five days prior to construction, SCE shall prepare and submit a Construction Notification Plan to the CPUC and BLM for approval. The Plan shall identify the procedures to ensure that SCE will inform property and business owners of the location and duration of construction, identify approvals that are needed prior to posting or publication of construction notices, and include template copies of public notices and advertisements (i.e., formatted text). The details of notification, as described below, may be modified in consultation with CPUC and BLM as warranted by circumstances. To ensure effective notification of construction activities, the plan shall address at a minimum the following components: **Public notice mailer.** No less than 15 days prior to construction that would affect property access, a public notice mailer shall be distributed. The notice shall identify construction activities that would restrict, block, or require a detour to access existing residential proper-ties, retail and commercial businesses, wilderness and recreation facilities,

Comment Set F3: Southern California Edison Company (cont.)

and public facilities (e.g., schools and memorial parks). The notice shall state the type of construction activities that will be conducted, and the location and duration of construction. SCE shall mail the notice to all residents or property owners within 300 feet of the right-of-way and to specific public agencies with facilities that could be impacted by construction. ~~If construction delays of more than seven days occur, an additional notice shall be prepared and distributed.~~ Newspaper advertisements. Fifteen days prior to construction, within a route segment a newspaper advertisement shall be placed in local newspapers and bulletins of general circulation in the area. The advertisement shall state when and where construction will occur and provide information on the public liaison person and hotline identified below. If construction is delayed as noted above, an additional round of newspaper ads shall be placed to discuss the status and schedule of construction. **F3-328 cont.**

Public venue notices. Thirty days prior to construction, notice of construction shall be posted at public venues such as trail crossings, rest stops, desert centers, resource management offices (e.g., Bureau of Land Management field offices, San Bernardino National Forest Ranger Station), and other public venues to inform residents and visitors of the purpose and schedule of construction activities. For public trail closures, SCE shall post information regarding the closure and any related trail detour at applicable resource management offices and post the notice within 2 miles north and south of any such point of trail closure and detour. For recreation facilities, the notice shall be posted along the access routes to known recreational destinations that would be restricted, blocked, or detoured and shall provide information on alternative recreation areas that may be used during the closure of these facilities.

Public liaison person and toll-free information hotline. SCE shall identify and provide a public liaison person before and during construction to respond to concerns of neighboring property owners about noise, dust, and other construction disturbance. Procedures for reaching the public liaison officer via telephone or in person shall be included in notices distributed to the public. SCE shall also establish a toll-free telephone number for receiving questions or complaints during construction and shall develop procedures for responding to callers. Procedures for handling and responding to calls shall be addressed in the Construction Notification Plan. SCE shall provide CPUC and BLM an itemized monthly summary of complaints and inquiries received and their resolution. This shall include the name and telephone number of the caller, if provided, and the location and resolution of the complaint or inquiry.

Responses to Comment Set F3 – Section D.11 Land Use and BLM Realty

F3-323 The commenter identifies that with removal of Timoteo and Tennessee Substations, information in Table D.11-2 needs to be updated. In Section D.11 (Land Use and BLM Realty), Table D.11-2 has been edited to show that Tennessee Substation in Yucaipa has been removed from the Project.

F3-324 The commenter suggests that in situations where construction is delayed more than seven days at properties where access would be affected by the construction that the requirement in Mitigation Measure LU-1a (Prepare construction notification plan) for preparing and distributing a new notice be omitted. Also, that the notification plan be provided to CPUC and BLM 45 days prior to construction rather than 60 days.

Mitigation Measure LU-1a has been amended to require submission of the plan 45 days prior to construction. For properties where access would be affected by construction, the requirement for re-notification of property owners if construction is delayed is modified to state that affected property owners will be notified of such delays, with the method of notification up to the utility.

F3-325 The commenter requests removal of a significance criterion for land use disruption, stating that it does not appear in CEQA guidelines. This is a comment on CEQA, not NEPA. See Response to Comment F3-95. Significance criteria are not limited to those found in CEQA guidelines.

F3-326 This comment request clarification in the EIS that mitigation referenced for Connected Actions is not imposed on SCE. See Response to Comment F3-102 with regard to mitigation for connected actions.

F3-327 Please see General Response GR-4 regarding the future construction impacts of the Phased Build Alternative.

F3-328 This is the same as Comment F3-324. Please see Response to Comment F3-324

Comment Set F3: Southern California Edison Company (cont.)

Section D.12 Mineral Resources

Page D.12-7

DEIR/DEIS Text: F3-329

MR-1a Coordinate with quarry operations. Prior to construction within the Banning Rock Plant No. 66, SCE would consult with the plant owners and plant operations and management personnel. The consultation will include identification of locations of active mining and coordination of construction activities in and through those areas and to determine the best way to proceed with project construction, all with the goal of minimizing any disruption to plant operations. A plan to avoid or minimize interference with mining operations shall be prepared in conjunction with the quarry operators prior to construction. Prior to construction in the quarry area, SCE shall provide CPUC and BLM documentation that an agreement has been reached with the quarry

SCE Comment:

SCE's APM MIN-1 was not mitigating an impact and was included simply to note that coordination would occur with the quarry. It should be noted that SCE's typical property rights would support the construction regardless of mining activities.

SCE recommends the following language be included in the mitigation measure:

MR-1a: Coordinate with quarry operations. Prior to construction within the Banning Rock Plant No. 66, SCE would consult with the plant owners and plant operations and management personnel. The consultation will include identification of locations of active mining and coordination of construction activities in and through those areas and to determine the best way to proceed with project construction, all with the goal of minimizing any disruption to plant operations. A plan to avoid or minimize interference with mining operations shall be prepared by SCE documenting how coordination with the quarry operators is expected to occur. ~~in conjunction with the quarry operators prior to construction.~~ Prior to construction in the quarry area, SCE shall provide CPUC and BLM a copy of this plan. ~~documentation that an agreement has been reached with the quarry~~

Page D.12-8

DEIR/DEIS Text: F3-330

Impact MR-1: Construction activities would render known mineral resources inaccessible (Class II)

For the connected solar projects, as with the Proposed Project, construction impacts to known mineral resources would be temporary and would not result in the loss of availability of those resources. Mitigation Measure MR-1a (Coordinate with quarry operations) would reduce the potential to interfere with quarry (or mining) operations and render mineral resources temporarily inaccessible by coordination with operators and preparation of a plan to minimize interference with plant operations. This impact would be less than significant with mitigation (Class II).

SCE Comment:

The DEIR should clarify that the potential mitigation measures referenced for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.12-9 through 10

DEIR/DEIS Text: F3-331

D.12.4.3 Phased Build Alternative

Impact MR-1: Construction activities would render known mineral resources inaccessible

SCE Comment:

As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional study and associated additional impact analysis. The additional disturbance areas and the increased duration could result in additional mineral impacts beyond those analyzed for the Phased Build Alternative in the document, and could be greater than those identified for the Proposed Project.

Page D.12- 11

DEIR/DEIS Text: F3-332

MR-1a Coordinate with quarry operations. Prior to construction within the Banning Rock Plant No. 66, SCE would consult with the plant owners and plant operations and management personnel. The consultation will include identification of locations of active mining and coordination of construction activities in and through those areas and to determine the best way to proceed with project construction, all with the goal of minimizing any disruption to plant operations. A plan to avoid or minimize interference with mining operations shall be prepared in conjunction with the quarry operators prior to construction. Prior to construction in the quarry area, SCE shall provide CPUC and BLM documentation that an agreement has been reached with the quarry

SCE Comment:

SCE's APM MIN-1 was not mitigating an impact and was included simply to note that coordination would occur with the quarry. It should be noted that SCE's typical property rights would support the construction regardless of mining activities.

SCE recommends the following language be included in the mitigation measure:

MR-1a: Coordinate with quarry operations. Prior to construction within the Banning Rock Plant No. 66, SCE would consult with the plant owners and plant operations and management personnel. The consultation will include identification of locations of active mining and coordination of construction activities in and through those areas and to determine the best way to proceed with project construction, all with the goal of minimizing any disruption to plant operations. A plan to avoid or minimize interference with mining operations shall be prepared by SCE documenting how coordination with the quarry operators is expected to occur. ~~in conjunction with the quarry operators prior to construction.~~ Prior to construction in the quarry area, SCE shall provide CPUC and BLM a copy of this plan. ~~documentation that an agreement has been reached with the quarry~~

Responses to Comment Set F3 – Section D.12 Mineral Resources

F3-329 The commenter suggests a textual revision of Mitigation Measure MR-1a. The Mitigation Measure MR-1a in Section D.12 has been revised, allowing SCE to prepare a plan to avoid or minimize interference with mining operations in coordination with the mine operator, rather than in conjunction with the operator.

F3-330 This comment requests clarification in the EIS that mitigation referenced for Connected Actions is not imposed on SCE. See Response to Comment F3-102 with regard to mitigation for connected actions.

F3-331 Please see General Response GR-4 regarding the future construction impacts of the Phased Build Alternative.

F3-332 This comment is similar to Comment F3-329. See Response to Comment F3-329 regarding Mitigation Measure MR-1a.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Section D.13 Noise

Page D.13-14

DEIR/DEIS Text: F3-333

SCE's description of the project does not include rock blasting or use of explosives for any portion of construction. Similarly, the project does not include splicing conductors through the use of implosive sleeves, which detonate explosives to fuse the conductors. However, if these construction methods were used, they would create instantaneous or short-term noise.

SCE Comment:

SCE's Proponent's Environmental Assessment (PEA) included a description of potential rock blasting as well as the potential use of implosive sleeves (SCE 2013, p 4.12-32). For consistency with SCE's PEA, please modify as follows:

SCE's description of the project ~~does not~~ included the potential for rock blasting and/or use of explosives for implosive sleeves during ~~or use of explosives for any portion of~~ construction. ~~Similarly, the project does not include splicing conductors through the use of implosive sleeves, which detonate explosives to fuse the conductors.~~ However, if these construction methods are ~~were~~ used, they would create instantaneous or short-term noise.

Page D.13-14

DEIR/DEIS Text: F3-334

Construction of foundations for new towers, poles, and shoo-fly structures would require use of a drill rig or large auger at each location. Pile driving would not be needed. Access and spur roads would require use of graders, compactors, dozers, and trucks.

SCE Comment:

Currently the SCE civil designs include the installation of soldier pile walls which require the use of pile driving equipment. Please modify the DEIR/DEIS language as follows:

Construction of foundations for new towers, poles, and shoo-fly structures would require use of a drill rig or large auger at each location. Pile driving equipment could be used for the installation of solider pile-type retaining walls, though most are expected to be drilled piers. ~~would not be needed.~~ Access and spur roads would require use of graders, compactors, dozers, and trucks.

Comment Set F3: Southern California Edison Company (cont.)

Page D.13-16

DEIR/DEIS Text: F3-335

Table D.13-6. Construction Noise Levels Modeled for Specific Locations (dBA)

Location	Typical Receptor Distance (ft)	Receptor Jurisdiction	Lmax (dBA)	Leq (dBA)
San Bernardino Substation	875	Redlands	59.5	52.3
Vista Substation	50	Grand Terrace	84.4	83.3
El Casco Substation	950	Calimesa	55.1	49.5
Devers Substation	1,000	Riverside County	58.4	50.3
Etiwanda Substation	50	Rancho Cucamonga	75.0	71.0
Timoteo Substation	50	Loma Linda	77.6	77.3
Tennessee Substation	50	Yucaipa	77.6	77.3
Telecommunications Facilities	50	Typical Facilities	77.6	76.8

Source: SCE, 2013 (PEA Appendix K).

SCE Comment:

As a result of additional engineering analysis, the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations:

~~Timoteo Substation~~	~~50~~	~~Loma Linda~~	~~77.6~~	~~77.3~~
~~Tennessee Substation~~	~~50~~	~~Yucaipa~~	~~77.6~~	~~77.3~~

Page D.13-16

DEIR/DEIS Text: F3-336

Helicopter operations, especially if necessary at night to string conductor across the highways, would likely cause annoyance to residences in the vicinity.

SCE Comment:

Helicopters will not be used at night for construction of the WOD Upgrade Project,; please make the following revision: Helicopter operations~~, especially if necessary at night to string conductor across the highways,~~ would likely cause annoyance to residences in the vicinity.

Page D.13-16

DEIR/DEIS Text: F3-337

Safety precautions may require homes near helicopter activity to be temporarily vacated, and this would help to minimize exposure of residents to helicopter noise.

SCE Comment:

Please make the following clarifying edits:

In areas where ~~S~~safety precautions may require homes near helicopter activity to be temporarily vacated, SCE will utilize other methods to conduct the work that do not require helicopters in these locations, ~~and this would help to minimize exposure of residents to helicopter noise."~~

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.13-17

DEIR/DEIS Text: F3-338

SCE identifies two specific helicopter models that would be used, the Bell 500 (MD 500) and the Kaman Kmax, which carries loads.

SCE Comment:

In the PEA, SCE referenced these two helicopters as models that would be "assumed" to be used for the purpose of impact analysis. The actual helicopter models used will be equivalent to those "assumed" for the purposes of analysis, i.e., light and medium duty helicopters. Please make the following revision:

SCE identifies two specific helicopter models that would be typically used, the Bell 500 (MD 500) and the Kaman Kmax, which carries loads.

Page D.13-17

DEIR/DEIS Text: F3-339

With implementation of the recommended mitigation measures, the construction activities would either comply with local noise ordinances, or SCE would request a variance from each affected jurisdiction.

SCE Comment:

Please see SCE's accompanying cover letter for additional discussion related to reasons why the requirement to obtain a variance from local jurisdictions for noise impacts should be stricken or revised. Given the CPUC's preemptive authority, please delete the reference to local noise variances: With implementation of the recommended mitigation measures, the construction activities would either comply with local noise ordinances, or SCE would inform the CPUC, BLM, and the impacted local jurisdiction of the potential for conflict with local noise ordinances.

Page D.13-18

DEIR/DEIS Text: F3-340

Mitigation Measures for Impact N-1

Construction noise shall be confined to daytime, weekday hours (7:00 a.m. to 6:00 p.m.) or an alternative schedule established by the local jurisdiction.

SCE Comment:

Please see SCE's accompanying cover letter for additional discussion related to reasons why the requirement to obtain a variance from local jurisdictions for noise impacts should be stricken or revised, and as noted if the language is not removed, SCE proposes revised language, as follows:

Mitigation Measures for Impact N-1

Construction noise shall be confined to those hours specified by the local jurisdiction ordinances, ~~daytime, weekday hours (7:00 a.m. to 6:00 p.m.)~~ or an alternative schedule ~~established by~~ provided that SCE informs the CPUC, BLM, and the impacted local jurisdiction that construction work will occur outside of the hours specified by local jurisdiction noise ordinances.

Comment Set F3: Southern California Edison Company (cont.)

Page D.13-18

DEIR/DEIS Text: F3-341

Table D.13-9 presents the mitigation monitoring program for noise.

Table D.13-9. Mitigation Monitoring Program – Noise

MITIGATION MEASURE

N-1a: Implement best management practices for construction noise. SCE shall employ the following noise-control techniques, at a minimum, to reduce construction noise exposure at noise-sensitive receptors and to avoid possible violations of local rules, standards, and ordinances during construction:

- Construction noise shall be confined to daytime, weekday hours (7:00 a.m. to 6:00 p.m.) or an alternative schedule established by the local jurisdiction.
- Construction equipment shall use noise reduction features (e.g., mufflers and engine shrouds) that are no less effective than those originally installed by the manufacturer.
- Stationary noise sources (e.g., generators, pumps) and staging areas shall be shielded from adjacent noise-sensitive receptors by an enclosure, temporary sound walls, or acoustic blankets. Where feasible, sound walls or acoustic blankets shall have a height of no less than 8 feet, a Sound Transmission Class (STC) of 27 or greater, and a surface with a solid face from top to bottom without any openings or cutouts.
- Construction traffic and helicopter flight shall be routed away from residences and schools, where feasible.
- Unnecessary construction vehicle use and idling time shall be minimized to the extent feasible, such that if a vehicle is not required for use immediately or continuously for safe construction activities, its engine should be shut off.

SCE Comment:

For consistency with the edits suggested in prior comments, please make the following revisions:

N-1a: Implement best management practices for construction noise. SCE shall employ the following noise-control techniques, at a minimum, to reduce construction noise exposure at noise-sensitive receptors and to avoid possible violations of local rules, standards, and ordinances during construction:

- Construction noise shall be confined to those hours specified by the local jurisdiction ordinances, ~~daytime, weekday hours (7:00 a.m. to 6:00 p.m.)~~ or an alternative schedule ~~established by~~ provided that SCE informs the CPUC, BLM, and the impacted local jurisdiction that construction work will occur outside of the hours specified by local jurisdiction noise ordinances.
- Construction equipment shall use noise reduction features (e.g., mufflers and engine shrouds) that are no less effective than those originally installed by the manufacturer.
- If noise levels at the adjacent noise sensitive receptor location exceed applicable jurisdictional criteria, ~~S~~stationary noise sources (e.g. generators, pumps) ~~and~~ at staging areas and on the ROW shall be shielded at the source to the extent necessary to meet the jurisdictional noise levels, if feasible. ~~from adjacent noise-sensitive receptors by an enclosure, temporary sound walls, or acoustic blankets. Where feasible~~, ~~When utilized and if feasible, sound walls or acoustic blankets shall have a height of no less than 8 feet, a Sound Transmission Class (STC) of 27 or greater, and a surface with a solid face from top to bottom without any openings or cuts.~~
- Construction traffic and helicopter flight shall be routed away from residences and schools, where feasible.
- Unnecessary construction vehicle use and idling time shall be minimized to the extent feasible, such that if a vehicle is not required for use immediately or continuously for safe construction activities, its engine should be shut off.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.13-18

DEIR/DEIS Text: F3-342

N-1b: Implement a helicopter noise control strategy. As part of the final Helicopter Use Plan, SCE shall include a helicopter noise control strategy that identifies the established helicopter flight corridors and minimum transit elevations above ground level to avoid noise-sensitive receptors on the ground. The noise control strategy shall prohibit helicopter hovering within 250 feet of residences.

SCE Comment:

SCE is requesting that additional clarification relating to the duration of hovering be included in the mitigation measure to be consistent with SCE's PEA Volume 3, Page 4.12-26. Additionally, as the analysis suggests, the use of helicopter noise could only exceed local noise standards within the City of Banning and Calimesa, therefore it is appropriate that the mitigation measure be revised to specify that it only applies to helicopter use within those two jurisdictions:

Please make the following revision:

N-1b: Implement a helicopter noise control strategy. As part of the final Helicopter Use Plan, SCE shall include a helicopter noise control strategy that identifies the established helicopter flight corridors and minimum transit elevations above ground level to avoid noise-sensitive receptors on the ground. The noise control strategy shall prohibit helicopter hovering (greater than 15 minutes) within 250 feet radial distance of residences. The noise control strategy should be applied to helicopter construction within the cities of Banning and Calimesa.

Page D.13-18

DEIR/DEIS Text: F3-343

The description of the project (Section B, Description of Proposed Project) does not include use of explosives or blasting that could cause ground-borne vibration at levels capable of causing structural damage to buildings in the immediate vicinity. Other construction activities would not involve sources likely to cause any structural damage outside of the work areas. No impact-pile driving would occur.

SCE Comment:

As described in previous comments, the project may include blasting, the use of explosives for implosive sleeves, and pile driving. Please make the following revisions:

The ~~description of the~~ Proposed Pproject ~~(Section B, Description of Proposed Project) does not include~~ may include the use of explosives or blasting that could cause ground-borne vibration; these would not be expected to be at levels capable of causing structural damage to buildings in the immediate vicinity. Other construction activities would not involve sources likely to cause any structural damage outside of the work areas. ~~No impact-pile driving would occur.~~

Page D.13-22

DEIR/DEIS Text: F3-344

D.13.3.5 CEQA Significance Determination for Proposed Project and Connected Actions

Impact N-1: Construction noise could substantially disturb sensitive receptors or violate local rules, standards, and/or ordinances (Class I)

SCE Comment:

As noted in the WOD PEA, the Proposed Project's construction activities would typically occur during the time periods allowed by the local jurisdiction's municipal code. Therefore, construction noise generated by the Proposed Project would result in less than significant impacts related to the exposure of persons to or generation of noise levels in excess of standards established in the local general plan, local noise ordinance, or applicable standards of other agencies.

Comment Set F3: Southern California Edison Company (cont.)

Page D.13-23

DEIR/DEIS Text: F3-345

Impact N-1: Construction noise could substantially disturb sensitive receptors or violate local rules, standards, and/or ordinances (Class I)

For connected actions in the Desert Center and Blythe areas, construction noise would be temporary and would be reduced by implementation of typical mitigation measures. Temporary construction noise was found less than significant with mitigation for both the Palen Solar Power Project and Desert Harvest Solar Project (Class II). For the other solar projects, where their locations are not known, construction noise occurring at the perimeter of the other solar projects would be the primary source of disruption to the nearest receptor. The level of construction noise could occasionally be substantially higher than ambient noise levels if sensitive receptors are located adjacent to the work area. Mitigation would reduce the impact, but could violate local rules, standards, or ordinances. Further, construction may be required outside usually allowed hours under the applicable noise regulation. Therefore, Impact N-1 is considered significant and unavoidable for confidential connected actions (Class I).

SCE Comment:

The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

Pages D.13-28 through 29

DEIR/DEIS Text: F3-346

D.13.4.3 Phased Build Alternative

Impact N-1: Construction noise could substantially disturb sensitive receptors or violate local rules, standards, and/or ordinances

Impact N-2: Construction activity would temporarily cause groundborne vibration

SCE Comment:

As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional study and associated additional impact analysis. The additional disturbance areas and the increased duration could result in additional noise impacts beyond those analyzed for the Phased Build Alternative in the document and could be greater than those identified for the Proposed Project.

Page D.13-29

DEIR/DEIS Text: F3-347

SCE Comment:

Corona noise levels at the edge of the ROW would be less than those of the Proposed Project. For all locations, permanent day-night or 24-hour noise levels (Ldn or CNEL) would not substantially increase due to corona noise for any segment of the Phased Build Alternative

SCE Comment:

Because of the reduced conductor size selected for the Phased Build Alternative, the conductor surface voltage gradient will be greater than it would be for the Proposed Project, therefore, the corona noise generated by the conductor will certainly be greater. However, when combined with other ambient noise, it is uncertain how much, if any, total noise would actually increase. Please make the following revisions:

Corona noise levels at the edge of the ROW would be greater ~~less~~ than those of the Proposed Project. For all locations, permanent day-night or 24-hour noise levels (Ldn or CNEL) could ~~would not substantially~~ increase due to corona noise for any segment of the Phased Build Alternative.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.13-30

DEIR/DEIS Text: F3-348

Corona noise levels at the edge of the ROW would be less than those of the Proposed Project. For all locations, permanent day-night or 24-hour noise levels (Ldn or CNEL) would not substantially increase due to corona noise for any segment of the Phased Build Alternative

SCE Comment:

Because of the reduced conductor size selected for the Phased Build Alternative, the conductor surface voltage gradient will be greater than it would be for the Proposed Project, therefore, the corona noise generated by the conductor will certainly be greater. However, when combined with other ambient noise, it is uncertain how much, if any, total noise would actually increase. Please make the following revisions:

Corona noise levels at the edge of the ROW would be greater ~~less~~ than those of the Proposed Project. For all locations, permanent day-night or 24-hour noise levels (Ldn or CNEL) could ~~would not substantially~~ increase due to corona noise for any segment of the Phased Build Alternative.

Comment Set F3: Southern California Edison Company (cont.)

Page D.13-32

DEIR/DEIS Text: F3-349

Table D.13-9 presents the mitigation monitoring program for noise. **Table D.13-9. Mitigation Monitoring Program – Noise**

MITIGATION MEASURE

N-1a: Implement best management practices for construction noise. SCE shall employ the following noise-control techniques, at a minimum, to reduce construction noise exposure at noise-sensitive receptors and to avoid possible violations of local rules, standards, and ordinances during construction:

- Construction noise shall be confined to daytime, weekday hours (7:00 a.m.. to 6:00 p.m.) or an alternative schedule established by the local jurisdiction.
- Construction equipment shall use noise reduction features (e.g., mufflers and engine shrouds) that are no less effective than those originally installed by the manufacturer.
- Stationary noise sources (e.g., generators, pumps) and staging areas shall be shielded from adjacent noise-sensitive receptors by an enclosure, temporary sound walls, or acoustic blankets. Where feasible, sound walls or acoustic blankets shall have a height of no less than 8 feet, a Sound Transmission Class (STC) of 27 or greater, and a surface with a solid face from top to bottom without any openings or cutouts.
- Construction traffic and helicopter flight shall be routed away from residences and schools, where feasible.
- Unnecessary construction vehicle use and idling time shall be minimized to the extent feasible, such that if a vehicle is not required for use immediately or continuously for safe construction activities, its engine should be shut off.

SCE Comment:

Consistent with previous comments, please modify language to the following bullet points 1 and 3:

N-1a: Implement best management practices for construction noise. SCE shall employ the following noise-control techniques, at a minimum, to reduce construction noise exposure at noise-sensitive receptors and to avoid possible violations of local rules, standards, and ordinances during construction:

- Construction noise shall be confined to those hours specified by the local jurisdiction ordinances, ~~daytime, weekday hours (7:00 a.m. to 6:00 p.m.)~~ or an alternative schedule ~~established by~~ provided that SCE informs the CPUC, BLM, and the impacted local jurisdiction that construction work will occur outside of the hours specified by local jurisdiction noise ordinances.
- Construction equipment shall use noise reduction features (e.g., mufflers and engine shrouds) that are no less effective than those originally installed by the manufacturer.
- If noise levels at the adjacent noise sensitive receptor location exceed applicable jurisdictional criteria, ~~S~~stationary noise sources (e.g. generators, pumps) ~~and~~ at staging areas and on the ROW shall be shielded at the source to the extent necessary to meet the jurisdictional noise levels, if feasible. ~~from adjacent noise-sensitive receptors by an enclosure, temporary sound walls, or acoustic blankets. Where feasible~~, ~~When utilized and if feasible, sound walls or acoustic blankets shall have a height of no less than 8 feet, a Sound Transmission Class (STC) of 27 or greater, and a surface with a solid face from top to bottom without any openings or cuts.~~
- Construction traffic and helicopter flight shall be routed away from residences and schools, where feasible
- Unnecessary construction vehicle use and idling time shall be minimized to the extent feasible, such that if a vehicle is not required for use immediately or continuously for safe construction activities, its engine should be shut off.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.13-

DEIR/DEIS Text: F3-350

MITIGATION MEASURE

N-1b: Implement a helicopter noise control strategy. As part of the final Helicopter Use Plan, SCE shall include a helicopter noise control strategy that identifies the established helicopter flight corridors and minimum transit elevations above ground level to avoid noise-sensitive receptors on the ground. The noise control strategy shall prohibit helicopter hovering within 250 feet of residences.

SCE Comment:

SCE is requesting additional clarification relating to the duration for hovering be included in the mitigation measure to be consistent with SCE's PEA Volume 3, Page 4.12-26. Additionally, as the analysis suggests the use of helicopter noise could only exceed local noise standards within the City of Banning and Calimesa, therefore it is appropriate that the mitigation measure be revised so implementation is specific to only helicopter use within those two jurisdictions:

Please make the following revision:

N-1b: Implement a helicopter noise control strategy. As part of the final Helicopter Use Plan, SCE shall include a helicopter noise control strategy that identifies the established helicopter flight corridors and minimum transit elevations above ground level to avoid noise-sensitive receptors on the ground. The noise control strategy shall prohibit helicopter hovering (greater than 15 minutes) within 250 feet radial distance of residences. The noise control strategy should be applied to helicopter construction within the cities of Banning and Calimesa.

Responses to Comment Set F3 – Section D.13 Noise

F3-333 The commenter clarifies that rock blasting or use of explosives may occur, although this information did not appear in the original description of the project. To reflect this change, the project description (EIS Section B.3.3.3, Foundation Installation and Section B.3.3.11, Transmission Wire Pulling and Splicing Locations) includes modifications. The noise impact discussion is also modified in the EIS as follows. The second paragraph of Impact N-1 (Construction noise could substantially disturb sensitive receptors or violate local rules, standards, and/or ordinances) in Section D.13.3.3 (Noise, Impacts and Mitigation Measures) and the description of Impact N-2 (Construction activity would temporarily cause groundborne vibration) have been modified to indicate the potential use of blasting and explosives.

F3-334 SCE clarifies that its current designs for foundations include the installation of soldier pile walls requiring the use of pile driving equipment, although this information did not appear in the original description of the project. To reflect this change, the project description (EIS Section B.3.3.1, Access, Spur, and Temporary Roads) includes modifications. The noise impact discussion is also modified in the EIS as follows. The first paragraph of Impact N-1 (Construction noise could substantially disturb sensitive receptors or violate local rules, standards, and/or ordinances) in Section D.13.3.3 (Noise, Impacts and Mitigation Measures) and the description of Impact N-2 (Construction activity would temporarily cause groundborne vibration) have been modified to indicate the potential use of pile driving equipment.

F3-335 The commenter states that Timoteo and Tennessee Substations are no longer needed to support the project. Table D.13-6 (Construction Noise Levels Modeled for Specific Locations (dBA)) has been modified, removing these substations.

F3-336 The commenter states that helicopters will not be used at night for construction and requests modification of the text to eliminate a statement about night stringing of conductor. The text has been modified in the description of the Proposed Project (in Section B.3.3.15, Helicopter Use and Section B.3.9, Construction Workforce and Equipment) and under the Helicopters discussion in Section D.13.3.3 (Noise, Impacts and Mitigation Measures) to indicate this.

F3-337 The commenter clarifies that in areas where safety precautions may require vacating homes for helicopter operations, the utility would use other methods to conduct work and would not use helicopters. The text has been modified under the Helicopters discussion in Section D.13.3.3 (Noise, Impacts and Mitigation Measures) to indicate this, omitting discussion of temporarily vacating homes. See also Response to Comment A4-9 which addresses helicopter use near and over structures.

F3-338 The commenter requests that the helicopters it identified in the PEA and the EIS (the Bell 500 and the Kmax) are “typical” helicopters used. The text has been modified in the description of the Proposed Project (in Section B.3.3.15, Helicopter Use) and under the Helicopters discussion in Section D.13.3.3 (Noise, Impacts and Mitigation Measures) to indicate this.

F3-339 This comment references SCE’s cover letter discussion of noise and night work variances and requests that the requirement for variances be stricken. See Response to Comment F1-2, which addresses this topic.

F3-340 This comment continues about local noise variances. See Response to Comment F1-2, which addresses this topic.

F3-341 This comment continues about local noise variances. See Response to Comment F1-2, which addresses this topic.

F3-342 The commenter requests that Mitigation Measure N-1b (Implement a helicopter noise control strategy) be amended to include specific hover times and approach distances at residences, and to apply the mitigation measure only within the cities of Banning and Calimesa.

SCE has identified various construction yards it may use for storage, staging, and assembly of project components. Some yards would include helicopter flights in and out. Additionally, SCE has identified that it may land helicopters on the ROW as well as access and spur roads. However, SCE has not identified where helicopter construction would occur and where it would not occur. It is recognized by BLM that such decisions often are made by the contractor during the course of construction and may be difficult to identify well in advance. Consequently, it must be assumed that helicopter-aided construction may occur anywhere along the project ROW and that helicopter traffic may occur between construction yards, airports, and locations on and near the ROW. In light of this, limiting the applicability of Mitigation Measure N-1b to two cities is not reasonable. Because FAA does not permit carrying of external loads over structures, it is not anticipated that structures and persons in those structures would be at high risk from a load lost in flight; however, persons who are near a hovering helicopter would be subject to noise and, possibly, downwash. SCE's PEA analysis of noise assumed helicopters lowering people and equipment to the top of a 100-foot pole using a 150-foot leash, meaning that the helicopter would be 250 feet above the ground. The PEA does not evaluate the delivery and placement of tower or pole sections, which would be less than 100 feet tall, or describe how these would be suspended from the helicopter. Based on previous transmission line construction employing helicopters, during delivery of tower or pole sections (in particular base sections) or pieces of equipment the helicopter could be less than 250 feet above the ground.

The amendments requested by SCE would allow hovering for up to 15 minutes within a 250 foot radial distance of residences. Or, in other words, the comment suggests allowing helicopter use closer than 250 feet as long as the duration is under 15 minutes. This would undermine the purpose of the mitigation measure. No change in the mitigation is necessary because as the measure is written, brief durations of operation within the distance of 250 feet are not precluded.

For clarity, Mitigation Measure N-1b is amended with regard to defining the radial (vertical and horizontal) distance within which a helicopter cannot hover as being 250 feet "in any vertical or horizontal direction." The other requested amendments to the mitigation measure have not been made.

F3-343 This comment follows from Comment F3-333 regarding explosives and suggests text modifications regarding vibration. See Responses to Comments F3-333 and F3-334.

F3-344 The commenter feels that Impact N-1 (Construction noise could substantially disturb sensitive receptors or violate local rules, standards, and/or ordinances) would be less than significant. BLM does not agree. See Response to Comment F3-342 regarding helicopter hovering and noise, and Response to Comment F1-2 regarding SCE's request regarding variances. Close helicopter work, other heavy-equipment construction activities, which include rock blasting and pile driving, and night work could result in noise impacts to sensitive receptors that would remain significant and unavoidable, as shown in Section D.13.3.5. A variance for

night work would allow the work, but the impact would remain as the noise levels may still exceed the existing standards. Having a variance does not mean an impact does not occur. Likewise, allowing helicopter hovering in the vicinity of residences does not mean the impact caused by the noise is less than significant; it can be significant but allowed under certain circumstances.

F3-345 This comment requests clarification in the EIS that mitigation referenced for Connected Actions is not imposed on SCE. See Response to Comment F3-102 with regard to mitigation for connected actions.

F3-346 The commenter states that there are additional impacts associated with the Phased Build Alternative that were not addressed in the Draft EIR/EIS. Please see General Response GR-4.

F3-347 This comment states that the audible corona noise level at the surface of the conductor in the Phased Build Alternative would be greater than that of the conductor in the Proposed Project. The text has been modified to reflect the potential difference in noise source levels, which would have an effect that is somewhat offset by the greater distances of the lines in the Phased Build Alternative from the edge of the ROW when compared with the lines in the Proposed Project.

F3-348 This comment with regard to corona noise is similar to Comment F3-347. See Response to Comment F3-347.

F3-349 This comment requests revisions to Mitigation Measure N-1a (Implement best management practices for construction noise) and is similar to Comment F1-2. See Response to Comment F1-2, which addresses the need for variances.

F3-350 This comment with regard to Mitigation Measure N-1b (Implement a helicopter noise control strategy) is similar to Comment F3-342. See Response to Comment F3-342.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Section D.14 Paleontological Resources

Page D.14-2

DEIR/DEIS Text: F3-351

First paragraph, 3rd line of D.14.1.1 Regional Setting and Approach to Data Collection

Paleontological resources, or fossils are the evidence of once-living organisms preserved in the rock record

SCE Comment:

Please revise as follow:

Paleontological resources, or fossils are the evidence of once-living organisms preserved in the ~~rock~~ geologic record

Page D.14-16

DEIR/DEIS Text: F3-352

First sentence of the first paragraph.

The loss of any identifiable fossil that could yield information important to prehistory, or that embodies the distinctive characteristics of a type of organism, environment, period of time, or geographic region, would be a significant environmental impact.

SCE Comment:

The DEIR/DEIS incorrectly assumes that the Proposed Project will have unanticipated discoveries and that resource could not be avoided.

Please revise as follows:

Significant paleontological resources are defined as "identifiable" vertebrate fossils, uncommon invertebrates and plants, and trace fossils that provide a critical piece of paleobiological or geologic data, illustrate a geological principle, or occupy a unique stratigraphic position (SVP, 2010). The loss of any significant ~~identifiable fossil~~ paleontological resource ~~that could,~~ which yields information important to prehistory, or that embodies the distinctive characteristics of a type of organism, environment, period of time, or geographic region, would be a significant environmental impact.

Page D14-18

DEIR/DEIS Text: F3-353

Impact PAL-1: Construction of the project would destroy or disturb significant paleontological resources

SCE Comment:

The DEIR/DEIS incorrectly assumes that the Proposed Project will destroy or disturb significant paleontological resources. Please revise as follows:

Impact PAL-1: Construction of the project ~~would~~ could destroy or disturb significant paleontological resources.

Page D14-18

DEIR/DEIS Text: F3-354

Under heading Impact PAL-1:

Construction within these segments has the potential to destroy valuable resources, and mitigation is required.

SCE Comment:

The CEQA criteria relates to significance rather than value. Please revise as follows:

Construction within these segments has the potential to destroy or disturb significant paleontological ~~valuable~~ resources, and mitigation is required

Comment Set F3: Southern California Edison Company (cont.)

Page D14-18

DEIR/DEIS Text: F3-355

Mitigation Measures for Impact PAL-1: Construction of the project would destroy or disturb significant paleontological resources

SCE Comment:

The DEIR/DEIS incorrectly assumes that the Proposed Project will destroy or disturb significant paleontological resources. Please revise as follows:

Mitigation Measures for Impact PAL-1: Construction of the project ~~would~~ could destroy or disturb significant paleontological resources

Page D14-19

DEIR/DEIS Text: F3-356

PAL-1b 4th bullet:

The Plan shall define monitoring procedures and methodology, and shall specify that sediments of undetermined sensitivity shall be monitored on a part-time basis (as determined by the Qualified Paleontologist). Sediments with very low or low sensitivity will not require paleontological monitoring. The Qualified Paleontological Monitor shall have at least a B.S in Geology or Paleontology, and demonstrated field experience in the collection and identification of fossil material.

SCE Comment:

SCE suggests deleting the last sentence of this bullet and creating a separate bullet for qualification of monitors under PAL-1d

Monitor construction for paleontological resources (see below). Please revise as follows:

The Plan shall define monitoring procedures and methodology, and shall specify that sediments of undetermined sensitivity shall be monitored on a part-time basis (as determined by the Qualified Paleontologist). Sediments with very low or low sensitivity will not require paleontological monitoring. ~~The Qualified Paleontological Monitor shall have at least a B.S in Geology or Paleontology, and demonstrated field experience in the collection and identification of fossil material~~.

Page D14-19

DEIR/DEIS Text: F3-357

PAL-1c Starting on the 5th line:

Training shall inform all construction personnel that Environmentally Sensitive Areas (ESAs) include areas determined to paleontologically sensitive as defined on the paleontological sensitivity maps for the project, and must be avoided and that travel and construction activity must be confined to designated roads and areas.

SCE Comment:

An ESA is an exclusion zone that cannot be entered. All paleontological sensitive areas are not automatically an ESA. Please revise as follows:

Training shall inform all construction personnel that designated Environmentally Sensitive Areas (ESAs) ~~include areas determined to paleontologically sensitive as defined on the paleontological sensitivity maps for the project~~, ~~and~~ must be avoided and that travel and construction activity must be confined to designated roads and areas.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D14-20

DEIR/DEIS Text: F3-358

PAL-1c

All construction contracts shall include clauses that require construction personnel to attend training so they are aware of the potential for inadvertently exposing subsurface paleontological resources, their responsibility to avoid and protect all such resources, and the penalties for collection, vandalism, or inadvertent destruction of ~~paleontological~~ resources.

SCE Comment:

SCE contracts for construction require compliance with all project mitigation measures and all workers will be required by additional mitigation measures to undergo WEAP training; environmental information is provided at construction tailboards, and construction is monitored to ensure that measures are complied with. The additional requirement is thus unnecessary, please remove this measure as follows:

~~PAL-1c~~

~~All construction contracts shall include clauses that require construction personnel to attend training so they are aware of the potential for inadvertently exposing subsurface paleontological resources, their responsibility to avoid and protect all such resources, and the penalties for collection, vandalism, or inadvertent destruction of paleontological resources.~~

Page D14-20

DEIR/DEIS Text: F3-359

PAL-1d

Sediments of very low (PFYC 1), low (PFYC 2), or unknown (PFYC 3b) sensitivity shall be monitored by a qualified paleontological monitor on a part-time basis (as determined by the Qualified Paleontologist).

SCE Comment:

There is no justification to require monitoring of very low (PFYC 1) or low (PFYC 2) sediments. Per SVP 2010, very low and low sediments do not require monitoring by a qualified paleontologist. Please revise as follows:

Sediments of ~~very low (PFYC 1), low (PFYC 2), or~~ unknown (PFYC 3b) sensitivity shall be monitored by a qualified paleontological monitor on a part-time basis (as outlined in the Plan ~~determined by the Qualified Paleontologist~~).

Comment Set F3: Southern California Edison Company (cont.)

Page D14-20

DEIR/DEIS Text: F3-360

PAL-1d

Monitoring will entail the visual inspection of excavated or graded areas and trench sidewalls. The monitor will also screen sediments to check for the presence of microvertebrates if they are believed to be present. In the event that a paleontological resource is discovered, the monitor will have the authority to temporarily halt the construction equipment around the find until it is assessed for scientific significance, and collected. A temporary construction exclusion zone (i.e., environmentally sensitive area [ESA]) of at least 50 feet, consisting at a minimum of lath and flagging tape, will be erected around the discovery. The exclusion zone acts as a buffer around the discovery and is maintained for safety. The monitor will immediately (within 24 hours) report the discovery to the CPUC and BLM. Construction activities can occur outside the buffer if it is safe to do so. The size of the buffer may be increased or decreased once the monitor adequately explores the discovery to determine its size and significance.

SCE Comment:

Edits to the mitigation measure are suggested for consistency for SVP 2010 and the order of discovery of resources. Please revise as follows:

Monitoring will entail the visual inspection of excavated or graded areas and trench sidewalls. ~~The monitor will also screen sediments to check for the presence of microvertebrates if they are believed to be present~~. In the event that a paleontological resource is discovered, the monitor will have the authority to temporarily halt the construction equipment around the find until it is assessed for scientific significance, and collected. A temporary construction exclusion zone (i.e., environmentally sensitive area [ESA]) of at least 50 feet, consisting at a minimum of lath and flagging tape, will be erected around the discovery. The exclusion zone acts as a buffer around the discovery and is maintained for safety. ~~The monitor~~ SCE will ~~immediately (within 24 hours)~~ report the discovery to the CPUC and BLM within 24 hours and/or as outlined in the Plan.

Construction activities can occur outside the buffer if it is safe to do so. The size of the buffer may be increased or decreased once the monitor adequately explores the discovery to determine its size and significance. If indicators of potential microvertebrate fossils are found, screening of a test sample shall be carried out as outlined in SVP 2010. This procedure will be outlined in the Plan.

Page D.14-20

DEIR/DEIS Text: F3-361

PAL-1d

Removed qualification of monitors from section PAL-1b and add to PAL-1d **Monitor construction for paleontological resources.**

SCE Comment:

SCE suggests adding a new bullet point to PAL-1d to include all potential qualifications from SVP 2010. Please revise as follows:

Paleontological resource monitors per SVP 2010 shall have the equivalent of the following qualifications:

1. BS or BA degree in geology or paleontology and one year experience monitoring in the state or geologic province of the specific project. An associate degree and/or demonstrated experience showing ability to recognize fossils in a biostratigraphic context and recover vertebrate fossils in the field may be substituted for a degree. An undergraduate degree in geology or paleontology is preferable, but is less important than documented experience performing paleontological monitoring, or

2. AS or AA in geology, paleontology, or biology and demonstrated two years of experience collecting and salvaging fossil materials in the state or geologic province of the specific project, or

3. Enrollment in upper division classes pursuing a degree in the fields of geology or paleontology and two years of monitoring experience in the state or geologic province of the specific project.

4. Monitors must demonstrate proficiency in recognizing various types of fossils, in collection methods, and in other paleontological field techniques

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.14-21

DEIR/DEIS Text: F3-362

PAL-1e Second paragraph:

All significant fossils collected will be prepared in a properly equipped paleontology laboratory to a point ready for curation no more than 60 days after all fieldwork is completed.

SCE Comment:

Please change the mitigation measure to include time for analyzing remains in the lab prior to prepping them for curation., as follows:

All significant fossils collected will be prepared in a properly equipped paleontology laboratory to a point ready for curation no more than 60 days after all ~~fieldwork~~ analyses are completed.

Page D.14-21

DEIR/DEIS Text: F3-363

Impact PAL-1: Construction of the project would destroy or disturb significant paleontological resources.

SCE Comment:

The DEIR/DEIS incorrectly assumes that the Proposed Project will destroy or disturb significant paleontological resources. lease revise as follows:

Impact PAL-1: Construction of the project ~~would~~ could destroy or disturb significant paleontological resources.

Page D.14-21

DEIR/DEIS Text: F3-364

Impact PAL-1: Construction of the project would destroy or disturb significant paleontological resources (Class III).

SCE Comment:

The DEIR/DEIS incorrectly assumes that the Proposed Project will destroy or disturb significant paleontological resources. Please revise as follows:

Impact PAL-1: Construction of the project ~~would~~ could destroy or disturb significant paleontological resources (Class III).

Page D.14-22

DEIR/DEIS Text: F3-365

One impact related to paleontological resources was identified for the Proposed Project.

SCE Comment:

Please revise as follows:

~~One impact related to paleontological resources was identified for t~~The Proposed Project identified that, the loss of any significant paleontological resource, which yields information important to prehistory, or that embodies the distinctive characteristics of a type of organism, environment, period of time, or geographic region, would be a significant environmental impact.

Page D.14-22

DEIR/DEIS Text: F3-366

Impact PAL-1: Construction of the project would destroy or disturb significant paleontological resources.

SCE Comment:

The DEIR/DEIS incorrectly assumes that the Proposed Project will destroy or disturb significant paleontological resources. Please revise as follows:

Impact PAL-1: Construction of the project ~~would~~ could destroy or disturb significant paleontological resources.

Comment Set F3: Southern California Edison Company (cont.)

Page D.14-22

DEIR/DEIS Text: F3-367

Impact PAL-1: Construction of the project would destroy or disturb significant paleontological resources (Class II)

For the connected actions, construction-related ground disturbance resulting from development of connected action projects in Desert Center and Blythe areas could result in adverse impacts to paleontological resources, including disturbance, damage, or destruction of a significant fossil; destruction of a unique geologic feature associated with a paleontological site; or disturbance or destruction of a paleontological site, which results in the loss of scientific context of fossil remains. Should paleontological resources be discovered during construction-related activities associated with the projects, they would be subject to federal and State legal requirements discussed in Section D.14.2 above and would be required to implement mitigation measures similar to Mitigation Measures PAL-1a through PAL-1e to reduce any adverse impacts to paleontological resources to less than significant levels (Class II).

SCE Comment:

The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

Page D.14-23

DEIR/DEIS Text: F3-368

Impact PAL-1: Construction of the project would destroy or disturb significant paleontological resources (Class III).

SCE Comment:

The DEIR/DEIS incorrectly assumes that the Proposed Project will destroy or disturb significant paleontological resources. Please revise as follows:

Impact PAL-1: Construction of the project ~~would~~ could destroy or disturb significant paleontological resources (Class III).

Page D.14-23

DEIR/DEIS Text: F3-369

One impact related to paleontological resources was identified for the Proposed Project.

SCE Comment:

Please revise as follows:

~~One impact related to paleontological resources was identified for t~~The Proposed Project identified that, the loss of any significant paleontological resource, which yields information important to prehistory, or that embodies the distinctive characteristics of a type of organism, environment, period of time, or geographic region, would be a significant environmental impact.

Page D.14-23

DEIR/DEIS Text: F3-370

Impact PAL-1: Construction of the project would destroy or disturb significant paleontological resources.

SCE Comment:

The DEIR/DEIS incorrectly assumes that the Proposed Project will destroy or disturb significant paleontological resources. Please revise as follows:

Impact PAL-1: Construction of the project ~~would~~ could destroy or disturb significant paleontological resources.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.14-23

DEIR/DEIS Text: F3-371

Impact PAL-1: Construction of the project would destroy or disturb significant paleontological resources (Class III).

SCE Comment:

The DEIR/DEIS incorrectly assumes that the Proposed Project will destroy or disturb significant paleontological resources. Please revise as follows:

Impact PAL-1: Construction of the project ~~would~~ could destroy or disturb significant paleontological resources (Class III).

Page D.14-24

DEIR/DEIS Text: F3-372

One impact related to paleontological resources was identified for the Proposed Project.

SCE Comment:

The analysis should state what the impact is. Please revise as follows:

~~One impact related to paleontological resources was identified for t~~The Proposed Project identified that, the loss of any significant paleontological resource, which yields information important to prehistory, or that embodies the distinctive characteristics of a type of organism, environment, period of time, or geographic region, would be a significant environmental impact.

Page D.14-24

DEIR/DEIS Text: F3-373

Impact PAL-1: Construction of the project would destroy or disturb significant paleontological resources.

SCE Comment:

Impact PAL-1: The DEIR/DEIS incorrectly assumes that the Proposed Project will destroy or disturb significant paleontological resources. Please revise as follows:

Impact PAL-1: Construction of the project ~~would~~ could destroy or disturb significant paleontological resources.

Construction of the project would destroy or disturb significant paleontological resources.

Page D.14-24

DEIR/DEIS Text: F3-374

Impact PAL-1: Construction of the project would destroy or disturb significant paleontological resources (Class III).

SCE Comment:

The DEIR/DEIS incorrectly assumes that the Proposed Project will destroy or disturb significant paleontological resources. Please revise as follows:

Impact PAL-1: Construction of the project ~~would~~ could destroy or disturb significant paleontological resources (Class III).

Comment Set F3: Southern California Edison Company (cont.)

Page D.14-24

DEIR/DEIS Text: F3-375

D.14.4.3 Phased Build Alternative

Impact PAL-1: Construction of the project would destroy or disturb significant paleontological resources

SCE Comment:

As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional study and associated additional impact analysis. The additional disturbance areas could result in additional paleontological impacts beyond those analyzed for the Phased Build Alternative in the document and could be greater than those identified for the Proposed Project.

Page D.14-27

DEIR/DEIS Text: F3-376

PAL-1b: Develop Paleontological Resource Mitigation and Monitoring Plan. Following completion and approval of the Paleontological Resources Report (required in Mitigation Measure PAL-1a) and prior to the start of ground-disturbing construction, the Applicant shall prepare and submit to CPUC and BLM for review and approval, a Paleontological Resources Mitigation and Monitoring Plan (Plan), consistent with the following requirements:

- The Plan shall be prepared by a Qualified Paleontologist and shall be based on Society of Vertebrate Paleontology (SVP) guidelines and meet all regulatory requirements. The qualified paleontologist shall have a Master's Degree or Ph.D. in paleontology, shall have knowledge of the local paleontology, and shall be familiar with paleontological procedures and techniques.
- The Plan shall include a site-specific investigation to identify construction impact areas of moderate (PFYC 3a) to very high (PFYC 5) sensitivity for encountering significant resources and the approximate depths at which those resources are likely to be encountered for each component of each segment of the Proposed Project.
- The Plan shall require the qualified paleontologist monitor to monitor all construction-related ground disturbance in sediments determined to have a moderate (PFYC 3a) to very high (PFYC 5) sensitivity.
- The Plan shall define monitoring procedures and methodology, and shall specify that sediments of undetermined sensitivity shall be monitored on a part-time basis (as determined by the Qualified Paleontologist). Sediments with very low or low sensitivity will not require paleontological monitoring. The Qualified Paleontological Monitor shall have at least a B.S. in Geology or Paleontology, and demonstrated field experience in the collection and identification of fossil material.
- The Plan shall state which resources will be avoided and which shall be recovered for their data potential. Where possible, recovery is preferred over avoidance in order to mitigate the potential for looting of paleontological resources. The Plan shall also detail methods of recovery, preparation and analysis of specimens, final curation of specimens at a federally accredited repository, data analysis, and reporting.
- The Plan shall specify that all paleontological work undertaken by the Applicant on public lands administered by BLM shall be carried out by qualified, permitted paleontologists with the appropriate current Paleontological Resources Use Permit.

SCE Comment:

For the reasons described above, please revise as follows:

PAL-1b: Develop Paleontological Resource Mitigation and Monitoring Plan. Following completion and approval of the Paleontological Resources Report (required in Mitigation Measure PAL-1a) and prior to the start of ground-disturbing construction, the Applicant shall prepare and submit to CPUC and BLM for review and approval, a Paleontological Resources Mitigation and Monitoring Plan (Plan), consistent with the following requirements:

§ The Plan shall be prepared by a Qualified Paleontologist and shall be based on Society of Vertebrate Paleontology (SVP) guidelines and meet all regulatory requirements. The qualified paleontologist shall have a Master's Degree or Ph.D. in paleontology, shall have knowledge of the local paleontology, and shall be familiar with paleontological procedures and techniques.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

F3-376 cont.

§ The Plan shall include a site-specific investigation to identify construction impact areas of moderate (PFYC 3a) to very high (PFYC 5) sensitivity for encountering significant resources and the approximate depths at which those resources are likely to be encountered for each component of each segment of the Proposed Project.

§ The Plan shall require the qualified paleontological monitor to monitor all construction-related ground disturbance in sediments determined to have a moderate (PFYC 3a) to very high (PFYC 5) sensitivity.

The Plan shall define monitoring procedures and methodology, and shall specify that sediments of undetermined sensitivity shall be monitored on a part-time basis (as determined by the Qualified Paleontologist). Sediments with very low or low sensitivity will not require paleontological monitoring. ~~The Qualified Paleontological Monitor shall have at least a B.S in Geology or Paleontology, and demonstrated field experience in the collection and identification of fossil material~~. § The Plan shall state which resources will be avoided and which shall be recovered for their data potential. Where possible, recovery is preferred over avoidance in order to mitigate the potential for looting of paleontological resources. The Plan shall also detail methods of recovery, preparation and analysis of specimens, final curation of specimens at a federally accredited repository, data analysis, and reporting.

§ The Plan shall specify that all paleontological work undertaken by the Applicant on public lands administered by BLM shall be carried out by qualified, permitted paleontologists with the appropriate current Paleontological Resources Use Permit.

Comment Set F3: Southern California Edison Company (cont.)

Page D.14-28

DEIR/DEIS Text: F3-377

PAL-1c: Train construction personnel. Prior to the initiation of construction, all construction personnel shall be trained regarding the recognition of possible subsurface paleontological resources and protection of all paleontological resources during construction. The Applicant shall complete training for all construction personnel. Training shall inform all construction personnel of the procedures to be followed upon the discovery of paleontological materials. Training shall inform all construction personnel that Environmentally Sensitive Areas (ESAs) include areas determined to be paleontologically sensitive as defined on the paleontological sensitivity maps for the project, and must be avoided and that travel and construction activity must be confined to designated roads and areas. All personnel shall be instructed that unauthorized collection or disturbance of protected fossils on or off the right-of-way by the Applicant, his representatives, or employees will not be allowed. Violators will be subject to prosecution under the appropriate State and federal laws and violations will be grounds for removal from the project. Unauthorized resource collection or disturbance may constitute grounds for the issuance of a stop work order. The following issues shall be addressed in training or in preparation for construction:

- All construction contracts shall include clauses that require construction personnel to attend training so they are aware of the potential for inadvertently exposing subsurface paleontological resources, their responsibility to avoid and protect all such resources, and the penalties for collection, vandalism, or inadvertent destruction of paleontological resources.
- The Applicant shall provide a background briefing for supervisory personnel describing the potential for exposing paleontological resources, the location of any potential ESAs, and procedures and notifications required in the event of discoveries by project personnel or paleontological monitors. Supervisory personnel shall enforce restrictions on collection or disturbance of fossils.
- Upon discovery of paleontological resources by paleontologists or construction personnel, work in the immediate area of the find shall be halted and the Applicant's paleontologist notified. Once the find has been inspected and a preliminary assessment made, the Applicant's paleontologist will notify the BLM and CPUC and proceed with data recovery in accordance with the approved Plan consistent with Mitigation Measure PAL-1b (Develop Paleontological Resource Mitigation and Monitoring Plan).

SCE Comment:

For the reasons described above, please revise as follows:

PAL-1c: Train construction personnel. Prior to the initiation of construction, all construction personnel shall be trained regarding the recognition of possible subsurface paleontological resources and protection of all paleontological resources during construction. The Applicant shall complete training for all construction personnel. Training shall inform all construction personnel that designated Environmentally Sensitive Areas (ESAs) ~~include areas determined to paleontologically sensitive as defined on the paleontological sensitivity maps for the project~~, ~~and~~ must be avoided and that travel and construction activity must be confined to designated roads and areas. All personnel shall be instructed that unauthorized collection or disturbance of protected fossils on or off the right-of-way by the Applicant, his representatives, or employees will not be allowed. Violators will be subject to prosecution under the appropriate State and federal laws and violations will be grounds for removal from the project. Unauthorized resource collection or disturbance may constitute grounds for the issuance of a stop work order. The following issues shall be addressed in training or in preparation for construction:

§ All construction contracts shall include clauses that require construction personnel to attend environmental training so they are aware of the potential for inadvertently exposing subsurface paleontological resources, their role in ~~responsibility to~~ avoiding ~~and protect all such~~ paleontological resources, and the penalties for collection, vandalism, or inadvertent destruction of paleontological resources.

§ The Applicant shall provide a background briefing for supervisory personnel describing the potential for exposing paleontological resources, the location of any potential ESAs, and procedures and notifications required in the event of discoveries by project personnel or paleontological monitors. Supervisory personnel shall enforce restrictions on collection or disturbance of fossils.

§ Upon discovery of paleontological resources by paleontologists or construction personnel, work in the immediate area of the find shall be halted and the Applicant's paleontologist notified. Once the find has been inspected and a preliminary assessment made, the Applicant's paleontologist will notify the BLM and CPUC and proceed with data recovery in accordance with the approved Plan consistent with Mitigation Measure PAL-1b (Develop Paleontological Resource Mitigation and Monitoring Plan).

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.14-29

DEIR/DEIS Text: F3-378

PAL-1e: Final reporting and curation. At the conclusion of laboratory work and museum curation, a final report will be prepared describing the results of the paleontological monitoring efforts associated with the project. The report will include a summary of the field and laboratory methods, an overview of the Proposed Project area geology and paleontology, a list of taxa recovered (if any), an analysis of fossils recovered (if any) and their scientific significance, and recommendations. If the monitoring efforts produced fossils, then a copy of the report will also be submitted to the designated museum repository.

All significant fossils collected will be prepared in a properly equipped paleontology laboratory to a point ready for curation no more than 60 days after all fieldwork is completed. Preparation will include the careful removal of excess matrix from fossil materials and stabilizing and repairing specimens, as necessary. Following laboratory work, all fossils specimens will be identified to the lowest taxonomic level, cataloged, analyzed, and delivered to an accredited museum repository for permanent curation and storage. The cost of curation is assessed by the repository and is the responsibility of the Applicant.

SCE Comment:

For the reasons described above, please revise as follows:

PAL-1e: Final reporting and curation. At the conclusion of laboratory work and museum curation, a final report will be prepared describing the results of the paleontological monitoring efforts associated with the project. The report will include a summary of the field and laboratory methods, an overview of the Proposed Project area geology and paleontology, a list of taxa recovered (if any), an analysis of fossils recovered (if any) and their scientific significance, and recommendations. If the monitoring efforts produced fossils, then a copy of the report will also be submitted to the designated museum repository.

All significant fossils collected will be prepared in a properly equipped paleontology laboratory to a point ready for curation no more than 60 days after all ~~fieldwork~~ analyses is completed. Preparation will include the careful removal of excess matrix from fossil materials and stabilizing and repairing specimens, as necessary. Following laboratory work, all fossils specimens will be identified to the lowest taxonomic level, cataloged, analyzed, and delivered to an accredited museum repository for permanent curation and storage. The cost of curation is assessed by the repository and is the responsibility of the Applicant.

Page D.14-29

DEIR/DEIS Text: F3-379

PAL-1d: Monitor construction for paleontological resources. Based on the paleontological sensitivity assessment and Paleontological Resource Mitigation and Monitoring Plan consistent with Mitigation Measure PAL-1b (Develop Paleontological Mitigation and Monitoring Plan), the Applicant shall conduct full-time construction monitoring through its qualified paleontological monitor in areas determined to have moderate (PFYC 3a) to very high (PFYC 5) sensitivity. Sediments of very low (PFYC 1), low (PFYC 2), or unknown (PFYC 3b) sensitivity shall be monitored by a qualified paleontological monitor on a part-time basis (as determined by the Qualified Paleontologist). Monitoring will entail the visual inspection of excavated or graded areas and trench sidewalls. The monitor will also screen sediments to check for the presence of microvertebrates if they are believed to be present. In the event that a paleontological resource is discovered, the monitor will have the authority to temporarily halt the construction equipment around the find until it is assessed for scientific significance, and collected. A temporary construction exclusion zone (i.e., environmentally sensitive area [ESA]) of at least 50 feet, consisting at a minimum of lath and flagging tape, will be erected around the discovery. The exclusion zone acts as a buffer around the discovery and is maintained for safety. The monitor will immediately (within 24 hours) report the discovery to the CPUC and BLM. Construction activities can occur outside the buffer if it is safe to do so. The size of the buffer may be increased or decreased once the monitor adequately explores the discovery to determine its size and significance.

Comment Set F3: Southern California Edison Company (cont.)

SCE Comment: F3-379 cont.

For the reasons described above and consistent with SVP 2010, please revise as follows:

PAL-1d: Monitor construction for paleontological resources. Based on the paleontological sensitivity assessment and Paleontological Resource Mitigation and Monitoring Plan consistent with Mitigation Measure PAL-1b (Develop Paleontological Mitigation and Monitoring Plan), the Applicant shall conduct full-time construction monitoring through its qualified paleontological monitor in areas determined to have moderate (PFYC 3a) to very high (PFYC 5) sensitivity. Sediments of ~~very low (PFYC 1), low (PFYC 2), or~~ unknown (PFYC 3b) sensitivity shall be monitored by a qualified paleontological monitor on a part-time basis (as outlined in the Plan ~~determined by the Qualified Paleontologist~~). Monitoring will entail the visual inspection of excavated or graded areas and trench sidewalls. ~~The monitor will also screen sediments to check for the presence of microvertebrates if they are believed to be present~~. In the event that a paleontological resource is discovered, the monitor will have the authority to temporarily halt the construction equipment around the find until it is assessed for scientific significance, and collected. A temporary construction exclusion zone (i.e., environmentally sensitive area [ESA]) of at least 50 feet, consisting at a minimum of lath and flagging tape, will be erected around the discovery. The exclusion zone acts as a buffer around the discovery and is maintained for safety. ~~The monitor~~ SCE will ~~immediately (within 24 hours)~~ report the discovery to the CPUC and BLM within 24 hours and/or as outlined in the Plan. Construction activities can occur outside the buffer if it is safe to do so. The size of the buffer may be increased or decreased once the monitor adequately explores the discovery to determine its size and significance. If indicators of potential microvertebrate fossils are found, screening of a test sample shall be carried out as outlined in SVP 2010. This procedure will be outlined in the Plan. Paleontological resource monitors per SVP 2010 shall have the equivalent of the following qualifications: 1. BS or BA degree in geology or paleontology and one year experience monitoring in the state or geologic province of the specific project. An associate degree and/or demonstrated experience showing ability to recognize fossils in a biostratigraphic context and recover vertebrate fossils in the field may be substituted for a degree. An undergraduate degree in geology or paleontology is preferable, but is less important than documented experience performing paleontological monitoring, or 2. AS or AA in geology, paleontology, or biology and demonstrated two years of experience collecting and salvaging fossil materials in the state or geologic province of the specific project, or 3. Enrollment in upper division classes pursuing a degree in the fields of geology or paleontology and two years of monitoring experience in the state or geologic province of the specific project. 4. Monitors must demonstrate proficiency in recognizing various types of fossils, in collection methods, and in other paleontological field techniques.

Responses to Comment Set F3 – Section D.14 Paleontological Resources

F3-351 For Section D.14.1.1 (Paleontological Resources, Regional Setting and Approach to Data Collection), the commenter prefers the phrase "Paleontological Resources, or fossils are the evidence of once-living organisms preserved in the ~~rock~~ geologic record." We agree that the commenter's suggestion provides clarity and we have modified Section D.14.1.1 to include the suggested revision.

F3-352 The commenter is concerned that in Section D.14.3 (Paleontological Resources, Environmental Impacts of the Proposed Project) it is incorrectly assumed that the Proposed Project will have unanticipated discoveries and that resource cannot not be avoided. We agree and have revised the text in Section D.14.3 for clarification, indicating that resources "could" be affected, rather than "would" be affected.

F3-353 The commenter notes that by using the following language under Impact PAL-1 in Section D.14.3.3 (Impacts and Mitigation Measures), the Draft EIR/EIS incorrectly assumes that the Proposed Project will certainly destroy or disturb significant paleontological resources: Construction of the project would destroy or disturb significant paleontological resource. We agree that Project-related impacts to paleontological resources are potential, not certain. Impact analyses in environmental documents discuss environmental impacts that could happen, but may not necessarily occur as the result of a project. Therefore, they are uncertain by nature. Regardless, Impact PAL-1 in Section D.14.3.3 (Impacts and Mitigation Measures) has been revised to change "would" to "could" to reflect the fact that the project could potentially impact paleontological resources. This same minor change has been made to Impact PAL-1 throughout Section D.14 (Paleontological Resources), as requested.

F3-354 Under Impact PAL-1 in Section D.14.3.3 (Impacts and Mitigation Measures), the commenter prefers the more precise phrase: "Construction within these segments has the potential to destroy ~~valuable~~ or disturb significant paleontological resources, and mitigation is required." The commenter's suggestion helps to clarify Impact PAL-1; therefore, the text in Section D.14.3.3 has been modified to include the suggested revision.

F3-355 This comment is similar to Comment F-354. See Response to Comment F3-353.

F3-356 The Commenter suggests Mitigation Measures PAL 1b (Develop Paleontological Resources Mitigation and Monitoring Plan) and PAL-1d (Monitor construction for paleontological resources) be revised to include requirements for Paleontological Monitor qualifications, in accordance with SVP (2010). Text in Mitigation Measures PAL-1b and PAL-1d has been modified, deleting the qualifications statement in Mitigation Measure PAL-1b and inserting the Paleontological Monitor qualifications into Mitigation Measure PAL-1d.

F3-357 The commenter is concerned that Mitigation Measure PAL-1c (Train construction personnel) does not clearly describe Environmentally Sensitive Areas (ESAs) as they relate to Paleontological Resources. Mitigation Measure PAL-1c has been modified to clarify the ESAs with respect to Paleontological Resources.

F3-358 The commenter is concerned that language regarding construction contracts in Mitigation Measure PAL-1c (Train construction personnel) is redundant or is already addressed by the Applicant's BMPs or APMs. We agree and have eliminated the redundant text in Mitigation Measure PAL-1c in Section D.14.3.3 (Impacts and Mitigation Measures).

F3-359 The commenter is concerned that there is no justification for part-time monitoring or spot-checking in geologic units with very low to low paleontological sensitivity (PFYC Class 1-2), as required in Mitigation Measure PAL-1d (Monitor construction for paleontological resources) in Section D.14.3.3 (Impacts and Mitigation Measures). We agree and Mitigation Measure PAL-1d has been revised to clarify the monitoring requirements for the Proposed Project.

F3-360 The Commenter suggests revising the Mitigation Measure PAL-1d (Monitor construction for paleontological resources) for clarity. Mitigation Measure PAL-1d text has been revised to explicitly specify the SVP (2010) guidelines in order to ensure consistency, including those related to the screening of potential microvertebrate fossil test samples and paleontological resource monitor's qualifications. As with the Draft EIR/EIS, these procedures would all be outlined in the Paleontological Resource Mitigation and Monitoring Plan, which is required under Mitigation Measure PAL-1b (Develop Paleontological Mitigation and Monitoring Plan).

F3-361 This comment is similar to Comment F3-356. See Response to Comment F3-356. The suggested revisions have been made.

F3-362 The commenter suggests revising the Mitigation Measure PAL-1e (Final reporting and curation) in Section D.14.3.3 (Impacts and Mitigation Measures) to allow more time for specimen analyses following fieldwork. We agree and have revised the text in Mitigation Measure PAL-1e accordingly.

F3-363 See Response to Comment F3-353. Impact PAL-1 in Section D.14.3.4 (Impacts of Connected Actions) was revised to reflect potential impacts.

F3-364 See Response to Comment F3-353. Impact PAL-1 in Draft EIR/EIS Section D.14.3.5 (CEQA Significance Determination for Proposed Project and Connected Actions) was revised in CPUC's Final EIR to reflect that impacts are potential, not certain. This relates to CEQA, not NEPA.

F3-365 The commenter suggests revising Section D.14.4.1 (Tower Relocation Alternative) for clarity to describe what the impact related to loss of paleontological resources would be. The second paragraph in Section D.14.4.1 has been revised to further clarify the potential impacts of the alternatives.

F3-366 See Response to Comment F3-353. Impact PAL-1 in Section D.14.4.1 (Tower Relocation Alternative) was revised to reflect that impacts are potential, not certain.

F3-367 See Response to Comment F3-102.

F3-368 See Response to Comment F3-353. Impact PAL-1 in Section D.14.4.1 (Tower Relocation Alternative) has been revised to reflect potential impacts by changing "would" to "could" in the Final EIS.

F3-369 The commenter suggests revising Section D.14.4.2 (Iowa Street 66 kV Underground Alternative) for clarity to describe what the impact related to loss of paleontological resources would be. The second paragraph in Section D.14.4.2 has been revised as suggested in order to further clarify the potential impacts of the alternatives.

F3-370 See Response to Comment F3-353. Impact PAL-1 in Section D.14.4.2 (Iowa Street 66 kV Underground Alternative) was revised to reflect potential impacts, indicating that resources "could" be affected, rather than "would" be affected.

F3-371 See Response to Comment F3-353. Impact PAL-1 in Section D.14.4.3 was revised to reflect potential impacts by changing "would" to "could" in the Final EIS.

F3-372 The commenter suggests revising Section D.14.4.3 (Phased Build Alternative) for clarity. The second paragraph in Section D.14.4.3 has been revised in order to further clarify the potential impacts of the alternatives by changing "would" to "could" in the Final EIS.

F3-373 See Response to Comment F3-353. Impact PAL-1 in Section D.14.4.3 (Phased Build Alternative) was revised to reflect potential impacts by changing "would" to "could" in the Final EIS.

F3-374 See Responses to Comments F3-353 and F3-364. Impact PAL-1 in Section D.14.4.3 (Impacts and Mitigation Measures) was revised to reflect potential impacts by changing "would" to "could" in the Final EIS.

F3-375 Please see General Response GR-4 regarding the future construction impacts of the Phased Build Alternative.

F3-376 See Response to Comment F3-356.

F3-377 See Response to Comments F3-357 and F3-358.

F3-378 See Response to Comment F3-362.

F3-379 See Response to Comments F3-359 and F3-360.

Comment Set F3: Southern California Edison Company (cont.)

Section D.15 Recreation

Page D.15-15

DEIR/DEIS Text: F3-380

Coordinate construction schedule and activities with the authorized officer for the recreation area. No less than 30 days prior to construction that would affect recreation areas, SCE shall coordinate construction activities and the project construction schedule with the authorized officer of the recreation areas listed below. SCE shall schedule construction activities to avoid heavy recreational use periods, including major holidays, in coordination with, and at the discretion of the authorized officer. SCE shall locate construction equipment to avoid temporary preclusion of recreation area use whenever feasible per the recommendations of the authorized officer. SCE shall also prepare a public notice of construction activities consistent with Mitigation Measure LU-1a (Prepare Construction Notification Plan). SCE shall document its coordination efforts with the authorized officer, and provide this documentation to the CPUC and the BLM 30 days prior to construction.

SCE Comment:

To ensure that mitigation measure R-1a can successfully be implemented, please make the following revision:

R-1a: Coordinate construction schedule and activities with ~~the authorized officer~~ a representative for the recreation area. No less than 30 days prior to construction that would affect recreation areas, SCE shall coordinate construction activities and the project construction schedule with ~~the authorized officer~~ a representative of the recreation areas listed below. SCE shall use best efforts to schedule construction activities to avoid heavy recreational use periods, including major holidays, in coordination with~~, and at the discretion of the authorized officer~~ the representative. SCE shall locate construction equipment to avoid temporary preclusion of recreation area use whenever feasible per the recommendations ~~of the authorized officer~~ a representative. SCE shall also prepare a public notice of construction activities consistent with Mitigation Measure LU-1a (Prepare Construction Notification Plan). SCE shall document its coordination efforts with a representative ~~the authorized officer~~, and provide this documentation to the CPUC and the BLM 30 days prior to construction.

Page D.15-15

DEIR/DEIS Text: F3-381

Coordinate with local agencies to identify alternative recreation areas. SCE shall coordinate with the local parks and recreation departments regarding construction activities at the park and recreation facilities listed in R-1a, in order to identify alternative recreation sites that may be used by the public. SCE shall post a public notice at recreation facilities to be closed or have limited access during construction consistent with Mitigation Measure LU-1a (Prepare Construction Notification Plan) and identify any alternative recreation sites. SCE shall document its coordination with the parks and recreation departments and shall submit this documentation to the CPUC and the BLM 30 days prior to initiating project construction.

SCE Comment:

To ensure that mitigation measure R-1b can successfully be implemented, please make the following revision:

R-1b: Coordinate with local agencies to identify alternative recreation areas. SCE shall coordinate with the local parks and recreation departments regarding construction activities at the park and recreation facilities listed in R-1a, in order to identify alternative recreation sites that may be used by the public. SCE shall post a public notice at recreation facilities to be closed or have limited access during construction consistent with Mitigation Measure LU-1a (Prepare Construction Notification Plan) and as allowed by the facility representative and identify any alternative recreation sites. SCE shall document its coordination with the parks and recreation departments and shall submit this documentation to the CPUC and the BLM 30 days prior to initiating project construction.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.15-16

DEIR/DEIS Text: F3-382

Impact R-2: Presence of a transmission line or substation would change the character of a recreation area, diminishing its recreational value

The proposed double-circuit structures would be greater in height than the single-circuit structures, and as such the Proposed Project would alter the viewshed along the ROW (see Section D.18.3, Visual Resources). However, the number of transmission lines that would traverse the recreational areas would decrease, allowing additional space for recreation.

SCE Comment:

To accurately characterize the change in viewshed, please make the following edits:

The proposed double-circuit structures would be greater in height than the single-circuit structures and would reduce the overall number of structures from three to two, and as such the Proposed Project would alter the viewshed along the ROW (see Section D.18.3, Visual Resources). ~~However, t~~ The number of transmission lines that would traverse the recreational areas would decrease, allowing additional space for recreation.

Page D.15-16

DEIR/DEIS Text: F3-383

Recreational resources that are located in the vicinity of the ROW would potentially be affected by the siting of a new transmission line.

SCE Comment:

To accurately characterize the change in viewshed, please make the following edits:

Recreational resources that are located in the vicinity of the ROW would potentially be affected by the removal of an existing transmission line and siting of a new transmission line.

Page D.15-18

DEIR/DEIS Text: F3-384

Impact R-1: Construction activities would temporarily reduce access and visitation to recreation areas (Class II)

For the connected actions, temporary conflicts regarding access to recreation areas during construction of the solar projects would depend on the final location of these projects relative to recreation areas. A short-term interference with visitation to a recreation site would create a potentially significant impact. Indirect impacts to recreation areas would also occur from construction-related noise, dust, and traffic that would diminish the value of nearby recreational facilities and would contribute to a decline in visitation. Imposing measures similar to Mitigation Measures R-1a and R-1b would reduce the impact to a less than significant level by ensuring that the construction time frame avoids the heavy recreational use periods and by identifying alternative areas for recreation to provide the users recreational options throughout the entire construction period (Class II).

SCE Comment:

The DEIR should clarify that potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

Comment Set F3: Southern California Edison Company (cont.)

Page D.15-19

DEIR/DEIS Text: F3-385

Impact R-2: Presence of project facilities would change the character of a recreation area, diminishing its recreational value (Class I for Connected Actions)

Connected Actions. The solar generation projects that are connected to the WOD Project would intro-duce energy infrastructure into a natural and undeveloped landscape that is characterized by its scenic resources. These projects would be visible from many recreation areas, especially in the Desert Center Area and the Blythe Area where many ACECs and wilderness areas are located. In particular, the CEC concluded that the impacts on local residents, the Desert Center Airport, and recreational visitors to the Chuckwalla Valley Raceway from the effects of glint and glare would be significant. The environmental review of the Solar Harvest project concluded that construction of the project would alter the existing character of the area and may affect surrounding recreational uses as a result of the altered viewshed, including a substantial adverse effect on the wilderness experience of dispersed and occasional visitors to the Joshua Tree Wilderness Area. It is likely that glint and glare for other solar PV projects would also be significant. Implementing mitigation measures similar to those imposed on the Proposed Project for visual resources would reduce impacts to the recreational experience of these resources to the extent feasible. However, the long-term impacts to the recreational value of these resources would remain significant and unavoidable (Class I).

SCE Comment:

The DEIR should clarify that potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

Page D.15-19

DEIR/DEIS Text: F3-386

Impact R-3: Presence of project facilities would permanently preclude recreational activities (Class II for Connected Actions)

Connected Actions. The connected projects are not anticipated to limit or preclude access to regional, city, or private recreation areas. Unlike these recreation opportunities, most BLM-managed recreational opportunities are dispersed across the desert areas. Construction of solar generation projects on BLM lands would eliminate access to these affected lands for the life of the project and could alter access to other areas. Mitigation measures would be needed to require alternate access to areas made inaccessible; such measures would make the impact less than significant (Class II).

SCE Comment:

The DEIR should clarify that potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

Page D.15-22 through 23

DEIR/DEIS Text: F3-387

D.15.4.3 Phased Build Alternative

Impact R-1: Construction activities would temporarily reduce access and visitation to recreation areas

Impact R-2: Presence of a transmission line or substation would change the character of a recreation area, diminishing its recreational value

Impact R-3: Presence of a transmission line would permanently preclude recreational activities

SCE Comment:

As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional study and associated additional impact analysis. The additional disturbance areas and the increased duration could result in additional recreation impacts beyond those analyzed for the PBA in the document and could be greater than those identified for the Proposed Project.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.15-25

DEIR/DEIS Text: F3-388

Table D.15-3. Mitigation Monitoring Program – Recreation
MITIGATION MEASURE

R-1a: Coordinate construction schedule and activities with the authorized officer for the recreation area. No less than 30 days prior to construction that would affect recreation areas, SCE shall coordinate construction activities and the project construction schedule with the authorized officer of the recreation areas listed below. SCE shall schedule construction activities to avoid heavy recreational use periods, including major holidays, in coordination with, and at the discretion of the authorized officer. SCE shall locate construction equipment to avoid temporary preclusion of recreation area use whenever feasible per the recommendations of the authorized officer. SCE shall also prepare a public notice of construction activities consistent with Mitigation Measure LU-1a (Prepare Construction Notification Plan). SCE shall document its coordination efforts with the authorized officer, and provide this documentation to the CPUC and the BLM 30 days prior to construction.

- Rancho Mediterranean Park
- South Hills Preserve
- Lillian V. Miller Memorial Trail
- Rest areas
- Stetson Community Park
- Noble Creek Regional Park
- Trevino Community Park
- Bike lane on Barton Road, Beaumont Avenue, Drainage and SCE Corridor Class I path, Cherry Avenue
- Norton Younglove Preserve
- San Timoteo Canyon State Park
- Cherry Valley Lakes RV campground
- Oak Valley Golf Club and Park
- Pacific Crest Trail

SCE Comment:

To ensure that mitigation measure R-1a can successfully be implemented, please make the following revision:

Table D.15-3. Mitigation Monitoring Program – Recreation
MITIGATION MEASURE

R-1a: Coordinate construction schedule and activities with ~~the authorized officer~~ a representative for the recreation area. No less than 30 days prior to construction that would affect recreation areas, SCE shall coordinate construction activities and the project construction schedule with the ~~authorized officer~~ a representative of the recreation areas listed below. SCE shall use best efforts to schedule construction activities to avoid heavy recreational use periods, including major holidays, in coordination with~~, and at the discretion of the authorized officer~~ the representative. SCE shall locate construction equipment to avoid temporary preclusion of recreation area use whenever feasible per the recommendations ~~of the authorized officer~~ a representative. SCE shall also prepare a public notice of construction activities consistent with Mitigation Measure LU-1a (Prepare Construction Notification Plan). SCE shall document its coordination efforts with a representative ~~the authorized officer~~, and provide this documentation to the CPUC and the BLM 30 days prior to construction.

- Rancho Mediterranean Park
- South Hills Preserve
- Lillian V. Miller Memorial Trail
- Rest areas
- Stetson Community Park
- Noble Creek Regional Park
- Trevino Community Park
- Bike lane on Barton Road, Beaumont Avenue, Drainage and SCE Corridor Class I path, Cherry Avenue
- Norton Younglove Preserve
- San Timoteo Canyon State Park
- Cherry Valley Lakes RV campground
- Oak Valley Golf Club and Park
- Pacific Crest Trail

Comment Set F3: Southern California Edison Company (cont.)

Page D.15-26

DEIR/DEIS Text: F3-389

MITIGATION MEASURE

R-1b: Coordinate with local agencies to identify alternative recreation areas. SCE shall coordinate with the local parks and recreation departments regarding construction activities at the park and recreation facilities listed in R-1a, in order to identify alternative recreation sites that may be used by the public. SCE shall post a public notice at recreation facilities to be closed or have limited access during construction consistent with Mitigation Measure LU-1a (Prepare Construction Notification Plan) and identify any alternative recreation sites. SCE shall document its coordination with the parks and recreation departments and shall submit this documentation to the CPUC and the BLM 30 days prior to initiating project construction.

SCE Comment:

To ensure that mitigation measure R-1b can successfully be implemented please make the following revision:

MITIGATION MEASURE

R-1b: Coordinate with local agencies to identify alternative recreation areas. SCE shall coordinate with the local parks and recreation departments regarding construction activities at the park and recreation facilities listed in R-1a, in order to identify alternative recreation sites that may be used by the public. SCE shall post a public notice at recreation facilities to be closed or have limited access during construction consistent with Mitigation Measure LU-1a (Prepare Construction Notification Plan) <u>and as allowed by the facility representative</u> and identify any alternative recreation sites. SCE shall document its coordination with the parks and recreation departments and shall submit this documentation to the CPUC and the BLM 30 days prior to initiating project construction.

Page D.15-13

DEIR/DEIS Text: F3-390

D.15.3.2 CEQA Significance Criteria

According to the CEQA Environmental Checklist for assessing the impacts to recreation, a project causes a potentially significant impact if it would:

- Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.
- Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Neither of these is applicable. The Proposed Project is a transmission project with a set construction period and a small operations workforce. It does not include an increase in population that would substantially increase the use of existing neighborhood and regional parks such that a substantial physical deterioration would occur; therefore, the first CEQA Environmental Checklist significance criterion is not applicable. The Proposed Project would not require construction of recreational facilities or require the expansion of recreational facilities; therefore the second criterion is not applicable to this project and is not addressed.

Although not identified in the CEQA checklist, from previous transmission projects it is known that the Proposed Project could result in impacts to recreation that:

- Would directly or indirectly disrupt activities in established recreation areas and reduce access or visitation.
- Would substantially reduce the scenic, biological, cultural, geologic, or other important factors that could to be to the value of recreational facilities or areas.

SCE Comment:

Significance criteria not found in the California Environmental Quality Act (CEQA) guidelines are not appropriate for inclusion in an analysis of CEQA Significance Criteria. As such, please remove the following:

~~Although not identified in the CEQA checklist, from previous transmission projects it is known that the Proposed Project could result in impacts to recreation that:~~

- ~~Would directly or indirectly disrupt activities in established recreation areas and reduce access or visitation.~~
- ~~Would substantially reduce the scenic, biological, cultural, geologic, or other important factors that could to be to the value of recreational facilities or areas.~~

Responses to Comment Set F3 – Section D.15 Recreation

F3-380 The commenter requests revisions to Mitigation Measure R1-a (Coordinate construction schedule and activities with the authorized officer for the recreation area) to provide some flexibility for the construction schedule.

The mitigation measure has been revised in Section D.15.3.3 (Recreation, Impacts and Mitigation Measures) to allow flexibility for the construction schedule. It also has been revised to require SCE to provide to the CPUC and BLM any dates of heavy recreational use that cannot be avoid and an explanation for why they cannot be avoided. It also will require SCE to avoid construction overlapping with an entire season of heavy use. While Mitigation Measure R-1a provides SCE more flexibility for limited work during heavy recreational use, SCE will need to identify alternative recreation areas as required by Mitigation Measure R-1b.

F3-381 The commenter requests a revision to Mitigation Measure R1-b (Coordinate with local agencies to identify alternative recreation areas) that would clarify that SCE would only post public notices at the recreation facilities as allowed by the facility representatives.

The mitigation measure has been clarified in Section D.15.3.3 (Recreation, Impacts and Mitigation Measures) to state that the recreational facility representatives will determine where and how public notices would be posted.

F3-382 The commenter requests adding language that highlights that while the new proposed double-circuit structures would be greater in height than the existing single-circuit structures, the project would decrease the number of structures from three to two.

This change has not been made. The first sentence of the discussion of Impact R-2 (Presence of a transmission line or substation would change the character of a recreation area, diminishing its recreational value) in Section D.15.3.3 already notes that the Proposed Project would decrease the number of transmission lines from three lines to two lines. Additionally, the existing structures are not uniform in nature and a viewshed may include many more than three structures so this language would not accurately characterize the change in a viewshed.

F3-383 The commenter requests adding language that notes that recreational resources would be potentially affected by the removal of an existing transmission line in addition to the siting of a new transmission line to Impact R-3 (Presence of a transmission line would permanently preclude recreational activities).

This change has been made to the discussion of Impact R-3 in Section D.15.3.3 (Impacts and Mitigation) to better reflect the change caused by the project that would be visible from recreational resources.

F3-384 See Response to Comment F3-102 with regard to mitigation for connected actions.

F3-385 See Response to Comment F3-102 with regard to mitigation for connected actions.

F3-386 See Response to Comment F3-102 with regard to mitigation for connected actions.

F3-387 Please see General Response GR-4 regarding the future construction impacts of the Phased Build Alternative.

F3-388 The commenter requests the same revisions to Mitigation Measure R-1a as Comment F3-380 only in Table D.15-3 (Mitigation Monitoring Program – Recreation). Please see Response to Comment F3-380.

F3-389 This comment requests the same revisions to Mitigation Measure R-1b as Comment F3-381 only in Table D.15-3 (Mitigation Monitoring Program – Recreation). Please see Response to Comment F3-381.

F3-390 See Response to Comment F3-95 with regard to the use of significance criteria.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Section D.16 Transportation and Traffic

Page D.16-2

DEIR/DEIS Text: F3-391

D.16.1.2 Environmental Setting by Segment

Major regional highways in the project vicinity include Interstate (I) highways and State Routes (SR). These are I-10, I-215, SR-60, SR-62, SR-79, and SR-111. Average daily traffic on various segments of these highways is shown in Table D.16-1. These regional highways would be used by construction workers and materials delivery trucks to reach assembly points, yards, and work sites along the project's length.

SCE Comment:

The proposed project also has a telecommunication line that crosses SR-243 near the Banning Substation. Please revise the sentence as follows:

Major regional highways in the project vicinity include Interstate (I) highways and State Routes (SR). These are I-10, I-215, SR-60, SR-62, SR-79, ~~and~~ SR-111, <u>and SR-243</u>.

Page D.16-13

DEIR/DEIS Text: F3-392

D.16.3.2 CEQA Significance Criteria

The significance criteria for transportation and traffic impacts are based on the CEQA Guidelines Appendix G Checklist and on comments received during scoping of the EIR/EIS. During scoping, concerns were expressed regarding levels of traffic on local roads, truck routes on the different project segments, the need for SCE to coordinate with local agencies on the construction schedule, and the repair of any dam-age to local roads. Several commenters requested that the EIR/EIS consider the impact of road closures and potential limited access to residential streets and individual residences and businesses.

Based on these criteria, transportation or traffic impacts would be significant if:

- Construction would require the temporary closure of lanes or roadways that would significantly: reduce the performance of the circulation system; create disruption of traffic flow; increase traffic congestion; restrict the movements of emergency vehicles; disrupt bus transit service; impede pedestrian and bicycle movement; and/or restrict access to residences and businesses.
- Vehicle movements associated with construction worker trips or movement of materials and equipment would result in an unacceptable reduction in level of service on the roadways in the project area.
- Construction activities would conflict with plants transportation projects in the project area.
- An increase in roadway wear and deterioration would occur as a result of being used by heavy trucks or construction equipment.
- Construction or staging activities would increase the demand for or reduce the supply of parking spaces.
- Helicopter used during construction would pose risks to public safety and create excessive noise and dust.
- Project construction cranes or permanent structures would be at heights so as to create aviation hazards or adversely affect airport or heliport facility use.

SCE Comment:

Significance criteria not found in the California Environmental Quality Act (CEQA) guidelines are not appropriate for inclusion in an analysis of CEQA Significance Criteria. The following criteria are provided in the CEQA Guidelines Appendix G Checklist:

a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Comment Set F3: Southern California Edison Company (cont.)

F3-392 cont.

b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

e) Result in inadequate emergency access?

f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

As such, please remove the following:

- ~~Construction would require the temporary closure of lanes or roadways that would significantly: reduce the performance of the circulation system; create disruption of traffic flow; increase traffic congestion; restrict the movements of emergency vehicles; disrupt bus transit service; impede pedestrian and bicycle movement; and/or restrict access to residences and businesses.~~
- ~~Vehicle movements associated with construction worker trips or movement of materials and equipment would result in an unacceptable reduction in level of service on the roadways in the project area.~~
- ~~Construction activities would conflict with plants transportation projects in the project area.~~
- ~~An increase in roadway wear and deterioration would occur as a result of being used by heavy trucks or construction equipment.~~
- ~~Construction or staging activities would increase the demand for or reduce the supply of parking spaces.~~
- ~~Helicopter used during construction would pose risks to public safety and create excessive noise and dust.~~
- ~~Project construction cranes or permanent structures would be at heights so as to create aviation hazards or adversely affect airport or heliport facility use.~~

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.16-15

DEIR/DEIS Text: F3-393

Mitigation Measures for Impact T-1: Road or travel lane closures for construction would adversely affect traffic flow and congestion, emergency vehicle response, pedestrians/bicyclists routes, and access to adjacent residential and business properties

T-1a Prepare Construction Transportation Plan. Where construction traffic has the potential to significantly affect regional and local roadways by generating additional vehicle trips, SCE shall prepare a Construction Transportation Plan (CTP) describing alternate traffic routes, timing of commutes, methods of reducing crew-related traffic, and other methods for reducing construction-generated additional traffic on regional and local roadways. The CTP also shall require construction workers to park personal vehicles at yards or designated assembly points and carpool to work locations in order to limit the number of construction-related vehicles on the road. At construction sites, vehicles shall be required to park within the project ROW or approved disturbance areas or on access roads to the maximum extent possible. Parking shall not be permitted in areas with dry vegetation that could pose a fire hazard. SCE shall submit the CTP to Caltrans and the affected local jurisdictions for review and approval at least 30 days prior to commencing construction activities.

At least 15 days prior to construction, SCE shall provide a letter or email to CPUC and BLM confirming that the mitigation measure has been executed and shall provide a copy of the final CTP. This communication shall identify persons or agencies contacted, contact information, and the date of contact, and shall summarize discussions and/or agreements reached, if any.

SCE Comment:

The analysis included under heading, *T-1: Road or travel lane closures for construction would adversely affect traffic flow and congestion, emergency vehicle response, pedestrians/bicyclists routes, and access to adjacent residential and business properties,* does not demonstrate that temporary impacts as a result of construction of the Proposed Project are significant thus requiring mitigation. CEQA Guidelines section, 15126.4 (3) Mitigation measures are not required for effects which are not found to be significant, therefore mitigation measure T-1a should be removed from the DEIR/DEIS.

Additionally, the mitigation measure requires that SCE prepare a Construction Transportation Plan with the intent to reduce construction generated traffic on regional and local roadways, where construction traffic has the potential to "significantly affect regional and local roadways." The document does not demonstrate significance, nor contain any study identifying where construction traffic or when construction traffic would be considered significant, therefore as written, the mitigation measure cannot be successfully implemented as the document does not demonstrate when the mitigation would be required.

The mitigation measure also requires, "…describing alternate traffic routes, timing of commutes, methods of reducing crew-related traffic, and other methods for reducing construction-generated additional traffic on regional and local roadways." As explained in the Transportation and Traffic section of SCE's PEA, sufficient information redundant to the requirements of the mitigation measure has been included as part of the analysis prepared for SCE's Proposed Project and is included below for reference:

- Construction workers commuting to the Proposed Project site(s) would use interstates, State highways, and local roadways (p. 4-16.2)
- At the beginning of each day of construction, workers would arrive at the staging areas in personal vehicles and depart the staging area in work vehicles destined for the transmission corridor (p.4-16.18)
- Construction workers would typically arrive at staging yards prior to 7:00 a.m., although it is expected that some workforce traffic may arrive during the a.m. peak commute period. The length of the work day would vary by season based on available sunlight. During winter, construction workers would typically leave prior to 4:00 p.m. During summer, construction workers would typically leave after 6:00 p.m. Therefore, during most of the year, construction worker trips would occur outside of the peak commute periods and there would be no impact on traffic during the morning (a.m.) and evening (p.m.) peak periods (p. 4-16.24)

Based on the reasoning provided above, Mitigation Measure T-1a should be removed.

Comment Set F3: Southern California Edison Company (cont.)

F3-393 cont.

~~***Mitigation Measures for Impact T-1: Road or travel lane closures for construction would adversely affect traffic flow and congestion, emergency vehicle response, pedestrians/bicyclists routes, and access to adjacent residential and business properties***~~

~~**T-1a Prepare Construction Transportation Plan.** Where construction traffic has the potential to significantly affect regional and local roadways by generating additional vehicle trips, SCE shall prepare a Construction Transportation Plan (CTP) describing alternate traffic routes, timing of commutes, methods of reducing crew-related traffic, and other methods for reducing construction-generated additional traffic on regional and local roadways. The CTP also shall require construction workers to park personal vehicles at yards or designated assembly points and carpool to work locations in order to limit the number of construction-related vehicles on the road. At construction sites, vehicles shall be required to park within the project ROW or approved disturbance areas or on access roads to the maximum extent possible. Parking shall not be permitted in areas with dry vegetation that could pose a fire hazard. SCE shall submit the CTP to Caltrans and the affected local jurisdictions for review and approval at least 30 days prior to commencing construction activities.~~

~~At least 15 days prior to construction, SCE shall provide a letter or email to CPUC and BLM confirming that the mitigation measure has been executed and shall provide a copy of the final CTP. This communication shall identify persons or agencies contacted, contact information, and the date of contact, and shall summarize discussions and/or agreements reached, if any.~~

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.16-15

DEIR/DEIS Text: F3-394

Mitigation Measure for Impact T-4: Construction vehicles and equipment would potentially damage roads in the project area

T-4a Repair roadways damaged by construction activities. If roadways, sidewalks, medians, curbs, shoulders, or other such features are damaged by the project's construction activities, as determined by the affected public agency, such damage shall be repaired and streets restored to their pre-project condition by SCE. Prior to construction, SCE shall confer with agencies having jurisdiction over the roads anticipated to be used by delivery vehicles and equipment. At least 30 days prior to construction, SCE shall photograph or video record all construction route public roads within 500 feet in each direction of project access points (i.e., locations where vehicles leave public roads to reach project sites), and shall provide the respective local jurisdictions, CPUC, BLM, and Caltrans (if applicable) with a copy of these images.

At least 15 days prior to construction, SCE shall provide a letter or email to CPUC and BLM confirming that the mitigation measure has been executed. This communication shall identify persons or agencies contacted, contact information, and the date of contact, and shall summarize discussions and/or agreements reached.

At the end of major construction, SCE shall coordinate with each affected jurisdiction to con-firm what repairs would be required. Any damage shall be repaired to the pre-construction condition within 60 days from the end of all construction, or on a schedule mutually agreed to by SCE and the jurisdiction. SCE shall provide CPUC and BLM confirming documentation when the coordination has been completed and when the repairs have been completed.

SCE Comment:

The requirements of the mitigation measure are disproportionate to the impact in terms of the required time and effort for the required coordination, as compared to the benefit of said coordination. SCE recommends the following revision:

MITIGATION MEASURE — MM T-4a: Repair roadways damaged by construction activities. If roadways, sidewalks, medians, curbs, shoulders, or other such features are damaged by the project's construction activities, SCE shall coordinate repairs with the affected public agencies and ensure that any such damage is repaired to the pre-construction condition within 60 days from the end of all construction within each affected county.

~~T-4a Repair roadways damaged by construction activities. If roadways, sidewalks, medians, curbs, shoulders, or other such features are damaged by the project's construction activities, as determined by the affected public agency, such damage shall be repaired and streets restored to their pre-project condition by SCE. Prior to construction, SCE shall confer with agencies having jurisdiction over the roads anticipated to be used by delivery vehicles and equipment. At least 30 days prior to construction, SCE shall photograph or video record all construction route public roads within 500 feet in each direction of project access points (i.e., locations where vehicles leave public roads to reach project sites), and shall provide the respective local jurisdictions, CPUC, BLM, and Caltrans (if applicable) with a copy of these images upon request.~~

At least 15 days prior to construction, SCE shall provide a letter or email to CPUC and BLM confirming that the mitigation measure has been executed. This communication shall identify persons or agencies contacted, contact information, and the date of contact, and shall summarize discussions and/or agreements reached.

At the end of major construction, ~~SCE shall coordinate with each affected jurisdiction to con-firm what repairs would be required. A~~any damage shall be repaired to the pre-construction condition within 60 days from the end of all construction, or on a schedule mutually agreed to by SCE and the jurisdiction. SCE shall provide CPUC and BLM confirming documentation ~~when the coordination has been completed and~~ when the repairs have been completed.

Comment Set F3: Southern California Edison Company (cont.)

Page D.16-20

DEIR/DEIS Text: F3-395

T-5a Obtain required permits or approvals for crossing or working in railroad rights-of-way. SCE shall obtain permits/approvals from affected railway operators (Union Pacific Railroad and Burlington Northern Santa Fey Railway) to ensure that project construction activities in the rail ROW comply with each company's safety requirements and to avoid disruption to rail traffic. Copies of required permits or approvals shall be submitted to the CPUC and BLM at least 60 days prior to construction in or across rail ROWs.

SCE Comment:

The lead time as written is overly burdensome and submittal of copies of permits or approvals may not be available that far in advance of work needing to occur. Please make the following edits:

T-5a Obtain required permits or approvals for crossing or working in railroad rights-of-way. SCE shall obtain permits/approvals from affected railway operators (Union Pacific Railroad and Burlington Northern Santa Fey Railway) to ensure that project construction activities in the rail ROW comply with each company's safety requirements and to avoid disruption to rail traffic. Copies of required permits or approvals shall be submitted to the CPUC and BLM ~~at least 60 days prior to construction in or across rail ROWs~~.

Page D.16-24

DEIR/DEIS Text: F3-396

Impact T-1: Road or travel lane closures for construction would adversely affect traffic flow and congestion, emergency vehicle response, pedestrians/bicyclists routes, and access to adjacent residential and business properties (Class II)

Although connected solar projects are in rural or remote locations, their construction could require brief road or land closures during certain construction activities. Depending on the site location, project construction could briefly affect access to adjacent properties. Implementation of typical mitigation, such as a construction transportation plan, would ensure that this impact is less than significant (Class II).

SCE Comment:

The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

Page D.16-24

DEIR/DEIS Text: F3-397

Impact T-2: Traffic related to project construction and operation would result in unacceptable levels of service on roadways in the project area (Class II)

With regard to connected actions, the location of solar projects in areas with generally light traffic is not expected to result in unacceptable levels of service on roadways in the vicinity of the projects. However, implementation of a construction transportation plan, including adoption of carpooling and time-of-day arrival and departure of workers, would ensure that any level of service impacts are addressed. This would result in a less than significant impact with mitigation (Class II).

SCE Comment:

The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.16-24

DEIR/DEIS Text: F3-398

Impact T-3: Construction would conflict with planned transportation projects (Class II)

While conflicts between connected solar projects and planned transportation projects are unlikely, implementation of a requirement that project proponents coordinate with regional transportation management agencies would ensure that this impact is less than significant (Class II).

SCE Comment:

The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

Page D.16-25

DEIR/DEIS Text: F3-399

Impact T-4: Construction vehicles and equipment would potentially damage roads in the project area (Class II)

As with the Proposed Project, heavy trucks and equipment can cause damage to roads leading to solar project sites. Implementation of a measure to require documentation of road conditions and appropriate repair or payment for damage would ensure that this impact is less than significant (Class II).

SCE Comment:

The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

Pages D.16-34 through 37

DEIR/DEIS Text: F3-400

D.16.4.3 Phased Build Alternative

Impact T-1: Road or travel lane closures for construction would adversely affect traffic flow and congestion, emergency vehicle response, pedestrians/bicyclists routes, and access to adjacent residential and business properties

Impact T-2: Traffic related to project construction and operation would result in unacceptable levels of service on roadways in the project area

Impact T-3: Construction would conflict with planned transportation projects

Impact T-4: Construction vehicles and equipment would potentially damage roads in the project area

Impact T-5: Construction activities would cause a temporary disruption to rail traffic or operations

Impact T-6: Construction would result in the short-term elimination of parking spaces

Impact T-7: Use of helicopters would have potential impacts on public safety and create nuisance conditions

~~***Impact T-8: Operations would affect aviation safety and activities associated with public airports***~~

SCE Comment:

As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional study and associated additional impact analysis. The additional disturbance areas and the increased duration could result in additional transportation and traffic impacts beyond those analyzed for the Phased Build Alternative in the document, and could be greater than those identified for the Proposed Project.

Comment Set F3: Southern California Edison Company (cont.)

Page D.16-39

DEIR/DEIS Text: F3-401

Mitigation Measures for Impact T-1: Road or travel lane closures for construction would adversely affect traffic flow and congestion, emergency vehicle response, pedestrians/bicyclists routes, and access to adjacent residential and business properties

T-1a Prepare Construction Transportation Plan. Where construction traffic has the potential to significantly affect regional and local roadways by generating additional vehicle trips, SCE shall prepare a Construction Transportation Plan (CTP) describing alternate traffic routes, timing of commutes, methods of reducing crew-related traffic, and other methods for reducing construction-generated additional traffic on regional and local roadways. The CTP also shall require construction workers to park personal vehicles at yards or designated assembly points and carpool to work locations in order to limit the number of construction-related vehicles on the road. At construction sites, vehicles shall be required to park within the project ROW or approved disturbance areas or on access roads to the maximum extent possible. Parking shall not be permitted in areas with dry vegetation that could pose a fire hazard. SCE shall submit the CTP to Caltrans and the affected local jurisdictions for review and approval at least 30 days prior to commencing construction activities.

At least 15 days prior to construction, SCE shall provide a letter or email to CPUC and BLM confirming that the mitigation measure has been executed and shall provide a copy of the final CTP. This communication shall identify persons or agencies contacted, contact information, and the date of contact, and shall summarize discussions and/or agreements reached, if any.

SCE Comment:

Consistent with the rationale provided in the comments above, the following mitigation measure should be removed:

~~**T-1a Prepare Construction Transportation Plan.** Where construction traffic has the potential to significantly affect regional and local roadways by generating additional vehicle trips, SCE shall prepare a Construction Transportation Plan (CTP) describing alternate traffic routes, timing of commutes, methods of reducing crew-related traffic, and other methods for reducing construction-generated additional traffic on regional and local roadways. The CTP also shall require construction workers to park personal vehicles at yards or designated assembly points and carpool to work locations in order to limit the number of construction-related vehicles on the road. At construction sites, vehicles shall be required to park within the project ROW or approved disturbance areas or on access roads to the maximum extent possible. Parking shall not be permitted in areas with dry vegetation that could pose a fire hazard. SCE shall submit the CTP to Caltrans and the affected local jurisdictions for review and approval at least 30 days prior to commencing construction activities.~~

~~At least 15 days prior to construction, SCE shall provide a letter or email to CPUC and BLM confirming that the mitigation measure has been executed and shall provide a copy of the final CTP. This communication shall identify persons or agencies contacted, contact information, and the date of contact, and shall summarize discussions and/or agreements reached, if any.~~

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.16-42

DEIR/DEIS Text: F3-402

T-4a: Repair roadways damaged by construction activities. If roadways, sidewalks, medians, curbs, shoulders, or other such features are damaged by the project's construction activities, as determined by the affected public agency, such damage shall be repaired and streets restored to their pre-project condition by SCE. Prior to construction, SCE shall confer with agencies having jurisdiction over the roads anticipated to be used by delivery vehicles and equipment. At least 30 days prior to construction, SCE shall photograph or video record all construction route public roads within 500 feet in each direction of project access points (i.e., locations where vehicles leave public roads to reach project sites), and shall provide the respective local jurisdictions, CPUC, BLM, and Caltrans (if applicable) with a copy of these images.

At least 15 days prior to construction, SCE shall provide a letter or email to CPUC and BLM confirming that the mitigation measure has been executed. This communication shall identify persons or agencies contacted, contact information, and the date of contact, and shall summarize discussions and/or agreements reached.

At the end of major construction, SCE shall coordinate with each affected jurisdiction to confirm what repairs are required. Any damage is to be repaired to the pre-construction condition within 60 days from the end of all construction, or on a schedule mutually agreed to by SCE and the jurisdiction. SCE shall provide CPUC and BLM confirming documentation when the coordination has been completed and when the repairs have been completed.

SCE Comment:

The requirements of the mitigation measure are disproportionate to the impact in terms of the required time and effort for the required coordination as compared to the benefit of said coordination. SCE recommends the following revision:

MITIGATION MEASURE — MM T-4a: Repair roadways damaged by construction activities. If roadways, sidewalks, medians, curbs, shoulders, or other such features are damaged by the project's construction activities, SCE shall coordinate repairs with the affected public agencies and ensure that any such damage is repaired to the pre-construction condition within 60 days from the end of all construction within each affected county.

~~**T-4a: Repair roadways damaged by construction activities.** If roadways, sidewalks, medians, curbs, shoulders, or other such features are damaged by the project's construction activities, as determined by the affected public agency, such damage shall be repaired and streets restored to their pre-project condition by SCE. Prior to construction, SCE shall confer with agencies having jurisdiction over the roads anticipated to be used by delivery vehicles and equipment. At least 30 days prior to construction, SCE shall photograph or video record all construction route public roads within 500 feet in each direction of project access points (i.e., locations where vehicles leave public roads to reach project sites), and shall provide the respective local jurisdictions, CPUC, BLM, and Caltrans (if applicable) with a copy of these images.~~

At least 15 days prior to construction, SCE shall provide a letter or email to CPUC and BLM confirming that the mitigation measure has been executed. This communication shall identify persons or agencies contacted, contact information, and the date of contact, and shall summarize discussions and/or agreements reached.

At the end of major construction~~, SCE shall coordinate with each affected jurisdiction to con-firm what repairs would be required. A~~any damage shall be repaired to the pre-construction condition within 60 days from the end of all construction, or on a schedule mutually agreed to by SCE and the jurisdiction. SCE shall provide CPUC and BLM ~~confirming~~ documentation ~~when the coordination has been completed and~~ when the repairs have been completed.

Comment Set F3: Southern California Edison Company (cont.)

Page D.16-42

DEIR/DEIS Text: F3-403

T-5a: Obtain required permits or approvals for crossing or working in railroad rights-of-way. SCE shall obtain permits/approvals from affected railway operators (Union Pacific Railroad and Burlington Northern Santa Fey Railway) to ensure project construction activities in the rail ROW comply with each company's safety requirements and to avoid disruption to rail traffic. Copies of required permits or approvals shall be submitted to the CPUC and BLM at least 60 days prior to construction in or across rail ROWs.

SCE Comment:

The lead time as written is overly burdensome and submittal of copies of permits or approvals may not be available that far in advance of work needing to occur. Please make the following edits:

T-5a Obtain required permits or approvals for crossing or working in railroad rights-of-way. SCE shall obtain permits/approvals from affected railway operators (Union Pacific Railroad and Burlington Northern Santa Fey Railway) to ensure that project construction activities in the rail ROW comply with each company's safety requirements and to avoid disruption to rail traffic. Copies of required permits or approvals shall be submitted to the CPUC and BLM ~~at least 60 days prior to construction in or across rail ROWs~~.

Responses to Comment Set F3 – Section D.16 Transportation and Traffic

F3-391 The commenter suggests adding State Route 243 to the list of major regional highways included in the first sentence of Section D.16.1.2 (Transportation and Traffic, Environmental Setting by Segment). State Route 243 was incorporated in the Draft EIR/EIS analysis, but was left off of this list in error. Therefore, this addition has been made in the Final EIS.

F3-392 The commenter requests removal of numerous significance criteria related to Transportation and Traffic. Please see Response to Comment F3-95.

F3-393 The commenter requests deletion of Mitigation Measure T-1a (Prepare Construction Transportation Plan), which addresses Impact T-1 (Road or travel lane closures for construction would adversely affect traffic flow and congestion, emergency vehicle response, pedestrians/bicyclists routes, and access to adjacent residential and business properties). The commenter asserts that the analysis of the impact does not demonstrate that temporary impacts as a result of construction are significant and require mitigation, citing CEQA Guidelines section 15126.4(3). The commenter further asserts that the Draft EIR/EIS does not identify when or where construction traffic would be considered significant. The commenter cites information provided in the Proponent's Environmental Assessment (PEA) and identifies that it is sufficient to address the requirements of the mitigation measure.

Except for one Applicant's Proposed Mitigation (APM) related to helicopter use, the PEA does not provide any APMs specific to transportation and traffic. The commenter cites various places in the PEA in which it is stated that workers would use various highways and roadways; that they would assemble at staging areas in personal vehicles and depart to construction sites in work vehicles; and that they would typically arrive at staging yards prior to 7:00 a.m. and leave before or after peak commute periods, depending on the season. These statements are not binding. Mitigation Measure T-1a establishes a requirement that a Construction Transportation Plan, incorporating these strategies, be developed and approved. This would make clear that the statements in the PEA are binding on the project. Mitigation Measure T-1a also addresses the requirement to park within the project ROW or other approved areas at project sites and not park in areas of dry vegetation, which would pose a fire hazard.

In the absence of knowing when and how many vehicles would be arriving and departing various yards and construction sites, it was conservatively assumed that construction-related traffic could create a significant impact. Taking at face value the information provided in the PEA, Mitigation Measure T-1a was established to ensure compliance with the strategies enumerated in the PEA to reduce traffic impacts. No change in Mitigation Measure TR-1a is required as a result of this comment; however, the requirement to describe alternate traffic routes is deleted.

F3-394 The commenter requests Mitigation Measure T-4a (Repair roadways damaged by construction activities) be revised to eliminate the requirement that SCE photograph or video record pre-construction conditions of roads at specified locations. SCE requests that coordination of repairs with the affected public agencies be the requirement, omitting how conditions would be documented.

Mitigation Measure T-4a was revised somewhat in response to one jurisdiction's comments. See Responses to Comments A1-7 and A1-8. The revisions allow for an alternative method

for determining pre-construction roadway conditions and also extend the pre-construction documentation to include areas of trenching or digging in roadways. The revision requested by SCE would delete the requirement for pre-construction documentation, requiring only coordination with affected public agencies on repairs. This suggested revision would leave open how pre-construction conditions are documented so as to ensure appropriate post-construction repair. In the absence of documentation, there would be no way for the parties to assess what is project-related damage and what is a pre-existing condition. Therefore, no change in the mitigation measure is required as a result of this comment. The last sentence of the mitigation measure is edited for clarity.

F3-395 The commenter suggests omitting the requirement that copies of permits for work in railroad ROW be provided at least 60 days in advance, because permits or approvals may not be available that far in advance of work needing to occur. The 60-day requirement has been removed in Mitigation Measure T-5a (Obtain required permits or approvals for crossing or working in railroad rights-of-way). Instead copies of the permits/approvals will need to be received prior to construction in or across rail ROWs. Because the BLM will only be receiving copies and no review/approval is required, the 60-day timeframe is not necessary and its removal in the Final EIS does not affect the adequacy of the mitigation measure.

F3-396 This comment requests clarification in the EIS that mitigation referenced for Connected Actions is not imposed on SCE. Clarification has been added in Section D.1.5 (Analysis of Connected Actions).

F3-397 This comment is similar to Comment F3-396. Please see Response to Comment F3-396.

F3-398 This comment is similar to Comment F3-396. Please see Response to Comment F3-396.

F3-399 This comment is similar to Comment F3-396. Please see Response to Comment F3-396.

F3-400 Please see General Response GR-4 regarding the future construction impacts of the Phased Build Alternative.

F3-401 This comment is similar to Comment F3-393. Please see Response to Comment F3-393.

F3-402 This comment is similar to Comment F3-394. Please see Response to Comment F3-394

F3-403 This comment is similar to Comment F3-395. Please see Response to Comment F3-395.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Section D.17 Utilities and Public Services

Page D.17-9

DEIR/DEIS Text: F3-404

Jurisdictions within this segment include unincorporated Riverside County and the Cities of Calimesa, Beaumont, and Banning. The City of Yucaipa is included in this segment as the Tennessee Substation is located here. Unincorporated River-side County is described in Section D.17.1.2.3, Segment 3: San Timoteo Canyon. Any new information for the County is provided below.

SCE Comment:

As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.

Jurisdictions within this segment include unincorporated Riverside County and the Cities of Calimesa, Beaumont, and Banning. ~~The City of Yucaipa is included in this segment as the Tennessee Substation is located here~~. Unincorporated River-side County is described in Section D.17.1.2.3, Segment 3: San Timoteo Canyon. Any new information for the County is provided below.

Page D.17-24

DEIR/DEIS Text: F3-405

In addition to the CEQA Environmental Checklist significance criteria, the following criterion was used to assess impacts to utilities because the construction would cross a large number of existing electrical or other utility systems:

- Disrupt the existing utility system or cause a collocation accident

SCE Comment:

Significance criteria not found in the California Environmental Quality Act (CEQA) guidelines are not appropriate for inclusion in an analysis of CEQA Significance Criteria. As such, please remove the following:

~~In addition to the CEQA Environmental Checklist significance criteria, the following criterion was used to assess impacts to utilities because the construction would cross a large number of existing electrical or other utility systems:~~

~~- Disrupt the existing utility system or cause a collocation accident~~

Pages D.17-26 through 27

DEIR/DEIS Text: F3-406

UPS-1a Use non-potable water for construction purposes. Use non-potable water for construction purposes. Project water supply for dust control, soil compaction activities, and site restoration/revegetation shall be obtained from nonpotable sources, if available, and ensured in a water contract through a local water agency or district. The Applicant shall provide a letter describing the availability of non-potable water and efforts made to obtain it for use during construction to the CPUC and BLM a minimum of 60 days prior to the start of construction.

SCE Comment:

The environmental analysis does not provide evidence that the temporary use of water for construction of the Proposed Project would result in a significant impact that would require mitigation. H, however, for consistency with the paraphrasing of the mitigation measure UPS-1a, , "would require SCE to use non-potable water for dust control and soil compaction whenever feasible", please make the following revision:

UPS-1a Use non-potable water for construction purposes. Project water supply for dust control, soil compaction activities, and site restoration/revegetation shall be obtained from non-potable sources as feasible~~, if available, and ensured in a water contract through a local water agency or district.~~ The Applicant shall provide a letter describing the availability of non-potable water and efforts made to obtain it for use during construction to the CPUC and BLM a mini-mum of 60 days prior to the start of construction.

Comment Set F3: Southern California Edison Company (cont.)

Page D.17-32

DEIR/DEIS Text: F3-407

Impact UPS-1: Project construction and operation would increase the need for public services and utilities (Class II for Proposed Project; Class II or III for Connected Actions)

With regard to the connected actions, except for fire services, construction and operation of the solar projects would have less than significant impacts (Class III) on utilities and public services. For fire services, the operational capabilities to handle technical rescues at electrical facilities, such as confined space/trench rescue/high angle rescue, may require additional staffing, training, and equipment. New or upgraded fire facilities may be required to accommodate additional staffing and fire rescue apparatus for solar facilities. Specialized rescue equipment also may be required in order to service the proposed gen-tie lines, which will require proper storage and maintenance to ensure optimal performance in the event of an emergency. The need for additional staff, equipment, or construction of fire response facilities would be a significant indirect environmental impact resulting from the implementation of the solar projects, particularly in the Desert Center and Blythe areas. The Palen Solar Power Project has included funding to help the RCFD with equipment and response times. In addition, it was concluded that compliance with all federal, State, and local safety requirements and providing mitigation to the RCFD (in the form of funding) would be adequate to assure protection from all fire hazards, and that new and expanded facilities are not needed.

If fire/rescue facilities are constructed or acquired using funds provided by solar projects, the construction of such facilities would be a significant indirect environmental impact resulting from the implementation of these solar projects. Typically, solar energy facilities prepare and implement a Fire Management and Protection Plan to ensure that emergency fire precautions are employed during project construction. Compliance with Riverside County Ordinance 659 and the resultant impact fees for fire services would help ensure that adequate new or expanded facilities are in place for projects in the affected areas. Together, the compliance with Riverside County Ordinance 659 and payment of impact fees similar to mitigation from the Palen Solar Power Project would reduce this impact to less than significant (Class II).

SCE Comment:

The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

Page D.17-33

DEIR/DEIS Text: F3-408

UPS-2: Construction would disrupt existing pipelines and utility systems or cause a collocation accident (Class II).

Similar impacts would occur for connected actions when located in the vicinity of pipelines and utilities, and similar mitigation would be required (Class II)

SCE Comment:

The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.17-39

DEIR/DEIS Text: F3-409

UPS-1a: **Use non-potable water for construction purposes.** Project water supply for dust control, soil compaction activities, and site restoration/revegetation shall be obtained from non-potable sources, if available, and ensured in a water contract through a local water agency or district. The Applicant shall provide a letter describing the availability of non-potable water and efforts made to obtain it for use during construction to the CPUC and BLM a minimum of 60 days prior to the start of construction.

SCE Comment:

The environmental analysis does not provide evidence that the temporary use of water for construction of the Proposed Project would result in a significant impact that would require mitigation. H, however, for consistency with the paraphrasing of the mitigation measure UPS-1a, , "would require SCE to use non-potable water for dust control and soil compaction whenever feasible", please make the following revision:

UPS-1a Use non-potable water for construction purposes. Project water supply for dust control, soil compaction activities, and site restoration/revegetation shall be obtained from non-potable sources as feasible~~, if available, and ensured in a water contract through a local water agency or district.~~ The Applicant shall provide a letter describing the availability of non-potable water and efforts made to obtain it for use during construction to the CPUC and BLM a mini-mum of 60 days prior to the start of construction.

Responses to Comment Set F3 – Section D.17 Utilities and Public Services

F3-404 The commenter notes that due to additional engineering, the work for the Timoteo and Tennessee Substations is no longer needed for the Proposed Project and request section D.17.1.2.4 (Utilities and Public Services, Segment 4: Beaumont and Banning) be revised to eliminate reference to the Tennessee Substation.

Section D.17.1.2.4 has been revised as requested. Additionally, as a result of the revision the only part of the Proposed Project located in the City of Yucaipa has been eliminated and all associated references to Yucaipa have been stricken as appropriate. The overall significance conclusions for impacts in the Draft EIR/EIS would not be affected.

F3-405 See Response to Comment F3-95 with regard to the use of significance criteria.

F3-406 The commenter reiterates what Section D.17.3.5 (Utilities and Public Services, CEQA Significance Determination for Proposed Project and Connected Actions) states, that impacts to the regional water supply would not be significant but that Mitigation Measure UPS-1a (Use non-potable water) would further reduce the effect. Additionally, the commenter requests a revision to the language of UPS-1a to match the discussion under Impact UPS-1 (Project construction and operation would increase the need for public services and utilities) that states the mitigation measure would be implemented as feasible.

Significance determination is a CEQA requirement, not a NEPA requirement. Mitigation Measure UPS-1a has been revised to clarify the feasibility of the measure; however, SCE has not explained why it remainder of the sentence that does not address feasibility was recommended to be stricken so this revision was not made.

F3-407 See Response to Comment F3-102 with regard to mitigation for connected actions.

F3-408 See Response to Comment F3-102 with regard to mitigation for connected actions.

F3-409 The commenter requests the same revisions to Mitigation Measure UPS-1a as Comment F3-406 only in Table D.17-8 (Mitigation Monitoring Program – Utilities and Public Services). Please see Response to Comment F3-406.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Section D.18 Visual Resources

Figures D.18-1 through D.18-6

DEIR/DEIS Text: F3-410

General Comment identifying issues associated with CPUC Preferred Alternative

Figures D.18-1 through D.18-6 comprise a set of maps that are all on the same base – i.e. they all show the entire route and label the individual line segments. The six maps differ from one another only in that each of the maps presents the results of GIS visibility analyses run for each of the individual line segments.

SCE Comment:

The map set referenced does not provide enough information to track the analysis and assess the relevance and accuracy of the findings. This is particularly true for those findings related to the impacts of the alternatives, for which no simulations have been provided.

Figures D-18-8A through D.18-25B

DEIR/DEIS Text: F3-411

General Comment identifying issues associated with CPUC Preferred Alternative

The key observation point (KOP) figures present an existing photo of each view and simulations for each view of what the view would look like with the project in place. In two cases, simulations are also provided that depict how the views would appear should the FAA require marker balls.

SCE Comment:

There are no simulations that depict the appearance of the project alternatives. Such simulations are necessary to provide a basis for comparing the visual effects of the proposed project with those of the project alternatives in order to determine whether, in what way, and to what extent the visual effects of the alternatives could be different from those of the proposed project. Thus, there is no evidence for the conclusion that there would be significant unmitigable impacts under the proposed project but that the impacts would be less than significant under the Phased Build Alternative.

Page D.18-10

DEIR/DEIS Text: F3-412

San Timoteo Canyon Road. The linear viewpoint analysis addressed the full extent of San Timoteo Canyon Road (see Figure D.18-7C) from its intersection with Barton Road in the north to its southern terminus with Oak Valley Parkway, a linear distance of almost 11.5 miles (northbound travel direction). As shown in Table D.18-8, the Proposed Project would be either not visible (due to screening by terrain and roadside vegetation) or visible but not noticeable for approximately 46 percent of the combined (northbound-southbound) travel distance of slightly more than 22.6 miles. However, given the Proposed Project's relatively close proximity to San Timoteo Canyon Road and frequent superior (elevated) location along the southern ridgeline, the Proposed Project would be prominently visible for 43 percent of the combined travel distance. However, at no point would the Proposed Project appear to be a dominant visual feature.

SCE Comment:

For clarification, please make the following revision:

San Timoteo Canyon Road. The linear viewpoint analysis addressed the full extent of San Timoteo Canyon Road (see Figure D.18-7C) from its intersection with Barton Road in the north to its southern terminus with Oak Valley Parkway, a linear distance of almost 11.5 miles (northbound travel direction). As shown in Table D.18-8, the Proposed Project would be either not visible (due to screening by terrain and roadside vegetation) or visible but not noticeable for approximately 46 percent of the combined (northbound-southbound) travel distance of slightly more than 22.6 miles. Given the Proposed Project's relatively close proximity to San Timoteo Canyon Road and frequent superior (elevated) location along the southern ridgeline, the Proposed Project would be prominently visible for 43 percent of the combined travel distance <u>consistent with the visibility of the current energy transmission infrastructure</u>. However, at no point would the Proposed Project appear to be a dominant visual feature.

Comment Set F3: Southern California Edison Company (cont.)

Page D.18-11

DEIR/DEIS Text: F3-413

Viewer Concern. High. Although energy transmission infrastructure dominates the foreground views from the park within the corridor, from adjacent residential neighborhoods, and from roads that are spanned by the ROW and adjacent to the park, viewers would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change.

SCE Comment:

The environmental setting recognizes that energy transmission infrastructure dominates the foreground views from a variety of locations, however the text subjectively states, "…any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change.

As seen in the KOP #1, the Proposed Project incorporates the use of similar lattice steel structures. Although these towers are taller, the industrial character would remain generally the same, the structure prominence is generally the same, and the view towards the mountains and sky is generally the same. The environmental setting fails to recognize or make mention of the prominence of the 66 kV lines that would be removed from the ROW.

The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location.

The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change an adverse visual change should be removed from the environmental setting.

Page D.18-12

DEIR/DEIS Text: F3-414

Viewer Concern. High. Although energy transmission infrastructure features prominently in the foreground views from the residential neighborhood, residents would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridges) an adverse visual change.

SCE Comment:

The environmental setting recognizes, that energy transmission infrastructure dominates the foreground views from a variety of locations, however the text subjectively states, "…any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change.

As seen in the KOP #2, the Proposed Project incorporates the use of similar lattice steel structures. Although these towers are taller, the industrial character would remain generally the same, the structure prominence is generally the same, and the view towards the mountains and sky is generally the same.

The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location.

The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change an adverse visual change should be removed from the environmental setting.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.18-13

DEIR/DEIS Text: F3-415

Viewer Concern. High. Although energy transmission infrastructure features prominently in the foreground landscape, residents would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridges) an adverse visual change.

SCE Comment:

The environmental setting recognizes that energy transmission infrastructure dominates the foreground views from a variety of locations, however the text subjectively states, "…any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change.

As seen in the KOP #3, the Proposed Project incorporates the use of similar lattice steel structures. Although these towers are taller, the industrial character would remain generally the same, the structure prominence is generally the same, and the view towards the mountains and sky is generally the same.

The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location.

The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change an adverse visual change should be removed from the environmental setting.

Page D.18.14

DEIR/DEIS Text: F3-416

Viewer Concern. High. Although energy transmission infrastructure features prominently in the foreground landscape, residents and travelers on San Timoteo Canyon Road would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridges) an adverse visual change

SCE Comment:

The environmental setting recognizes that energy transmission infrastructure dominates the foreground views from a variety of locations, however, the text subjectively states, "…any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change.

As seen in the KOP #4, the Proposed Project incorporates the use of similar lattice steel structures. Although these towers are taller, the industrial character would remain generally the same, the structure prominence is generally the same, and the view towards the mountains and sky is generally the same.

The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location.

The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change an adverse visual change should be removed from the environmental setting.

Comment Set F3: Southern California Edison Company (cont.)

Page D.18-15

DEIR/DEIS Text: F3-417

Viewer Concern. High. Although energy transmission infrastructure features prominently in the foreground of views from the adjacent neighborhood, residents would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background ridges or sky) an adverse visual change.

SCE Comment:

The environmental setting recognizes that energy transmission infrastructure dominates the foreground views from a variety of locations, however the text subjectively states, "…any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change.

As seen in the KOP #5, the Proposed Project incorporates the use of similar lattice steel structures. Although these towers are taller, the industrial character would remain generally the same, the structure prominence is generally the same, and the view towards the mountains and sky is generally the same.

The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location.

The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change as an adverse visual change should be removed from the environmental setting.

Page D.18-15

DEIR/DEIS Text: F3-418

Viewer Concern. High. Although energy transmission infrastructure dominates the foreground views from the park within the corridor, from adjacent residential neighborhoods, and from roads that are spanned by the ROW and adjacent to the park, viewers would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change.

SCE Comment:

The environmental setting recognizes that energy transmission infrastructure dominates the foreground views from a variety of locations, however, the text subjectively states, "…any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change.

As seen in the KOP #6, the Proposed Project incorporates the use of similar lattice steel structures. Although these towers are taller, the industrial character would remain generally the same, the structure prominence is generally the same and the view towards the park is generally the same.

The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location.

The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change as an adverse visual change should be removed from the environmental setting, especially in regard to this location because the number of structures would be reduced.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.18-16

DEIR/DEIS Text: F3-419

Viewer Concern. High. Visitors to the golf course and adjacent residents expect to see a landscape with high aesthetic appeal, characterized by a mosaic of natural and managed vegetative forms. Any additional intrusion of built structures with industrial character or blockage of views from any of the golf course grounds would be seen as an adverse visual change.

SCE Comment:

The environmental setting fails to recognize that energy transmission infrastructure dominates the foreground views from a variety of locations. The text subjectively states, "…any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change.

As seen in the KOP #7, the Proposed Project incorporates the use of similar lattice steel structures. Although these structures are taller, the industrial character would remain generally the same, the structure prominence is generally the same and the view towards the greenbelt is generally the same.

The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location.

The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider that "any" change as an adverse visual change should be removed from the environmental setting, especially in regard to this location becausee the number of structures would be reduced.

Page D.18-16

DEIR/DEIS Text: F3-420

Viewer Concern. High. Although energy transmission infrastructure features prominently in the foreground of views from the adjacent neighborhood, residents would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky and Mt. San Jacinto) an adverse visual change.

SCE Comment:

The environmental setting recognizes that energy transmission infrastructure dominates the foreground views from a variety of locations, however, the text subjectively states, "…any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change.

As seen in the KOP #8, the Proposed Project incorporates the use of similar lattice steel structures. Although these structures are taller, the industrial character would remain generally the same, the structure prominence is generally the same and the view towards the mountain is generally the same.

The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location.

The analysis needs to be updated with supporting documentation and the subjective conclusion that viewers would consider "any" change as an adverse visual change should be removed from the environmental setting, especially in regard to this location because the number of structures would be reduced.

Comment Set F3: Southern California Edison Company (cont.)

Page D.18-17

DEIR/DEIS Text: F3-421

Viewer Concern. High. Although energy transmission infrastructure features prominently in the foreground of views from the adjacent neighborhood, residents would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky) an adverse visual change.

SCE Comment:

The environmental setting recognizes that energy transmission infrastructure dominates the foreground views from a variety of locations, however, the text subjectively states, "…any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change.

As seen in the KOP #9, the Proposed Project incorporates the use of similar lattice steel structures. Although these structures are taller, the industrial character would remain generally the same, the structure prominence is generally the same and the view towards the mountain is generally the same.

The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location.

The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change as an adverse visual change should be removed from the environmental setting, especially in regard to this location because the number of structures would be reduced.

Page D.18-18

DEIR/DEIS Text: F3-422

Viewer Concern. High. Although energy transmission infrastructure features prominently in the foreground landscape at the base of the hills, travelers on Bluff Street and adjacent residents would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky, hills, and mountains) an adverse visual change.

SCE Comment:

The environmental setting recognizes that energy transmission infrastructure dominates the foreground views from a variety of locations, however, the text subjectively states, "…any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change.

As seen in the KOP #10, the Proposed Project incorporates the use of TSP structures. Although these structures are taller, the industrial character would remain generally the same, the structure prominence is generally the same and the view towards the mountain is generally the same.

The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location.

The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change as an adverse visual change should be removed from the environmental setting.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.18-18

DEIR/DEIS Text: F3-423

Viewer Concern. High. Although the foreground landscape is disturbed, and existing utility infrastructure is noticeable in views from Hathaway Street, travelers and adjacent residents would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky, hills, and mountains) an adverse visual change.

SCE Comment:

The environmental setting recognizes that energy transmission infrastructure is noticeable from a variety of locations, however, the text subjectively states, "…any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change.

As seen in the KOP #11, the Proposed Project incorporates the use of TSP structures. Although these structures are taller, the industrial character would remain generally the same, the structure prominence is generally the same and the view towards the mountain is generally the same.

The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location.

The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change as an adverse visual change should be removed from the environmental setting.

Comment Set F3: Southern California Edison Company (cont.)

Pages D.18-18 through 19

DEIR/DEIS Text: F3-424

General Comment identifying issues associated with CPUC Preferred Alternative

KOP 11 – Hathaway Street in Banning

Figure D.18-18A presents a life-size scale view to the northeast toward the Proposed Project across the southwest corner of the Morongo Tribal Lands, from the entrance to the Summit Ridge Apartments on Hathaway Street, in eastern Banning. The view encompasses the ROW as it passes across the corner of the tribal lands, north of I-10, and adjacent to the eastern border of the City of Banning. The San Bernardino Mountains provide a backdrop of visual interest in views to the north and northeast.

Visual Quality. Low to Moderate. The foreground landscape is disturbed and undeveloped, is generally lacking features of visual interest, and exhibits minimal visual variety. Existing utility infrastructure (distantly visible) further compromises views of the background San Bernardino Mountains, which do provide a backdrop of visual interest.

Viewer Concern. High. Although the foreground landscape is disturbed, and existing utility infrastructure is noticeable in views from Hathaway Street, travelers and adjacent residents would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky, hills, and mountains) an adverse visual change.

Viewer Exposure. Moderate to High. The Proposed Project would be highly visible in the foreground views from travelers on Hathaway Street and adjacent residences. The number of viewers would be Low, and the duration of view would be Extended. Combining the four equally weighted factors (i.e., visibility, distance zone, number of viewers, and duration of view) results in an overall rating of Moderate to High for viewer exposure.

Overall Visual Sensitivity. Moderate to High. For viewers in the vicinity of KOP 11, combining the equally weighted Low to Moderate visual quality, High viewer concern, and Moderate to High viewer exposure results in an overall rating of Moderate to High for visual sensitivity of the visual setting and viewing characteristics.

SCE Comment:

The discussion of visual quality and viewer concern should be revised to reflect the fact that the area in the immediate foreground of the view is used by the Orco Block Company. Because of this use of the site, the surface of the site is highly disturbed. Street View photos of the site taken from Hathaway Street in front of the apartment complex show large piles of concrete blocks stacked up in the area immediately to the east of the fence along Hathaway street, and a number of large, industrial-appearing features on the site, including several large steel buildings and a cluster of stacks and silos. Because of the presence of this Orco Block operation in the immediate foreground of the view, the view is far from pristine, and thus the level of visual quality would be more accurately characterized as low to moderate and the level of concern as moderate.

The assessment of viewer exposure should be lowered to moderate, at most. In reality, the numbers of viewers and the duration of viewers and the duration of views would be lower than is asserted here. The Summit Ridge apartment complex is internally focused, with only some of the buildings fronting along Hathaway Street. As a result, for most of the units in the complex views toward the east where the proposed transmission line would be located, the views are blocked by the buildings on the east side of the complex. For those units located in buildings along the complex's eastern perimeter, views toward the proposed transmission alignment are screened by large trees planted in the landscape strip that borders the edge of the complex along Hathaway Street. For most residences of the Summit Ridge Apartment, views looking toward the project would only occur as they exit the apartment complex onto Hathaway Street. These views would be of short duration and given the need fordrivers to pay attention to traffic as they turn onto Hathaway Street, it is reasonable to assume that the attention paid to the distant view may be limited. For drivers traveling on Hathaway Street, the elapsed time on this segment of the street would be low and their view toward the transmission line alignment would be outside of their primary cone of vision.

Taking into account the contextual factors and the at-most moderate level of viewer exposure, the overall level of visual sensitivity of this view should be reduced to moderate.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.18-19

DEIR/DEIS Text: F3-425

Viewer Concern. High. Although energy transmission infrastructure features prominently in the foreground landscape when viewed from the community center, visitors to the community center would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky, ridges, and Mount San Jacinto) an adverse visual change.

SCE Comment:

The environmental setting recognizes that energy transmission infrastructure dominates the foreground views from a variety of locations, however, the text subjectively states, "…any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change.

As seen in the KOP #12, the Proposed Project incorporates the use of TSP structures. Although these structures are taller, the industrial character would remain generally the same, the structure prominence is generally the same and the view towards the mountain is generally the same.

The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location.

The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change as an adverse visual change should be removed from the environmental setting.

Page D.18-20

DEIR/DEIS Text: F3-426

Viewer Concern. High. Although energy transmission infrastructure features prominently in the landscape visible within this community, residential viewers would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky, ridges, or Mount San Jacinto if viewing to the south) an adverse visual change.

SCE Comment:

The environmental setting recognizes that energy transmission infrastructure dominates the foreground views from a variety of locations, however, the text subjectively states, "…any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change.

As seen in the KOP #13, the Proposed Project incorporates the use of lattice steel structures. Although these structures are taller, the industrial character would remain generally the same, the structure prominence is generally the same and the view towards the mountain and for residences in this location are generally the same.

The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location.

The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change as an adverse visual change should be removed from the environmental setting.

Comment Set F3: Southern California Edison Company (cont.)

Page D.18-21

DEIR/DEIS Text: F3-427

Viewer Concern. High. Although energy transmission infrastructure features prominently in the western San Gorgonio Pass landscape visible from the PCT and parking lot, trail users would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky, ridges, or Mount San Jacinto) an adverse visual change.

SCE Comment:

The environmental setting fails to recognize the significance distance of energy transmission infrastructure from the current view. The text subjectively states, "…any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change.

As seen in the KOP #14, the Proposed Project incorporates the use lattice steel structures. Although these structures are taller, the industrial character would remain generally the same, the structure prominence is generally the same and the view towards the mountain is generally the same.

The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location.

The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change as an adverse visual change should be removed from the environmental setting.

Page D.18-22

DEIR/DEIS Text: F3-428

Viewer Concern. High. Travelers on Whitewater Canyon Road, including residents from the nearby residential enclave of Bonnie Bell, would consider any increase in industrial character or built structural prominence in the canyon, or view blockage of the background sky and Mount San Jacinto an adverse visual change.

SCE Comment:

The environmental setting does not recognize that energy transmission infrastructure and wind generation facilities dominate the foreground views from a variety of locations. The text subjectively states, "…any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change.

As seen in the KOP #15, the Proposed Project incorporates the use lattice steel structures. Although these structures are taller, the industrial character would remain generally the same, the structure prominence is generally the same and the view towards the mountain is generally the same.

The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location.

The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change as an adverse visual change should be removed from the environmental setting.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.18-23

DEIR/DEIS Text: F3-429

Viewer Concern. High. Residential viewers in this portion of Whitewater would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky, ridges, and Mount San Jacinto) an adverse visual change.

SCE Comment:

The environmental setting does not recognize that energy transmission infrastructure and wind generation facilities dominate the foreground views from a variety of locations. The text subjectively states that , "…any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change.

As seen in the KOP #16, the Proposed Project incorporates the use lattice steel structures. Although these structures are taller, the industrial character would remain generally the same, the structure prominence is generally the same and the view towards the mountain is generally the same.

The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location.

The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider that "any" change as an adverse visual change should be removed from the environmental setting.

Page D.18-23

DEIR/DEIS Text: F3-430

Viewer Concern. High. SR 62 is an Officially Designated State Scenic Highway and, therefore, warrants a high rating for viewer concern. Although travelers on this stretch of SR 62 would not likely notice the change in conductors and structure configurations that would occur from the Proposed Project, given the existing structural context, any perceived increase in industrial character, structure prominence, or view blockage would be experienced as an adverse visual impact.

SCE Comment:

The environmental setting recognizes that energy transmission infrastructure changes would not likely be perceptible, however, the text subjectively states, "…any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change.

As seen in the KOP #17, the Proposed Project incorporates the use lattice steel structures. Although these structures are taller, the industrial character would remain generally the same, the structure prominence is generally the same and the view towards the mountain is generally the same.

The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location.

The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change as an adverse visual change should be removed from the environmental setting.

Comment Set F3: Southern California Edison Company (cont.)

Page D.18-24

DEIR/DEIS Text: F3-431

Viewer Concern. High. Travelers on Iowa Street and adjacent residents would consider the introduction of prominent energy infrastructure with its associated industrial character and view blockage of higher value landscape features (background sky and mountains) an adverse visual change.

SCE Comment:

The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location.

The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change an adverse visual change should be removed from the environmental setting. Please see the suggested revision below:

Viewer Concern. High. Travelers on Iowa Street currently see utility infrastructure as seen in KOP #18.~~and adjacent residents would consider the introduction of prominent energy infrastructure with its associated industrial character and view blockage of higher value landscape features (background sky and mountains) an adverse visual change~~.

Page D.18-33

DEIR/DEIS Text: F3-432

VR-1a Screen construction activities from view. Construction yards, staging areas, and material and equipment storage areas, including storage sites for excavated materials, shall be visually screened using temporary screening fencing. Fencing will be of an appropriate structure, material, and color for each specific location. This requirement shall not apply if SCE can demonstrate that construction yards are located away from areas of high public visibility including public roads, residential areas, and public recreational facilities. For any site that SCE proposes to exempt from the screening requirement, SCE shall define the site on a detailed map demonstrating its visibility from nearby roads, residences, or recreational facilities to the CPUC and BLM for review and approval at least 60 days prior to the start of construction at that site.

SCE Comment:

Mitigation Measure VR-1a is unnecessarily restrictive; please make the following revisions:

VR-1a Screen construction activities from view. Construction yards, staging areas, and material and equipment storage areas, ~~including storage sites for excavated materials,~~ shall be visually screened using temporary screening fencing. Fencing will be of an appropriate structure, material, and color for each specific location. This requirement shall not apply if SCE can demonstrate that construction yards are located away from areas of high public visibility including public roads, residential areas, and public recreational facilities. For any site that SCE proposes to exempt from the screening requirement, SCE shall define the site on a detailed map demonstrating its visibility from nearby roads, residences, or recreational facilities to the CPUC and BLM for review and approval at least ~~60~~ 7 days prior to the start of construction at that site.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.18-34

DEIR/DEIS Text: F3-433

VR-2a Minimize vegetation removal and ground disturbance. Only the minimum amount of vegetation necessary for the construction of structures and facilities shall be removed during construction. In particular, vegetation within the ROW and ground clearing at the foot of each tower and between towers shall be limited to the clearing necessary to comply with requirements of CPUC General Order 95 and other regulatory requirements.

SCE Comment:

The project as designed depicts the maximum amount of disturbance necessary for construction. Ultimately SCE's disturbance areas will be limited to the sufficient areas needed to feasibly construct the proposed project in a safe and efficient manner. As such please make the following revisions:

VR-2a Minimize vegetation removal and ground disturbance. Only the minimum amount of vegetation necessary for the construction of structures and facilities shall be removed during construction. ~~In particular, vegetation within the ROW and ground clearing at the foot of each tower and between towers shall be limited to the clearing necessary to comply with requirements of CPUC General Order 95 and other regulatory requirements.~~

Comment Set F3: Southern California Edison Company (cont.)

Page D.18-34

DEIR/DEIS Text: F3-434

VR-2a Limit ground disturbance in Segments 2, 3, and 6. Within these segments, structure and access road scars may be highly visible when located on hill slopes and along ridges, or when visible from elevated vantage points. In order to reduce visual impacts, the boundaries of all areas to be disturbed shall be delineated consistent with the requirements of Biological Resources Mitigation Measure VEG-1c. Staking shall define staging areas, access roads, spur roads, tower locations, pulling sites, and sites for temporary placement of spoils. Stakes and flagging shall be installed before construction and in consultation with the Project Biologist and the CPUC/BLM Environmental Monitor or Visual Specialist. Areas staked shall be as small as possible in order to minimize the visibility of ground disturbance from sensitive viewing locations such as roads, trails, residences, and recreation facilities and areas. Parking areas and staging and disposal site locations shall be similarly located in areas approved by the Project Biologist and CPUC/BLM's Environmental Monitor or Visual Specialist prior to the start of construction. All disturbances by Proposed Project vehicles and equipment shall be confined to the staked and flagged areas.

SCE Comment:

Mitigation Measure VR-2a improperly defers analysis of impacts to a post-approval stage. The mere fact that there *may* be some areas of potentially significant impacts within Segments 2, 3 and 6 does not justify a post-approval consultation for the entirety of Segments 2, 3, and 6. Under Mitigation Measure VR-2a, the Project Biologist and the CPUC/BLM Environmental Monitor or Visual Specialist will consult on staking to *all* staging areas, access roads, spur roads, tower locations, pulling sites, and sites for temporary placement of spoils to minimize the visibility of ground disturbance. Mitigation Measure VR-2a also gives the "CPUC/BLM Visual Specialist and Designated Project Biologist" discretion to require changes in project design, which could cause delays and implicate other engineering and environmental topic areas.

CEQA generally disallows deferring analysis unless it is not practical to do so in the EIR. *See* CEQA Guidelines §15126.4(a)(1)(B); *Sacramento Old City Assn. v. City Council*, 229 Cal. App. 3d 1011, 1029 (1991). In cases where mitigation measures include future analysis not included in the EIR, the mitigation measure must identify specific performance standards by which the analysis will be applied. *See* CEQA Guidelines § 15126.4(a)(1)(B). CEQA prohibits mitigation measures that simply require a developer to comply with any recommendations in a future analysis. *See Rialto Citizens For Responsible Growth v. Wla-Mart Real Estate Business Trust*, 208 Cal. App. 4th 899, 944-945 (2012).As such, please make the following revisions:

VR-2a Minimize vegetation removal and ground disturbance.

Limit ground disturbance in Segments 2, 3, and 6. Within these segments, structure and access road scars may be highly visible when located on hill slopes and along ridges, or when visible from elevated vantage points. In order to reduce visual impacts, the boundaries of all areas to be disturbed shall be delineated consistent with the requirements of Biological Resources Mitigation Measure VEG-1c. Staking shall define the limits of the Proposed Project disturbance areas ~~staging areas, access roads, spur roads, tower locations, pulling sites, and sites for temporary placement of spoils. Stakes and flagging shall be installed before construction and in consultation with the Project Biologist and the CPUC/BLM Environmental Monitor or Visual Specialist. Areas staked shall be as small as possible in order to minimize the visibility of ground disturbance from sensitive viewing locations such as roads, trails, residences, and recreation facilities and areas.~~ Parking areas and staging and disposal site locations shall be similarly located in approved areas. ~~approved by the Project Biologist and CPUC/BLM's Environmental Monitor or Visual Specialist prior to the start of construction. All disturbances by Proposed Project vehicles and equipment shall be confined to the staked and flagged areas.~~

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.18-35

DEIR/DEIS Text: F3-435

Mitigation Measure for Impact VR-3: Construction would result in visual contrast associated with retaining walls, land scarring, and establishment of graveled surfaces

VR-3a Reduce color contrast of retaining walls, land scars, and graveled surfaces. Where construction would unavoidably create land scars or retaining walls visible from sensitive public viewing locations, disturbed soils and new walls shall be treated with an appropriate color or material (Natina Concentrate, Eonite, or Permeon, or similar). The material shall be approved by the CPUC and BLM, and the intent shall be to reduce the visual contrast created by the lighter-colored disturbed soils and rock with the darker soil and vegetated surroundings. SCE shall consult with the CPUC and BLM and/or their authorized representative(s) on a site-by-site basis and obtain written approval prior to the use of any colorants.

SCE Comment:

Application of treatments for temporary areas (disturbed soils) creates artificial blending that is less desirable at the expense of eventual natural blending. Land scars would only remain in areas used permanently and these areas are inappropriate for treatment. The mitigation measure as written is excessive. Additionally, between the PEA and SCE's responses to data requests, there is ample information about the project's ground disturbance and retaining walls to determine which specific locations may cause significant impacts to visual resources. In other words, the DEIR/DEIS must identify *which specific* retaining walls or grading areas will result in a potentially significant impact, not just those visible from sensitive public viewing locations, especially as sensitive viewing locations are not defined in the DEIR/DEIS. The document should not simply conclude that such activities could generically cause potentially significant impacts across the entirety of the Project.

SCE believes there are few, if any, areas within where construction ground disturbance and retaining will result in a potentially significant visual impacts requiring mitigation. Almost all construction activities will occur in previously disturbed areas or established ROW with existing transmission line infrastructure, substantially reducing the potential for significant visual impacts. The PEA concludes that construction activities would not result in significant impacts to visual resources because construction activities are temporary and the proposed project includes restoration of laydown/work areas through recontouring and revegetation at the end of construction.[1]

Second, Mitigation Measure VR-3a improperly defers analysis of impacts to a post-approval stage. The mere fact that there *may* be some areas of potentially significant impacts does not justify a post-approval analysis for the entirety of Proposed Project. Under Mitigation Measure VR-3a, SCE shall consult with the CPUC and BLM and/or their authorized representative(s) on a site-by-site basis and obtain written approval prior to the use of any colorants, implying discretion or future analysis would be required.

CEQA generally disallows deferring analysis unless it is not practical to do so in the EIR. *See* CEQA Guidelines §15126.4(a)(1)(B); *Sacramento Old City Assn. v. City Council*, 229 Cal. App. 3d 1011, 1029 (1991). In cases where mitigation measures include future analysis not included in the EIR, the mitigation measure must identify specific performance standards by which the analysis will be applied. *See* CEQA Guidelines § 15126.4(a)(1)(B). CEQA prohibits mitigation measures that simply require a developer to comply with any recommendations in a future analysis. *See Rialto Citizens For Responsible Growth v. Wla-Mart Real Estate Business Trust*, 208 Cal. App. 4th 899, 944-945 (2012). as such, please make the following revisions:

Mitigation Measure for Impact VR-3: Construction would result in visual contrast associated with retaining walls, land scarring, and establishment of graveled surfaces

VR-3a Reduce color contrast of retaining walls, land scars, and graveled surfaces. Where construction would ~~unavoidably~~ create ~~land scars or~~ retaining walls <u>that have been identified as creating a significant visual impact</u> ~~visible from sensitive public viewing locations, disturbed soils and~~ new walls shall be treated with an appropriate color or material (Natina Concentrate, Eonite, or Permeon, or similar) with the intent to reduce the visual contrast. ~~created by the lighter-colored disturbed soils and rock with the darker soil and vegetated surroundings. SCE shall consult with the CPUC and BLM and/or their authorized representative(s) on a site-by-site basis and obtain written approval prior to the use of any colorants.~~

[1] *Id*.

Comment Set F3: Southern California Edison Company (cont.)

Page D.18-35

DEIR/DEIS Text:

F3-436

VR-4a Minimize in-line views of retaining walls and land scars. Prior to final Project design, SCE shall prepare a map book and description detailing the preliminary design and location of all access and spur roads, retaining walls, and ground disturbance areas within Segments 2, 3, 4, and 6. The map book and description shall be submitted to the CPUC and BLM for field evaluation by the CPUC's Visual Specialist and Designated Project Biologist. The CPUC's Visual Specialist will evaluate all proposed access roads, spur roads, retaining walls, and ground disturbance areas within Segments 2, 3, 4, and 6 to assess in-line visibility of these Proposed Project features and characteristics from sensitive viewing locations. The analysis shall include consideration of viewing angles, screening, view duration, and other pertinent viewing characteristics. This analysis shall be subsequently provided to SCE for response and final design.

In response, SCE shall develop design options to reduce the in-line visibility of these components, including alternative access and spur road routes, the use of "drive and crush" access, and redesign and placement of retaining walls to reduce the need for new roads and retaining walls and to reduce or eliminate the in-line visibility of these facilities. SCE's redesign shall document the proposed resolution for each access road or other visible road feature and shall include the following:

- Approximate location, lakes, and design of alternative access or spur road routes that would replace proposed roads.
- Vegetation that would be affected and steepness of terrain for consideration of vegetation and erosion impacts.
- Areas where "drive and crush" access is a feasible measure to avoid access road scars (i.e., no grading or vegetation removal is required). SCE shall define frequency of driving, vehicle types to be used, and likelihood of vegetation recovery.
- The CPUC/BLM Visual Specialist and Designated Project Biologist shall evaluate whether the overall impacts of the alternate road designs are less than that of the original access road designs.

SCE Comment:

Impact VR-4 indicates that, within Segments 2,3, 4 and 6, construction of the Proposed Project on hilltops and hillsides may "create extended, in-line view of newly graded terrain" which "can exacerbate the visibility, prominence, and overall visible contrast of graded surfaces such that the overall level of visual change becomes Moderate to High."[2] The DEIR/DEIS identifies this as a potentially significant impact that can be reduced to less than significance with the imposition of mitigation.[3]

To address this impact, Mitigation Measure VR-4a requires SCE to submit a "map book and description of <u>all</u> access and spur roads, retaining walls, and ground disturbance areas within Segments 2, 3, 4, and 6" (emphasis added), which will be analyzed by the CPUC's Visual Specialist "to assess in-line visibility of these Proposed Project features" from undefined "sensitive viewing locations." In response to the Visual Specialist's analysis, SCE shall "develop design options to reduce the in-line visibility of these components," after which, the "CPUC/BLM Visual Specialist and Designated Project Biologist shall evaluate whether the overall impacts of the alternate road designs are less than that of the original access road designs."

SCE has three primary concerns with Mitigation Measure VR-4a, discussed next. Based on these comments, SCE proposes changes to the measure in redline format, provided below.

First, the scope of impact conclusion is far too broad because the Draft EIR/EIS does not address *where* potentially significant impacts from spur roads, retaining walls, and ground disturbance will occur within Segments 2, 3, 4 and 6. CEQA requires an EIR to evaluate and conclude whether specific activities are significant, not simply reach generalized findings. *See Laurel Heights Improvement Ass' v. Regents of Univ. of Cal.*, 47 Cal. 3d 376, 404 (1988). An EIR cannot merely label an impact significant without first providing a detailed discussion and analysis supporting the specific impact conclusion. *See Berkeley Keep Jets Over the Bay Comm. v. Board of Port Comm'rs*, 91 Cal. App. 4th 1344, 1370 (2001).

[2] Draft EIR/EIS, p. D.18-35.
[3] Draft EIR/EIS, p. D.18-60.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

F3-436 cont.

Between the PEA and SCE's responses to data requests, there is ample information about the project's ground disturbance, retaining walls and spur roads to determine which specific construction activities and locations may cause significant impacts to visual resources. In other words, the EIR/EIS must identify *which specific* spur roads, retaining walls or grading areas will result in a potentially significant impact, and not simply conclude that such activities could generically cause potentially significant impacts across the entirety of Segments 2, 3, 4 and 6. Once the scope of the impact is identified, Mitigation Measure VR-4a can be properly tailored to address the specific impact areas (see comment below).

SCE believes there are few, if any, areas within Segments 2, 3, 4 and 6 where construction ground disturbance, retaining walls and spur roads will result in a potentially significant visual impacts requiring mitigation. Almost all construction activities will occur in previously disturbed areas or established ROW with existing transmission line infrastructure, substantially reducing the potential for significant visual impacts. The PEA concludes that construction activities would not result in significant impacts to visual resources because construction activities are temporary and the proposed project includes restoration of laydown/work areas through re-contouring and revegetation at the end of construction.[4]

Second, Mitigation Measure VR-4a improperly defers analysis of impacts to a post-approval stage. The mere fact that there *may* be some areas of potentially significant impacts within Segments 2, 3, 4 and 6 does not justify a post-approval analysis for the entirety of Segments 2, 3, 4 and 6. Under Mitigation Measure VR-4a, the "Visual Specialist" will analyze impacts to *all* access and spur roads, retaining walls, and ground disturbance areas in Segments 2, 3, 4 and 6 to determine the potential for impacts. Mitigation Measure VR-4a also gives the "CPUC/BLM Visual Specialist and Designated Project Biologist" discretion to require changes in project design, which could cause delays and implicate other engineering and environmental topic areas.

CEQA generally disallows deferring analysis unless it is not practical to do so in the EIR. *See* CEQA Guidelines §15126.4(a)(1)(B); *Sacramento Old City Assn. v. City Council*, 229 Cal. App. 3d 1011, 1029 (1991). In cases where mitigation measures include future analysis not included in the EIR, the mitigation measure must identify specific performance standards by which the analysis will be applied. *See* CEQA Guidelines § 15126.4(a)(1)(B). CEQA prohibits mitigation measures that simply require a developer to comply with any recommendations in a future analysis. *See Rialto Citizens For Responsible Growth v. Wla-Mart Real Estate Business Trust*, 208 Cal. App. 4th 899, 944-945 (2012).

While some impact determinations require post-approval analysis, that is not the case here. The information requested in Mitigation Measure VR-4a has already been provided by SCE, supporting an analysis in the Draft EIR/EIS, consistent with CEQA and NEPA. To the extent that some additional analysis is required, it should be limited to specific areas where: (1) the EIR identifies a potentially significant impact, not the entirety of the Segment 2, 3, 4 and 6 (see prior comment); <u>and</u> (2) the final design is materially different from the design that SCE has already provided.

Third, to the extent that SCE must incorporate additional design features to mitigate potentially significant impacts from ground disturbance, retaining walls or spur roads, the options should be clearly identified in Mitigation Measure VR-4a. *See* CEQA Guidelines § 15126.4(a)(1)(B).

Accordingly, based on the reasons provided above Mitigation Measure VR-4a should be removed from the DEIR/DEIS.

~~**VR-4a Minimize in-line views of retaining walls and land scars.** Prior to final Project design, SCE shall prepare a map book and description detailing the preliminary design and location of all access and spur roads, retaining walls, and ground disturbance areas within Segments 2, 3, 4, and 6. The map book and description shall be submitted to the CPUC and BLM for field evaluation by the CPUC's Visual Specialist and Designated Project Biologist. The CPUC's Visual Specialist will evaluate all proposed access roads, spur roads, retaining walls, and ground disturbance areas within Segments 2, 3, 4, and 6 to assess in-line visibility of these Proposed Project features and characteristics from sensitive viewing locations. The analysis shall include consideration of viewing angles, screening, view duration, and other pertinent viewing characteristics. This analysis shall be subsequently provided to SCE for response and final design.~~

[4] *Id*.

Comment Set F3: Southern California Edison Company (cont.)

F3-436 cont.

~~In response, SCE shall develop design options to reduce the in-line visibility of these components, including alternative access and spur road routes, the use of "drive and crush" access, and redesign and placement of retaining walls to reduce the need for new roads and retaining walls and to reduce or eliminate the in-line visibility of these facilities. SCE's redesign shall document the proposed resolution for each access road or other visible road feature and shall include the following:~~

- ~~Approximate location, length, and design of alternative access or spur road route that would replace proposed roads.~~
- ~~Vegetation that would be affected and steepness of terrain for consideration of vegetation and erosion impacts.~~
- ~~Areas where "drive and crush" access is a feasible measure to avoid access road scars (i.e., no grading or vegetation removal is required). SCE shall define frequency of driving, vehicle types to be used, and likelihood of vegetation recovery.~~
- ~~The CPUC/BLM Visual Specialist and Designated Project Biologist shall evaluate whether the overall impact of the alternate road designs are less than that of the original access road designs.~~

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.18-36

DEIR/DEIS Text: F3-437

VR-5a Prohibit construction marking of natural features. SCE shall not apply paint or permanent discoloring agents to rocks or vegetation to indicate survey or construction activity limits or for any other purpose.

SCE Comment:

The following clarifying information is recommended:

VR-5a: Prohibit construction marking of natural features. SCE shall not apply paint or permanent discoloring agents to rocks or vegetation to indicate survey or construction activity limits or for any other purpose. This measure does not apply to temporary marking agents used to identify underground utilities.

Page D.18-45

DEIR/DEIS Text: F3-438

General Comment identifying issues associated with CPUC Preferred Alternative

From the analysis of impacts on KOP 8-Stargazer Street in the Estates Residential Development in the City of Beaumont

The impact would be substantial for about 10 percent of south-side residences: those that would be located adjacent to a proposed new structure pair. Mitigation Measures VR-8a (Minimize visual contrast in project design) and VR-9a (Treat structure surfaces) are recommended to reduce the visual effects along this portion of the Proposed Project. In addition, the Tower Relocation Alternative defined in Section C and Appendix 5, would require specific structure pairs with the most severe visual impacts to be moved farther from residences, reducing the severity of the visual impact. The effects of this alternative are presented in Section D.18.4.1.

SCE Comment:

These findings vary substantially from the findings that were based on a review of the existing and simulated with-project views from KOP 8, seen in Figures D.18-15A and D.18-15B.

There is no tangible evidence in the form of either simulations or mapped analyses that have been provided to support the conclusions that the Proposed Project would have substantial visual impacts on views from residences on the south side of the alignment and that the Tower Relocation Alternative would reduce the severity of those impacts.

Page D.18-46

DEIR/DEIS Text: F3-439

General Comment identifying issues associated with CPUC Preferred Alternative

From the analysis of impacts on KOP 9-Cedar Hollow Road in the City of Beaumont:

The visual effects would be substantial for approximately 10 percent of south side residences — those located adjacent to a proposed new structure pair. Mitigation Measures VR-8a (Minimize visual contrast in project design) and VR-9a (Treat structure surfaces) are recommended to reduce the visual effects along this portion of the Proposed Project. In addition, the Tower Relocation Alternative defined in Section C and Appendix 5, would require specific structure pairs with the most severe visual impacts to be moved farther from residences, reducing the severity of the visual impact. The effects of this alternative are presented in Section D.18.4.1.

SCE Comment:

These findings vary substantially from the findings that were based on a review of the existing and simulated with-project views from KOP 7 seen in Figures D.18-16A and D.18-16B.

There is no tangible evidence in the form of either simulations or mapped analyses that have been provided to support the conclusions that the Proposed Project would have substantial visual impacts on views from residences on the south side of the alignment and that the Tower Relocation Alternative would reduce the severity of those impacts.

Comment Set F3: Southern California Edison Company (cont.)

Page D.18-47

DEIR/DEIS Text: F3-440

General Comment identifying issues associated with CPUC Preferred Alternative

From the analysis of impacts on KOP 11-Hathaway Street in the City of Banning

Figure D.18-18B presents a visual simulation of two new transmission lines that would be introduced into an area absent such features but with existing wood-pole utility lines present in the foreground of views. Given the relatively unobstructed viewing opportunities of the transmission line corridor and the mountains beyond, travelers on Hathaway Street and adjacent residents would be afforded Extended viewing durations of the Proposed Project. Also, given the close proximity and relatively large scale of the transmission lines, atmospheric conditions would have minimal effect on the viewing experience.

As shown in the simulation, two double-circuit TSP transmission lines would be introduced into a fore-ground landscape presently absent similar features. The TSPs would appear as visually prominent, vertical structures that would result in Moderate to High visual contrast. The TSPs would appear Co-dominant in scale with the more distant background mountains. View blockage of the background sky, hills, and mountains would be Moderate to High. The overall visual change would be Moderate to High, and in the context of the existing landscape's Moderate to High visual sensitivity, the resulting visual effect would be substantial. Mitigation Measures VR-8a (Minimize visual contrast in project design) and VR-9a (Treat structure surfaces) are recommended to reduce the visual effects. These severe visual effects could be reduced if the proposed new structures were located about 500 feet farther east. However, as described in Appendix 5, Section 5.7, the structures are located on Morongo Tribal Lands, and the Morongo Band of Mission Indians is not willing to consider this relocation, so an alternative that would reduce the severity of this impact is not feasible.

SCE Comment:

The finding of a significant and unmitigable visual impact on this view is not supported by the evidence.

Based on a comparison of the simulation with the existing condition view, it is clear that the level of visual change has been overestimated. The proposed transmission structures are declared to be "co-dominant" in relationship to the scale of the mountains in the backdrop. Given the fact that the mountains are higher and more massive in scale than the proposed trim transmission structures, it would be more accurate to characterize the structures as being subordinate in relationship to the mountains. View blockage has been incorrectly classified as "moderate to high". Given the slim profiles of the transmission structures, their actual blockage of views toward landscape elements behind them is quite small, resulting in a level of view blockage that would be more accurately classified as "low" as opposed to "moderate to high". Taking the visually subordinate character of the structures and the low level of view blockage into account, the overall level of visual change would be more correctly determined to be "moderate" than "moderate to high'. As indicated in the comments made related to text on pages D.18-18 and D.18-19, the correct assessment of the sensitivity of this view is moderate, rather than moderate to high. Given the moderate level of visual sensitivity and the overall moderate level of visual change, applying the assumptions indicated in Table D.18-9, the level of impact would be less than significant.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.18-52 and Figure D.18-25B

DEIR/DEIS Text: F3-441

KOP 18 – Northbound Iowa Street in the City of Redlands. Figure D.18-25A presents a life-size scale view to the north along the Iowa Street, near the southwest corner of the Cottage Lane residential sub-division, south of Orange Avenue and North of Barton Road in the City of Redlands. The view encompasses a portion of the Proposed Project SB-Redlands-Tennessee overhead 66 kV subtransmission line as it passes immediately west of the Cottage Lane residential subdivision. There are no other substantial overhead utility structures apparent in the suburban landscape along this portion of Iowa Street. Figure D.18-25B presents a simulation of a new 66 kV subtransmission line in this suburban neighborhood.

As shown in the simulation, the Proposed Project would result in the introduction of a light-weight, steel-pole, 66 kV subtransmission line into a residential suburban landscape presently absent similar features. The light-weight steel poles would appear as visually prominent, vertical structures along the east side of Iowa Street adjacent to the Cottage Lane residential subdivision. The resulting visual contrast would be Moderate to High, and the light-weight steel poles would appear Co-dominant in scale with the more distant background mountains. View blockage of the mountains and sky would be Moderate to High

SCE Comment:

Figure D-18-25B improperly simulates the installation of double-circuit 220kV TSPs (with a typical as shown in Figure B-10), instead of the correct use of single-circuit 66kV wood poles (with typical as shown in Figure B-14b). If this simulation had incorporated the correct structure type, it would show that the Proposed Project creates a similar visual impact as the "single, wood-pole utility lines along Orange Avenue and a portion of Iowa Street" and the "…vertical street light poles and a more distant communication tower." (See DEIR page D.18-24, KOP-18, Visual Quality.)

The DEIR language should be revised as follows:

KOP 18 – Northbound Iowa Street in the City of Redlands. Figure D.18-25A presents a life-size scale view to the north along the Iowa Street, near the southwest corner of the Cottage Lane residential sub-division, south of Orange Avenue and North of Barton Road in the City of Redlands. The view encompasses a portion of the Proposed Project SB-Redlands-Tennessee overhead 66 kV subtransmission line as it passes immediately west of the Cottage Lane residential subdivision. There are no other substantial overhead utility structures apparent in the suburban landscape along this portion of Iowa Street, though there are some single, wood-pole utility lines along Orange Avenue and a portion of Iowa Street, as well as some vertical street light poles and a more distant communication tower. Figure D.18-25B presents a simulation of a new 66 kV subtransmission line in this suburban neighborhood.

As shown in the simulation, the Proposed Project would result in the introduction of a ~~light-weight, steel~~wood-pole, 66 kV subtransmission line into a residential suburban landscape ~~presently absent similar features~~. The ~~light-weight steel~~ wood poles would appear as visually prominent, vertical structures along the east side of Iowa Street adjacent to the Cottage Lane residential subdivision. The resulting visual contrast would be Low to Moderate ~~to High~~, and ~~the light-weight steel poles would~~ could appear Co-dominant in scale with the more distant background mountains. View blockage of the mountains and sky would be Low to Moderate ~~to High~~

Comment Set F3: Southern California Edison Company (cont.)

Page D.18-54

F3-442

DEIR/DEIS Text:

Mitigation Measure for Impact VR-8: Long-term presence of the project would result in landscape changes that degrade existing visual character or quality

VR-8a Minimize visual contrast in project design. In the final design of approved project structures, SCE shall use design fundamentals that reduce the visual contrast of new structures and components to the characteristic landscape. These include siting and location; reduction of visibility; repetition of form, line, color, and texture of the landscape; and reduction of unnecessary disturbance. SCE shall provide to the CPUC and BLM for review, a draft Project Design Plan describing the siting, placement, and other design considerations to be employed to minimize Proposed Project contrast.

The draft plan must explain how the design will minimize visual intrusion and contrast by blending the earthwork, vegetation manipulation, and facilities with the landscape. Design strategies to address these fundamentals shall be based on the following factors.

- **Earthwork.** Select locations and alignments that fit into the landforms to minimize the sizes of cuts and fills.
- **Vegetation Manipulation.** Use existing vegetation to screen graded areas and facilities from public viewing to the extent feasible. Feather and thin the edges of cleared areas and retain a representative mix of plant species and sizes.
- **Reclamation and Restoration.** Blend the disturbed areas into the characteristic landscape including access and spur roads and disturbed areas created during construction (transmission line structures, and construction yards and staging areas). Replace soil, brush, rocks, and natural debris over these disturbed areas. Newly introduced plant species shall be of a form, color, and texture that blend with the landscape.

A draft Project Design Plan shall be submitted to CPUC and BLM at least 60 days prior to the start of construction. If the CPUC or BLM notifies SCE that revisions to the plan are needed before the plan can be approved, within 30 days of receiving that notification, SCE shall pre-pare and submit for review and approval a revised plan.

SCE Comment:

The Draft EIR/EIS Impact VR-8 analyzes whether the long-term presence of the project would result in landscape changes that degrade the existing visual character or quality. CEQA requires evaluating a project against the existing environmental setting (i.e., the baseline). Here, the project will be developed almost entirely within previously disturbed areas or established rights-of-way with existing transmission line infrastructure. Given the highly disturbed nature of the existing setting, the incremental visual changes from the project are relatively minor or even beneficial. As such, the PEA concluded the project would not significantly degrade the visual character or quality of the surrounding area.[5]

The Draft EIR also concludes that the large majority of the project along 48 corridor miles would either result in a *beneficial* impact or a less than significant impact. Significant impacts were limited to the following locations:[6]

- Segment 4 for approximately 16 percent of the residences on the south side of the ROW between Palmer Avenue and Mockingbird Lane.
- Segment 5 when viewed from residences on North Hathaway Street, North Allen Street, North Evans Street, and North Cherry Street in eastern Banning.
- Segment 6 when viewed from several residences along the north sides of Amethyst Drive and Haugen-Lehmann Way in the central portion of the community of Whitewater.
- The Subtransmission Line Route when viewed from the Cottage Lane residential subdivision on Iowa Street and Orange Avenue in the City of Redlands.

Appendix 10 of the Draft EIR, Table AP.10-1, summarized next, illustrates that significant operational impacts were limited in scope compared to the rest of the project (locations with a significant visual impact are bolded):

[5] Proponent's Environmental Assessment, p. 4.1-38.

[6] Draft EIR, p. D.18-6.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

F3-442 cont.

KOP	CEQA Impact Significance Determination
KOP 1 – Right-of-Way Crossing of Mission Road in Loma Linda	BEFORE: Beneficial (Class IV) AFTER: Same
KOP 2 – Canyon Vista Dr. and East Chase Canyon Lane in Colton	BEFORE: Less than Significant (Class III) AFTER: Same
KOP 3 –Pilgrim Road in San Timoteo Canyon	BEFORE: Beneficial (Class IV) AFTER: Same
KOP 4 – Westbound San Timoteo Canyon Road	BEFORE: Beneficial (Class IV) AFTER: Same
KOP 5 – Boros Boulevard – Tukwet Canyon	BEFORE: Less than Significant (Class III) AFTER: Same
KOP 6 – Stetson Community Park in the City of Beaumont	North of, Within, & Most Views South of ROW: Beneficial (Class IV) Some Views South of ROW: Less than Significant (Class III) **Some Views South of ROW: Significant (Class I)**
KOP 7 – Oak Valley Golf Course	North of, Within, & Most Views South of ROW: Beneficial (Class IV) Some Views South of ROW: Less than Significant (Class III) **Some Views South of ROW: Significant (Class I)**
KOP 8 – Stargazer St. and Rose Ave. in The Estates Residential Development in the City of Beaumont	North of, Within, & Most Views South of ROW: Beneficial (Class IV) Some Views South of ROW: Less than Significant (Class III) **Some Views South of ROW: Significant (Class I)**
KOP 9 – Cedar Hollow Road in Beaumont	North of, Within, & Most Views South of ROW: Beneficial (Class IV) Some Views South of ROW: Less than Significant (Class III) **Some Views South of ROW: Significant (Class I)**
KOP 10 – Bluff Street in Banning	BEFORE: Less than Significant (Class III) AFTER: Same
KOP 11 – Hathaway Street in Banning	**BEFORE: Significant and Unmitigable (Class I)** **AFTER: Same**
KOP 12 – Morongo Community Center	BEFORE: Less than Significant (Class III) AFTER: Same
KOP 13 – Haugen-Lehmann Way in the Central Portion of the Community of Whitewater	BEFORE: Beneficial (Class IV) AFTER: Same
KOP 14 – Pacific Crest Trail Trailhead / Parking Lot	BEFORE: Less than Significant (Class III) AFTER: Same
KOP 15 – Whitewater Canyon Road, South of Bonnie Bell	BEFORE: Less than Significant (Class III) AFTER: Same
KOP 16 – Painted Hills Road in the Community of Whitewater	BEFORE: Less than Significant (Class III) AFTER: Same
KOP 17 – Southbound State Route 62 Scenic Hwy.	BEFORE: Less than Significant (Class III) AFTER: Same
KOP 18 – Northbound Iowa Street in the City of Redlands	**BEFORE: Significant and Unmitigable (Class I)** **AFTER: Same**

Comment Set F3: Southern California Edison Company (cont.)

F3-442 cont.

Under CEQA, "[m]itigation measures are not required for effects which are not found to be significant." CEQA Guidelines § 15126.4(a)(3); *see also San Franciscans for Reasonable Growth v. City & County of San Francisco*, 209 Cal. App. 3d 1502, 1517 (1989) (an exaction for open space and parks not required because the EIR concluded impacts requiring such mitigation were not significant); *North Coast Rivers Alliance v. Marin Mun. Water Distr.* 216 Cal. App. 4th 614, 649 (2013) (mitigation for energy impacts not needed where EIR determined the project's energy impacts would not be significant).

When mitigation is imposed, CEQA requires that the lead agency limit the scope of the mitigation to match the nature of the impact. CEQA Guidelines § 15126.4(a)(4) requires:

> There must be an essential nexus (i.e. connection) between the mitigation measure and a legitimate governmental interest. *Nollan v. California Coastal Commission*, 483 U.S. 825 (1987); and
>
> The mitigation measure must be "roughly proportional" to the impacts of the project. *Dolan v. City of Tigard*, 512 U.S. 374 (1994).

In contrast to the clear limits imposed by CEQA, the Draft EIR/EIS applies Mitigation Measures VR-8a ***across the entirety of the project***, not just the locations where a significant visual impact would occur. The Draft EIR recommends that Measures VR-8a apply to sections with a less than significant impact to "further reduce the adverse visual effects," and to sections with beneficial impacts to "further ensure that the resulting impacts are an improvement and are, in fact, beneficial."[7]

Simply put, this approach is not consistent with CEQA. Mitigation measures should only be applied to reduce significant environmental impacts, not to "further reduce" less than significant impacts or to ensure that beneficial impacts occur. As proposed, Mitigation Measures VR-8a would impose substantial costs and effort on SCE that are not connected to or roughly proportional to the limited nature of the impact. The measures effectively require the entirety of the project to be reevaluated for visual effects based on the criteria in Mitigation Measures VR-8a even though the vast majority of project components would not result in a significant environmental impact.

As discussed in the PEA, SCE will reduce visual impacts across the entirety of the project by applying design features intended to reduce visual effects, including revegetation, recontouring, use of appropriate materials, light shielding, and glare reduction as appropriate. However, except for the limited locations identified in the Draft EIR/EIS where significant visual impacts will occur, no additional mitigation is permitted under CEQA. As such, SCE respectfully proposes mitigation measure Vr-8a be removed from the DEIR/DEIS.

~~***Mitigation Measure for Impact VR-8: Long-term presence of the project would result in landscape changes that degrade existing visual character or quality***~~

~~**VR-8a Minimize visual contrast in project design.** In the final design of approved project structures, SCE shall use design fundamentals that reduce the visual contrast of new structures and components to the characteristic landscape. These include siting and location; reduction of visibility; repetition of form, line, color, and texture of the landscape; and reduction of unnecessary disturbance. SCE shall provide to the CPUC and BLM for review, a draft Project Design Plan describing the siting, placement, and other design considerations to be employed to minimize Proposed Project contrast. The draft plan must explain how the design will minimize visual intrusion and contrast by blending the earthwork, vegetation manipulation, and facilities with the landscape. Design strategies to address these fundamentals shall be based on the following factors.~~

- ~~**Earthwork.** Select locations and alignments that fit into the landforms to minimize the sizes of cuts and fills.~~
- ~~**Vegetation Manipulation.** Use existing vegetation to screen graded areas and facilities from public viewing to the extent feasible. Feather and thin the edges of cleared areas and retain a representative mix of plant species and sizes.~~
- ~~**Reclamation and Restoration.** Blend the disturbed areas into the characteristic landscape including access and spur roads and disturbed areas created during construction (transmission line structures, and construction yards and staging areas). Replace soil, brush, rocks, and natural debris over these disturbed areas. Newly introduced plant species shall be of a form, color, and texture that blend with the landscape.~~

~~A draft Project Design Plan shall be submitted to CPUC and BLM at least 60 days prior to the start of construction. If the CPUC or BLM notifies SCE that revisions to the plan are needed before the plan can be approved, within 30 days of receiving that notification, SCE shall prepare and submit for review and approval a revised plan.~~

[7] Draft EIR, p. D.lS-61.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.18-55

DEIR/DEIS Text:

Mitigation Measure for Impact VR-9: Project operation would create a new source of reflected light and glare F3-443

VR-9a Treat structure surfaces. SCE shall treat the surfaces of all structures and new buildings visible to the public such that: a) their colors minimize visual contrast by blending with the characteristic landscape colors; b) their colors and finishes do not create excessive glare; and c) their colors and finishes are consistent with local policies and ordinances. The trans-mission structures and conductors shall be non-specular and non-reflective, and the insulators shall be non-reflective and non-refractive. SCE shall consider the use of special galvanizing treatments or post-manufacture application of chemical treatments (such as Natina Steel) to ensure that transmission structures are sufficiently dulled and non-reflective and are of the appropriate color to blend effectively with the surrounding landscape. SCE shall comply with CPUC and BLM requirements regarding appropriate surface treatments for Pro-posed Project elements.

SCE shall provide to the CPUC and BLM for review, a draft Surface Treatment Plan describing the application of colors and textures to all new facility structures, buildings, walls, fences, and components comprising all facilities to be constructed. The draft Surface Treatment Plan must explain how the design will reduce glare and minimize visual intrusion and contrast by blending the facilities with the landscape. The draft plan shall be submitted to CPUC and BLM at least 60 days prior to ordering the first structures that are to be color-treated during manufacture or prior to construction of any of the facility components, whichever comes first. If the BLM or CPUC notifies SCE that revisions to the plan are needed before the plan can be approved, within 30 days of receiving that notification, SCE shall prepare and submit for review and approval a revised plan. The draft Surface Treatment Plan shall include the following components and specifications.

SCE Comment:

The analysis related to mitigation measure VR-9, states the following:

Steel Structure Glare and Reflectivity. Components of new steel transmission structures can be reflective and highly visible in sunlight, even creating distractions to motorists and nearby residents. Therefore, the long-term presence of the Proposed Project could create a new source of reflective glare and surface color contrast that could adversely affect daytime views along much of the Proposed Project route. However, the visibility and reflectivity of new structures can be minimized with various surface treatments. Mitigation Measure VR-9a (Treat structure surfaces) is recommended to minimize the views of these facilities.

That analysis fails to recognize that there are existing steel transmission structures within the same corridor as the new structures and there would be no new source of reflective glare and surface color contrast. As noted in the PEA[8], new structures and conductors would weather to a dull gray finish. Thus, colors would be consistent with the existing visual condition and approval of specific colors for towers and conductors is unnecessary. Furthermore for the same reasoning explained for measure VR-8 (mitigation not required for impacts not found to be significant, scope of mitigation to match nature of the impact), mitigation measure VR-9 should be removed from the DEIR/DEIS

~~***Mitigation Measure for Impact VR-9: Project operation would create a new source of reflected light and glare***~~

~~**VR-9a Treat structure surfaces.** SCE shall treat the surfaces of all structures and new buildings visible to the public such that: a) their colors minimize visual contrast by blending with the characteristic landscape colors; b) their colors and finishes do not create excessive glare; and c) their colors and finishes are consistent with local policies and ordinances. The trans-mission structures and conductors shall be non-specular and non-reflective, and the insulators shall be non-reflective and non-refractive. SCE shall consider the use of special galvanizing treatments or post-manufacture application of chemical treatments (such as Natina Steel) to ensure that transmission structures are sufficiently dulled and non-reflective and are of the appropriate color to blend effectively with the surrounding landscape. SCE shall comply with CPUC and BLM requirements regarding appropriate surface treatments for Pro-posed Project elements.~~

[8] Proponent's Environmental Assessment, p. 4.1-39

Comment Set F3: Southern California Edison Company (cont.)

~~SCE shall provide to the CPUC and BLM for review, a draft Surface Treatment Plan describing the application of colors and textures to all new facility structures, buildings, walls, fences, and components comprising all facilities to be constructed. The draft Surface Treatment Plan must explain how the design will reduce glare and minimize visual intrusion and contrast by blending the facilities with the landscape. The draft plan shall be submitted to CPUC and BLM at least 60 days prior to ordering the first structures that are to be color-treated during manufacture or prior to construction of any of the facility components, whichever comes first. If the BLM or CPUC notifies SCE that revisions to the plan are needed before the plan can be approved, within 30 days of receiving that notification, SCE shall prepare and submit for review and approval a revised plan. The draft Surface Treatment Plan shall include the following components and specifications.~~ **F3-443 cont.**

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.18-59

DEIR/DEIS Text: F3-444

Impact VR-1C: Construction would result in adverse visual effects due to the presence of equipment, vehicles, materials, and workforce, or use of night lighting (Class II) **[For connected actions]**

Construction of the connected actions would cause temporary visual contrast and degradation of the construction sites and yards, staging areas, and surrounding landscapes due to the presence of equipment, vehicles, materials, workforce, and potentially, night lighting. Due to the relatively short-term nature of this impact, these construction characteristics would be consistent with the BLM VRM Class Management Objectives. The overall visual impact would be adverse due to the substantial visual contrast associated with the construction activities; however, with implementation of Mitigation Measures VR-1a (Screen construction activities from view) and VR-7a (Minimize night lighting at project facilities), this impact would be less than significant (Class II).

SCE Comment:

The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

Page D.18-61

DEIR/DEIS Text: F3-445

General Comment identifying issues associated with CPUC Preferred Alternative

Impact VR-8: Long-term presence of the project would result in landscape changes that degrade existing visual character or quality (Class I, III, or IV depending on location)

The long-term presence of the Proposed Project would result in various levels of perceived landscape changes ranging from Significant and Unmitigable (Class I) to Less Than Significant (Class III) to Beneficial (Class IV), depending on the location:

- ***Significant and Unmitigable*** **(Class I)** visual impacts would occur for the Proposed Project in the following locations:

  (a) Segment 4 for approximately 16 percent of the residences on the south side of the ROW between Palmer Avenue and Mockingbird Lane.

  (b) Segment 5 when viewed from residences on North Hathaway Street, North Allen Street, North Evans Street, and North Cherry Street in eastern Banning.

  (c) Segment 6 when viewed from several residences along the north sides of Amethyst Drive and Haugen-Lehmann Way in the central portion of the community of Whitewater.

  (d) The Subtransmission Line Route when viewed from the Cottage Lane residential subdivision on Iowa Street and Orange Avenue in the City of Redlands.

In all cases, Mitigation Measures VR-8a (Minimize visual contrast in project design) and VR-9a (Treat structure surfaces) are required to reduce the severity of adverse visual impacts, though they would remain significant. These impacts would be less than significant with implementation of the Tower Relocation Alternative and the Iowa Street 66 kV Underground Alternative, as discussed in Sections D.18.4.1 and D.18.4.2, respectively.

SCE Comment:

No tangible evidence has been presented in the analysis to support the conclusions that have been made regarding the significant and unmitigable impacts labeled a, b, and c.

Comment Set F3: Southern California Edison Company (cont.)

Pages D.18-61 through 62

DEIR/DEIS Text: F3-446

Impact VR-8C: Long-term presence of the project would result in landscape changes or new sources of light and glare that degrade existing visual character or quality (Class I or III depending on location) **[For connected actions]**

For connected actions, their long-term presence would result in various levels of perceived landscape changes ranging from Significant and Unmitigable (Class I) to Less Than Significant (Class III), depending on location….

In all cases, Mitigation Measures VR-8a (Minimize visual contrast in project design) and VR-9a (Treat structure surfaces) are required to reduce the severity of adverse visual impacts, though they would remain significant…

Because NEPA requires implementation of feasible mitigation for impacts regardless of severity, Mitigation Measures VR-8a (Minimize visual contrast in project design) and VR-9a (Treat structure sur-faces) would further reduce the adverse visual effects.

SCE Comment:

The DEIR should clarify that the potential mitigation measures referenced for connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

Pages D.18-68 through 69

DEIR/DEIS Text: F3-447

D.18.4.3 Phased Build Alternative

Impact VR-1: Construction would result in adverse visual effects due to the presence of equipment, vehicles, materials, and workforce

Impact VR-2: Construction would result in visual contrast due to vegetation removal

Impact VR-3: Construction would result in visual contrast associated with retaining walls, land scarring, and establishment of graveled surfaces

Impact VR-4: Construction could result in visual contrast associated with in-line views of retaining walls and land scars

Impact VR-5: Construction could result in visual contrast associated with the marking of natural features

Impact VR-6: Construction could result in visual contrast associated with fugitive dust, waste, and trash

Impact VR-7: Construction could result in the use of night lighting or installation of reflective surfaces, which could cause undesirable night light and glare effects

SCE Comment:

As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional visual impact analysis. The additional disturbance areas and the increased duration could result in additional visual impacts beyond those analyzed for the Phased Build Alternative in the document and could be greater than those identified for the Proposed Project.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.18-70

DEIR/DEIS Text: F3-448

Impact VR-6: Construction could result in visual contrast associated with fugitive dust, waste, and trash

Grading activities for the construction of specific sites, access roads, and spur roads have the potential to generate dust clouds, creating visual contrast that can substantially degrade the quality of a site. Implementation of Mitigation Measure AQ-1a (Control fugitive dust; see Section D.3, Air Quality) can reduce this impact. Also, during construction, there is the potential for trash and food-related waste to be discarded inappropriately at construction sites and then be transported by wind and/or animals across the landscape, resulting in additional visual contrast and degradation of landscape quality and character… However, these adverse effects would be less severe than in the Proposed Project because the existing double-circuit structures would be retained and reconductored rather than replaced.

SCE Comment:

The Phased Build Alternative actually results in greater environmental impacts than the Proposed Project because it will force multiple rounds of construction activities, possibly in short succession, prolonging the duration of noise and air pollutant exposure while increasing land disturbance and associated impacts. Please see additional comments provided in SCE's cover letter.

Page D.18-71

DEIR/DEIS Text: F3-449

General Comment identifying issues associated with CPUC Preferred Alternative

Impact VR-8: Long-term presence of the project would result in landscape changes that degrade existing visual character or quality

The Phased Build Alternative would result in permanent adverse effects related to visual change perceived from sensitive viewing locations including adjacent residences, local roadways, and nearby recreation areas and facilities. The perceived visual change would be associated with new towers, conductors, and FAA hazard markers. The permanent visual changes in this alternative would be substantially reduced due to the retention of the existing set of double-circuit towers.

For some portions of the Proposed Project, the structures and/or conductors would appear immediately adjacent to residential property lines. As a result, the increased visual contrast, structure prominence, and view blockage associated with the close proximity of the structure pairs would result in a Moderate to High degree of visual change, which would constitute a substantial visual effect under the Proposed Project.

In contrast, the Phased Build Alternative would produce a less severe visual impact (compared to the Proposed Project) by retaining the set of existing double-circuit structures near the center of the ROW and constructing one new set of double-circuit structures that generally would be farther from the edge of the ROW (and in all cases no closer to the edge of the ROW) than the comparable Proposed Project structures. By shifting structures farther away from the closest residences, the Phased Build Alternative would achieve structure placements within the ROW that would appear more similar to the existing structure locations. As a result, the Phased Build Alternative would cause less incremental visual contrast, structure prominence, and view blockage compared to the Proposed Project when viewed from residential locations along the south side of the ROW. From the most adversely affected residences (those closest to a structure pair), the resulting incremental visual change (from the present condition) would be Moderate and the overall visual effect would be less than substantial. Mitigation Measures VR-8a (Minimize visual contrast in project design) and VR-9a (Treat structure surfaces) as described in Section D.18.3.3 above, are recommended to reduce the visual effects of the Phased Build Alternative.

SCE Comment:

No tangible evidence is provided to support the assertions that the Phased Build Alternative would produce a less severe visual impact than the proposed project.

Comment Set F3: Southern California Edison Company (cont.)

Page D.18-71

DEIR/DEIS Text: F3-450

Impact VR-8: Long-term presence of the project would result in landscape changes that degrade existing visual character or quality (Class I)

Under the Proposed Project, the long-term presence of the project would result in significant (Class I) visual impacts in Segment 4 for approximately 16 percent of the residences on the south side of the ROW between Palmer Avenue and Mockingbird Lane, and in Segment 6 when viewed from several residences along the north sides of Amethyst Drive and Haugen-Lehmann Way in the central portion of the Community of Whitewater.

Under the Tower Relocation Alternative, these Class I visual impacts would be reduced to less than significant levels by moving the towers farther to the north away from the residences. However, the significant (Class I) visual impact in Segment 5 on Morongo Tribal Lands (when viewed from North Hathaway Street, North Allen Street, North Evans Street, and North Cherry Street in eastern Banning) would remain Significant as the Morongo Band of Mission Indians opted not to consider tower relocation.

SCE Comment:

No tangible evidence is provided to support the assertions that the Phased Build Alternative would produce a less severe visual impact than the proposed project.

The comments related to the text on page D.18-47 make it clear that the reference to significant impacts on Morongo lands as viewed from Hathaway Street must be deleted because the impacts on this view would be less than significant.

Page D.18-75

DEIR/DEIS Text: F3-451

VR-1a: Screen construction activities from view. Construction yards, staging areas, and material and equipment storage areas, including storage sites for excavated materials, shall be visually screened using temporary screening fencing. Fencing will be of an appropriate structure, material, and color for each specific location. This requirement shall not apply if SCE can demonstrate that construction yards are located away from areas of high public visibility including public roads, residential areas, and public recreational facilities. For any site that SCE proposes to exempt from the screening requirement, SCE shall define the site on a detailed map demonstrating its visibility from nearby roads, residences, or recreational facilities to the CPUC and BLM for review and approval at least 60 days prior to the start of construction at that site.

SCE Comment:

Mitigation Measure VR-1a is unnecessarily restrictive; please make the following revisions:

VR-1a Screen construction activities from view. Construction yards, staging areas, and material and equipment storage areas, ~~including storage sites for excavated materials,~~ shall be visually screened using temporary screening fencing. Fencing will be of an appropriate structure, material, and color for each specific location. This requirement shall not apply if SCE can demonstrate that construction yards are located away from areas of high public visibility including public roads, residential areas, and public recreational facilities. For any site that SCE proposes to exempt from the screening requirement, SCE shall define the site on a detailed map demonstrating its visibility from nearby roads, residences, or recreational facilities to the CPUC and BLM for review and approval at least ~~60~~ 7 days prior to the start of construction at that site.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.18-76

DEIR/DEIS Text: F3-452

VR-2a: Minimize vegetation removal and ground disturbance. Only the minimum amount of vegetation necessary for the construction of structures and facilities shall be removed during construction. In particular, vegetation within the ROW and ground clearing at the foot of each tower and between towers shall be limited to the clearing necessary to comply with requirements of CPUC General Order 95 and other regulatory requirements.

Limit ground disturbance in Segments 2, 3, and 6. Within these segments, structure and access road scars may be highly visible when located on hill slopes and along ridges, or when visible from elevated vantage points. In order to reduce visual impacts, the boundaries of all areas to be disturbed shall be delineated consistent with the requirements of Biological Resources Mitigation Measure VEG-1c. Staking shall define staging areas, access roads, spur roads, tower locations, pulling sites, and sites for temporary placement of spoils. Stakes and flagging shall be installed before construction and in consultation with the Project Biologist and the CPUC/BLM Environmental Monitor or Visual Specialist. Areas staked shall be as small as possible in order to minimize the visibility of ground disturbance from sensitive viewing locations such as roads, trails, residences, and recreation facilities and areas. Parking areas and staging and disposal site locations shall be similarly located in areas approved by the Project Biologist and CPUC/BLM's Environmental Monitor or Visual Specialist prior to the start of construction. All disturbances by Proposed Project vehicles and equipment shall be confined to the staked and flagged areas.

SCE Comment:

For the reasons noted previously, please make the following revisions:

VR-2a Minimize vegetation removal and ground disturbance. Only the minimum amount of vegetation necessary for the construction of structures and facilities shall be removed during construction. ~~In particular, vegetation within the ROW and ground clearing at the foot of each tower and between towers shall be limited to the clearing necessary to comply with requirements of CPUC General Order 95 and other regulatory requirements.~~

Limit ground disturbance in Segments 2, 3, and 6. Within these segments, structure and access road scars may be highly visible when located on hill slopes and along ridges, or when visible from elevated vantage points. In order to reduce visual impacts, the boundaries of all areas to be disturbed shall be delineated consistent with the requirements of Biological Resources Mitigation Measure VEG-1c. Staking shall define the limits of the Proposed Project disturbance areas ~~staging areas, access roads, spur roads, tower locations, pulling sites, and sites for temporary placement of spoils~~. ~~Stakes and flagging shall be installed before construction and in consultation with the Project Biologist and the CPUC/BLM Environmental Monitor or Visual Specialist.Areas staked shall be as small as possible in order to minimize the visibility of ground disturbance from sensitive viewing locations such as roads, trails, residences, and recreation facilities and areas.~~ Parking areas and staging and disposal site locations shall be similarly located in approved areas. ~~approved by the Project Biologist and CPUC/BLM's Environmental Monitor or Visual Specialist prior to the start of construction. All disturbances by Proposed Project vehicles and equipment shall be confined to the staked and flagged areas.~~

Comment Set F3: Southern California Edison Company (cont.)

Page D.18-76

DEIR/DEIS Text: F3-453

VR-3a Reduce color contrast of retaining walls, land scars, and graveled surfaces. Where construction would unavoidably create land scars or retaining walls visible from sensitive public viewing locations, disturbed soils and new walls shall be treated with an appropriate color or material (Natina Concentrate, Eonite, or Permeon, or similar). The material shall be approved by the CPUC and BLM, and the intent shall be to reduce the visual contrast created by the lighter-colored disturbed soils and rock with the darker soil and vegetated surroundings. SCE shall consult with the CPUC and BLM and/or their authorized representative(s) on a site-by-site basis and obtain written approval prior to the use of any colorants.

SCE Comment:

For the reasons noted previously, please make the following revisions:

VR-3a Reduce color contrast of retaining walls, land scars, and graveled surfaces. Where construction would ~~unavoidably~~ create ~~land scars or~~ retaining walls that have been identified as creating a significant visual impact ~~visible from sensitive public viewing locations, disturbed soils and~~ new walls shall be treated with an appropriate color or material (Natina Concentrate, Eonite, or Permeon, or similar) with the intent to reduce the visual contrast. ~~created by the lighter-colored disturbed soils and rock with the darker soil and vegetated surroundings. SCE shall consult with the CPUC and BLM and/or their authorized representative(s) on a site-by-site basis and obtain written approval prior to the use of any colorants.~~

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.18-77

DEIR/DEIS Text: F3-454

VR-4a: Minimize in-line views of retaining walls and land scars. Prior to final Project design, SCE shall prepare a map book and description detailing the preliminary design and location of all access and spur roads, retaining walls, and ground disturbance areas within Segments 2, 3, 4, and 6. The map book and description shall be submitted to the CPUC and BLM for field evaluation by the CPUC's Visual Specialist and Designated Project Biologist. The CPUC's Visual Specialist will evaluate all proposed access roads, spur roads, retaining walls, and ground disturbance areas within Segments 2, 3, 4, and 6 to assess in-line visibility of these Proposed Project features and characteristics from sensitive viewing locations. The analysis shall include consideration of viewing angles, screening, view duration, and other pertinent viewing characteristics. This analysis shall be subsequently provided to SCE for response and final design.

In response, SCE shall develop design options to reduce the in-line visibility of these components, including alternative access and spur road routes, the use of "drive and crush" access, and redesign and placement of retaining walls to reduce the need for new roads and retaining walls and to reduce or eliminate the in-line visibility of these facilities. SCE's redesign shall document the proposed resolution for each access road or other visible road feature and shall include the following:

- Approximate location, length, and design of alternative access or spur road routes that would replace proposed roads.
- Vegetation that would be affected and steepness of terrain for consideration of vegetation and erosion impacts.
- Areas where "drive and crush" access is a feasible measure to avoid access road scars (i.e., no grading or vegetation removal is required). SCE shall define frequency of driving, vehicle types to be used, and likelihood of vegetation recovery.

The CPUC/BLM Visual Specialist and Designated Project Biologist shall evaluate whether the overall impacts of the alternate road designs are less than that of the original access road designs.

SCE Comment:

For the reasons noted previously, please remove mitigation measure VR-4a from the DEIR/DEIS:

~~**VR-4a: Minimize in-line views of retaining walls and land scars.** Prior to final Project design, SCE shall prepare a map book and description detailing the preliminary design and location of all access and spur roads, retaining walls, and ground disturbance areas within Segments 2, 3, 4, and 6. The map book and description shall be submitted to the CPUC and BLM for field evaluation by the CPUC's Visual Specialist and Designated Project Biologist. The CPUC's Visual Specialist will evaluate all proposed access roads, spur roads, retaining walls, and ground disturbance areas within Segments 2, 3, 4, and 6 to assess in-line visibility of these Proposed Project features and characteristics from sensitive viewing locations. The analysis shall include consideration of viewing angles, screening, view duration, and other pertinent viewing characteristics. This analysis shall be subsequently provided to SCE for response and final design.~~

~~In response, SCE shall develop design options to reduce the in-line visibility of these components, including alternative access and spur road routes, the use of "drive and crush" access, and redesign and placement of retaining walls to reduce the need for new roads and retaining walls and to reduce or eliminate the in-line visibility of these facilities. SCE's redesign shall document the proposed resolution for each access road or other visible road feature and shall include the following:~~

- ~~Approximate location, length, and design of alternative access or spur road routes that would replace proposed roads.~~
- ~~Vegetation that would be affected and steepness of terrain for consideration of vegetation and erosion impacts.~~
- ~~Areas where "drive and crush" access is a feasible measure to avoid access road scars (i.e., no grading or vegetation removal is required). SCE shall define frequency of driving, vehicle types to be used, and likelihood of vegetation recovery.~~

~~The CPUC/BLM Visual Specialist and Designated Project Biologist shall evaluate whether the overall impacts of the alternate road designs are less than that of the original access road designs.~~

Comment Set F3: Southern California Edison Company (cont.)

Page D.18-77

DEIR/DEIS Text: F3-455

VR-5a: Prohibit construction marking of natural features. SCE shall not apply paint or permanent discoloring agents to rocks or vegetation to indicate survey or construction activity limits or for any other purpose.

SCE Comment:

The following clarifications are recommended:

VR-5a: Prohibit construction marking of natural features. SCE shall not apply paint or permanent discoloring agents to rocks or vegetation to indicate survey or construction activity limits or for any other purpose. This measure does not apply to temporary marking agents used to identify underground utilities.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.18-79

DEIR/DEIS Text: F3-456

VR-8a: Minimize visual contrast in project design. In the final design of approved project structures, SCE shall use design fundamentals that reduce the visual contrast of new structures and components to the characteristic landscape. These include siting and location; reduction of visibility; repetition of form, line, color, and texture of the landscape; and reduction of unnecessary disturbance. SCE shall provide to the CPUC and BLM for review, a draft Project Design Plan describing the siting, placement, and other design considerations to be employed to minimize Proposed Project contrast.

The draft plan must explain how the design will minimize visual intrusion and contrast by blending the earthwork, vegetation manipulation, and facilities with the landscape. Design strategies to address these fundamentals shall be based on the following factors.

- **Earthwork.** Select locations and alignments that fit into the landforms to minimize the sizes of cuts and fills.
- **Vegetation Manipulation.** Use existing vegetation to screen graded areas and facilities from public viewing to the extent feasible. Feather and thin the edges of cleared areas and retain a representative mix of plant species and sizes.
- **Reclamation and Restoration.** Blend the disturbed areas into the characteristic landscape including access and spur roads and disturbed areas created during construction (transmission line structures, and construction yards and staging areas). Replace soil, brush, rocks, and natural debris over these disturbed areas. Newly introduced plant species shall be of a form, color, and texture that blend with the landscape.

A draft Project Design Plan shall be submitted to CPUC and BLM at least 60 days prior to the start of construction. If the CPUC or BLM notifies SCE that revisions to the plan are needed before the plan can be approved, within 30 days of receiving that notification, SCE shall pre-pare and submit for review and approval a revised plan.

SCE Comment:

For the reasons noted previously, please remove mitigation measure VR-8a from the DEIR/DEIS:

~~**VR-8a: Minimize visual contrast in project design.** In the final design of approved project structures, SCE shall use design fundamentals that reduce the visual contrast of new structures and components to the characteristic landscape. These include siting and location; reduction of visibility; repetition of form, line, color, and texture of the landscape; and reduction of unnecessary disturbance. SCE shall provide to the CPUC and BLM for review, a draft Project Design Plan describing the siting, placement, and other design considerations to be employed to minimize Proposed Project contrast. The draft plan must explain how the design will minimize visual intrusion and contrast by blending the earthwork, vegetation manipulation, and facilities with the landscape. Design strategies to address these fundamentals shall be based on the following factors.~~

- ~~**Earthwork.** Select locations and alignments that fit into the landforms to minimize the sizes of cuts and fills.~~
- ~~**Vegetation Manipulation.** Use existing vegetation to screen graded areas and facilities from public viewing to the extent feasible. Feather and thin the edges of cleared areas and retain a representative mix of plant species and sizes.~~
- ~~**Reclamation and Restoration.** Blend the disturbed areas into the characteristic landscape including access and spur roads and disturbed areas created during construction (transmission line structures, and construction yards and staging areas). Replace soil, brush, rocks, and natural debris over these disturbed areas. Newly introduced plant species shall be of a form, color, and texture that blend with the landscape.~~

~~A draft Project Design Plan shall be submitted to CPUC and BLM at least 60 days prior to the start of construction. If the CPUC or BLM notifies SCE that revisions to the plan are needed before the plan can be approved, within 30 days of receiving that notification, SCE shall pre-pare and submit for review and approval a revised plan.~~

Comment Set F3: Southern California Edison Company (cont.)

Page D.18-80

DEIR/DEIS Text: F3-457

Mitigation Measure for Impact VR-9: Project operation would create a new source of reflected light and glare

VR-9a Treat structure surfaces. SCE shall treat the surfaces of all structures and new buildings visible to the public such that: a) their colors minimize visual contrast by blending with the characteristic landscape colors; b) their colors and finishes do not create excessive glare; and c) their colors and finishes are consistent with local policies and ordinances. The trans-mission structures and conductors shall be non-specular and non-reflective, and the insulators shall be non-reflective and non-refractive. SCE shall consider the use of special galvanizing treatments or post-manufacture application of chemical treatments (such as Natina Steel) to ensure that transmission structures are sufficiently dulled and non-reflective and are of the appropriate color to blend effectively with the surrounding landscape. SCE shall comply with CPUC and BLM requirements regarding appropriate surface treatments for Pro-posed Project elements.

SCE shall provide to the CPUC and BLM for review, a draft Surface Treatment Plan describing the application of colors and textures to all new facility structures, buildings, walls, fences, and components comprising all facilities to be constructed. The draft Surface Treatment Plan must explain how the design will reduce glare and minimize visual intrusion and contrast by blending the facilities with the landscape. The draft plan shall be submitted to CPUC and BLM at least 60 days prior to ordering the first structures that are to be color-treated during manufacture or prior to construction of any of the facility components, whichever comes first. If the BLM or CPUC notifies SCE that revisions to the plan are needed before the plan can be approved, within 30 days of receiving that notification, SCE shall prepare and submit for review and approval a revised plan. The draft Surface Treatment Plan shall include the following components and specifications.

SCE Comment:

For the reasons noted previously, please remove mitigation measure VR-9 from the DEIR/DEIS:

~~***Mitigation Measure for Impact VR-9: Project operation would create a new source of reflected light and glare***~~

~~**VR-9a Treat structure surfaces.** SCE shall treat the surfaces of all structures and new buildings visible to the public such that: a) their colors minimize visual contrast by blending with the characteristic landscape colors; b) their colors and finishes do not create excessive glare; and c) their colors and finishes are consistent with local policies and ordinances. The trans-mission structures and conductors shall be non-specular and non-reflective, and the insulators shall be non-reflective and non-refractive. SCE shall consider the use of special galvanizing treatments or post-manufacture application of chemical treatments (such as Natina Steel) to ensure that transmission structures are sufficiently dulled and non-reflective and are of the appropriate color to blend effectively with the surrounding landscape. SCE shall comply with CPUC and BLM requirements regarding appropriate surface treatments for Pro-posed Project elements.~~

~~SCE shall provide to the CPUC and BLM for review, a draft Surface Treatment Plan describing the application of colors and textures to all new facility structures, buildings, walls, fences, and components comprising all facilities to be constructed. The draft Surface Treatment Plan must explain how the design will reduce glare and minimize visual intrusion and contrast by blending the facilities with the landscape. The draft plan shall be submitted to CPUC and BLM at least 60 days prior to ordering the first structures that are to be color-treated during manufacture or prior to construction of any of the facility components, whichever comes first. If the BLM or CPUC notifies SCE that revisions to the plan are needed before the plan can be approved, within 30 days of receiving that notification, SCE shall prepare and submit for review and approval a revised plan. The draft Surface Treatment Plan shall include the following components and specifications.~~

Responses to Comment Set F3 – Section D.18 Visual Resources

F3-410 SCE asserts that the Project viewshed maps presented as Figures D.18-1 through D.18-6 do not provide sufficient information to support the analytical findings. The purpose of the referenced regional viewshed maps is to provide a graphic overview of project visibility by segment. More detailed segment visibility characterizations (that support the analyses) are provided for each representative key observation point (KOP) presented in Section D.18.1.2 (Environmental Setting by Segment), as well as the linear (roadway) viewpoints presented in Section D.18.1.1.4 (Linear Viewpoint Analysis).

The commenter also asserts that insufficient information (including simulations) has been provided to substantiate the visual impact conclusions made in the EIS regarding the various alternatives. In order to more thoroughly document, and provide evidence for, the conclusions presented for the Proposed Project, Tower Relocation Alternative, and Phased Build Alternative, an additional representative key observation point (KOP 6A) has been established for which additional analysis and a visual simulation were prepared for the Proposed Project in Section D.18.3.3 (Impacts and Mitigation Measures). Additional narrative has also been added to the discussion of the Tower Relocation Alternative (Section D.18.4.1). KOP 6A was also used as a basis for additional analysis and simulation of the Phased Build Alternative in Section D.18.4.3 (Phased Build Alternative).

In summary, the additional analyses and simulations support the conclusion that the Proposed Project would be the most visually impacting of the three tower location alternatives. The Tower Relocation Alternative, which essentially shifts the proposed structure pairs approximately 50 feet to the north would be less visually impacting than the Proposed Project but would result in varying degrees of visual impact depending on the viewing location. Residences closest to the structure pairs would derive the greatest visual benefit from the Tower Relocation Alternative because of the reduction of the looming, overhead, structural presence achieved by shifting the structures even slightly to the north, away from the residences along the south side of the ROW. The Phased Build Alternative would be the least visual impacting of the three tower location alternatives due to a more comprehensive strategy of (a) retaining the existing 220 kV structures, (b) shifting the southern-most line (structures) to the north (away from south side residences), (c) utilizing a similar (to the existing 220 kV line) structural design for the new towers, and (d) reducing overall structural clutter in the ROW (by eliminating the two smaller transmission lines).

F3-411 The commenter notes that no simulations have been prepared for the alternatives, and thus, evidence is lacking to support the impact conclusions presented in the visual analysis. Please see Response to Comment F3-410.

F3-412 The commenter requests that a notation be made in the discussion of the San Timoteo Canyon Road linear viewpoint analysis presented in Section D.18.1.1.4 (Linear Viewpoint Analysis) that visibility of the Proposed Project would be consistent with the visibility of the current energy transmission infrastructure. The requested notation has been added to the discussion.

F3-413 The commenter asserts that the environmental setting for KOP 1 fails to mention the prominence of the facilities to be removed. The KOP 1 visual quality discussion in Section D.18.1.2 (Environmental Setting by Segment) provides a general characterization of the utility corridor landscape and does note the substantial industrial character within the ROW.

The commenter also asserts that the KOP discussions of viewer concern in Section D.18.1.2 (Environmental Setting by Segment) present subjectivity about adverse visual change that are inappropriate for the setting section and that there is no evidence to support the conclusion that residential viewers would consider an increase in "….industrial character, structure prominence, or view blockage of higher value landscape features" an adverse visual change.

The setting discussions of viewer concern do not evaluate visual change or suggest that such change would occur, they merely acknowledge the elements of visual change that are relevant to the analysis and that serve as the basis for characterizing viewer concern. The determinations of viewer concern presented in the analysis are neither uninformed nor unsupported. The determinations of viewer concern are reasonable and what are expected from affected residents. They are based on several decades of the visual resource specialist's reviewing public comments (including those for the Proposed Project) and attending public workshops, scoping meetings, and hearings on similar transmission line projects. Therefore, no changes to the viewer concern characterizations have been made.

F3-414 The commenter makes the same assertion for KOP 2 as for KOP 1 in Comment F3-413. Please see the discussion of KOP 1 in Response to Comment F3-413.

F3-415 The commenter makes the same assertion for KOP 3 as for KOP 1 in Comment F3-413. Please see the discussion of KOP 1 in Response to Comment F3-413.

F3-416 The commenter makes the same assertion for KOP 4 as for KOP 1 in Comment F3-413. Please see the discussion of KOP 1 in Response to Comment F3-413.

F3-417 The commenter makes the same assertion for KOP 5 as for KOP 1 in Comment F3-413. Please see the discussion of KOP 1 in Response to Comment F3-413.

F3-418 The commenter makes the same assertion for KOP 6 as for KOP 1 in Comment F3-413. Please see the discussion of KOP 1 in Response to Comment F3-413.

F3-419 The commenter makes the same assertion for KOP 7 as for KOP 1 in Comment F3-413. Please see the discussion of KOP 1 in Response to Comment F3-413.

F3-420 The commenter makes the same assertion for KOP 8 as for KOP 1 in Comment F3-413. Please see the discussion of KOP 1 in Response to Comment F3-413.

F3-421 The commenter makes the same assertion for KOP 9 as for KOP 1 in Comment F3-413. Please see the discussion of KOP 1 in Response to Comment F3-413.

F3-422 The commenter makes the same assertion for KOP 10 as for KOP 1 in Comment F3-413. Please see the discussion of KOP 1 in Response to Comment F3-413.

F3-423 The commenter makes the same assertion for KOP 11 as for KOP 1 in Comment F3-413. Please see the discussion of KOP 1 in Response to Comment F3-413.

F3-424 The commenter asserts that the visual quality determination for KOP 11 would more accurately be characterized as low to moderate because of the highly disturbed immediate foreground and that the level of concern should be moderate.

The disturbed character of the immediate foreground was taken into consideration in the visual quality determination for KOP 11, which is why the visual quality for KOP 11 was rated

low to moderate. The level of concern for the adjacent and nearby residents was rated high for the reasons previously discussed in Response to Comment F3-413. Therefore, no changes are warranted for either the visual quality or viewer concern ratings of KOP 11.

The commenter also asserts that overall viewer exposure should be reduced to moderate from moderate to high because the adjacent apartment complex is internally focused and east side residents have views that are screened by large trees. Some of the views from the east side residences are only partially screened by trees and only during the seasonal period when the trees are in full leaf since the trees are deciduous. However, views to the northeast toward the project and mountains are relatively unobstructed during the seasonal period when the trees are leafless. Furthermore, the proposed Project would be highly visible to motorists entering and exiting the complex as well as pedestrians on North Hathaway Street. It should also be remembered that each KOP is selected to be representative of views (and visual impacts) of a broader area. In this case, the high overall viewer exposure also accounts for the proposed Project views of other nearby residents on North Hathaway Street, North Allen Street, North Evans Street, and North Cherry Street. Those viewers would also experience moderate to high viewer exposure, as noted in the discussion of Impact VR-8 in Section D.18.4.3 (Phased Build Alternative). Therefore, the viewer exposure and overall visual sensitivity ratings for KOP 11 are considered reasonable and no changes have been made.

F3-425 The commenter makes the same assertion for KOP 12 as for KOP 1 in Comment F3-413. Please see the discussion of KOP 1 in Response to Comment F3-413.

F3-426 The commenter makes the same assertion for KOP 13 as for KOP 1 in Comment F3-413. Please see the discussion of KOP 1 in Response to Comment F3-413.

F3-427 The commenter makes the same assertion for KOP 14 as for KOP 1 in Comment F3-413. Please see the discussion of KOP 1 in Response to Comment F3-413.

F3-428 The commenter makes the same assertion for KOP 15 as for KOP 1 in Comment F3-413. Please see the discussion of KOP 1 in Response to Comment F3-413.

F3-429 The commenter makes the same assertion for KOP 16 as for KOP 1 in Comment F3-413. Please see the discussion of KOP 1 in Response to Comment F3-413.

F3-430 The commenter makes the same assertion for KOP 17 as for KOP 1. Please see the discussion of KOP 1 in Response to Comment F3-413.

F3-431 The commenter makes the same assertion for KOP 18 as for KOP 1. Please see the discussion of KOP 1 in Response to Comment F3-413.

The commenter also suggests that the viewer concern discussion be changed to state that travelers on Iowa Street currently see utility infrastructure from KOP 18. As noted in the visual setting for KOP 18 in Section D.18.1.2.7 (Subtransmission), there are no visually prominent or dominant energy or utility facilities on Iowa Street in the immediate vicinity of KOP 18 that would be visible to residents in the Cottage Lane residential development or motorists or pedestrians on Iowa Street adjacent to the residential development. Therefore, the viewer concern rating for KOP 18 is considered reasonable and no change has been made.

F3-432 The commenter asserts that Mitigation Measure VR-1a is unnecessarily restrictive and requests that the language be modified to exclude the application of MM VR-1a to storage sites for excavated materials. The commenter also requests that the deadline for exemption requests under this mitigation measure be reduced from 60 days prior to the start of construction to 7 days prior to the start of construction.

Mitigation Measure VR-1a (Screen construction activities from view) has been revised to exclude storage sites for excavated materials. A seven-day exemption request review period is not considered reasonable and would not provide adequate time to accommodate the necessary review by the co-lead agencies. The 60-day review period is retained; however, the agencies always endeavor to respond as soon as possible upon receiving a request, typically resulting in a shorter review period than 60-days.

F3-433 The commenter requests a revision to Mitigation Measure VR-2a pertaining to vegetation removal and ground disturbance at the foot of each tower within the existing ROW, and compliance with CPUC General Order 95.

General Order 95 relates to CPUC, not BLM. The request is considered reasonable since SCE will need to comply with ground clearing consistent with General Order 95 and other regulatory requirements regardless of the implementation of Mitigation Measure VR-2a (Minimize vegetation removal and ground disturbance). Therefore, the suggested revision will not affect the adequacy of the measure, and the text of MM VR-2a has been revised accordingly to streamline the measure and remove the unnecessary reference to General Order 95.

F3-434 The commenter makes similar assertions to Comment F1-3. The reader is referred to the response to Comment F1-3 above.

F3-435 The commenter makes similar assertions to Comment F1-3. The reader is referred to the response to Comment F1-3 above.

F3-436 The commenter makes similar assertions to Comment F1-3. The reader is referred to the response to Comment F1-3 above.

F3-437 The commenter requests that temporary marking agents used to identify underground utilities be exempted from the requirements of Mitigation Measure VR-5a. MM VR-5a (Prohibit construction marking of natural features) refers to the application of <u>paint or permanent</u>, not temporary, marking agents. However, to improve the clarity of this requirement, the requested language change has been incorporated into Mitigation Measure VR-5a in Section D.18.3.3 (Impacts and Mitigation Measures) and in Table D.18-10 (Mitigation Monitoring Program – Visual Resources).

F3-438 The commenter makes similar assertions to Comment F3-410. The reader is referred to the response to Comment F3-410 above

F3-439 The commenter makes a similar assertion to Comment F3-410. The reader is referred to the response to Comment F3-410 above.

F3-440 The commenter asserts that the analysis presented for KOP 11 overstates the assessments of project dominance view blockage, and overall visual change, while also overstating the factors contributing to overall visual sensitivity.

The assessment of overall visual sensitivity at KOP 11 is accurate and reasonable and has been addressed previously; see Responses to Comments F3-413 and F3-424.

The EIS characterization of the overall visual change that would be experienced by residents in the vicinity of KOP 11 is also reasonable. The natural, angular forms of the mountains visible in the vicinity of KOP 11 are generally unobstructed. The introduction of prominent, vertical steel poles in the foreground of those views would add linear, industrial gray features that do not repeat any of the natural characteristics (form, line, color, or texture) of the background natural landforms. The resulting visual contrast would be Moderate to High as stated in the KOP 11 analysis in Section D.18.3.3 (Visual Resources, Impacts and Mitigation Measures). The color contrast between the lighter gray foreground poles and the darker background landform colors would exacerbate structural prominence and in combination with the curvilinear forms of the conductors, would contribute to the Moderate to High view blockage of the background mountains. This assessment presented in the DEIR/EIS is a reasonable characterization of the proposed Project effects that would be experienced in vicinity of KOP 11, and no change has been made to those conclusions.

F3-441 The commenter asserts that the simulation of the subtransmission line proposed along Iowa Street and presented in Figure D.18-25B illustrates the wrong structure type and as a result the language describing the existing setting and visual impacts should be changed. At the time the simulation and analysis were undertaken, the structure design used in the simulation followed the guidance of SCE as to representative facilities that could be used as a model. However, with this new guidance provided by SCE, the simulation presented in Figure D.18-25 has been revised. Based on SCE's initial description, the Draft EIR/EIS Project Description stated that Lightweight Steel (LWS) Poles were to be used for this portion of the subtransmission route, though it is understood that the poles could be either LWS or wood. The revised simulation shows LWS poles. However, as stated in the EIS text for Section D.18.3.3 under KOP 18 (Iowa Street), there are presently no visually prominent or dominant energy or utility facilities along this portion of Iowa Street adjacent to the Cottage Lane residential subdivision. As a result, the visual impact would essentially be the same regardless of the structure composition and the analysis and conclusions are considered accurate for either structure type. Therefore, the language in the EIS has not been changed.

F3-442 The commenter makes the same assertions as contained in Comment F1-24. The reader is referred to the Response to Comment F1-24.

F3-443 The commenter makes the same assertions as contained in Comment F1-24. The reader is referred to the Response to Comment F1-24.

F3-444 The commenter requests that the EIS clarify that mitigation measures for connected actions will not be imposed on the West of Devers Upgrade Project.

See Response to Comment F3-102 with regard to mitigation for connected actions.

F3-445 The commenter makes a similar assertion to Comment F3-438. The reader is referred to the Response to Comment F3-438 above.

F3-446 The commenter requests that the EIS clarify that mitigation measures for connected actions will not be imposed on the West of Devers project.

See Response to Comment F3-102 with regard to mitigation for connected actions.

F3-447 Please see General Response GR-4 regarding the future construction impacts of the Phased Build Alternative.

F3-448 Please see General Response GR-4 regarding the future construction impacts of the Phased Build Alternative.

F3-449 The commenter makes a similar assertion to Comment F3-438. The reader is referred to the response to Comment F3-438 above.

F3-450 The commenter makes a similar assertion to Comment F3-438. The reader is referred to the response to Comment F3-438 above.

The commenter also asserts that the visual impacts in the vicinity of KOP 11 would be less than significant and should be removed from the EIS. The visual analysis of KOP 11 is addressed in Responses to Comments F3-424 and F3-440. See those responses for discussions as to why the KOP 11 analysis is accurate and appropriate to retain in the EIS.

F3-451 The commenter asserts that Mitigation Measure VR-1a is unnecessarily restrictive and requests that the language be modified to exclude the application of MM VR-1a to storage sites for excavated materials. The commenter also requests that the deadline for exemption requests under this mitigation measure be reduced from 60 days prior to the start of construction to 7 days prior to the start of construction.

The commenter makes the same assertions and requests in Comment F3-432. Please see Response to Comment F3-432.

F3-452 The commenter requests a revision to Mitigation Measure VR-2a pertaining to vegetation removal and ground disturbance at the foot of each tower within the existing ROW, and compliance with CPUC General Order 95.

The commenter makes the same request in Comment F3-433. Please see the discussion in Response to Comment F3-433.

The commenter also makes similar assertions to Comment F1-3. The reader is referred to the response to Comment F1-3 above.

F3-453 The commenter makes similar assertions to Comment F1-3. The reader is referred to the response to Comment F1-3 above.

F3-454 The commenter makes similar assertions to Comment F1-3. The reader is referred to the response to Comment F1-3 above.

F3-455 The commenter requests that temporary marking agents used to identify underground utilities be exempted from the requirements of Mitigation Measure VR-5a. The commenter makes the same request in Comment F3-437. Please see Response to Comment F3-437.

F3-456 The commenter asserts that Mitigation Measure VR-8a (Minimize visual contrast in project design) presented in Section D.18.3.3 (Impacts and Mitigation Measures) should not be applied across the entirety of the project and in fact should be eliminated because CEQA does not require the application of mitigation measures to less than significant impacts. The commenter makes the same assertion in Comment F3-442. Please see Response to Comment F1-24 and F3-442. Under NEPA, mitigation measures must be considered even for impacts that by themselves would not be considered significant.

F3-457 The commenter asserts that Mitigation Measure VR-9a (Treat structure surfaces) presented in Section D.18.3.3 (Impacts and Mitigation Measures) is not needed because the proposed Project structures and conductors would weather to a dull gray finish, and that similar to MM VR-8a discussed above, MM VR-9a should be removed from the EIS. The commenter makes the same assertion in Comment F3-443. Please see Response to Comment F3-443.

Comment Set F3: Southern California Edison Company (cont.)

Section D.19 Water Resources and Hydrology

Page D.19-15

DEIR/DEIS Text: F3-458

Under the heading TMDL Program, the paragraph states:

The California TMDL Program evaluates the condition of surface waters and sets limits on the amount of pollution that the water can be exposed to without adversely affecting the beneficial uses of those waters. The RWQCBs identify waters that are not attaining standards, and develop total maximum daily loads to account for all sources of the pollutants that caused the water to no attain standards. TMDL levels are established to achieve the applicable water quality standards. When the TMDL is established as a standard, a program must be designed to implement the TMDL. TMDLs developed by RWQCBs are Regional Basin Plan amendments and include implementation provisions.

SCE Comment:

Please make the following revisions:

The California TMDL Program evaluates the condition of surface waters and sets limits on the amount of pollution that the water can be exposed to without adversely affecting the beneficial uses of those waters. The RWQCBs are required to identify waters ~~that are not attaining standards~~ where beneficial uses are impaired, establish priority rankings for water segments on the lists, and develop action plans, or TMDLs, to improve water quality. ~~and develop total maximum daily loads to account for all sources of the pollutants that caused the water to not attain standards. TMDL levels are established to achieve the applicable water quality standards.~~ When the TMDL is established as a standard, a program must be designed to implement the TMDL. As TMDLs are developed and established as a standard, they are added to the ~~by RWQCBs are~~ Water Quality Control Plan through ~~Regional Basin Plan~~ amendments and include implementation provisions.

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DEIR/DEIS Text: F3-459

The Porter Cologne Water Quality Control Act of 1967, Water Code Section 13000 et seq., requires the SWRCB and the nine RWQCBs to adopt water quality criteria to protect State waters. These criteria include the identification of beneficial uses, narrative and numerical water quality standards, and implementation procedures. The criteria for the project area are contained in the Water Quality Control Plan for the Santa Ana River Basin (CRWQCB, 1995) and the Water Quality Control Plan Colorado River Basin – Region 7 (CRWQCB, 2005). Constraints in the water quality control plans relative to the Proposed Project relate primarily to the avoidance of altering the sediment discharge rate of surface waters, and the avoidance of introducing toxic pollutants to the water resource. A primary focus of water quality control plans is to protect designated beneficial uses of waters. In addition, anyone proposing to discharge waste that could affect the quality of the waters of the state must make a report of the waste discharge to the Regional Water Board or State Water Board as appropriate, in compliance with Porter-Cologne.

SCE Comment:

Please make the following revisions:

The Porter Cologne Water Quality Control Act of 1967, Water Code Section 13000 et seq., requires the SWRCB and the nine RWQCBs to adopt water quality criteria to protect State waters. These criteria include the identification of beneficial uses, narrative and numerical water quality standards, and implementation procedures. The criteria for the project area are contained in the Water Quality Control Plan for the Santa Ana River Basin-Region 4 (CRWQCB, ~~1995~~2014) and the Water Quality Control Plan Colorado River Basin – Region 7 (CRWQCB, ~~2005~~2014). Constraints in the water quality control plans relative to the Proposed Project relate primarily to the avoidance of altering the sediment discharge rate of surface waters, and the avoidance of introducing toxic pollutants to the water resource. A primary focus of water quality control plans is to protect designated beneficial uses of waters. In addition, anyone proposing to discharge waste that could affect the quality of the waters of the state must make a report of the waste discharge to the Regional Water Quality Control Board or State Water Resources Control Board as appropriate, in compliance with Porter-Cologne.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.19-20

DEIR/DEIS Text: F3-460

Under the header *Impact WR-2* in the fifth paragraph it states:

As described in Section B.3.1.2 (Section B, Project Description), SCE would develop and adhere to a SWPPP in conformance with the California General Permit for Discharges of Storm Water Associated with Construction Activity.

SCE Comment:

Please make the following revisions:

As described in Section B.3.1.2 (Section B, Project Description), SCE would develop and adhere to ~~a~~ the SWPPPs in conformance with the California General Permit for Discharges of Storm Water Associated with Construction Activit~~y~~ies and the Federal General Permit for Storm Water Discharges Associated with Construction Activities on Tribal Land .

Page D.19-20

DEIR/DEIS Text: F3-461

Access roads would be constructed in watercourses, but none of the proposed structures would be located directly within major watercourses listed in Table D.19-1. APM HYDRO-1 requires maintaining the existing flow pattern where possible. Mitigation Measure WR-2a (Implement an Erosion Control Plan

SCE Comment:

Please make the following revisions:

Major Streams and watercourses crossed by the project route are identified in Table D.19-1. Figures D.19-1a through D.19-1i (presented at the end of this section) show the locations of most watercourses on a topographic base map. Note, Table D.19-1 does not include all surface water features within the Proposed Project; SCE will prepare a Jurisdictional Delineation (JD) Report of the project's impact areas after completing final design (PEA, page 4.4-112) to identify and quantify all site-specific project impacts to jurisdictional waters.

Access roads would be constructed in watercourses, ~~but none of the proposed~~ and some structures ~~would~~ may be located directly within major watercourses listed in Table D.19-1. APM HYDRO-1 requires maintaining the existing flow pattern where possible. Mitigation Measure WR-2a (Implement an Erosion Control Plan

Comment Set F3: Southern California Edison Company (cont.)

Page D.19-21

DEIR/DEIS Text: F3-462

WR-2a Implement an Erosion Control Plan and demonstrate compliance with water quality permits. SCE shall develop and submit an Erosion Control Plan to the CPUC and BLM for approval at least 60 days prior to construction. The Erosion Control Plan may be part of the same document as the Stormwater Pollution Prevention Plan. Soil disturbance at structures and access roads is to be minimized and designed to prevent long-term erosion through revegetation or construction of permanent erosion control structures. The Erosion Control Plan shall include:

- The location of all soil-disturbing activities, including but not limited to new and/or improve access and spur roads
- The location of all streams and drainage structures that would be directly affected by soil-disturbing activities (such as stream crossings or public storm drains by the right-of-way and access roads)
- Design features to be implemented to minimize erosion during construction and during operation (if the project feature is to remain permanent after construction).
- If soil cement is proposed, the specific locations must be defined in the Plan, and evidence of approval by the Regional Water Quality Control Board shall be submitted to the CPUC and BLM prior to its use.
- If design features include the use of retaining structures and/or walls, the design of the features shall be consistent with Mitigation Measure VR-3a (Reduce color contrast of retaining walls and land scars).
- The location and type of all BMPs that would be installed to prevent off-site sedimentation and to protect aquatic resources.
- A proposed schedule for the implementation and maintenance of erosion control measures and a description of the erosion control practices, including appropriate design and installation details.

SCE Comment:

The Erosion Control Plan will be incorporated into the Storm Water Pollution Prevention Plan, which will be written and implemented in compliance with the applicable Federal and California Construction General Permits for Storm Water. The SWPPP will be kept onsite and will be readily available on request.

WR-2a Implement an Erosion Control Plan and demonstrate compliance with water quality permits. SCE shall develop and submit an Erosion Control Plan to the CPUC and BLM ~~for approval at least 60 days~~ prior to construction. The Erosion Control Plan may be part of the same document as the Storm ~~w~~Water Pollution Prevention Plan. Soil disturbance at structures and access roads is to be minimized and designed to prevent long-term erosion. ~~through revegetation or construction of permanent erosion control structures.~~ The Erosion Control Plan shall include:

- The location of all soil-disturbing activities, including but not limited to new and/or improve access and spur roads
- BMPs will be included to protect and drainage structures (such as public storm drains) down stream of soil disturbance activities.
- The location of all streams ~~and drainage structures~~ that would be directly affected by soil-disturbing activities (such as stream crossings ~~or public storm drains~~ by the right-of-way and access roads)
- Design features to be implemented to minimize erosion during construction and during operation (if the project feature is to remain permanent after construction).
- If soil cement is proposed, the specific locations must be defined in the Plan, and ~~evidence of approval by the Regional Water Quality Control Board shall~~ be submitted to the CPUC and BLM prior to its use.
- If design features include the use of retaining structures and/or walls, the design of the features shall be consistent with Mitigation Measure VR-3a (Reduce color contrast of retaining walls and land scars).
- The location and type of ~~all~~ BMPs that would be installed to prevent off-site sedimentation and to protect aquatic resources.
- ~~A proposed schedule for the~~ Specifications for implementation and maintenance of erosion control measures and a description of the erosion control practices, including appropriate design and installation details.
- Proposed schedule for inspection of erosion control/SW PPP measures and schedule for corrective actions/repairs, if required. Erosion control/NSW PPP inspection reports shall be kept in the SWPPP ~~provided to the CPUC EM~~ and be made available upon request.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.19-21

DEIR/DEIS Text: F3-463

Under the header WR-2a in the paragraph under the bulleted list it states:

Locations requiring erosion control/SWPPP corrective actions/repairs shall be tracked, including dates of completion. A weekly report identifying the status of corrective actions/repairs shall be submitted to State and Regional Water Boards, and CPUC and BLM.

SCE Comment:

Please make the following revisions:

Locations requiring erosion control/SWPPP corrective actions/repairs shall be tracked, including dates of completion, and documented during inspections. Inspections and monitoring will be performed in compliance with the Federal and California Construction General Permits. ~~A weekly report identifying the status of corrective actions/repairs shall be submitted to State and Regional Water Boards, and CPUC and BLM.~~ The inspection reports will be maintained and kept in their respective SWPPP and will be kept on site as required by the Federal and State Construction General Permits. Additionally, an Annual Report will be filed for each reporting period in compliance with both the Federal and California Construction General Permit reporting requirements.

Page D.19-21

DEIR/DEIS Text: F3-464

Under the header WR-2a in the paragraph under the bulleted list it states:

Locations requiring erosion control/SWPPP corrective actions/repairs shall be tracked, including dates of completion. A weekly report identifying the status of corrective actions/repairs shall be submitted to State and Regional Water Boards, and CPUC and BLM.

SCE Comment:

Please make the following revisions:

Locations requiring erosion control/SWPPP corrective actions/repairs shall be tracked, including dates of completion, and documented during inspections. Inspections and monitoring will be performed in compliance with the federal and California Construction General Permits. ~~A weekly report identifying the status of corrective actions/repairs shall be submitted to State and Regional Water Boards, and CPUC and BLM.~~ The inspection reports will be maintained and kept in their respective SWPPP and will be kept on site as required by the federal and State Construction General Permits. Additionally, an Annual Report will be filed for each reporting period in compliance with both the federal and California Construction General Permit reporting requirements.

Comment Set F3: Southern California Edison Company (cont.)

Page D.19-21

DEIR/DEIS Text: F3-465

Under the header WR-2a in the last paragraph it states:

SCE shall submit to the CPUC and BLM evidence of possession of all required permits before engaging in soil-disturbing construction/demolition activities, before entering flowing or ponded water, or before constructing a crossing at flowing or ponded water. Such permits may include, but are not limited to, a Streambed Alteration Agreement from the California Department of Fish and Wildlife, a Clean Water Act (CWA) Section 404 permit from the USACE, a CWA Section 402 NPDES General Permit for Storm Water Discharges Associated with Construction Activities (General Permit) from the applicable Regional Water Quality Control Board(s) (RWQCBs), and/or a CWA Section 401 certification from the applicable RWQCBs.

SCE Comment:

Please make the following revisions:

SCE shall submit to the CPUC and BLM evidence of possession of ~~all~~ applicable required permits for the representative land disturbance area prior to~~before~~ engaging in soil-disturbing construction/demolition activities.~~ before entering flowing or ponded water, or before constructing a crossing at flowing or ponded water.~~ Such permits may include, but are not limited to, ~~a Streambed Alteration Agreement from the California Department of Fish and Wildlife, a Clean Water Act (CWA) Section 404 permit from the USACE, a~~ Clean Water Act (CWA) Section 402 NPDES California General Permits for Storm Water Discharges Associated with Construction Activities (General Permit) from the applicable Regional Water Quality Control Board(s) (RWQCBs) and the Federal General Permit for Storm Water Discharges Associated with Construction Activities on Tribal Land.~~, and/or a CWA Section 401 certification from the applicable RWQCBs.~~

Prior to ground disturbance in waters (e.g., maintenance grading or constructing a crossing at flowing or ponded water, etc.), SCE will obtain a Streambed Alteration Agreement from the California Department of Fish and Wildlife, a ~~Clean Water Act~~ (CWA) Section 404 permit from the USACE, and a CWA Section 401 certification from the SWRCB.

Page D.19-23

DEIR/DEIS Text: F3-466

Onsite damages related to channel erosion and vertical scour during a flood could be prevented by design of footings and burial depth to account for erosion and scour. The final design analysis has not been completed, and it is not known at this time if footings and burial depths would take erosion and scour into account. Mitigation Measure WR-3a (Implement flood, erosion, and scour protection for aboveground and belowground improvements) is recommended in order to reduce the potential for damage and interruption of power and communication services due to erosion and scour.

Mitigation Measure for Impact WR-3: The project would cause flood damage

WR-3a Implement flood, erosion, and scour protection for aboveground and belowground improvements. SCE shall make a determination during final project design phase as to the erosion and 100-year scour potential for watercourses near proposed structures and other above-ground features, as well as new underground conduits. This determination shall be made by a registered professional engineer with expertise in river mechanics. If the determination identifies specific structures or underground conduits that may be subject to scour or lateral movement of a stream channel, these structures shall be protected against 100-year scour and/or lateral erosion through modifications of the foundation design, or otherwise in a manner determined to be appropriate by the river mechanics engineer.

SCE shall provide the initial determination and the recommended corrective actions to the CPUC and BLM prior to the start of construction (as defined in Mitigation Measure EM-1a (Prepare monitoring plan)).

SCE Comment:

SCE's standard engineering design practices incorporate analysis of potential scour impacts to determine foundation depth. Therefore, please make the following revisions:

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

F3-466 cont.

Onsite damages related to channel erosion and vertical scour during a flood could be prevented by design of footings and burial depth to account for erosion and scour. The final design analysis has not been completed, ~~and it is not known at this time~~ however, ~~if~~ footings and burial depths would take erosion and scour into account per SCE's standard engineering design practices. Mitigation Measure WR-3a (Implement flood, erosion, and scour protection for aboveground and belowground improvements) is recommended in order to reduce the potential for damage and interruption of power and communication services due to erosion and scour.

Mitigation Measure for Impact WR-3: The project would cause flood damage

WR-3a Implement flood, erosion, and scour protection for aboveground and belowground improvements. SCE shall make a determination during final project design phase as to the erosion and 100-year scour potential for watercourses near proposed structures with a foundation ~~and other above-ground features~~, as well as new underground conduits located within mapped FEMA 100-year flood zone boundaries. This determination shall be made by a registered professional engineer with expertise in river mechanics. If the determination identifies specific structures or underground conduits that may be subject to scour or lateral movement of a stream channel, these structures shall be protected against 100-year scour and/or lateral erosion through modifications of the foundation design, or otherwise in a manner determined to be appropriate by the river mechanics engineer.

SCE shall provide appropriate documentation that indicates incorporation of scour depths into the foundation design. ~~the initial determination and the recommended corrective actions to the CPUC and BLM prior to the start of construction (as defined in Mitigation Measure EM-1a (Prepare monitoring plan))~~.

Comment Set F3: Southern California Edison Company (cont.)

Page D.19-24

DEIR/DEIS Text: F3-467

Under the header WR-4 in the fourth paragraph it states:

Mitigation Measure WR-2a (Implement an Erosion Control Plan and demonstrate compliance with water quality permits) would require development of and adherence to erosion-control and hazardous material plans during construction. Development and adherence to an SWPPP in conformance with the California General Permit for Discharges of Storm Water Associated with Construction Activity, administered by the California State Water Resources Control Board and the Regional Water Quality Control Boards, would require best management practices to prevent and control erosion and siltation during construction, prevent, contain and mitigate accidental spills during construction, and address treatment and disposal of any groundwater to prevent violation of water quality objectives or damaging beneficial uses. Compliance with Sections 401 and 404 of the Clean Water Act would also minimize this impact. Mitigation Measure HH-2a (Prepare a hazardous materials and waste management plan), described in Section D.10 Hazards and Hazardous Materials, would further ensure against potential surface and groundwater contamination.

SCE Comment:

Please make the following revisions:

Mitigation Measure WR-2a (Implement an Erosion Control Plan and demonstrate compliance with water quality permits) would require development of and adherence to erosion control and hazardous material plans during construction. Development and adherence to ~~an~~the SWPPPs in conformance with the applicable (California or Federal) General Permit for Discharges of Storm Water Associated with Construction Activit~~y~~ies~~, administered by the California State Water Resources Control Board and the Regional Water Quality Control Boards~~, would require best management practices to prevent and control erosion and siltation during construction, prevent, contain and mitigate accidental spills during construction, and address treatment (if required) and disposal of ~~any~~ dewatered groundwater to prevent violation of water quality objectives or damaging beneficial uses. Compliance with Sections 401 and 404 of the Clean Water Act would also minimize this impact. Mitigation Measure HH-2a (Prepare a hazardous materials and waste management plan), described in Section D.10 Hazards and Hazardous Materials, would further ensure against potential surface and groundwater contamination.

Page D.19-29 through 30

DEIR/DEIS Text: F3-468

Impact WR-2: The project would cause erosion and siltation (Class II)

Construction and operation of the connected action projects would involve ground disturbance that would result in a significant impact related to accelerated erosion and sedimentation. With implementation of mitigation to control erosion, this impact would be less than significant (Class II).

SCE Comment:

The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.19-30

DEIR/DEIS Text: F3-469

Impact WR-3: The project would cause flood damage (Class II)

Connected Actions. For connected solar projects, construction and operation of the connected action projects would involve changes to the amount of impervious surface in the area as well as placement of structures in floodplains or areas that would experience shallow flooding following a precipitation event. These activities could result in a significant impact related to flood damage. With implementation of mitigation, this impact would be less than significant (Class II).

SCE Comment:

The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

Page D.19-30

DEIR/DEIS Text: F3-470

Under the header *Impact WR-4* in the first paragraph it states:

Project construction would disturb soil and result in erosion and lowered water quality through increased turbidity and sediment deposition into local streams. Accidental spills or disposal of harmful materials used during construction could wash into and pollute surface waters or groundwater. Mitigation Measure WR-2a requires a specific erosion control plan. Development and adherence to an SWPPP in conformance with the California General Permit for Discharges of Storm Water Associated with Construction Activity, administered by the California State Water Resources Control Board and the Regional Water Quality Control Boards, requires best management practices to prevent and control erosion and siltation, contain and mitigate accidental spills during construction, and address treatment and disposal of any groundwater. Clean Water Act Sections 401 and 404 would provide additional water quality protection. With implementation of mitigation, APM, and existing regulations, Impact WR-4 would be less than significant (Class II).

SCE Comment:

Please make the following revisions:

Project construction would disturb soil and result in erosion and lowered water quality through increased turbidity and sediment deposition into local streams. Accidental spills or disposal of harmful materials used during construction could wash into and pollute surface waters or groundwater. Mitigation Measure WR-2a requires a specific erosion control plan. Development and adherence to ~~an~~the SWPPPs in conformance with the applicable (California or federal) General Permit for Discharges of Storm Water Associated with Construction Activit~~y~~ies, ~~, administered by the California State Water Resources Control Board and the Regional Water Quality Control Boards~~, requires best management practices to prevent and control erosion and siltation, contain and mitigate accidental spills during construction, and address treatment (if required) and disposal of ~~any~~ dewatered groundwater. Clean Water Act Sections 401 and 404 would provide additional water quality protection. With implementation of mitigation, APM, and existing regulations, Impact WR-4 would be less than significant (Class II).

Comment Set F3: Southern California Edison Company (cont.)

Page D.19-30

DEIR/DEIS Text: F3-471

Impact WR-4: The project would degrade water quality, or violate a water quality standard or waste discharge requirement (Class II)

Construction and operation of the connected action projects would involve ground disturbance that could lead to increased erosion and sedimentation that could violate water quality standards. Also, accidental spills or disposal of harmful materials used during construction could wash into and pollute sur-face waters or groundwater. These activities would result in a significant impact related to water quality degradation. With implementation of mitigation, this impact would be less than significant (Class II).

SCE Comment:

The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

Page D.19-31

DEIR/DEIS Text: F3-472

Under the header *Impact WR-2* in the last sentence it states:

As a component of both the Proposed Project and this alternative, SCE would have to obtain a National Pollution Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction Activity.

SCE Comment:

Please make the following revisions:

As a component of both the Proposed Project and this alternative, SCE would have to obtain the applicable ~~a National Pollution Discharge Elimination System (~~NPDES~~)~~ General Permits for Storm Water Discharges Associated with Construction Activit~~y~~ies.

Page D.19-34

DEIR/DEIS Text: F3-473

Under the header *Impact WR-2* in the second paragraph in the third sentence it states:

As a component of both the Proposed Project and this alternative, SCE would have to obtain a National Pollution Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction Activity.

SCE Comment:

Please make the following revisions:

As a component of both the Proposed Project and this alternative, SCE would have to obtain the applicable ~~a National Pollution Discharge Elimination System (~~NPDES~~)~~ General Permits for Storm Water Discharges Associated with Construction Activit~~y~~ies.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.19-35 through 36

DEIR/DEIS Text: F3-474

D.19.4.3 Phased Build Alternative

Impact WR-1: The project would deplete groundwater supplies or interfere with groundwater recharge

Impact WR-2: The project would cause erosion and siltation

Impact WR-3: The project would cause flood damage

Impact WR-4: The project would degrade water quality, or violate a water quality standard or waste discharge requirement

SCE Comment:

As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional study and associated additional impact analysis. The additional disturbance areas and the increased duration could result in additional waters and hydrology impacts beyond those analyzed for the Phased Build Alternative in the document, and could be greater than those identified for the Proposed Project.

Page D.19-36

DEIR/DEIS Text: F3-475

Under the header *Impact WR-2* in the first paragraph in the second sentence it states:

As a component of both the Proposed Project and this alternative, SCE would have to obtain a National Pollution Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction Activity."

SCE Comment:

Please make the following revisions:

As a component of both the Proposed Project and this alternative, SCE would have to obtain the applicable ~~a National Pollution Discharge Elimination System (~~NPDES~~)~~ General Permits for Storm Water Discharges Associated with Construction Activit~~y~~ies.

Comment Set F3: Southern California Edison Company (cont.)

Page D.19-40

DEIR/DEIS Text: F3-476

Within Table D.19-4, under WR-2a it states:

WR-2a: Implement an Erosion Control Plan and demonstrate compliance with water quality permits. SCE shall develop and submit an Erosion Control Plan to the CPUC and BLM for approval at least 60 days prior to construction. The Erosion Control Plan may be part of the same document as the Stormwater Pollution Prevention Plan. Soil disturbance at structures and access roads is to be minimized and designed to prevent long-term erosion through revegetation or construction of permanent erosion control structures. The Erosion Control Plan shall include:

- The location of all soil-disturbing activities, including but not limited to new and/or improved access and spur roads
- The location of all streams and drainage structures that would be directly affected by soil-disturbing activities (such as stream crossings or public storm drains by the right-of-way and access roads)
- Design features to be implemented to minimize erosion during construction and during operation (if the project feature is to remain permanent after construction).
- If soil cement is proposed, the specific locations must be defined in the Plan, and evidence of approval by the Regional Water Quality Control Board shall be submitted to the CPUC and BLM prior to its use.
- If design features include the use of retaining structures and/or walls, the design of the features shall be consistent with Mitigation Measure VR-3a (Reduce color contrast of retaining walls and land scars).
- The location and type of all BMPs that would be installed to prevent off-site sedimentation and to protect aquatic resources.
- A proposed schedule for the implementation and maintenance of erosion control measures and a description of the erosion control practices, including appropriate design and installation details.
- Proposed schedule for inspection of erosion control/SWPPP measures and schedule for corrective actions/repairs, if required. Erosion control/SWPPP inspection reports shall be provided to the CPUC EM.

SCE Comment:

The Erosion Control Plan will be incorporated into the Storm Water Pollution Prevention Plan, which will be written and implemented in compliance with the applicable Federal and California Construction General Permits for Storm Water. The SWPPP will be kept onsite and will be readily available on request.

WR-2a Implement an Erosion Control Plan and demonstrate compliance with water quality permits. SCE shall develop and submit an Erosion Control Plan to the CPUC and BLM ~~for approval at least 60 days~~ prior to construction. The Erosion Control Plan may be part of the same document as the Storm ~~w~~Water Pollution Prevention Plan. Soil disturbance at structures and access roads is to be minimized and designed to prevent long-term erosion. ~~through revegetation or construction of permanent erosion control structures.~~ The Erosion Control Plan shall include:

- The location of all soil-disturbing activities, including but not limited to new and/or improved access and spur roads
- BMPs will be included to protect drainage structures (such as public storm drains) down stream of soil disturbance activities.
- The location of all streams ~~and drainage structures~~ that would be directly affected by soil-disturbing activities (such as stream crossings ~~or public storm drains~~ by the right-of-way and access roads)
- Design features to be implemented to minimize erosion during construction and during operation (if the project feature is to remain permanent after construction).
- If soil cement is proposed, the specific locations must be defined in the Plan, and ~~evidence of approval by the Regional Water Quality Control Board~~ shall be submitted to the CPUC and BLM prior to its use.
- If design features include the use of retaining structures and/or walls, the design of the features shall be consistent with Mitigation Measure VR-3a (Reduce color contrast of retaining walls and land scars).
- The location and type of ~~all~~ BMPs that would be installed to prevent off-site sedimentation and to protect aquatic resources.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

F3-476 cont.

- ~~A proposed schedule for the~~ Specifications for implementation and maintenance of erosion control measures and a description of the erosion control practices, including appropriate design and installation details.
- Proposed schedule for inspection of erosion control/SW PPP measures and schedule for corrective actions/ repairs, if required. Erosion control/SWPPP inspection reports shall be kept in the SWPPP~~provided to the CPUC EM~~and be made available upon request.

Comment Set F3: Southern California Edison Company (cont.)

Page D.19-40

DEIR/DEIS Text: F3-477

Monitoring / Reporting Action	CPUC/BLM monitor to verify that Erosion Control Plan meets defined requirements, and that all required permits have been obtained prior to the start of construction in each segment.

SCE Comment:

Based on the edits to mitigation measure WR-2a, please make the following revisions to the Monitoring/Reporting Action:

Monitoring / Reporting Action	CPUC/BLM monitor to verify that ~~Erosion Control Plan~~ applicable SWPPP (includes Erosion Control Plan) has been prepared and permitted prior to the start of soil disturbing activities of the applicable construction project components. The SWPPPs will be prepared in compliance with the applicable Federal and California Construction General Permit requirements. ~~meets defined requirements, and that all required permits have been obtained prior to the start of construction in each segment.~~

Page D.19-40

DEIR/DEIS Text: F3-478

SCE shall submit to the CPUC and BLM evidence of possession of all required permits before engaging in soil-disturbing construction/demolition activities, before entering flowing or ponded water, or before constructing a crossing at flowing or ponded water. Such permits may include, but are not limited to, a Streambed Alteration Agreement from the California Department of Fish and Wildlife, a Clean Water Act (CWA) Section 404 permit from the USACE, a CWA Section 402 NPDES General Permit for Storm Water Discharges Associated with Construction Activities (General Permit) from the applicable Regional Water Quality Control Board(s) (RWQCBs), and/or a CWA Section 401 certification from the applicable RWQCBs.

SCE Comment:

Please make the following revisions:

SCE shall submit to the CPUC and BLM evidence of possession of ~~all~~ applicable required permits for the representative land disturbance area prior to~~before~~ engaging in soil-disturbing construction/demolition activities. ~~before entering flowing or ponded water, or before constructing a crossing at flowing or ponded water.~~ Such permits may include, but are not limited to, ~~a Streambed Alteration Agreement from the California Department of Fish and Wildlife, a Clean Water Act (CWA) Section 404 permit from the USACE, a~~ Clean Water Act (CWA) Section 402 NPDES California General Permits for Storm Water Discharges Associated with Construction Activities (General Permit) from the applicable Regional Water Quality Control Board(s) (RWQCBs) and the Federal General Permit for Storm Water Discharges Associated with Construction Activities on Tribal Land.~~, and/or a CWA Section 401 certification from the applicable RWQCBs.~~

Prior to ground disturbance in waters (e.g., maintenance grading or constructing a crossing at flowing or ponded water, etc.), SCE will obtain a Streambed Alteration Agreement from the California Department of Fish and Wildlife, a ~~Clean Water Act (~~CWA~~)~~ Section 404 permit from the USACE, and a CWA Section 401 certification from the SWRCB.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.19-41

DEIR/DEIS Text: F3-479

WR-3a: Implement flood, erosion, and scour protection for aboveground and belowground improvements. SCE shall make a determination during final project design phase as to the erosion and 100-year scour potential for watercourses near proposed structures and other above-ground features, as well as new underground conduits. This determination shall be made by a registered professional engineer with expertise in river mechanics. If the determination identifies specific structures or underground conduits that may be subject to scour or lateral movement of a stream channel, these structures shall be protected against 100-year scour and/or lateral erosion through modifications of the foundation design, or otherwise in a manner determined to be appropriate by the river mechanics engineer.

SCE shall provide the initial determination and the recommended corrective actions to the CPUC and BLM prior to the start of construction (as defined in Mitigation Measure EM-1a (Prepare monitoring plan)).

SCE Comment:

Based on the edits provided in previous comments, please make the following revision:

WR-3a Implement flood, erosion, and scour protection for aboveground and belowground improvements. SCE shall make a determination during final project design phase as to the erosion and 100-year scour potential for watercourses near proposed structures with a foundation ~~and other above-ground features~~, as well as new underground conduits located within mapped FEMA 100-year flood zone boundaries. This determination shall be made by a registered professional engineer with expertise in river mechanics. If the determination identifies specific structures or underground conduits that may be subject to scour or lateral movement of a stream channel, these structures shall be protected against 100-year scour and/or lateral erosion through modifications of the foundation design, or otherwise in a manner determined to be appropriate by the river mechanics engineer. SCE shall provide appropriate documentation that indicates incorporation of scour depths into the foundation design. ~~the initial determination and the recommended corrective actions to the CPUC and BLM prior to the start of construction (as defined in Mitigation Measure EM-1a (Prepare monitoring plan))~~.

Page D.19-42

DEIR/DEIS Text: F3-480

_____. 1995. Water Quality Control Plan Santa Ana River Basin.

SCE Comment:

Please make the following revisions to the third reference:

RWQCBSAR (California Regional Water Quality Control Board Santa Ana River Region). 2014. ~~1995.~~Water Quality Control Plan Santa Ana River Basin.

Page D.19-42

DEIR/DEIS Text: F3-481

References

SCE Comment:

Please add the following missing reference:

Federal General Permit for Storm Water Discharges Associated with Construction Activities on Tribal Land

Responses to Comment Set F3 – Section D.19 Water Resources and Hydrology

F3-458 The commenter asks for text changes describing TMDLs. The text changes would remove the reference to RWQCBs identifying waters that do not attain standards, but otherwise the changes clarify but would not substantially change the intended meaning. The original text is generally taken from the RWQCB and is considered adequate. For clarification, a minor text change is made in Section D.19.2.2 (Water Resources and Hydrology, Applicable Regulations, Plans, and Standards, State).

F3-459 The commenter asks for editorial text changes in Section D.19.2.2 (Water Resources and Hydrology) describing the Porter Cologne Water Quality Control Act. The changes relate to the dates of the RWQCB basin plans. Text has been modified in Section D.19.2.2 in the discussion of the Porter-Cologne Act for clarification.

F3-460 The commenter requests mention of Tribal Land in Impact WR-2 related to erosion and siltation. The text change has been made to include Tribal Lands in the discussion of Impact WR-2 (The project would cause erosion and siltation) in Section D.19.3.3 (Water Resources and Hydrology, Impacts and Mitigation). A similar clarification has been made in Section D.19.2.1, under the discussion of the Federal Clean Water Act.

F3-461 The commenter asks to include in Table D.19-1 mention of a jurisdictional delineation to be prepared by SCE. Other minor text changes are requested in the discussion of Impact WR-2 (The project would cause erosion and siltation).

In response, Table D.19-1 (Surface Water Features Crossed by the Proposed Project) has been modified to add a footnote stating that SCE prepared a Drainage Assessment (described in EIS Section D.4.1), as preliminary information related to potential jurisdictional waters under Section 404 of the Clean Water Act, to support project design. After final design, SCE will prepare a Jurisdictional Delineation Report of the project's areas of impact.

This discussion of Impact WR-2 in Section D.19.3.3 (Water Resources and Hydrology, Impacts and Mitigation) has been modified as suggested to indicate the impact potential that "some" structures "may" be located directly within watercourses listed in Table D.19-1. This minor modification would not affect the impact analysis, which concludes that with implementation of mitigation, APMs, and compliance with existing regulations, erosion impacts related to disturbance of drainage patterns are expected to be minimal.

F3-462 The commenter requests text changes to Mitigation Measure WR-2a (Implement an Erosion Control Plan) in Section D.19.3.3 (Water Resources and Hydrology, Impacts and Mitigation). The suggested text changes would eliminate the requirement to submit the plan 60-days prior to construction, eliminate the requirement for identifying the location of drainage structures and storm drains in the erosion control plan, and eliminate the requirement for RWQCB approval of soil cement. Otherwise, the text changes are clarifications that would not substantially alter the intended meaning of the text.

Some text changes are made for clarification and if they did not alter the meaning or intent of Mitigation Measure WR-2a in Section D.19.3.3. Other changes are not made. No reason was offered for why the proposed changes should be made. The requirement to submit the plan "for approval at least 60 days prior to construction" remains. BLM requires adequate time for review and approval. The request to strike drainage structures and public storm drains from the features affected by soil-disturbing activities is not acceptable, as these are

features that could be affected. The requirement to provide evidence of approval by the Regional Water Quality Control Board of the use of soil cement, if proposed, remains, as does the provision requiring submission of inspection reports to the CPUC EM remains.

F3-463 The commenter requests text changes to Mitigation Measure WR-2a (Implement an Erosion Control Plan) as a follow on to Comment F3-462. The text change clarifies the protocol for inspection reports.

Clarifying text changes have been made in the first paragraph after the bullet list in Mitigation Measure WR-2a, in Section D.19.3.3 (Water Resources and Hydrology, Impacts and Mitigation). These do not change the meaning or intent of the mitigation measure.

F3-464 This comment is identical to Comment F3-463.

F3-465 The commenter requests text changes to the third and fourth paragraphs after the bullet list in Mitigation Measure WR-2a. The text changes clarify that California Streambed Alteration Agreements, and Federal Section 401 and 404 permits are required for disturbance in riparian areas, but not necessarily for disturbance outside of watercourses.

The requested text changes have been made to the third and fourth paragraphs after the bullet list in Mitigation Measure WR-2a in Section D.19.3.3. These do not change the meaning or intent of the mitigation measure.

F3-466 The commenter requests text changes to Mitigation Measure WR-3a (Implement flood, erosion, and scour protection) in Section D.19.3.3 (Water Resources and Hydrology, Impacts and Mitigation). The text change refers to SCE's standard engineering practices, limit scour protection to structures within FEMA floodplains, and would eliminate the requirement for providing BLM the determinations and recommended corrective actions to be made.

Delineated FEMA floodplains represent only part of the potential for scour-related and erosion-related damage to structures. The intent of this mitigation measure is to ensure that an experienced engineer makes a determination of which structures are likely at risk and to design corrective measures to address scour and erosion risks wherever they may occur, not just those in FEMA-designated floodplains. SCE standard engineering practices may be used, if these are adequate to cover the intent of this mitigation measure. Text changes have been made to Mitigation Measure WR-3a in Section D.19.3.3 to further clarify the intent of the mitigation measure.

F3-467 The commenter requests clarifying text changes to the discussion of Impact WR-4 (The project would degrade water quality, or violate a water quality standard or waste discharge requirement) in Section D.19.3.3. The changes are clarifications that would not substantially change discussion in the text. The requested text changes have been made in Section D.19.3.3, in the fourth paragraph under Impact WR-4.

F3-468 The commenter requests clarification that mitigation measures for connected actions are not to be imposed on SCE, nor implemented prior to construction of the West of Devers project. See Response to Comment F3-102 with regard to mitigation for connected actions.

F3-469 The commenter requests clarification that mitigation measures for connected actions are not to be imposed on SCE, nor implemented prior to construction of the West of Devers project. See Response to Comment F3-102 with regard to mitigation for connected actions.

F3-470 The commenter requests text changes to Impact WR-4 (The project would degrade water quality, or violate a water quality standard or waste discharge requirement) in Draft EIR/EIS Section D.19.3.5 (CEQA Significance Determination for Proposed Project and Connected Actions). The text changes are the same as those requested in Comment F3-467. This relates to CEQA, not NEPA. However, the requested text changes have been made in Section D.19.3.3. See Response to Comment F3-467.

F3-471 The commenter requests clarification that mitigation measures for connected actions are not to be imposed on SCE, nor implemented prior to construction of the West of Devers project. See Response to Comment F3-102 with regard to mitigation for connected actions.

F3-472 The commenter requests text changes to the discussion of Impact WR-2 (The project would degrade water quality, or violate a water quality standard or waste discharge requirement) in the Tower Relocation Alternative (Section D.19.4.1). The changes are text clarifications that would not substantially change the discussion. The text changes have been made in Section D.19.4.1, eliminating NPDES being spelled out and making text plural.

F3-473 This comment is the same as Comment F3-472, but applied to the Iowa Street 66 kV Underground Alternative (Section D.19.4.2). The changes are text clarifications that would not substantially change the intended meaning. The requested text changes have been made in Section D.19.4.2.

F3-474 Please see General Response GR-4 regarding the future construction impacts of the Phased Build Alternative.

F3-475 This comment is the same as Comment F3-472, but applied to the Iowa Street 66 kV Underground Alternative (Section D.19.4.3). The changes are text clarifications that would not substantially change the intended meaning. The requested text changes have been made in Section D.19.4.3.

F3-476 The commenter requests text changes to Mitigation Measure WR-2a in Table D.19-4. This comment is identical to Comment F3-462, applied to the repeat of Mitigation Measure WR-2a in Table D.19-4. The response is the same as for Comment F3-462. Text changes have been made to Table D.19-4.

F3-477 The commenter requests text changes to the Monitoring/Reporting Action for Mitigation Measure WR-2a in Table D.19-4. The changes would make the reporting action consistent with the changes to Mitigation Measure WR-2a described in Comments F3-462 and F3-476. The requested text changes have been made to Table D.19-4.

F3-478 The commenter requests text changes to Mitigation Measure WR-2a in Table D.19-4. This comment is identical to Comment F3-465, applied to the repeat of Mitigation Measure WR-2a in Table D.19-4. The response is the same as for Comment F3-465. Text changes have been made to Table D.19-4.

F3-479 The commenter requests text changes to Mitigation Measure WR-3a in Table D.19-4. This comment is identical to Comment F3-466, applied to the repeat of Mitigation Measure WR-3a in Table D.19-4. The response is the same as for Comment F3-466. Text changes have been made to Table D.19-4 to clarify the intent of Mitigation Measure WR-3a.

F3-480 The commenter requests the reference to the Santa Ana River Basin Water Quality Control Plan in the References section be updated from 1995 to 2014. The reference to the Santa Ana River Basin Water Quality Control Plan in the D.19.7 References section has been updated.

F3-481 The commenter requests that a reference be added for the Federal General Permit for Storm Water Discharges Associated with Construction Activities on Tribal Land. A text change has been made in Section D.19.2.1 of the report to clarify that the EPA administers NPDES permits on Tribal Land. The comment did not provide a specific reference citation that could be identified.

Comment Set F3: Southern California Edison Company (cont.)

Section D.20 Wildland Fire

Page D.20-1

DEIR/DEIS Text: F3-482

The presence of a transmission line can hinder initial attack and containment in the event of a fire in the vicinity of the line. The presence of structures and conductors can pose risks to firefighters, both on the ground and in the air. Where overhead power lines are present, aerial and ground attacks are restricted. Aerial operations are complicated by the risk of aircraft and/or water buckets colliding with structures or conductors during smoky, reduced-visibility conditions. Conditions are especially hazardous when trans-mission lines are placed on ridge tops, reducing the proximity of fire retardant and water drop deliveries that aerial firefighting crews can achieve safely. For these reasons, pilots are kept apprised of the location of transmission lines. Firefighters on the ground can be put at risk if charged particles in heavy smoke create a short circuit or arc between an energized line and the earth, a person, or firefighting equipment. For this reason, firefighting protocols require crews to maintain certain distances from energized lines. Fire managers coordinate with utilities on shutting down lines as needed. Access roads to structures can also provide fire crews access to the area and be used as potential fire breaks.

SCE Comment:

To acknowledge beneficial aspects of utility facilities, please make the following revisions:

The presence of a transmission line can hinder initial attack and containment in the event of a fire in the vicinity of the line. The presence of structures and conductors can pose risks to firefighters, both on the ground and in the air. Where overhead power lines are present, aerial and ground attacks are restricted. Aerial operations are complicated by the risk of aircraft and/or water buckets colliding with structures or conductors during smoky, reduced-visibility conditions. Conditions are especially hazardous when trans-mission lines are placed on ridge tops, reducing the proximity of fire retardant and water drop deliveries that aerial firefighting crews can achieve safely. For these reasons, pilots are kept apprised of the location of transmission lines. Firefighters on the ground can be put at risk if charged particles in heavy smoke create a short circuit or arc between an energized line and the earth, a person, or firefighting equipment. For this reason, firefighting protocols require crews to maintain certain distances from energized lines. Fire managers coordinate with utilities on shutting down lines as needed. Conversely, utility facilities can also assist initial attack and containment in the event of a fire in the vicinity of a line. Access roads to structures can also provide fire crews access to the area and be used as potential fire breaks.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.20-1

DEIR/DEIS Text: F3-483

MITIGATION MEASURE

WF-1a: Prepare and implement a Fire Management Plan. A Project-specific fire prevention plan for both construction and operation of the project shall be prepared by SCE and submitted to for review prior to initiation of construction. The draft copy of this Plan is to be provided to each fire agency at least 90 days before the start of any construction activities in areas designated as Very High or High Fire Hazard Severity Zones. Plan reviewers shall include CPUC, BLM, CAL FIRE, San Bernardino and Riverside Counties, and local municipal fire agencies with jurisdiction over areas where the project is located. Comments on the Plan shall be pro-vided by SCE to all other participants, and SCE shall resolve each comment in consultation with CAL FIRE, BLM, and the Morongo Fire Department, as appropriate. The final Plan shall be approved by these agencies at least 30 days prior to the initiation of construction activities. SCE shall fully implement the Plan during all construction and maintenance activities.

A project Fire Marshal or similar qualified position shall be established by SCE to enforce all provisions of the Fire Management Plan as well as perform other duties related to fire detection, prevention, and suppression for the project. SCE shall monitor construction activities to ensure implementation and effectiveness of the plan.

The Plan shall include at a minimum SCE's Specification E-2005-104 (Transmission line Project Fire Plan), including any updates and amendments, and other requirements specified below.

The plan should recognize and prepare for the high probability that fast moving, wind driven wildfires will burn adjacent or through the Proposed Project with some regularity as the result of severe fire weather conditions, flash fuels such as provided by perennial grasslands, and abundant ignition sources. Wind driven fires can quickly overcome operational and maintenance crews, placing their health and safety at risk.

The Plan shall cover:

- The purpose and applicability of the plan;
- Responsibilities and duties;
- Preparedness training and drills;
- Procedures for fire reporting, response, and prevention that include:
  - identification of daily site-specific risk conditions
  - the tools and equipment needed on vehicles and to be on hand at sites
  - reiteration of fire prevention and safety considerations to ringtail board meetings
  - daily monitoring of the red-flag warning system with appropriate restrictions on types and levels of permissible activity,
- Coordination procedures with BLM and San Bernardino and Riverside County fire officials
- Crew training, including fire safety practices and restrictions,
- Method for verification that Plan protocols and requirements are being followed.

SCE Comment:

The requirements of the mitigation measure are disproportionate to the impact in terms of the required time and effort for the required coordination as compared to the benefit of said coordination. Please make the following revisions:

MITIGATION MEASURE

WF-1a: Prepare and implement a Fire Management Plan. A Project-specific fire prevention plan for both construction and operation of the project shall be prepared by SCE and submitted to for review to the CPUC and BLM prior to initiation of construction. ~~The draft copy of this Plan is to be provided to each fire agency at least 90 days before the start of any construction activities in areas designated as Very High or High Fire Hazard Severity Zones. Plan reviewers shall include CPUC, BLM, CAL FIRE, San Bernardino and Riverside Counties, and local municipal fire agencies with jurisdiction over areas where the project is located. Comments on the Plan shall be pro-vided by SCE to all other participants, and SCE shall resolve each comment in consultation with CAL FIRE, BLM, and the Morongo Fire Department, as appropriate. The final Plan shall be approved by these agencies at least 30 days prior to the initiation of construction activities.~~ SCE shall fully implement the Plan during all construction and maintenance activities.

Comment Set F3: Southern California Edison Company (cont.)

F3-483 cont.

A project Fire Marshal or similar qualified position shall be established by SCE to enforce all provisions of the Fire Management Plan as well as perform other duties related to fire detection, prevention, and suppression for the project. SCE shall monitor construction activities to ensure implementation and effectiveness of the plan.

The Plan shall include at a minimum SCE's Specification E-2005-104 (Transmission line Project Fire Plan), including any updates and amendments, and other requirements specified below.

The plan should recognize and prepare for the high probability that fast moving, wind driven wildfires will burn adjacent or through the Proposed Project with some regularity as the result of severe fire weather conditions, flash fuels such as provided by perennial grasslands, and abundant ignition sources. Wind driven fires can quickly overcome operational and maintenance crews, placing their health and safety at risk.

The Plan shall cover:

- The purpose and applicability of the plan;
- Responsibilities and duties;
- Preparedness training and drills;
- Procedures for fire reporting, response, and prevention that include:
  - identification of daily site-specific risk conditions
  - the tools and equipment needed on vehicles and to be on hand at sites
  - reiteration of fire prevention and safety considerations to ringtail board meetings
  - daily monitoring of the red-flag warning system with appropriate restrictions on types and levels of permissible activity,
- Coordination procedures with BLM and San Bernardino and Riverside County fire officials
- Crew training, including fire safety practices and restrictions,
- Method for verification that Plan protocols and requirements are being followed.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

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DEIR/DEIS Text: F3-484

D.20.3.2 CEQA Significance Criteria

The Hazards and Hazardous materials section of CEQA Guidelines Appendix G identifies one question with regard to wildland fire:

Would the project "expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?"

This question and others related to wildland fire hazards are addressed in this EIR/EIS by considering the following evaluation criteria, which are based on the nature of the Proposed Project and the existing environment:

a) Would project activities required during construction or maintenance increase the probability of a wildland fire, resulting in damaging impacts to communities, firefighter health and safety, and/or natural resources?

b) Would the presence of the overhead transmission lines increase the probability of a wildland fire, resulting in damaging impacts to communities, firefighter health and safety, and/or natural resources? c) Would the presence of the project create obstructions or impediments to fire suppression efforts, resulting in damaging impacts to communities and/or natural resources?

d) Would activities associated with project construction or maintenance result in a vegetation mix that could increase ignition potential and rate of fire spread?

The criteria used to evaluate these questions are (1) the degree to which the existing situation in the ROW with regard to wildland fire risk and fire suppression would be changed by implementation of the Proposed Project and (2) whether such a change is meaningful.

SCE Comment:

Significance criteria not found in the California Environmental Quality Act (CEQA) guidelines are not appropriate for inclusion in an analysis of CEQA Significance Criteria. As such, please remove the following:

~~This question and others related to wildland fire hazards are addressed in this EIR/EIS by considering the following evaluation criteria, which are based on the nature of the Proposed Project and the existing environment:~~

~~a) Would project activities required during construction or maintenance increase the probability of a wildland fire, resulting in damaging impacts to communities, firefighter health and safety, and/or natural resources?~~

~~b) Would the presence of the overhead transmission lines increase the probability of a wildland fire, resulting in damaging impacts to communities, firefighter health and safety, and/or natural resources?~~

~~c) Would the presence of the project create obstructions or impediments to fire suppression efforts, resulting in damaging impacts to communities and/or natural resources?~~

~~d) Would activities associated with project construction or maintenance result in a vegetation mix that could increase ignition potential and rate of fire spread?~~

~~The criteria used to evaluate these questions are (1) the degree to which the existing situation in the ROW with regard to wildland fire risk and fire suppression would be changed by implementation of the Proposed Project and (2) whether such a change is meaningful.~~

Comment Set F3: Southern California Edison Company (cont.)

Page D.20-14

DEIR/DEIS Text: F3-485

Impact WF-2: The presence of overhead transmission lines would increase the probability of a wildland fire.

SCE Comment:

The Proposed Project would reduce the number of towers and that should be noted in the text. Please add the following language:

Together, these factors make it highly unlikely that the 220 kV transmission line would pose a fire hazard through arcing or line failure. Additionally, the ROW currently has 220 kV circuits located in it, and the Proposed Project would reduce the number of structures within the corridor, thus not adding a significant new risk as compared to existing conditions.

Page D.20-19

DEIR/DEIS Text: F3-486

Impact WF-1: Construction or maintenance activities would increase the probability of a wildland fire (Class II)

For connected actions in the Desert Center and Blythe areas, mitigation measures to address increased wildfire risks during construction and operation of the facilities are expected to be required by the agencies approving those projects. These would be tailored to the nature of the project and local conditions. These would ensure that this impact is less than significant (Class II).

SCE Comment:

The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

Page D.20-19

DEIR/DEIS Text: F3-487

After implementation of the Proposed Project, conditions in the ROW with regard to wildfire risks would not be significantly changed from existing conditions. Towers and conductors would still be present in approximately the same locations. SCE and fire agencies would continue to follow existing procedures and regulations for managing wildfire risk. No mitigation is required. The impact would be less than significant (Class III).

SCE Comment:

For clarification, please make the following revisions:

After implementation of the Proposed Project, conditions in the ROW with regard to wildfire risks would not be significantly changed from existing conditions. However, the Proposed Project would reduce the number of structures within the corridor. Towers and conductors would still be present in approximately the same locations. SCE and fire agencies would continue to follow existing procedures and regulations for managing wildfire risk. No mitigation is required. The impact would be less than significant (Class III).

Page D.20-19

DEIR/DEIS Text: F3-488

Impact WF-3: The presence of the project would create new obstructions to fire suppression efforts (Class III)

With implementation of the Proposed Project, structure and conductor heights in the ROW and safety distances from the transmission line would increase nominally. This would not be a significant change from existing conditions. SCE and fire agencies would continue to follow existing procedures and regulations for conducting and managing wildfire suppression. No mitigation is required. The impact would be less than significant (Class III).

SCE Comment:

The Proposed Project would reduce the number of towers, which should be noted in the text. The presence of the project can also provide benefit to fire suppression efforts; please add the following language:

<u>The Proposed Project would reduce the number of towers. Utility facilities can also assist initial attack and containment in the event of a fire in the vicinity of a line. Access roads to structures can also provide fire crews access to the area and be used as potential fire breaks.</u>

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.20-19

DEIR/DEIS Text: F3-489

Impact WF-3: The presence of the project would create new obstructions to fire suppression efforts (Class III)

For connected actions in the Desert Center and Blythe areas, gen-tie lines would be installed; however, these not as tall as high-voltage transmission lines. Also, the areas of the connected actions are sparsely vegetated, reducing fire risk. During fire suppression activity, pilots and ground crews are advised of the location of lines. Agencies would follow existing procedures for conducting and managing wildfire suppression. These would ensure that this impact is less than significant (Class III).

SCE Comment:

The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

Page D.20-20

DEIR/DEIS Text: F3-490

Impact WF-4: Construction or maintenance activities would result in a vegetation fuel mix that increases ignition potential and rate of fire spread (Class II)

For connected actions, approving agencies are expected to require weed management and abatement programs to address this impact. These measures would ensure that this impact is less than significant (Class II).

SCE Comment:

The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

Page D.20-24

DEIR/DEIS Text: F3-491

D.20.4.3 Phased Build Alternative

Impact WF-1: Construction or maintenance activities would increase the probability of a wildland fire

Impact WF-2: The presence of overhead transmission lines would increase the probability of a wildland fire

Impact WF-3: The presence of the project would create new obstructions to fire suppression efforts

Impact WF-4: Construction or maintenance activities would result in a vegetation fuel mix that increases ignition potential and rate of fire spread

SCE Comment:

As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional study and associated additional impact analysis. The additional disturbance areas and the increased duration could result in additional wildland fire impacts beyond those analyzed for the PBA in the document and could be greater than those identified for the Proposed Project.

Responses to Comment Set F3 – Section D.20 Wildland Fire

F3-482 The commenter asks that a sentence be added in the introduction to Section D.20 (Wildland Fire) stating that "utility facilities can also assist initial attack and containment in the event of a fire in the vicinity of a line." No change in the EIS is required. The paragraph in question describes various risk conditions for firefighting in the vicinity of power lines and acknowledges that utility access roads also provide fire crew access and may be used as fire breaks. It is not clear how utility facilities could assist initial attack and containment except if utility personnel happened to be in the vicinity and were appropriately equipped.

F3-483 The commenter believes the requirement in Mitigation Measure WF-1a (Prepare and implement a Fire Management Plan) that a draft of the Plan be circulated to fire agencies for comment and that comments be reconciled in consultation with CALFIRE, BLM, and the Morongo Fire Department, as appropriate, are disproportionate to the impact in terms of the benefit achieved for the time and effort needed for the coordination.

The BLM disagrees. No information is provided on how or why this consultation requirement is onerous. Once a draft Fire Management Plan is developed, it should be a straightforward process to provide a copy to the fire agencies, requesting comments by a reasonable date. Likewise, consulting with CALFIRE, BLM, and the Morongo Fire Department, as appropriate, on resolving the comments when developing the final Plan is a reasonable coordination activity, particularly as portions of the Project ROW are in high fire hazard areas.

F3-484 This comment questions the use of significance criteria not specifically found in CEQA guidelines. This comment relates to CEQA, not NEPA. Please see Response to Comment F3-95.

F3-485 The commenter requests revision to a sentence in Section D.20.3.3 (Wildland Fire, Impacts and Mitigation Measures) under Impact WF-2 (The presence of overhead transmission lines would increase the probability of a wildland fire). The suggested revision would note that the Proposed Project would reduce the number of structures in the corridor.

No change in the EIS is required. The Project description fully discloses that there would be fewer structures in the ROW. The discussion cited in Wildland Fire concludes that the Project would not be adding a significant new risk as compared to existing conditions. While the suggested revision is accurate with regard to the number of structures, it is unnecessary. It also fails to note that while the number of structures would be less, the number of circuits would be the same and the proposed new towers would be taller.

F3-486 This comment request clarification in the EIS that mitigation referenced for Connected Actions is not imposed on SCE. Clarification has been added in Section D.1.5 (Analysis of Connected Actions). See Response to Comment F3-102.

F3-487 The commenter requests a revision in Section D.20.3.5 (CEQA Significance Determination for Proposed Project and Connected Actions), under Impact WF-2 (The presence of overhead transmission lines would increase the probability of a wildland fire). This comment relates to CEQA, not NEPA. Please see Response to Comment F3-485, addressing this requested revision.

F3-488 This comment is similar to F3-482 regarding assisting in attack and containment of fire in the vicinity of a line. Please see Response to Comment F3-482.

F3-489 This comment questions the use of significance criteria not specifically found in CEQA guidelines. This comment relates to CEQA, not NEPA. Please see Response to Comment F3-95.

F3-490 This comment questions the use of significance criteria not specifically found in CEQA guidelines. This comment relates to CEQA, not NEPA. Please see Response to Comment F3-95.

F3-491 Please see General Response GR-4 regarding the future construction impacts of the Phased Build Alternative.

Comment Set F3: Southern California Edison Company (cont.)

Section D.21 Electrical Interference and Safety

Page D.21-1

DEIR/DEIS Text: F3-492

This section describes certain effects that are unique to public safety in the vicinity of electrical transmission, including electrical interference and hazards. Please see EIR/EIS Section B.5 for information on electric and magnetic fields (EMF). The following discussions address existing environmental conditions in the affected area, identify and analyze environmental impacts, and recommend measures to reduce or avoid adverse impacts anticipated from project construction and operation. In addition, existing laws and regulations relevant to electrical interference and safety are described. In some cases, compliance with these existing laws and regulations would serve to reduce or avoid certain impacts that might other-wise occur with the implementation of the project. Section D.21.1 presents the affected environment for Electrical Interference and Safety. Relevant regulations and standards are summarized in Section D.21.2. Sections D.21.3 through D.21.5 describe the impacts of the Proposed Project and the alter-natives. Section D.21.6 presents the mitigation measures and mitigation monitoring requirements, and D.21.7 lists references cited.

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

This section describes certain <u>potential</u> effects that are unique to public safety in the vicinity of electrical transmission, including electrical interference and hazards. Please see EIR/EIS Section B.5 for information on electric and magnetic fields (EMF). The following discussions address existing environmental conditions in the affected area, identify and analyze environmental impacts, and recommend measures to reduce or avoid <u>potential</u> adverse impacts anticipated from project construction and operation. In addition, existing laws and regulations relevant to electrical interference and safety are described. In some cases, compliance with these existing laws and regulations would serve to reduce or avoid certain impacts that might other-wise occur with the implementation of the project. Section D.21.1 presents the affected environment for <u>potential</u> Electrical Interference and Safety. Relevant regulations and standards are summarized in Section D.21.2. Sections D.21.3 through D.21.5 describe the impacts of the Proposed Project and the alter-natives. Section D.21.6 presents the mitigation measures and mitigation monitoring requirements, and D.21.7 lists references cited.

Page D.21-1

DEIR/DEIS Text: F3-493

Electric fields from power lines do not typically pose interference problems for electronic equipment in businesses since the equipment is shielded by buildings and walls. However, magnetic fields can penetrate buildings and walls, thereby interacting with electronic equipment. Depending upon the sensitivity of equipment, the magnetic fields have been found to interfere with electric equipment operation…

SCE Comment:

As there is no evidence that the existing or future magnetic fields will interact with electronic equipment please make the following revisions:

Electric fields from power lines do not typically pose interference problems for electronic equipment in businesses since the equipment is shielded by buildings and walls. However, magnetic fields can penetrate buildings and walls, thereby <u>potentially</u> interacting with electronic equipment. Depending upon the sensitivity of equipment, the magnetic fields have been found to interfere with electric equipment operation…

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.21-2

DEIR/DEIS Text: F3-494

The most common electronic equipment that can be susceptible to magnetic field interference is older CRT televisions or computer monitors. Magnetic field interference results in disturbances to the image displayed on the monitor, often described as screen distortion, "jitter," or other visual defects. In most cases it is annoying, and at its worst, it can prevent use of the monitor. This type of interference is a recognized problem in the video monitor industry. As a result, there are manufacturers who specialize in monitor interference solutions and shielding equipment. Possible solutions to this problem include: relocation of the monitor, use of magnetic shield enclosures, software programs, and replacement of CRT monitors with current technology displays that are not susceptible to magnetic field interference.

SCE Comment:

As there is no evidence that existing or future magnetic fields will interfere with electronic devices please make the following revisions:

The most common electronic equipment that can be susceptible to magnetic field interference is older CRT televisions or computer monitors. Potential magnetic field interference results in disturbances to the image displayed on the monitor, often described as screen distortion, "jitter," or other visual defects. In most cases it is annoying, and at its worst, it can prevent use of the monitor. This type of interference is a recognized problem in the video monitor industry. As a result, there are manufacturers who specialize in monitor interference solutions and shielding equipment. Possible solutions to this potential problem include: relocation of the monitor, use of magnetic shield enclosures, software programs, and replacement of CRT monitors with current technology displays that are not susceptible to magnetic field interference.

Page D.21-2

DEIR/DEIS Text: F3-495

Power line fields can induce voltages and currents on conductive objects, such as metal roofs or buildings, fences, and vehicles. Transmission lines are designed to limit the short circuit current, from conductive items beneath the line, to a safe level (less than 5 milliampere). When a person or animal comes in contact with a conductive object, a perceptible current or small electric shock may occur. These small electric shocks cause no physiological harm; however, they may present a nuisance.

SCE Comment:

To clarify that the text is address conductive materials, please make the following revisions:

Power line fields can induce voltages and currents on conductive objects, such as metal roofs or buildings, metal fences, and vehicles. Transmission lines are designed to limit the short circuit current, from conductive items beneath the line, to a safe level (less than 5 milliampere). When a person or animal comes in contact with a conductive object, a perceptible current or small electric shock may occur. These small electric shocks cause no physiological harm; however, they may present a nuisance.

Comment Set F3: Southern California Edison Company (cont.)

Page D.21-2

DEIR/DEIS Text: F3-496

The connected solar projects would be located in rural or remote areas and would interconnect to existing substations. The lines connecting the generators to the substations (gen-tie lines) would be in existing transmission line corridors or require new corridors. The effect in terms of electrical interference and safety would be similar in nature to the Proposed Project. However, the connected action projects are in remote or rural areas and the population in the vicinity of these lines would be low.

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

The connected solar projects would be located in rural or remote areas and would interconnect to existing substations. The lines connecting the generators to the substations (gen-tie lines) would be in existing transmission line corridors or require new corridors. The effect in terms of potential electrical interference and safety ~~would~~ could be similar in nature to the Proposed Project. However, the connected action projects are in remote or rural areas and the population in the vicinity of these lines would be low.

Page D.21-3

DEIR/DEIS Text: F3-497

The impact assessment for electrical interference and hazards was conducted through a review of the change in power line field strength in the environment that would occur due to the construction and operation of the project. Within the ROW, the proposed transmission line would be the predominant source of electrical interference and hazards. Further, the area within the transmission line ROW is within the control of SCE with regard to development land use restrictions and public access. In areas outside of the ROW, and as the distance from the transmission line increases, there may be other sources of electrical interference and hazards not associated with the project that affect the level of electrical interference. Therefore, the edge of the transmission line ROW was adopted as the point of reference for assessing Project impacts with respect to electrical interference and hazards.

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

The impact assessment for potential electrical interference and hazards was conducted through a review of the change in power line field strength in the environment that would occur due to the construction and operation of the project. Within the ROW, the proposed transmission line would be the predominant source of potential electrical interference and hazards. Further, the area within the transmission line ROW is within the control of SCE with regard to development land use restrictions and public access. In areas outside of the ROW, and as the distance from the transmission line increases, there may be other sources of potential electrical interference and hazards not associated with the project that affect the level of potential electrical interference. Therefore, the edge of the transmission line ROW was adopted as the point of reference for assessing Project impacts with respect to potential electrical interference and hazards.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.21-4

DEIR/DEIS Text: F3-498

D.21.3.2 CEQA Significance Criteria

The Environmental Checklist Form in Appendix G of the State CEQA Guidelines does not provide any significance criteria related to electrical hazards and interference. CEQA significance determinations for electrical interference and safety are made based on reasonably assumed potential impacts, as described below. For purposes of the CEQA analysis for this Project, an impact would be considered significant and require additional mitigation if Project construction or if maintenance of Project facilities during Project operations would:

- Create interference with radio, television, communications, or electronic equipment.
- Create hazards to the public through Project-induced currents or shocks.
- Create interference with cardiac pacemakers.

SCE Comment:

Significance criteria not found in the California Environmental Quality Act (CEQA) guidelines are not appropriate for inclusion in an analysis of CEQA Significance Criteria. As such, please remove the following:

- ~~Create interference with radio, television, communications, or electronic equipment.~~
- ~~Create hazards to the public through Project-induced currents or shocks.~~
- ~~Create interference with cardiac pacemakers.~~

Page D.21-4

DEIR/DEIS Text: F3-499

SCE proposed no Applicant Proposed Measures related to electrical interference and hazards.

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revision:

SCE proposed no Applicant Proposed Measures related to <u>potential</u> electrical interference and hazards.

Page D.21-4

DEIR/DEIS Text: F3-500

This section presents discussion of impacts related to electrical interference and safety, and mitigation measures for the West of Devers Upgrade Project.

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revision:

This section presents discussion of impacts related to <u>potential</u> electrical interference and safety, and mitigation measures for the West of Devers Upgrade Project.

Page D.21-4

DEIR/DEIS Text: F3-501

The Proposed Project would cause changes in power line field strength as the locations of energized conductors would change during construction and in the final configuration of the transmission lines after construction is complete. These changes in field strength at the edge of the ROW could cause the following types of electrical interference and hazards.

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revision:

The Proposed Project would cause changes in power line field strength as the locations of energized conductors would change during construction and in the final configuration of the transmission lines after construction is complete. These changes in field strength at the edge of the ROW could cause the following types of <u>potential</u> electrical interference and hazards.

Comment Set F3: Southern California Edison Company (cont.)

Page D.21-4

DEIR/DEIS Text: F3-502

Corona or gap discharges related to high frequency radio and television interference impacts are dependent upon several factors, including the strength of broadcast signals and are anticipated to be very localized, if it were to occur. Individual sources of adverse radio/television interference impacts can be located and corrected on power lines. Conversely, magnetic field interference with electronic equipment, such as older CRT monitors, can be corrected through the use of software, shielding, or changes at the monitor location. Mitigation Measures EIS-1a and EIS-1b would limit interference by reducing corona discharges from the energized conductor and by addressing loose connections that result in gap discharges.

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards or that corona will be an issue, please make the following revisions:

Corona or gap discharges related to high frequency radio and television interference impacts are dependent upon several factors, including the strength of broadcast signals and are anticipated to be very localized, if it were to occur. Individual sources of potential adverse radio/television interference impacts can be located and corrected on power lines. Conversely, potential magnetic field interference with electronic equipment, such as older CRT monitors, can be corrected through the use of software, shielding, or changes at the monitor location. Mitigation Measures EIS-1a and EIS-1b would limit interference by reducing corona discharges from the energized conductor and by addressing loose connections that result in gap discharges.

Page D.20-5

DEIR/DEIS Text: F3-503

EIS-2a Implement grounding measures. As part of the siting and construction process, SCE shall identify objects (such as fences, metal buildings, and pipelines) within and near the right-of-way that have the potential for induced voltages and shall implement electrical grounding of metallic objects in accordance with SCE's standards. The identification of objects shall document the threshold electric field strength and metallic object size at which grounding becomes necessary.

SCE Comment:

Please make the following clarifying revisions:

EIS-2a Implement grounding measures. As part of the siting and construction process, SCE shall identify objects (such as metal fences, metal buildings, and metal pipelines) within and near the right-of-way that have the potential for induced voltages and shall implement electrical grounding of metallic objects in accordance with SCE's standards. The identification of objects shall document the threshold electric field strength and metallic object size at which grounding becomes necessary.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.21-5

DEIR/DEIS Text: F3-504

The Proposed Project's direct and indirect impacts to electrical interference with radio, television, communications, or electronic equipment during O&M would be minimized or avoided through the implementation of Mitigation Measures EIS-1a and EIS-1b, presented below. Mitigation Measure EIS-1a (Limit the conductor surface gradient) ensures reduction of the conductor surface gradient in accordance with the IEEE Radio Noise Design Guide. In addition, Mitigation Measure EIS-1b (Document and resolve electronic interference complaints) ensures complaints regarding electronic interference would be logged and resolved to the extent feasible.

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revision:

The Proposed Project's direct and indirect impacts to potential electrical interference with radio, television, communications, or electronic equipment during O&M would be minimized or avoided through the implementation of Mitigation Measures EIS-1a and EIS-1b, presented below. Mitigation Measure EIS-1a (Limit the conductor surface gradient) ensures reduction of the conductor surface gradient in accordance with the IEEE Radio Noise Design Guide. In addition, Mitigation Measure EIS-1b (Document and resolve electronic interference complaints) ensures complaints regarding electronic interference would be logged and resolved to the extent feasible.

Page D.21-5

DEIR/DEIS Text: F3-505

EIS-2a Implement grounding measures. As part of the siting and construction process, SCE shall identify objects (such as fences, metal buildings, and pipelines) within and near the right-of-way that have the potential for induced voltages and shall implement electrical grounding of metallic objects in accordance with SCE's standards. The identification of objects shall document the threshold electric field strength and metallic object size at which grounding becomes necessary.

SCE Comment:

To clarify that the text addresses conductive materials, please make the following revisions:

EIS-2a Implement grounding measures. As part of the siting and construction process, SCE shall identify objects (such as metal fences, metal buildings, and metal pipelines) within and near the right-of-way that have the potential for induced voltages and shall implement electrical grounding of metallic objects in accordance with SCE's standards. The identification of objects shall document the threshold electric field strength and metallic object size at which grounding becomes necessary.

Page D.21-6

DEIR/DEIS Text: F3-506

The impacts of the connected solar projects in terms of electrical interference and safety would be similar to those described for the Proposed Project. The impacts would be created by the gen-tie lines connecting the solar projects to SCE substations. Because of the remote location of the solar projects, the potentially affected population would be small.

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

The impacts of the connected solar projects in terms of potential electrical interference and safety ~~would~~ could be similar to those described for the Proposed Project. The potential impacts would be created by the gen-tie lines connecting the solar projects to SCE substations. Because of the remote location of the solar projects, the potentially affected population would be small.

Comment Set F3: Southern California Edison Company (cont.)

Page D.21-6

DEIR/DEIS Text: F3-507

This impact would be similar to the Proposed Project, but reduced in severity due to the short length and remote location of the gen-tie lines.

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

The potential impact ~~would~~ could be similar to the Proposed Project, but reduced in severity due to the short length and remote location of the gen-tie lines.

Page D.21-6

DEIR/DEIS Text: F3-508

This impact would be similar to the Proposed Project, but reduced in severity due to the short length and remote location of the gen-tie lines.

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

The potential impact ~~would~~ could be similar to the Proposed Project, but reduced in severity due to the short length and remote location of the gen-tie lines.

Pages D.21-6 through 7

DEIR/DEIS Text: F3-509

Impact EIS-1: Project could create interference with radio, television, communications, or electronic equipment (Class II)

For the connected solar projects, gen-tie lines would be required to comply with existing industry standards. While the facilities would be in remote locations, implementation of mitigation similar to Mitigation Measures EIS-1a and EIS-1b would ensure that the impact is less than significant (Class II).

SCE Comment:

The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

Page D.21-7

DEIR/DEIS Text: F3-510

The function of some pacemakers could be altered by exposure to electric fields that would be generated in the immediate vicinity of the project. As described above, electrical interference with modern cardiac pacemakers is not a substantial threat to public health because most modern pacemakers are designed to revert to a fixed-rate pacing mode, which is life-sustaining. This impact would be less than significant for both the Proposed Project and for gen-tie lines associated with the connected solar projects. No mitigation is required (Class III).

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revision:

The function of some pacemakers could be potentially altered by exposure to electric fields that would be generated in the immediate vicinity of the project. As described above, electrical interference with modern cardiac pacemakers is not a substantial threat to public health because most modern pacemakers are designed to revert to a fixed-rate pacing mode, which is life-sustaining. This potential impact would be less than significant for both the Proposed Project and for gen-tie lines associated with the connected solar projects. No mitigation is required (Class III).

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.21-7

DEIR/DEIS Text: F3-511

Impact EIS-2: Project-induced currents or shocks would create hazards to the public (Class II) Gen-tie lines for the solar projects would be required to comply with existing industry standards. While the facilities would be in remote locations, implementation of mitigation similar to Mitigation Measure EIS-2a would ensure that the impact is less than significant (Class II).

SCE Comment:

The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

Pages D.21-6 through D.21-7

DEIR/DEIS Text: F3-512

Corona or gap discharges related to transmission line operation could cause localized and temporary disruptions to radio, television, communications, or electronic equipment. Mitigation Measure EIS-1a (Limit the conductor surface gradient) would require SCE to limit the conductor surface gradient in accordance with the IEEE Radio Noise Design Guide, which would minimize disruptions to radio, television, communications, or electrical equipment. Mitigation Measure EIS-1b (Document and resolve electronic interference complaints) would require SCE to respond to, document, and resolve interference complaints related to corona or gap discharges after energizing the transmission line. With implementation of these mitigation measures, this impact would be less than significant (Class II).

For the connected solar projects, gen-tie lines would be required to comply with existing industry standards. While the facilities would be in remote locations, implementation of mitigation similar to Mitigation Measures EIS-1a and EIS-1b would ensure that the impact is less than significant (Class II).

SCE Comment:

As there is no evidence that proposed transmission lines will introduce adverse impacts from corona discharge, please make the following revisions:

Corona or gap discharges related to transmission line operation could <u>potentially</u> cause localized and temporary disruptions to radio, television, communications, or electronic equipment. Mitigation Measure EIS-1a (Limit the conductor surface gradient) would require SCE to limit the conductor surface gradient in accordance with the IEEE Radio Noise Design Guide, which would minimize <u>potential</u> disruptions to radio, television, communications, or electrical equipment. Mitigation Measure EIS-1b (Document and resolve electronic interference complaints) would require SCE to respond to, document, and resolve <u>potential</u> interference complaints related to corona or gap discharges after energizing the transmission line. With implementation of these mitigation measures, this <u>potential</u> impact would be less than significant (Class II).

For the connected solar projects, gen-tie lines would be required to comply with existing industry standards. While the facilities would be in remote locations, implementation of mitigation similar to Mitigation Measures EIS-1a and EIS-1b would ensure that the <u>potential</u> impact is less than significant (Class II).

Comment Set F3: Southern California Edison Company (cont.)

Page D.21-7

DEIR/DEIS Text: F3-513

After the gen-tie lines are energized, the public could be exposed to potential hazards, including shock, through induced currents on conducting objects near the transmission line. Mitigation Measure EIS-2a (Implement grounding measures) would reduce the potential for this adverse impact through the provision of a conductive path to ground thereby avoiding a buildup of electrical potential that could discharge as an electrical shock. With implementation of mitigation, this impact would be less than significant (Class II).

Gen-tie lines for the solar projects would be required to comply with existing industry standards. While the facilities would be in remote locations, implementation of mitigation similar to Mitigation Measure EIS-2a would ensure that the impact is less than significant (Class II).

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

After the gen-tie lines are energized, the public could be exposed to potential hazards, including shock, through induced currents on conducting objects near the transmission line. Mitigation Measure EIS-2a (Implement grounding measures) would reduce the potential for this adverse impact through the provision of a conductive path to ground thereby avoiding a buildup of electrical potential that could discharge as an electrical shock. With implementation of mitigation, this potential impact would be less than significant (Class II).

Gen-tie lines for the solar projects would be required to comply with existing industry standards. While the facilities would be in remote locations, implementation of mitigation similar to Mitigation Measure EIS-2a would ensure that the potential impact is less than significant (Class II).

Page D.21-7

DEIR/DEIS Text: F3-514

Three alternatives are considered in this section; all of these alternatives would be located within the existing WOD ROW. The No Project/No Action Alternative is evaluated in Section D.21.5. Alternatives are described in detail in Appendix 5 (Alternatives Screening Report) and are summarized in Section C.

Electrical interference and safety within the ROW is described in Section D.21.1.1 above; the description of the environmental setting would apply equally to the alternatives.

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revision:

Three alternatives are considered in this section; all of these alternatives would be located within the existing WOD ROW. The No Project/No Action Alternative is evaluated in Section D.21.5. Alternatives are described in detail in Appendix 5 (Alternatives Screening Report) and are summarized in Section C.

Potential ~~E~~electrical interference and safety within the ROW is described in Section D.21.1.1 above; the description of the environmental setting would apply equally to the alternatives.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.21-7

DEIR/DEIS Text: F3-515

The Tower Relocation Alternative would locate certain transmission structures in Segments 4 and 6 farther from existing homes than would be the case under the Proposed Project.

Three impacts related to electrical interference and safety were identified for the Proposed Project. These impacts also would apply to the Tower Relocation Alternative, which overall would be the same as the Proposed Project, with the exception of the relocated transmission towers that are described above and in Appendix 5. The full text of all mitigation measures referenced in this section is presented in Section D.21.3.3, except where otherwise noted.

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

The Tower Relocation Alternative would locate certain transmission structures in Segments 4 and 6 farther from existing homes than would be the case under the Proposed Project.

Three potential impacts related to electrical interference and safety were identified for the Proposed Project. These potential impacts also would apply to the Tower Relocation Alternative, which overall would be the same as the Proposed Project, with the exception of the relocated transmission towers that are described above and in Appendix 5. The full text of all mitigation measures referenced in this section is presented in Section D.21.3.3, except where otherwise noted.

Page D.21-8

DEIR/DEIS Text: F3-516

The minor adjustment to the location of these towers would not differ from the Proposed Project's minor risk of interference with cardiac pacemakers. No mitigation is proposed.

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revision:

The minor adjustment to the location of these towers would not differ from the Proposed Project's minor potential risk of interference with cardiac pacemakers. No mitigation is proposed.

Page D.21-8

DEIR/DEIS Text: F3-517

The CEQA significance determination for each electrical interference and safety impact in this alternative is presented below.

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revision:

The CEQA significance determination for each potential electrical interference and safety impact in this alternative is presented below.

Comment Set F3: Southern California Edison Company (cont.)

Page D.21-8

DEIR/DEIS Text: F3-518

In general, the relocated towers would be moved approximately 50 feet farther from the southern edge of the ROW. Relocating towers in the identified project segments would shift the transmission line slightly farther from the edge of the ROW. This nominal change in distance is not expected to substantially alter (increase or decrease) the effects of the transmission line with regard to electric interference, although the risk of electric interference would be reduced very slightly for the nearest residents. Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints) would limit interference by reducing corona discharges from the energized conductor and by addressing loose connections that result in gap discharges.

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

In general, the relocated towers would be moved approximately 50 feet farther from the southern edge of the ROW. Relocating towers in the identified project segments would shift the transmission line slightly farther from the edge of the ROW. This nominal change in distance is not expected to substantially alter (increase or decrease) the effects of the transmission line with regard to potential electric interference, although the risk of potential electric interference would be reduced very slightly for the nearest residents. Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints) would limit potential interference by reducing corona discharges from the energized conductor and by addressing loose connections that result in gap discharges.

Page D.21-8

DEIR/DEIS Text: F3-519

Corona or gap discharges related to transmission line operation could cause localized and temporary disruptions to radio, television, communications, or electronic equipment. With implementation of Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints), this impact would be less than significant (Class II).

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

Corona or gap discharges related to transmission line operation could potentially cause localized and temporary disruptions to radio, television, communications, or electronic equipment. With implementation of Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints), this potential impact would be less than significant (Class II).

Page D.21-8

DEIR/DEIS Text: F3-520

After the transmission line is energized, the public could be exposed to potential hazards, including shock, through induced currents on conducting objects near the transmission line. With implementation of Mitigation Measure EIS-2a (Implement grounding measures), this impact would be less than significant (Class II).

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

After the transmission line is energized, the public could be exposed to potential hazards, including shock, through induced currents on conducting objects near the transmission line. With implementation of Mitigation Measure EIS-2a (Implement grounding measures), this potential impact would be less than significant (Class II).

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.21-8

DEIR/DEIS Text: F3-521

The function of some pacemakers could be altered by exposure to electric fields that would be generated in the immediate vicinity of the project. As described above, electrical interference with modern cardiac pacemakers is not a substantial threat to public health because most modern pacemakers are designed to revert to a fixed-rate pacing mode, which is life-sustaining. This impact would be less than significant. No mitigation is required (Class III).

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

The function of some pacemakers could potentially be altered by exposure to electric fields that would be generated in the immediate vicinity of the project. As described above, potential electrical interference with modern cardiac pacemakers is not a substantial threat to public health because most modern pacemakers are designed to revert to a fixed-rate pacing mode, which is life-sustaining. This potential impact would be less than significant. No mitigation is required (Class III).

Page D.21-9

DEIR/DEIS Text: F3-522

The Iowa Street 66 kV Underground Alternative would place a 1,600-foot segment of subtransmission line underground, rather than overhead.

Three impacts were identified under the Proposed Project for electrical interference and safety. These impacts also would apply to the Iowa Street 66 kV Underground Alternative, which overall would be the same as the Proposed Project, with the exception of the underground portion of the subtransmission line that is described above and in Appendix 5. The full text of all mitigation measures referenced in this section is presented in Section D.21.3.3, except where otherwise noted.

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

The Iowa Street 66 kV Underground Alternative would place a 1,600-foot segment of subtransmission line underground, rather than overhead.

Three potential impacts were identified under the Proposed Project for electrical interference and safety. These potential impacts also would apply to the Iowa Street 66 kV Underground Alternative, which overall would be the same as the Proposed Project, with the exception of the underground portion of the subtransmission line that is described above and in Appendix 5. The full text of all mitigation measures referenced in this section is presented in Section D.21.3.3, except where otherwise noted.

Comment Set F3: Southern California Edison Company (cont.)

Page D.21-9

DEIR/DEIS Text: F3-523

This alternative would place a 1,600-foot segment of 66 kV subtransmission line underground instead of on overhead poles. This short underground segment would decrease slightly the effects of the transmission line with regard to electric interference for the nearest residents. Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints) would limit interference by reducing corona discharges from the energized conductor and by addressing loose connections that result in gap discharges.

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revision:

This alternative would place a 1,600-foot segment of 66 kV subtransmission line underground instead of on overhead poles. This short underground segment would decrease slightly the effects of the transmission line with regard to potential electric interference for the nearest residents. Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints) would limit the potential interference by reducing corona discharges from the energized conductor and by addressing loose connections that result in gap discharges.

Page D.21-9

DEIR/DEIS Text: F3-524

This short underground segment would decrease slightly the Proposed Project's risk to the public through project-induced currents or shocks, because the conductors in this area would be underground and not accessible. There would be transition structures at the north and south ends of the under-ground segment, and these facilities would still have the potential to create shock hazards. With implementation of Mitigation Measure EIS-2a (Implement grounding measures), this impact would be less than significant (Class II).

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

This short underground segment would decrease slightly the Proposed Project's potential risk to the public through project-induced currents or shocks, because the conductors in this area would be underground and not accessible. There would be transition structures at the north and south ends of the under-ground segment, and these facilities would still have the potential to create shock hazards. With implementation of Mitigation Measure EIS-2a (Implement grounding measures), this potential impact would be less than significant (Class II).

Page D.21-9

DEIR/DEIS Text: F3-525

This short underground segment would decrease slightly the risk of interference with cardiac pacemakers as compared with the Proposed Project. Given the rarity of an exposure event to occur simultaneously with a biological need for full function pacemakers, it would be unlikely that the transmission line's electric field would cause harmful interference to the operations of cardiac pacemakers. No mitigation is proposed.

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

This short underground segment would decrease slightly the potential risk of interference with cardiac pacemakers as compared with the Proposed Project. Given the rarity of an exposure event to occur simultaneously with a biological need for full function pacemakers, it would be unlikely that the transmission line's electric field would cause harmful interference to the operations of cardiac pacemakers. No mitigation is proposed.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.21-9

DEIR/DEIS Text: F3-526

The CEQA significance determination for each electrical interference and safety impact in this alternative is presented below.

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions.

The CEQA significance determination for each potential electrical interference and safety impact in this alternative is presented below.

Page D.21-9

DEIR/DEIS Text: F3-527

Corona or gap discharges related to transmission line operation could cause localized and temporary disruptions to radio, television, communications, or electronic equipment. With implementation of Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints), this impact would be less than significant (Class II).

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

Corona or gap discharges related to transmission line operation could potentially cause localized and temporary disruptions to radio, television, communications, or electronic equipment. With implementation of Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints), this potential impact would be less than significant (Class II).

Page D.21-10

DEIR/DEIS Text: F3-528

The Iowa Street 66 kV Underground Alternative would eliminate the potential for induced current or shocks in the underground segment, but the transition structures would remain at each end of the segment. At these structures, the public could be exposed to potential hazards, including shock, through induced currents on conducting objects near the transmission line. With implementation of Mitigation Measure EIS-2a (Implement grounding measures), this impact would be less than significant (Class II).

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

The Iowa Street 66 kV Underground Alternative would eliminate the potential for induced current or shocks in the underground segment, but the transition structures would remain at each end of the segment. At these structures, the public could be exposed to potential hazards, including shock, through induced currents on conducting objects near the transmission line. With implementation of Mitigation Measure EIS-2a (Implement grounding measures), this potential impact would be less than significant (Class II).

Comment Set F3: Southern California Edison Company (cont.)

Page D.29-10

DEIR/DEIS Text: F3-529

The function of some pacemakers could be altered by exposure to electric fields that would be generated in the immediate vicinity of the project. As described above, electrical interference with modern cardiac pacemakers is not a substantial threat to public health because most modern pacemakers are designed to revert to a fixed-rate pacing mode, which is life-sustaining. This impact would be less than significant. No mitigation is required (Class III).

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

The function of some pacemakers could be potentially altered by exposure to electric fields that would be generated in the immediate vicinity of the project. As described above, potential electrical interference with modern cardiac pacemakers is not a substantial threat to public health because most modern pacemakers are designed to revert to a fixed-rate pacing mode, which is life-sustaining. This potential impact would be less than significant. No mitigation is required (Class III).

Page D.21-10

DEIR/DEIS Text: F3-530

The Phased Build Alternative would retain existing double-circuit 220 kV transmission structures to the extent feasible, remove single-circuit structures, add new double-circuit 220 kV structures, and string all structures with higher-capacity conductors.

Three impacts were identified under the Proposed Project for electrical interference and safety. These impacts also would apply to the Phased Build Alternative, which would be located in the same corridor as the Proposed Project and would involve similar although less intense construction activities. The full text of all mitigation measures referenced in this section is presented in Section D.21.3.3, except where otherwise noted.

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

The Phased Build Alternative would retain existing double-circuit 220 kV transmission structures to the extent feasible, remove single-circuit structures, add new double-circuit 220 kV structures, and string all structures with higher-capacity conductors.

Three potential impacts were identified under the Proposed Project for electrical interference and safety. These potential impacts also would apply to the Phased Build Alternative, which would be located in the same corridor as the Proposed Project and would involve similar although less intense construction activities. The full text of all mitigation measures referenced in this section is presented in Section D.21.3.3, except where otherwise noted.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.21-10

DEIR/DEIS Text: F3-531

In the locations where the structures in this alternative would be farther from the edge of the ROW than the Proposed Project structures, the potential for project-induced electrical interference would be reduced. Also, less power would flow through the transmission lines in this alternative compared to the Proposed Project, and it is assumed that this reduced amount of power flow would also lead to a reduced potential for electrical interference. The same as for the Proposed Project, corona or gap discharges related to high frequency radio and television interference adverse effects are dependent upon several factors, including the strength of broadcast signals and are anticipated to be very localized, if they were to occur. Individual sources of adverse radio/ television interference impacts can be located and corrected on power lines. Conversely, magnetic field interference with electronic equipment, such as older CRT monitors, can be corrected through the use of software, shielding, or changes at the monitor location. Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints) would limit interference by reducing corona discharges from the energized conductor and by addressing loose connections that result in gap discharges.

SCE Comment:

There is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards. Electrical interference with radio, television, etc. is based on electrical field influences as opposed to magnetic field, therefore, given that the alternative operates at the same voltage as the proposed project there will be no reduction of the interference by selection of the alternative. Please make the following revisions:

In the locations where the structures in this alternative would be farther from the edge of the ROW than the Proposed Project structures, the potential for project-induced electrical interference would be reduced. ~~Also, less power would flow through the transmission lines in this alternative compared to the Proposed Project, and it is assumed that this reduced amount of power flow would also lead to a reduced potential for electrical interference.~~ The same as for the Proposed Project, corona or gap discharges related to high frequency radio and television interference potential adverse effects are dependent upon several factors, including the strength of broadcast signals and are anticipated to be very localized, if they were to occur. Individual sources of potential adverse radio/television interference impacts can be located and corrected on power lines. Conversely, potential magnetic field interference with electronic equipment, such as older CRT monitors, can be corrected through the use of software, shielding, or changes at the monitor location. Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints) would limit the potential interference by reducing corona discharges from the energized conductor and by addressing loose connections that result in gap discharges.

Comment Set F3: Southern California Edison Company (cont.)

Pages D.21-10 through 11

DEIR/DEIS Text: F3-532

Due to the Segment 4 and 6 locations where the alternative would be further from the edge of ROW than the Proposed Project, the potential for hazards to the public due to project-induced currents may be reduced for the nearest residents compared to the Proposed Project. However, because much of the ROW is accessible to the public the risk of project-induced currents or shocks would be substantially the same regardless of the tower locations within the ROW. The same as for the Proposed Project, induced currents and voltages on conducting objects near the proposed transmission lines represent a potential adverse impact that can be mitigated. These impacts do not pose a threat in the environment if the conducting objects are properly grounded. Mitigation Measure EIS-2a (Implement grounding measures) would provide a conductive path to ground thereby avoiding a buildup of electrical potential that could discharge as an electrical shock.

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

Due to the Segment 4 and 6 locations where the alternative would be further from the edge of ROW than the Proposed Project, the potential for hazards to the public due to project-induced currents may be reduced for the nearest residents compared to the Proposed Project. However, because much of the ROW is accessible to the public the potential risk of project-induced currents or shocks would be substantially the same regardless of the tower locations within the ROW. The same as for the Proposed Project, induced currents and voltages on conducting objects near the proposed transmission lines represent a potential adverse impact that can be mitigated. These potential impacts do not pose a threat in the environment if the conducting objects are properly grounded. Mitigation Measure EIS-2a (Implement grounding measures) would provide a conductive path to ground thereby avoiding a buildup of electrical potential that could discharge as an electrical shock.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.21-11

DEIR/DEIS Text: F3-533

The potential for interference with cardiac pacemakers would be slightly reduced compared to the Pro-posed Project for locations along the corridor where the structures in this alternative would be located further from the edge of the ROW. However, because much of the ROW is accessible to the public the risk of interference with cardiac pacemakers would be substantially the same regardless of the tower locations within the ROW. The same as for the Proposed Project, the function of some pacemakers could be altered by exposure to electric fields that would be generated in the immediate vicinity of the project (i.e., adjacent to the transmission line ROW), potentially resulting in inaccurate detections by the pacemaker of normal cardiac signals or resulting in inappropriate behavior, until the field strength is reduced by the individual leaving the immediate area. However, the biological consequences of transient, reversible pacemaker malfunction are mostly benign because, as discussed in Section D.21.3.3, most modern units revert to a fixed-rate pacing mode, which is life-sustaining. Given the rarity of an exposure event to occur simultaneously with a biological need for full function pacemakers, it would be unlikely that the transmission line's electric field would cause harmful interference to the operations of cardiac pacemakers. No mitigation is proposed.

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

The potential for interference with cardiac pacemakers would be slightly reduced compared to the Proposed Project for locations along the corridor where the structures in this alternative would be located further from the edge of the ROW. However, because much of the ROW is accessible to the public the <u>potential</u> risk of interference with cardiac pacemakers would be substantially the same regardless of the tower locations within the ROW. The same as for the Proposed Project, the function of some pacemakers could be <u>potentially</u> altered by exposure to electric fields that would be generated in the immediate vicinity of the project (i.e., adjacent to the transmission line ROW), potentially resulting in inaccurate detections by the pacemaker of normal cardiac signals or resulting in inappropriate behavior, until the field strength is reduced by the individual leaving the immediate area. However, the biological consequences of transient, reversible pacemaker malfunction are mostly benign because, as discussed in Section D.21.3.3, most modern units revert to a fixed-rate pacing mode, which is life-sustaining. Given the rarity of an exposure event to occur simultaneously with a biological need for full function pacemakers, it would be unlikely that the transmission line's electric field would cause harmful interference to the operations of cardiac pacemakers. No mitigation is proposed.

Page D.21-11

DEIR/DEIS Text: F3-534

The CEQA significance determination for each electrical interference and safety impact in this alternative is presented below.

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

The CEQA significance determination for each <u>potential</u> electrical interference and safety impact in this alternative is presented below.

Comment Set F3: Southern California Edison Company (cont.)

Page D.21-11

DEIR/DEIS Text: F3-535

Impact EIS-1: Project could create interference with radio, television, communications, or electronic equipment (Class II)

Corona or gap discharges related to transmission line operation could cause localized and temporary disruptions to radio, television, communications, or electronic equipment. With implementation of Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints), this impact would be less than significant (Class II).

SCE Comment:

The DEIR/DEIS does not sufficiently recognize that the use of 795 Drake ACCR results in a higher conductor surface gradient than the selection of two bundled 1590 ACSR. Please make the following revisions:

Impact EIS-1: Project could create interference with radio, television, communications, or electronic equipment (Class II)

Corona or gap discharges related to transmission line operation could cause localized and temporary disruptions to radio, television, communications, or electronic equipment. The potential for corona or gap discharges operations with the Phase Build Alternative are likely greater than those expected in the project because the conductor surface gradient of the single conductor 795 ACCR would be significantly greater than the conductor surface gradient of the two bundled 1590 ACSR as designed in the Proposed Project. With implementation of Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints), this impact would be less than significant (Class II).

Page D.21-11

DEIR/DEIS Text: F3-536

Corona or gap discharges related to transmission line operation could cause localized and temporary disruptions to radio, television, communications, or electronic equipment. With implementation of Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints), this impact would be less than significant (Class II).

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

Corona or gap discharges related to transmission line operation could potentially cause localized and temporary disruptions to radio, television, communications, or electronic equipment. With implementation of Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints), this potential impact would be less than significant (Class II).

Page D.21-11

DEIR/DEIS Text: F3-537

After the transmission line is energized, the public could be exposed to potential hazards, including shock, through induced currents on conducting objects near the transmission line. With implementation of Mitigation Measure EIS-2a (Implement grounding measures), this impact would be less than significant (Class II).

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

After the transmission line is energized, the public could be exposed to potential hazards, including shock, through induced currents on conducting objects near the transmission line. With implementation of Mitigation Measure EIS-2a (Implement grounding measures), this potential impact would be less than significant (Class II).

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.21-11

DEIR/DEIS Text: F3-538

The function of some pacemakers could be altered by exposure to electric fields that would be generated in the immediate vicinity of the project. As described above, electrical interference with modern cardiac pacemakers is not a substantial threat to public health because most modern pacemakers are designed to revert to a fixed-rate pacing mode, which is life-sustaining. This impact would be less than significant. No mitigation is required (Class III).

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

The function of some pacemakers could be potentially altered by exposure to electric fields that would be generated in the immediate vicinity of the project. As described above, potential electrical interference with modern cardiac pacemakers is not a substantial threat to public health because most modern pacemakers are designed to revert to a fixed-rate pacing mode, which is life-sustaining. This potential impact would be less than significant. No mitigation is required (Class III).

Page D.21-12

DEIR/DEIS Text: F3-539

No Project Alternative Transmission Lines and Beaumont Substation. Development of the 500 kV/220 kV transmission line from Devers to El Casco Substation would cause changes in power line field strength at the edge of the ROW. This could cause interference with radio, television, communications or electronic equipment and induce currents or shocks that would be hazards. The potential for these impacts to occur is common to all high-voltage lines. Mitigation measures include limiting the conductor surface gradient as part of the design and construction process (in accordance with the IEEE Radio Noise Design Guide); documenting and resolving individual complaints of interference; and implementing grounding measures for fences, metal building, pipelines, etc., within and near the ROW. Another potential impact is interference with cardiac pacemakers. However, most modern pacemakers revert to a fixed-rate pacing mode during transient events. Given the rarity of an exposure event to occur simultaneously with a bio-logical need for full function pacemakers, it would be unlikely that the transmission line's electric field would cause harmful interference to the operations of cardiac pacemakers.

SCE Comment:

To clarify that the text is addressing conductive materials, please make the following revisions:

No Project Alternative Transmission Lines and Beaumont Substation. Development of the 500 kV/220 kV transmission line from Devers to El Casco Substation would cause changes in power line field strength at the edge of the ROW. This could cause interference with radio, television, communications or electronic equipment and induce currents or shocks that would be hazards. The potential for these impacts to occur is common to all high-voltage lines. Mitigation measures include limiting the conductor surface gradient as part of the design and construction process (in accordance with the IEEE Radio Noise Design Guide); documenting and resolving individual complaints of interference; and implementing grounding measures for metal fences, metal building, metal pipelines, etc., within and near the ROW. Another potential impact is interference with cardiac pacemakers. However, most modern pacemakers revert to a fixed-rate pacing mode during transient events. Given the rarity of an exposure event to occur simultaneously with a bio-logical need for full function pacemakers, it would be unlikely that the transmission line's electric field would cause harmful interference to the operations of cardiac pacemakers.

Comment Set F3: Southern California Edison Company (cont.)

Page D.21-12

DEIR/DEIS Text: F3-540

Development of the 500 kV/220 kV transmission line from Devers to El Casco Substation would cause changes in power line field strength at the edge of the ROW. This could cause interference with radio, television, communications or electronic equipment and induce currents or shocks that would be hazards. The potential for these impacts to occur is common to all high-voltage lines. Mitigation measures include limiting the conductor surface gradient as part of the design and construction process (in accordance with the IEEE Radio Noise Design Guide); documenting and resolving individual complaints of interference; and implementing grounding measures for fences, metal building, pipelines, etc., within and near the ROW. Another potential impact is interference with cardiac pacemakers. However, most modern pacemakers revert to a fixed-rate pacing mode during transient events. Given the rarity of an exposure event to occur simultaneously with a biological need for full function pacemakers, it would be unlikely that the transmission line's electric field would cause harmful interference to the operations of cardiac pacemakers.

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

Development of the 500 kV/220 kV transmission line from Devers to El Casco Substation would cause changes in power line field strength at the edge of the ROW. This could cause potential interference with radio, television, communications or electronic equipment and induce currents or shocks that ~~would~~ could be potential hazards. The potential for these impacts to occur is common to all high-voltage lines. Mitigation measures include limiting the conductor surface gradient as part of the design and construction process (in accordance with the IEEE Radio Noise Design Guide); documenting and resolving individual complaints of potential interference; and implementing grounding measures for fences, metal building, pipelines, etc., within and near the ROW. Another potential impact is interference with cardiac pacemakers. However, most modern pacemakers revert to a fixed-rate pacing mode during transient events. Given the rarity of an exposure event to occur simultaneously with a biological need for full function pacemakers, it would be unlikely that the transmission line's electric field would cause harmful interference to the operations of cardiac pacemakers.

Page D.21-13

DEIR/DEIS Text: F3-541

EIS-2a: Implement Grounding Measures. As part of the siting and construction process, SCE shall identify objects (such as fences, metal buildings, and pipelines) within and near the right-of-way that have the potential for induced voltages and shall implement electrical grounding of metallic objects in accordance with SCE's standards. The identification of objects shall document the threshold electric field strength and metallic object size at which grounding becomes necessary.

SCE Comment:

To clarify that the text is addressing conductive materials, please make the following revisions:

EIS-2a: Implement Grounding Measures. As part of the siting and construction process, SCE shall identify objects (such as metal fences, metal buildings, and metal pipelines) within and near the right-of-way that have the potential for induced voltages and shall implement electrical grounding of metallic objects in accordance with SCE's standards. The identification of objects shall document the threshold electric field strength and metallic object size at which grounding becomes necessary.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page D.21-12

DEIR/DEIS Text: F3-542

No Project Alternative Option 2 would require the construction of over 40 miles of new 500 kV transmission line, following the existing Valley-Serrano 500 kV line. The alternative is described in Section C.6.3.2, and illustrated on Figure C-6b. The ROW between the Valley Substation and the Serrano Substation contains an existing 500 kV transmission line. This alternative would add a second 500 kV circuit within or adjacent to the existing ROW. Operation of this new circuit would cause changes in the power line field strength at the edge of the ROW. These changes could cause interference with radio, television, communications or electronic equipment. The new circuit could also create a hazard for workers or the public through induced currents or shocks. The function of some pacemakers could be altered by exposure to electric fields that would be generated in the immediate vicinity of the new 500 kV circuit. Electrical interference with modern cardiac pacemakers is not a substantial threat to public health because most modern pacemakers are designed to revert to a fixed-rate pacing mode, which is life-sustaining. The potential electrical interference and electrical hazards associated with the new 500 kV circuit would not be substantially different than under existing conditions, and can be reduced through implementation of recommended mitigation described in the Proposed Project and Option 1.

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

No Project Alternative Option 2 would require the construction of over 40 miles of new 500 kV transmission line, following the existing Valley-Serrano 500 kV line. The alternative is described in Section C.6.3.2, and illustrated on Figure C-6b. The ROW between the Valley Substation and the Serrano Substation contains an existing 500 kV transmission line. This alternative would add a second 500 kV circuit within or adjacent to the existing ROW. Operation of this new circuit would cause changes in the power line field strength at the edge of the ROW. These changes could cause <u>potential</u> interference with radio, television, communications or electronic equipment. The new circuit could also <u>potentially</u> create a hazard for workers or the public through induced currents or shocks. The function of some pacemakers could <u>potentially</u> be altered by exposure to electric fields that would be generated in the immediate vicinity of the new 500 kV circuit. <u>Potential</u> electrical interference with modern cardiac pacemakers is not a substantial threat to public health because most modern pacemakers are designed to revert to a fixed-rate pacing mode, which is life-sustaining. The potential electrical interference and electrical hazards associated with the new 500 kV circuit would not be substantially different than under existing conditions, and can be reduced through implementation of recommended mitigation described in the Proposed Project and Option 1.

Responses to Comment Set F3 – Section D.21 Electrical Interference and Safety

F3-492 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). Impact analyses in environmental documents discuss environmental impacts that could happen, but may not necessarily occur as the result of a project. Therefore, they are uncertain by nature, so the discussions of impacts in the EIS are already considered potential. Therefore, there is no need to modify the text throughout to make this distinction, and the EIS has not been revised.

F3-493 The commenter states that as there is no evidence that the existing or future magnetic fields will interact with electronic equipment, the EIS should be revised to add "potentially" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

F3-494 The commenter states that as there is no evidence that existing or future magnetic fields will interfere with electronic devices, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

F3-495 The commenter suggests a clarification to the text to ensure that only conductive materials are described as potential induced current and shock hazards. The text under Induced Currents and Shock Hazards in Section D.21.1 (Environmental Setting / Affected Environment) of the Final EIS has been revised as suggested to add the word "metal" to describe fences capable of current induction. Similar text modifications have also been made throughout Section D.21 (Electrical Interference and Safety) in Responses to Comments F3-503, F3-505, F3-539, and F3-541.

F3-496 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

F3-497 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

F3-498 The commenter states that significance criteria not found in CEQA guidelines are not appropriate for inclusion in an analysis of CEQA Significance Criteria. Therefore, the commenter requests deletion of the significance criteria listed in Section D.21.3.2 (CEQA Significance Criteria) regarding electrical inference and safety hazards. This comment relates to CEQA, not NEPA. Please see Response to Comment F3-95. No change in the EIS is required as a result of this comment.

F3-499 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

F3-500 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

F3-501 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

F3-502 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

F3-503 The commenter suggests a clarification to the text to ensure that only conductive materials are described as potential induced current and shock hazards. The comment references page D.20-5 of the Draft EIR/EIS, but based on its content regarding electrical interference and safety, it is assumed that page D.21-5 is the location of the intended clarification. Therefore, the text in Mitigation Measure EIS-2a (Implement grounding measures) in Section D.21.3.3 (Impacts and Mitigation Measures) of the Final EIS has been revised as suggested to add the word "metal" to describe fences and pipelines capable of current induction. Similar text modifications have also been made throughout Section D.21 (Electrical Interference and Safety) in Responses to Comments F3-495, F3-505, F3-539, and F3-541.

F3-504 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

F3-505 The commenter suggests a clarification to the text to ensure that only conductive materials are described as potential induced current and shock hazards. This comment appears to be duplicative of Comment F3-503. Regardless, the text in Mitigation Measure EIS-2a (Implement grounding measures) in Section D.21.3.3 (Impacts and Mitigation Measures) of the Final EIS has been revised as suggested to add the word "metal" to describe fences and pipelines capable of current induction. Similar text modifications have also been made throughout Section D.21 (Electrical Interference and Safety) in Responses to Comments F3-495, F3-503, F3-539, and F3-541.

F3-506 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

F3-507 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

F3-508 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

F3-509 The commenter requests that the EIS clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers Upgrade Project. See Response to Comment F3-102 with regard to mitigation for connected actions.

F3-510 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

F3-511 The commenter requests that the EIS should clarify under Impact EIS-2 (Project-induced currents or shocks would create hazards to the public) that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers Upgrade Project. See Response to Comment F3-509.

F3-512 The commenter states that as there is no evidence that transmission lines will introduce adverse impacts from corona discharge, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

F3-513 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

F3-514 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

F3-515 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

F3-516 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

F3-517 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

F3-518 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

F3-519 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" and "potentially" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

F3-520 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

F3-521 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

F3-522 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

F3-523 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

F3-524 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

F3-525 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

F3-526 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

F3-527 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" and "potentially" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

F3-528 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to

add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

F3-529 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" and "potentially" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

F3-530 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

F3-531 The commenter requests deletion of the statement that under the Phased Build Alternative a reduced amount of power flow would lead to a reduced potential for electrical interference. Impact EIS-1 (Project could create interference with radio, television, communications, or electronic equipment) in Section D.21.4.3 (Phased Build Alternative) of the Final EIS has been revised to remove the sentence. In addition, a similar statement has been removed from Section ES.4.21.2 (Effects of Alternatives on Electrical Interference and Safety) in the Executive Summary of the Final EIS (see Response to Comment F3-11).

F3-532 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

F3-533 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" and "potentially" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

F3-534 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

F3-535 The commenter states that the Draft EIR/EIS does not sufficiently recognize that the use of 795 Drake ACCR results in a higher conductor surface gradient than the selection of two bundled 1590 ACSR and requests a text addition to the effect under Impact EIS-1 (Project could create interference with radio, television, communications, or electronic equipment) in Section D.21.4.3 (Phased Build Alternative).

The EIS Team agrees that the potential for corona is likely higher, however, gap discharges are not related to the conductor size. Therefore, the text has been revised in the Final EIS, but gap discharges are not included in the statement.

F3-536 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" and "potentially" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

F3-537 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

F3-538 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" and "potentially" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

F3-539 The commenter suggests a clarification to the text to ensure that only conductive materials are described as potential induced current and shock hazards. The text in Section D.21.5.1 (No Project Alternative Option 1) of the Final EIS has been revised, as suggested, to add the word "metal" to describe fences and pipelines capable of current induction. Similar text modifications have also been made throughout Section D.21 (Electrical Interference and Safety) in Responses to Comments F3-495, F3-503, F3-505, and F3-541.

F3-540 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" and "could" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

F3-541 The commenter suggests a clarification to the text to ensure that only conductive materials are described as potential induced current and shock hazards. The text of Mitigation Measure EIS-2a (Implement grounding measures) in Table D.21 1 (Mitigation Monitoring Program – Electrical Interference and Safety) in Section D.21.6 (Mitigation Monitoring, Compliance, and Reporting) of the Final EIS has been revised as suggested to add the word "metal" to describe fences and pipelines capable of current induction. Similar text modifications have also been made throughout Section D.21 (Electrical Interference and Safety) in Responses to Comments F3-495, F3-503, F3-505, and F3-539.

F3-542 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" and "potentially" to the discussion in Section D.21 (Electrical Interference and Safety). See Response to Comment F3-492.

Comment Set F3: Southern California Edison Company (cont.)

Section E Cumulative Scenario and Impacts

Page E-13

DEIR/DEIS Text: F3-543

While SCE states that it currently has no specific plans for transmission expansion in the WOD corridor, there are other regional studies that point to the potential for future development.

SCE Comment:

Please make the following revision:

While SCE states that it currently has no specific plans for transmission expansion in the WOD corridor, and CAISO has not studied nor identified the need for transmission expansion in the WOD corridor beyond SCE's Proposed West of Devers Upgrade Project, there are other regional studies that point to the potential for future development.

Page E-17

DEIR/DEIS Text: F3-544

Based on the information above, the CPUC and BLM have determined that a future 500 kV transmission line in the WOD corridor is foreseeable, and therefore should be evaluated as a cumulative project in this EIR/EIS.

SCE Comment:

Please see the accompanying cover letter for a detailed discussion of SCE's concerns regarding the Phased Build Alternative and potential future construction within the West of Devers corridor.

Page E-17

DEIR/DEIS Text: F3-545

The potential future 500 kV transmission structures in that segment would likely be new tubular steel poles approximately 190 to 200 feet tall, most likely located along an existing transmission corridor.

SCE Comment:

Please see the accompanying cover letter for a detailed discussion of SCE's concerns regarding the Phased Build Alternative and potential future construction within the West of Devers corridor. Additionally,

The assumption that a future 500 kV transmission line would likely use tubular steel poles is speculation as SCE has no specific plans for transmission expansion in the WOD corridor beyond the West of Devers Upgrade nor has CAISO studied or identified the need for which a design would be necessary. Please make the following revisions:

The potential future 500 kV transmission structures in that segment would ~~likely be new tubular steel poles approximately 190 to 200 feet tall, most~~ likely be located along an existing transmission corridor.

Pages E-19 through 22

DEIR/DEIS Text: F3-546

Figure E-2a thru Figure E-2d

SCE Comment:

The source information for these figures should not reflect "SCE, 2014" because they were not created by SCE, but instead modified from similar figures that SCE provided. In addition, these figures show proposed 500 kV structure locations that, in some instances, improperly reflect minimum distances required between structures of other voltages or reflect the use of TSPs when LSTs may be more appropriate.

Please make the following revision to the DEIR/DEIS language on all four figures. Source: Aspen, 2015. ~~SCE, 2014.~~

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page E-35

DEIR/DEIS Text: F3-547

Severity of Project Contribution to Cumulative Adverse Effects. Construction and operation of the Proposed Project would result in adverse effects to cultural resources that would combine with the adverse effects from construction and operation of other projects in the cumulative analysis study area to result in a substantial cumulative adverse effect to cultural resources.

SCE Comment:

The DEIR/DEIS incorrectly assumes that adverse impacts to cultural resources are inevitable. Please make the following revisions:

Severity of Project Contribution to Cumulative Adverse Effects. Construction and operation of the Proposed Project ~~would~~ could result in adverse effects to cultural resources. If the Proposed Project caused an adverse effect to cultural resources, ~~that would~~ combine with the adverse effects from construction and operation of other projects in the cumulative analysis study area, ~~to~~ could result in a substantial cumulative adverse effect to cultural resources.

Comment Set F3: Southern California Edison Company (cont.)

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DEIR/DEIS Text: F3-548

Total Construction Emissions

Estimated Daily Emissions (lbs/day)

Construction Activity	CO	ROG	NOX	PMIO	PM2.5
Devers Substation	19.4	4.3	31.4	2.6	1.6
El Casco Substation	16.3	3.7	28.8	2.0	1.3
Vista Substation	17.0	3.7	28.9	2.2	1.3
San Bernardino Substation	19.4	4.3	31.4	4.1	2.0
Etiwanda Substation	1.0	0.0	0.1	0.0	0.0
Timoteo Substation	2.2	0.1	0.6	0.1	0.0
Tennessee Substation	2.2	0.1	0.6	0.0	0.0
220 kV Transmission Line	2,259.0	525.9	4,009.0	243.4	156.0
Shoo-Fly	837.6	241.3	1,739.3	165.2	87.7
66 kV Subtransmission Line	448.6	111.5	828.2	57.1	34.8
Telecommunications System	54.6	17.4	141.2	9.9	5.6
Total	3,677.3	912.2	6,839.5	486.8	290.4
SCAQMD Regional	550	75	100	150	55
Exceed SCAQMD	TRUE	TRUE	TRUE	TRUE	TRUE

Total Construction Emissions after Implementation of APMs

Estimated Daily Emissions (lbs/day)

Construction Activity	CO	ROG	NOX	PMIO	PM2.5
Devers Substation	19.4	4.3	25.1	2.3	1.6
El Casco Substation	16.3	3.7	23.0	1.8	1.2
Vista Substation	17.0	3.7	23.1	1.9	1.3
San Bernardino Substation	19.4	4.3	25.1	3.5	1.8
Etiwanda Substation	1.0	0.0	0.1	0.0	0.0
Timoteo Substation	2.2	0.1	0.5	0.1	0.0
Tennessee Substation	2.2	0.1	0.5	0.0	0.0
220 kV Transmission Line	2,259.0	525.9	3,207.2	195.6	145.9
Shoo-Fly	837.6	241.3	1,391.4	119.0	78.0
66 kV Subtransmission Line	448.6	111.5	662.5	44.1	32.1
Telecommunications System	54.6	17.4	113.0	7.4	5.1
Total	3,677.3	912.2	5,471.6	375.8	267.1
SCAQMD Regional	550	75	100	150	55

SCE Comment:

Please remove references to the Timoteo and Tennessee Substations.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

F3-548 cont.

Total Construction Emissions

Estimated Daily Emissions (lbs/day)

Construction Activity	CO	ROG	NOX	PM10	PM2.5
Devers Substation	19.4	4.3	31.4	2.6	1.6
El Casco Substation	16.3	3.7	28.8	2.0	1.3
Vista Substation	17.0	3.7	28.9	2.2	1.3
San Bernardino Substation	19.4	4.3	31.4	4.1	2.0
Etiwanda Substation	1.0	0.0	0.1	0.0	0.0
~~Timoteo Substation~~	~~2.2~~	~~0.1~~	~~0.6~~	~~0.1~~	~~0.0~~
~~Tennessee Substation~~	~~2.2~~	~~0.1~~	~~0.6~~	~~0.0~~	~~0.0~~
220 kV Transmission Line	2,259.0	525.9	4,009.0	243.4	156.0
Shoo-Fly	837.6	241.3	1,739.3	165.2	87.7
66 kV Subtransmission Line	448.6	111.5	828.2	57.1	34.8
Telecommunications System	54.6	17.4	141.2	9.9	5.6
Total	~~3,677.3~~	~~912.2~~	~~6,839.5~~	~~486.8~~	~~290.4~~
	3,672.9	912.1	6,838.3	486.5	290.3
SCAQMD Regional Threshold	550	75	100	150	55
Exceed SCAQMD Threshold?	TRUE	TRUE	TRUE	TRUE	TRUE

Total Construction Emissions after Implementation of APMs

Estimated Daily Emissions (lbs/day)

Construction Activity	CO	ROG	NOX	PM10	PM2.5
Devers Substation	19.4	4.3	25.1	2.3	1.6
El Casco Substation	16.3	3.7	23.0	1.8	1.2
Vista Substation	17.0	3.7	23.1	1.9	1.3
San Bernardino Substation	19.4	4.3	25.1	3.5	1.8
Etiwanda Substation	1.0	0.0	0.1	0.0	0.0
~~Timoteo Substation~~	~~2.2~~	~~0.1~~	~~0.5~~	~~0.1~~	~~0.0~~
~~Tennessee Substation~~	~~2.2~~	~~0.1~~	~~0.5~~	~~0.0~~	~~0.0~~
220 kV Transmission Line	2,259.0	525.9	3,207.2	195.6	145.9
Shoo-Fly	837.6	241.3	1,391.4	119.0	78.0
66 kV Subtransmission Line	448.6	111.5	662.5	44.1	32.1
Telecommunications System	54.6	17.4	113.0	7.4	5.1
Total	~~3,677.3~~	~~912.2~~	~~5,471.6~~	~~375.8~~	~~267.1~~
	3,672.90	912.1	5,470.50	375.6	267.00
SCAQMD Regional Threshold	550	75	100	150	55
Exceed SCAQMD Threshold?	TRUE	TRUE	TRUE	TRUE	TRUE

Comment Set F3: Southern California Edison Company (cont.)

Page E-56

DEIR/DEIS Text: F3-549

Future 500 kV Transmission Line, Cumulative Simulations, KOP#2, #4, #7, #12, #13

SCE Comment:

Cumulative simulations were developed as part of the DEIR/DEIS and used in the analysis to make conclusions related to cumulative impacts of a future 500 kV transmission line. The development of simulations implies that there is a design that has been developed to support locations of structures within the corridor. Consistent with the prior comment, the assumption that a future 500 kV transmission line would likely use tubular steel poles is speculation as SCE has no specific plans for transmission expansion in the WOD corridor beyond the West of Devers Upgrade nor has CAISO studied or identified the need for which a design would be necessary. Simulations should not be included as part of the analysis of a speculative project as it gives a false sense of a level of detail that has not been developed. SCE cannot validate the accuracy or lack thereof for these simulations.

Please see the accompanying cover letter for a detailed discussion of SCE's concerns regarding the Phased Build Alternative and potential future construction within the West of Devers corridor.

Page E-59

DEIR/DEIS Text: F3-550

Visual Resources Cumulative Simulation Figure E-3a

The 500 kV structures would be noticeably taller and would appear somewhat more massive compared to the lattice structures.

SCE Comment:

As it relates to the figures for the Cumulative Future 500 kV Corridor Profiles the source is stated as SCE 2014, however, SCE did not provide corridor profiles with 500 kV structures.

Page E-73

DEIR/DEIS Text: F3-551

The geographic scope for analysis of Proposed Project adverse effects related to electrical interference and safety is the ROW for the entire length of the 220 kV transmission line. The geographic scope for this cumulative analysis is the same as for the Proposed Project, but also includes projects immediately adjacent to the 220 kV ROW. This geographic scope is appropriate because electrical interference and electrical safety hazards attenuate rapidly with distance from the transmission line, and therefore these potential adverse effects would not combine with similar adverse effects from other projects that are not within or immediately adjacent to the Proposed Project ROW.

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

The geographic scope for analysis of Proposed Project <u>potential</u> adverse effects related to electrical interference and safety is the ROW for the entire length of the 220 kV transmission line. The geographic scope for this cumulative analysis is the same as for the Proposed Project, but also includes projects immediately adjacent to the 220 kV ROW. This geographic scope is appropriate because <u>potential</u> electrical interference and electrical safety hazards attenuate rapidly with distance from the transmission line, and therefore these potential adverse effects would not combine with similar <u>potential</u> adverse effects from other projects that are not within or immediately adjacent to the Proposed Project ROW.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Pages E-73 through 74

DEIR/DEIS Text: F3-552

The past, present, and reasonably foreseeable projects that contribute or would contribute to electrical interference and electrical safety hazards within the cumulative analysis study area are limited generally to electrical transmission lines. Several transmission lines currently exist in the Proposed Project corridor, and these past projects contribute to the existing baseline for electrical interference in the study area. Other transmission lines in the region also create electrical interference, but those other regional transmission lines are outside of the cumulative analysis study area because electrical interference from transmission lines attenuates rapidly with distance and would not combine with the potential adverse effects of the Proposed Project. The only project within the cumulative projects study area that could combine with the Proposed Project to result in a cumulative adverse effect is the future 500 kV trans-mission line, which could result in an increase in electrical interference and electrical safety hazards. This cumulative analysis has determined that a future 500 kV transmission line is foreseeable, and therefore should be evaluated as a cumulative project in this EIR/EIS. The line would be built in SCE's existing ROW and along about 40 miles of the 45-mile project ROW. The future 500 kV line could be single-circuit or double-circuit, and for the purpose of this study, it is assumed to be a double-circuit line. Construction and operation of the Proposed Project would result in minor adverse effects related to electrical interference and electrical safety hazards. These potential adverse effects could combine with the adverse effects on electrical interference and safety from the future 500 kV transmission line to result in a cumulative adverse effect.

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

The past, present, and reasonably foreseeable projects that contribute or ~~would~~ could contribute to potential electrical interference and electrical safety hazards within the cumulative analysis study area are limited generally to electrical transmission lines. Several transmission lines currently exist in the Proposed Project corridor, and these past projects contribute to the existing baseline for potential electrical interference in the study area. Other transmission lines in the region also create potential electrical interference, but those other regional transmission lines are outside of the cumulative analysis study area because potential electrical interference from transmission lines attenuates rapidly with distance and would not combine with the potential adverse effects of the Proposed Project. The only project within the cumulative projects study area that could combine with the Proposed Project to result in a cumulative potential adverse effect is the future 500 kV trans-mission line, which could potentially result in an increase in electrical interference and electrical safety hazards. This cumulative analysis has determined that a future 500 kV transmission line is foreseeable, and therefore should be evaluated as a cumulative project in this EIR/EIS. The line would be built in SCE's existing ROW and along about 40 miles of the 45-mile project ROW. The future 500 kV line could be single-circuit or double-circuit, and for the purpose of this study, it is assumed to be a double-circuit line. Construction and operation of the Proposed Project ~~would~~ could result in potential minor adverse effects related to electrical interference and electrical safety hazards. These potential minor adverse effects could combine with the potential adverse effects on electrical interference and safety from the future 500 kV transmission line to result in a cumulative potential adverse effect.

Comment Set F3: Southern California Edison Company (cont.)

Page E-74

DEIR/DEIS Text: F3-553

Construction and operation of the Proposed Project would cause changes in power line field strength as the locations of energized conductors would change during construction and in the final configuration of the transmission lines after construction is complete. These changes in field strength at the edge of the ROW could create: interference with radio, television, communications, or electronic equipment; hazards to the public from project-induced currents or shocks; and, interference with cardiac pacemakers. The only other project within the cumulative projects study area that could result in adverse effects related to electrical interference and safety is the future 500 kV transmission line. Although the future 500 kV transmission line would be geo-graphically contiguous with the majority of the Proposed Project, the construction schedule for the future transmission line would not overlap with the construction schedule of the Proposed Project. There-fore, construction-related adverse effects to electrical interference and safety from the Proposed Project would not combine with construction-related adverse effects to electrical interference and safety from the future transmission line to result in a cumulative effect. However, the operational adverse effects of the future transmission line could combine with the operational adverse effects of the Proposed Project to result in a cumulative adverse effect. Overall, construction and operation of the Proposed Project would result in minor adverse effects related to electrical interference and safety, and the incremental contribution of the Proposed Project to the cumulative adverse effect would be similarly minor.

The severity of the Proposed Project potential adverse effects related to electrical interference and safety, as well as the incremental contribution of the Proposed Project to the cumulative adverse effect, would be reduced through implementation of Mitigation Measures EIS-1a (Limit the conductor surface gradient), EIS-1b (Document and resolve electronic interference complaints), and EIS-2a (Implement grounding measures). These mitigation measures are fully described in Section D.21.

With implementation of the mitigation measures noted above and described fully in Section D.21, the incremental contribution of the Proposed Project to the adverse cumulative effect would be negligible.

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

Construction and operation of the Proposed Project would cause changes in power line field strength as the locations of energized conductors would change during construction and in the final configuration of the transmission lines after construction is complete. These changes in field strength at the edge of the ROW could create: interference with radio, television, communications, or electronic equipment; hazards to the public from project-induced currents or shocks; and, interference with cardiac pacemakers. The only other project within the cumulative projects study area that could result in potential adverse effects related to electrical interference and safety is the future 500 kV transmission line. Although the future 500 kV transmission line would be geo-graphically contiguous with the majority of the Proposed Project, the construction schedule for the future transmission line would not overlap with the construction schedule of the Proposed Project. Therefore, construction-related potential adverse effects to electrical interference and safety from the Proposed Project would not combine with construction-related potential adverse effects to electrical interference and safety from the future transmission line to result in a cumulative effect. However, the operational potential adverse effects of the future transmission line could combine with the operational potential adverse effects of the Proposed Project to result in a cumulative potential adverse effect. Overall, construction and operation of the Proposed Project ~~would~~ could result in potential minor adverse effects related to electrical interference and safety, and the incremental contribution of the Proposed Project to the cumulative potential adverse effect would be similarly minor.

The severity of the Proposed Project potential adverse effects related to electrical interference and safety, as well as the incremental contribution of the Proposed Project to the cumulative potential adverse effect, would be reduced through implementation of Mitigation Measures EIS-1a (Limit the conductor surface gradient), EIS-1b (Document and resolve electronic interference complaints), and EIS-2a (Implement grounding measures). These mitigation measures are fully described in Section D.21. With implementation of the mitigation measures noted above and described fully in Section D.21, the incremental contribution of the Proposed Project to the potential adverse cumulative effect would be negligible.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page E-74

DEIR/DEIS Text: F3-554

Operation of the Proposed Project would combine with the impacts from construction and operation of the future 500 kV transmission line to result in a significant cumulative impact related to electrical interference and safety. Without the implementation of mitigation, the incremental contribution of the Proposed Project to the significant cumulative impact would be cumulatively considerable. However, with implementation of mitigation measures noted above and described fully in Section D.21, the contribution of the Proposed Project to the significant electrical interference and safety cumulative impact would be less than cumulatively considerable.

SCE Comment:

As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions:

Operation of the Proposed Project ~~would~~ could combine with the impacts from construction and operation of the future 500 kV transmission line to result in a potentially significant cumulative impact related to electrical interference and safety. Without the implementation of mitigation, the incremental contribution of the Proposed Project to the potentially significant cumulative impact would be cumulatively considerable. However, with implementation of mitigation measures noted above and described fully in Section D.21, the contribution of the Proposed Project to the potentially significant electrical interference and safety cumulative impact would be less than cumulatively considerable.

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DEIR/DEIS Text: F3-555

E-4 Comparison of Alternatives

All of the retained alternatives are located in the same ROW as the Proposed Project and would involve similar types of construction activities. The same list of cumulative projects that could potentially com-bine with the Proposed Project to result in a cumulative adverse effect would also apply to all of the retained alternatives. Therefore, the cumulative analysis presented above for the Proposed Project would also apply to all of the alternatives, and the adverse cumulative effects that are described for the Pro-posed Project would also occur with all of the alternatives.

SCE Comment:

The description provided in the Phased Build Alternative (Section C.4.3 and Figure C-5) indicates that the existing double-circuit towers in Segment 6 would remain as-is. Given that those structures are already located at the northern edge of the ROW in this segment, any 'future phase' that would consist of installing a single- or double-circuit 500kV or 220kV line in the vacant space remaining in the ROW would have to be built in the "center" position. This would increase complexity in both terminating that project into Devers Substation (either at 500kV or 220kV switchracks), as well as creating additional crossovers in the Banning Junction, El Casco, and/or San Bernardino Junction area. Such crossovers are not sufficiently incorporated into the alternative project description regarding the location of the future 500kV structures. And because no figures similar to Figures E-2a through E-2d were provided anywhere within the DEIR/DEIS to reflect these orientation details, there is no basis to conclude that the Phase Build Alternative would have similar cumulative impacts, because that latter phase would involve additional construction complexities, including, but not limited to, additional crossovers that would not be necessary if the project were constructed as designed by SCE (*i.e*. the Proposed Project).

Please make the following revisions:

All of the retained alternatives are located in the same ROW as the Proposed Project and would involve similar types of construction activities, with the exception of the Phased Build Alternative, which would result in greater construction disturbances for the subsequent set of circuits than the Proposed Project. The same list of cumulative projects that could potentially com-bine with the Proposed Project to result in a cumulative adverse effect would also apply to all of the retained alternatives. Therefore, the cumulative analysis presented above for the Proposed Project would also apply to all of the alternatives, and the adverse cumulative effects that are described for the Pro-posed Project would also occur with all of the alternatives with the exception of the Phased Build Alternative, which would result in greater cumulative effects due to the subsequent set of circuits than the Proposed Project.

Responses to Comment Set F3 – Section E Cumulative Scenario and Impacts

F3-543 As suggested by the commenter, Section E.2.3.1 has been revised to clarify that the CAISO has not studied the need for transmission expansion in the WOD corridor beyond SCE's Proposed West of Devers Upgrade Project.

F3-544 Please see General Response GR-4 (Analysis of Potential Future Construction under the Phased Build Alternative) and Response to Comment F1-13 regarding the potential for the Phased Build Alternative to require additional future construction.

F3-545 The comment state that the EIS speculates that a future 500 kV transmission line would be "likely" to use tubular steel poles, since SCE has no specific plans for transmission expansion in the WOD corridor beyond the West of Devers Upgrade. The description of this future cumulative project clearly states that SCE has no specific plans (Section E.2.3.1, Background). Therefore, the Cumulative Transmission Scenario (Section E.2.3.2) is general in some respects with enough details described and shown on figures to enable an analysis of foreseeable cumulative impacts. The description of the Cumulative Transmission Scenario need not be revised, as it clearly describes what is only "likely" to occur based on other recent SCE major transmission projects reviewed.

F3-546 The commenter states that SCE did not create Figure E-2a thru E-2d in Section E (Cumulative Scenario and Impacts) and requests that the source identified on the figures be revised to Aspen, 2015. The commenter further notes that in some instances the figures improperly reflect minimum distances required between structures of other voltages and reflect use of TSPs when LSTs may be more appropriate.

The commenter is mistaken, as SCE is the source of the images shown in Figure E-2a thru E-2d. Many figures throughout the EIS identify SCE as the source. Throughout the EIS, the EIS preparers assembled and formatted SCE-provided information to create a final figure, based on background information and basic images from SCE. The basic illustrations of structures used in these figures were originally from SCE and assembled by the EIS team. The description of the Cumulative Transmission Scenario need not be revised, as it clearly describes what is only "likely" to occur, and it is presented only for the purpose of enabling an analysis of foreseeable cumulative impacts.

F3-547 SCE requests that references to estimated daily emissions for construction activities at the Timoteo and Tennessee Substations be removed from the table since this work is no longer needed as part of the Proposed Project. The table referenced in the comment is from page E-46 of the PEA, included in the Draft EIR/EIS as part of Appendix 6 (Air Quality, page Ap.6-44). Because the table in the appendix was included as it was shown in the PEA, it has not been updated as a result of this comment. However, the Final EIS updates Section D.3 (Air Quality) and eliminates the air emissions associated with construction activities at the Timoteo and Tennessee Substations.

F3-548 Reference to the Tennessee and Timoteo Substations has been removed from the Project Description and from the construction emissions table (Table D.3-8). This comment references page E-46 of the PEA, included in the Draft EIR/EIS as part of Appendix 6 (Air Quality, page Ap.6-44). Because the table in the appendix was included as it was shown in the PEA, it has not been updated as a result of this comment. A table with similar information appears in Section D.3 (Air Quality) as Table D.3-8, which was edited in response to a previous com-

ment removing the substations. All comments requesting deletion of the substations in the EIS text have been addressed. For example, see Responses to Comments F3-335 and F3-579.

F3-549 SCE believes that simulations for the cumulative scenario's future 500 kV transmission line should not be presented in the EIS because they give the impression that SCE has specific plans for future development in the corridor. Nothing in the description of the cumulative scenario states or implies that SCE has specific plans for transmission expansion within the WOD Corridor. In fact, Section E.2.3.1 of the Draft EIR/EIS specifically stated, "While SCE states that it currently has no specific plans for transmission expansion in the WOD corridor, there are other regional studies that point to the potential for future development." Note that a similar simulation of the cumulative scenario was presented in the EIR/EIS for the Devers–Palo Verde No. 2 Transmission Project.

Visual photo-simulations are often prepared to provide the public and decision-makers with an image of potential future infrastructure. This simulation is based on an existing 500 kV transmission line on tubular steel poles, and is considered to be accurate for the purposes of the EIS assessment of potential cumulative impacts.

F3-550 SCE states that it did not provide the 500 kV corridor profiles for a simulation shown in Figure E-3a in the cumulative analysis of visual resources. First, Figure E-3a is not a simulation but simply a photograph of the existing corridor. Second, neither Figure E-3a nor Figure E-3b state SCE as a source for the photograph.

F3-551 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to add "potential" to the discussion in Section E.3.21 (Cumulative Scenario and Impacts, Electrical Interference and Safety). See Response to Comment F3-492.

F3-552 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to qualify the discussion and add "potential" or "could" to the discussion in Section E.3.21 (Cumulative Scenario and Impacts, Electrical Interference and Safety). See Response to Comment F3-492.

F3-553 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to qualify the discussion and add "potential" or "could" to the discussion in Section E.3.21 (Cumulative Scenario and Impacts, Electrical Interference and Safety). See Response to Comment F3-492.

F3-554 The commenter states that as there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, the EIS should be revised to qualify the discussion and add "potential" or "could" to the discussion in Section E.3.21 (Cumulative Scenario and Impacts, Electrical Interference and Safety). See Response to Comment F3-492.

F3-555 Please see General Response GR-4 regarding the future construction impacts of the Phased Build Alternative.

Comment Set F3: Southern California Edison Company (cont.)

Section F Other NEPA Considerations

Page F-7

DEIR/DEIS Text: F3-556

Cultural Resources

– Impact CL-2: Construction, operation and maintenance, and restoration would cause an adverse change to unknown buried prehistoric and historical archaeological sites or buried Native American human remains

SCE Comment:

This section is listed under the section "Significant Environmental Effects that Cannot be Avoided if the Proposed Project is Implemented." The analysis in this section conflicts with the analysis in Section D.7. Section D.7 does not find cultural impacts to be significant and unavoidable, therefore, this discussion should be deleted from this section.

Page F-7

DEIR/DEIS Text: F3-557

Cultural Resources

– Impact CL-2: Construction, operation and maintenance, and restoration would cause an adverse change to unknown buried prehistoric and historical archaeological sites or buried Native American human remains.

SCE Comment:

The DEIR/DEIS incorrectly assumes adverse impacts. SCE recommends the following edits:

Cultural Resources

– Impact CL-2: Construction, operation and maintenance, and restoration ~~would~~ could cause an adverse change to unknown buried prehistoric and historical archaeological sites or buried Native American human remains.

Page F-8

DEIR/DEIS Text: F3-558

Visual Resources

– Impact VR-2: Construction would result in visual contrast due to vegetation removal.
– Impact VR-9: Long-term presence of the project would result in landscape changes that degrade existing visual character or quality.

SCE Comment:

Evidence has not been presented to support the conclusion that these impacts is significant and unavoidable nor has evidence been provided to support the conclusion that mitigation would not reduce the impact to less than significant levels. These impacts should be changed from Class I to Class II.

Responses to Comment Set F3 – Section F Other NEPA Considerations

F3-556 The comment incorrectly states that Impact CL-2 in D.7 Cultural Resources is not found to be a significant and unavoidable impact (Class I). This comment relates to CEQA, not NEPA. As explained in CPUC's Final EIR, Section D.7.3.5 under Impact CL-2, this impact is found to be significant. No change is required.

F3-557 The language change requested (from "would" to "could" has been made in Section C.7 (Cultural Resources) .

F3-558 The commenter asserts that no evidence has been provided that supports the conclusion that construction would result in visual contrast due to vegetation removal (Impact VR-2). This conclusion is considered reasonable and what would be expected from construction activities in semi-arid and arid environments where vegetation recovery is difficult and often takes many years, often never achieving full recovery. Furthermore, this conclusion is based on several decades of observing the effects of construction of similar projects in similar environments and consulting with lead and responsible agencies tasked with the review and evaluation of such projects. Therefore, no changes to the impact conclusion have been made.

The commenter also asserts that evidence has not been provided to support the conclusion that the long-term presence of the project would result in landscape changes that degrade existing visual character or quality (Impact VR-8) and result in significant visual impacts. The determination of the level of significance of an impact is a CEQA consideration, and not addressed under NEPA. As CPUC discusses in its Final EIR, the discussion of Impact VR-8 states that in the majority of cases, Impact VR-8 would result in either Adverse but Less Than Significant or Beneficial (Class IV) visual impacts. In a very few instances it has been determined that Impact VR-8 would cause Significant and Unavoidable (Class I) visual impacts. Throughout the Final EIS impact analysis, visual simulations have been presented to document the representative visual impacts that would occur with project implementation. Therefore, no additional information is considered necessary and no changes to the impact conclusion have been made.

Comment Set F3: Southern California Edison Company (cont.)

Section G Comparison of Alternatives

Page G-6

DEIR/DEIS Text: F3-559

The Proposed Project in would have 4 significant (Class I) impacts for the 66 kV subtransmission line component. The first 3 impacts would occur for all proposed or alternative segments, but Impact VR-8 results specifically from the 1,600 feet of proposed overhead 66 kV subtransmission along Iowa Street in the City of Redlands. The Iowa Street 66 kV Underground Alternative would mitigate Impact VR-8 to less than significant levels.

SCE Comment:

SCE's comments to the Visual Resources section of the DEIR/DEIS indicated that Figure D-18-25B improperly simulates the installation of double-circuit 220kV TSPs (with a typical as shown in Figure B-10), instead of the correct use of single-circuit 66 kV wood poles (with typical as shown in Figure B-14b). If this simulation had incorporated the correct structure type, it would show that the Proposed Project creates a similar visual impact as the "single, wood-pole utility lines along Orange Avenue and a portion of Iowa Street" and the "…vertical street light poles and a more distant communication tower." (See DEIR page D.18-24, KOP-18, Visual Quality.), therefore the significant impact would not warrant the need for the underground alternative as there would be no impact to mitigate. As such the comparison of this underground alternative to the Proposed Project, as seen in Table G-3, indicates that if not for the incorrect conclusion that this alternative was preferred for visual the Proposed Project is preferred for all other resource areas and, therefore, this alternative should be deleted from further consideration and/or Table G-2 should incorporate the following revisions.

Issue Area	Proposed Project	Iowa 66 kV Underground Alternative
Climate Change	~~No preference~~ Preferred	~~No preference~~ Greater construction impacts due to need for trenching
Visual Resources	~~Significant and unmitigable long-term visual impacts from the Cottage Lane residential subdivision on Iowa Street and Orange Avenue in the City of Redlands~~ No preference	~~Preferred Elimination of overhead segment in residential neighborhood reduces long-term impact to less than significant levels~~ No Preference

Page G-5

DEIR/DEIS Text: F3-560

Table G-2. Comparison of the Proposed Project to Tower Relocation

Land Use and BLM Realty	Greater disturbance of sensitive receptors (residences) during both construction and operation	**Preferred** Even though construction timeframe would be longer

SCE Comment:

Both the Proposed Project and the Tower Relocation Alternative result in Class II impacts. The Comparison states that the Proposed Project disturbance would be greater during both construction and operation. However, when compared to the tower relocation alternative, the construction timeframe would be longer for that alternative. The analysis does not support that the Tower Relocation Alternative would be preferred; therefore, the text should be modified to reflect no preference:

Land Use and BLM Realty	~~Greater disturbance of sensitive receptors (residences) during both construction and operation~~ No preference	~~**Preferred**~~ ~~Even though construction timeframe would be longer~~ No Preference

Comment Set F3: Southern California Edison Company (cont.)

Page G-6

DEIR/DEIS Text: F3-561

Table G-2. Comparison of the Proposed Project to Tower Relocation

Visual Resources	Significant and unmitigable visual impacts on sensitive receptors (residences) during both construction and operation	**Preferred:** Visual impacts less than significant due to greater distance of towers from residences

SCE Comment:

A decrease in visual impacts for the Tower Relocation Alternative has not been demonstrated by the DEIR/DEIS analysis, especially as the alternative does not include any visual simulations, nor is there a basis for concluding that this slight shift in structure location would be perceptible, therefore the text should be modified to reflect no preference.

Visual Resources	~~Significant and unmitigable visual impacts on sensitive receptors (residences) during both construction and operation~~ No preference	~~**Preferred:** Visual impacts less than significant due to greater distance of towers from residences~~ No preference

Page G-8

DEIR/DEIS Text: F3-562

G.4.3 Phased Build Alternative

SCE Comment:

Please see SCE's accompanying cover letter for concerns related to the DEIR/DEIS's characterization of optional future phases to the WOD Upgrade Project. The concerns raised in the accompanying cover letter demonstrate that the analysis included in this section comparing the Phased Build Alternative to the Proposed Project is deficient and conclusions related to the Phase Build Alternative being preferred to the Proposed Project are unsubstantiated.

Comment Set F3: Southern California Edison Company (cont.)

Pages G-8 through G-9

DEIR/DEIS Text: F3-563

G.4.3 Phased Build Alternative

SCE Comment:

Table G-4 of the Draft EIR/EIS identifies the Phased Build Alternative as the preferred alternative for the following resource areas:

- Air Quality
- Cultural Resources
- Geology and Soils
- Land Use and BLM Realty
- Noise
- Paleontological Resources
- Transportation and Traffic
- Visual Resources

Water Resources and Hydrology.

The Draft EIR/EIS, though, fails to adequately describe all the construction features for the Phased Build Alternative that if taken into account would likely lead to minimal differences for these resource areas. Moreover, impacts for these resource areas would only be potentially less than the Proposed Project because the full environmental impacts of the Phased Build Alternative were not evaluated, including additional ground disturbance that would be required to avoid construction work area constraints due to the presence of the adjacent towers that would not be removed.

Please see SCE's accompanying cover letter demonstrating that the analysis included in this section comparing the Phased Build Alternative to the Proposed Project is deficient and conclusions related to the Phase Build Alternative being preferred to the Proposed Project are unsubstantiated.

Pages G-8 through G-9

DEIR/DEIS Text: F3-564

G.4.3 Phased Build Alternative

SCE Comment:

Relative to those resources for which the DEIR finds the Phased Build Alternative to be Preferred, the following should be addressed:

Air Quality

The future portion of the Phased Build Alternative will require construction activities to occur throughout the entire WOD ROW. These construction activities will generate dust and exhaust emissions of criteria pollutants and toxic air contaminants in a quantity roughly equal to that estimated for the Alternative. Conservatively, it is likely that construction-related air quality impacts for the Phased Build Alternative plus the future portion of the Phased Build Alternative will be greater than the air quality impacts for the Proposed Project (e.g., fugitive dust related to greater areas of ground disturbance under the Phase Build Alternative).

Cultural Resources

The Draft EIR/EIS assumes that because one set of transmission structures is not removed for the Phased Build Alternative that the Alternative would result in reduced impacts to buried prehistoric and historical archaeological sites or buried Native American human remains compared to the Proposed Project. However, because the future portion of the Phased Build Alternative does require removal and replacement of the second 220kV transmission line as well as additional ground disturbance due to construction work area constraints, the perceived reduction in impacts to cultural resources for the Phased Build Alternative is merely a deferral of potential impacts. Because both 220kV transmission lines are ultimately rebuilt under the Phased Build Alternative, the full impact to Cultural Resources is equivalent to or greater than those for the Proposed Project.

Comment Set F3: Southern California Edison Company (cont.)

Pages G-8 through G-9

DEIR/DEIS Text: F3-565

G.4.3 Phased Build Alternative

SCE Comment:

Relative to those resources for which the DEIR finds the Phased Build Alternative to be Preferred, the following should be addressed (cont):

Geology and Soils

The Draft EIR/EIS assumes that because the Phased Build Alternative does not remove the second 220kV transmission line initially that impacts related to Geology and Soils are less for that alternative than for the Proposed Project. However, because the future portion of the Phased Build Alternative will require construction activities through the entire WOD ROW, including removal and construction of transmission structures in Segments 1, 2, 3, 4, and 6 and greater ground disturbance due to constrained work area, the full impacts related to Geology and Soils for the Phased Build Alternative are equivalent to or greater than those for the Proposed Project.

Land Use and BLM Realty

The Draft EIR/EIS assumes that because the Phased Build Alternative does not remove the second 220kV transmission line initially that impacts related to Land Use and BLM Realty are less for that alternative than for the Proposed Project. However, because the future portion of the Phased Build Alternative will require construction activities through the entire WOD ROW, including removal and construction of transmission structures in Segments 1, 2, 3, 4, and 6 and greater ground disturbance due to constrained work area, the full impacts related to Land Use and BLM Realty for the Phased Build Alternative are at least equivalent to those for the Proposed Project. In fact, because the Phased Build Alternative would require that SCE cross tribal land to remove conductor from the reused transmission structures and again to reconductor the new transmission structures, there is the potential for Land Use and BLM Realty impacts from the full Phased Build Alternative to be greater than the impacts from the Proposed Project

Comment Set F3: Southern California Edison Company (cont.)

Pages G-8 through G-9

DEIR/DEIS Text: F3-566

G.4.3 Phased Build Alternative

SCE Comment:

Relative to those resources for which the DEIR finds the Phased Build Alternative to be Preferred, the following should be addressed (cont):

Noise

The Draft EIR/EIS assumes that because the Phased Build Alternative does not remove the second 220kV transmission line initially that impacts related to Noise are less for that alternative than for the Proposed Project. While it may be possible that noise impacts for the immediate portion of the Phased Build Alternative are less than the Proposed Project, full implementation of the Phased Build Alternative would require construction throughout the WOD ROW that would result in similar impacts being experienced by sensitive receptors for a second time.

Paleontological Resources

The Draft EIR/EIS assumes that because one set of transmission structures is not removed for the Phased Build Alternative that the Alternative would result in reduced impacts to paleontological resources compared to the Proposed Project. However, because the future portion of the Phased Build Alternative does require removal and replacement of the second 220kV transmission line, the perceived reduction in impacts to paleontological resources for the Phased Build Alternative is merely a deferral of potential impacts. Because both 220 kV transmission lines are ultimately rebuilt under the Phased Build Alternative, the full impact to Paleontological Resources is equivalent to or greater than those for the Proposed Project because of the additional ground disturbance required to address constrained work area.

Transportation and Traffic

The Draft EIR/EIS assumes that because the Phased Build Alternative does not remove the second 220kV transmission line initially that impacts related to Transportation and Traffic are less for the Alternative than for the Proposed Project. While it may be possible that traffic impacts for the immediate portion of the Phased Build Alternative are less than the Proposed Project, full implementation of the Phased Build Alternative would require construction throughout the WOD ROW that would result in similar impacts occurring again in as little as 10 years.

Comment Set F3: Southern California Edison Company (cont.)

Pages G-8 through G-9

DEIR/DEIS Text: F3-567

G.4.3 Phased Build Alternative

SCE Comment:

Relative to those resources for which the DEIR/DEIS finds the Phased Build Alternative to be Preferred, the following should be addressed (cont):

Visual Resources

The Draft EIR/EIS states that impacts to visual resources for the Phased Build Alternative would be "less than significant due to greater distances of towers from residences," compared to "significant and unmitigable visual impacts on sensitive receptors (residences) during both construction and operation for the Proposed Project." However, because the future portion of the Phased Build Alternative does require removal and replacement of the second 220kV transmission line, the perceived reduction in impacts to visual resources for the Phased Build Alternative is primarily a deferral of potential impacts. Sensitive receptors of the WOD ROW would experience visual impacts related to construction twice – once for initial construction of the Phased Build Alternative and again for the future construction of the Phased Build Alternative.

Water Resources

The Draft EIR/EIS assumes that because the Phased Build Alternative does not remove the second 220kV transmission line initially that impacts related to Water Resources and Hydrology are less for that alternative than for the Proposed Project, presumably because less water is needed for construction activities under the Phased Build Alternative. While it may be possible that water needs for the immediate portion of the Phased Build Alternative is less than the Proposed Project, full implementation of the Phased Build Alternative would require construction throughout the WOD ROW for a second time. Additionally, greater ground disturbance would be necessary to address work area constraints during construction. Conservatively, it is likely that construction-related water needs for the Phased Build Alternative plus the construction-related water needs for the future portion of the Phased Build Alternative would be greater than the construction-related water needs for the Proposed Project.

Other Resource Areas

Generally, the same assessment that applies to the resource areas identified above applies to the remainder of the resource areas analyzed in the Draft EIR/EIS.

Comment Set F3: Southern California Edison Company (cont.)

Page G-9

DEIR/DEIS Text: F3-568

The Phased Build Alternative is preferred over the Proposed Project because it would mitigate operational impacts (visual presence of the Proposed Project closer to the south edge of the ROW in Segments 4 and 6 and from the 66 kV line along Iowa Street) to less than significant levels.

Table G-4. Comparison of the Proposed Project to Phased Build Alternative

	No preference	No preference
Visual Resources	Significant and unmitigable visual impacts on sensitive receptors (residences) during both construction and operation	**Preferred** Visual impacts less than significant due to greater distance of towers from residences and elimination

SCE Comment:

The document should indicate no preference between the Phased Build Alternative and the Proposed Project with respect to visual resources. As such, please make the following revisions:

The Phased Build Alternative is not preferred for visual reasons

Table G-4. Comparison of the Proposed Project to Phased Build Alternative

Visual Resources	~~Significant and unmitigable visual impacts on sensitive receptors (residences) during both construction and operation~~ No preference	~~**Preferred**~~ ~~Visual impacts less than significant due to greater distance of towers from residences and elimination~~ No preference	

Responses to Comment Set F3 – Section G Comparison of Alternatives

F3-559 Please see Response to Comment F3-441 regarding the revised simulation of the proposed new Iowa Street 66 kV line. Level of impact significance is a CEQA consideration, and not a NEPA consideration. As CPUC notes in its Final EIR, the revised simulation showed that the visual impact would remain significant and unavoidable, and no change has been made to Table G-3 for visual resources.

F3-560 SCE states that the construction timeframe would be longer for the Tower Relocation Alternative than for the Proposed Project, so Table G-2 should be modified. The table has not been modified, because the EIS conclusion more heavily weighs the long-term visual impact (presence of the larger tower, closer to residences) than the short-term construction impact.

F3-561 The text in the Visual Resources section (D.18.4.1, Tower Relocation Alternative) has been expanded to more clearly explain why this alternative presents a visual benefit in comparison with the Proposed Project. As a result, the Comparison of Alternatives (Table G-2) has not been modified as requested by SCE.

F3-562 Please see General Response GR-4 (Analysis of Potential Future Construction under the Phased Build Alternative) and Response to Comment F1-13 regarding the impacts of the Phased Build Alternative.

F3-563 Please see General Response GR-4 regarding the future construction impacts of the Phased Build Alternative.

F3-564 Please see General Response GR-4 (Analysis of Potential Future Construction under the Phased Build Alternative) regarding SCE's statement that the EIS inadequately considers air quality and cultural resources impacts of this alternative.

F3-565 Please see General Response GR-4 (Analysis of Potential Future Construction under the Phased Build Alternative) regarding SCE's statement that the EIS inadequately considers geology/soils and land use impacts of this alternative.

F3-566 Please see General Response GR-4 (Analysis of Potential Future Construction under the Phased Build Alternative) regarding SCE's statement that the EIS inadequately considers paleontology and transportation/traffic impacts of this alternative.

F3-567 Please see General Response GR-4 (Analysis of Potential Future Construction under the Phased Build Alternative) regarding SCE's statement that the EIS inadequately considers water resources and other resource areas for this alternative.

F3-568 Please see Response to Comment F3-561 regarding the Tower Relocation Alternative. The response to that comment also applies to this comment about the Phased Build Alternative.

Comment Set F3: Southern California Edison Company (cont.)

Section H Mitigation Monitoring and Reporting

Page H-3

DEIR/DEIS Text: F3-569

When a mitigation measure requires that a study or plan be developed during the design or pre-construction phase of the project, SCE must submit the final study or plan to CPUC and BLM for review and approval. Any study or plan that requires approval of the CPUC and BLM must allow at least 60 days for adequate review. Other agencies and jurisdictions with authority over aspects of the project or particular resources may require additional review time. It would be the responsibility of the CPUC/BLM environmental monitoring team to confirm that appropriate opportunities for agency reviews have occurred and required approvals obtained.

SCE Comment:

Review time may be more or less than that referenced, depending on the complexity of a given plan. As such, please make the following revisions:

When a mitigation measure requires that a study or plan be developed during the design or pre-construction phase of the project, SCE must submit the final study or plan to CPUC and BLM for review and approval. Any study or plan that requires approval of the CPUC and BLM must allow ~~at least 60 days~~ adequate time for ~~adequate~~ review. Other agencies and jurisdictions with authority over aspects of the project or particular resources may require additional review time. It would be the responsibility of the CPUC/BLM environmental monitoring team to confirm that appropriate opportunities for agency reviews have occurred and required approvals obtained.

Pages H.3 through H-4

DEIR/DEIS Text: F3-570

If a project change would create or have the potential to create a new significant impact, increase the severity of an impact, or occur outside the geographic area evaluated in the EIR/EIS, the Applicant would be required to submit a PFM.

SCE Comment:

To clarify that minor project additions (e.g. a new construction yard) that would not result in significant impacts would not require a PFM, please make the following revisions:

If a project change would create or have the potential to create a new significant impact or, increase the severity of an impact, ~~or occur outside the geographic area evaluated in the EIR/EIS,~~ the Applicant would be required to submit a PFM.

Page H-5

DEIR/DEIS Text: F3-571

Step 1. Disputes and complaints (including those from the public) should be directed first to the CPUC and/or BLM's Project Manager or designee, as appropriate, for resolution. The Project Manager or designee would attempt to resolve the dispute.

SCE Comment:

To ensure consistency between the Dispute Resolution procedures and Mitigation Measure "LU-1a Prepare construction notification plan". Per "LU-1a Prepare construction notification plan", the following edits are suggested:

Step 1. Disputes and complaints (including those from the public) should be directed first to SCE ~~to the CPUC and/or BLM's Project Manager or designee, as appropriate,~~ for resolution. ~~The Project Manager or designee would attempt to resolve the dispute.~~ SCE -will attempt to resolve the dispute. If the dispute or complaint is resolved by SCE no further action or escalation is needed. If SCE is not able to resolve a dispute or complaint, SCE will direct those to the CPUC and/or BLM's Project Manager or designee, as appropriate, for resolution.

Comment Set F3: Southern California Edison Company, Appendix B (cont.)

Page H-6

DEIR/DEIS Text: F3-572

Procedures to be followed by construction companies engaged to do the work would be written into their contracts with SCE. Procedures to be followed by construction crews would be written into a separate agreement that all construction personnel would be asked to sign, denoting consent to the procedures.

SCE Comment:

SCE contracts for construction require compliance with all project mitigation measures and all workers will be required by additional mitigation measures to undergo WEAP training; environmental information is provided at construction tailboards, and lastly, construction is monitored to ensure that measures are complied with. The additional requirement is thus unnecessary, please make the following edits:

Procedures to be followed by construction companies engaged to do the work would be written into their contracts with SCE. ~~Procedures to be followed by construction crews would be written into a separate agreement that all construction personnel would be asked to sign, denoting consent to the procedures.~~

Page H-6

DEIR/DEIS Text: F3-573

The public is allowed access to records and reports used to track the monitoring program. Monitoring records and reports would be made available for public inspection by the CPUC and BLM on request. The CPUC, the BLM, and SCE would develop a filing and tracking system

SCE Comment:

To clarify that this does not require additional reporting by SCE, please make the following revision:

The public is allowed access to records and reports used to track the monitoring program. Monitoring records and reports prepared by the CPUC and BLM, or officially transmitted to the CPUC and BLM by SCE, would be made available for public inspection by the CPUC and BLM on request. The CPUC, the BLM, and SCE would develop a filing and tracking system.

Responses to Comment Set F3 – Section H Mitigation Monitoring and Reporting

F3-569 The commenter states that review time of studies or plans may be more or less than that referenced in Section H.3 (Mitigation Monitoring and Reporting, Roles and Responsibilities), depending on the complexity of a given plan. The commenter requests that the text is modified to remove "at least 60 days" and replace it with "adequate time for review" by the CPUC and BLM. To retain consistency in this standard review timeframe, this suggested change has not been made. SCE is in control of the construction schedule and can submit plans or studies to the CPUC and BLM a month or two earlier, if it believes that review timeframe could affect the start of construction.

F3-570 The commenter requests text revisions in Section H.3 (Roles and Responsibilities) to state that minor project additions (e.g., new construction yard) that would not result in significant impacts would not require a Petition For Modification (PFM). This is a CPUC issue and is addressed in the Final EIR.

F3-571 The commenter requests text clarification in Section H.4 (Mitigation Monitoring and Reporting, Dispute Resolution) to ensure consistency between the dispute resolution procedures and Mitigation Measure LU-1a (Prepare construction notification plan). The discussion in Section H.4 (Dispute Resolution) is intended to primarily apply to disputes between the CPUC, BLM and SCE. Therefore, the CPUC and/or BLM's Project Manager or designee would be the appropriate person to first attempt to resolve the dispute, and no change has been made to this text in the EIS. However, to insure that public dispute resolution would be consistent with Mitigation Measure LU-1a (Prepare construction notification plan), clarifying text has been added to the Final EIS in Section H.4, under Step 1.

F3-572 The commenter states that SCE contracts for construction require compliance with all project mitigation measures and all workers will be required by additional mitigation measures to undergo WEAP training; environmental information is provided at construction tailboards, and lastly, construction is monitored to ensure that measures are complied with. The additional text requirement in Section H.5.2 (Mitigation Monitoring and Reporting, Construction Personnel) of the EIS is thus unnecessary and should be deleted.

A signed agreement by construction subcontractors to adhere to procedures, including APMs and mitigation measures, is an important step to confirm that the specific requirements are not only known, but will be followed to ensure the protection of resources. However, this agreement does not necessary have to be an additional requirement between the construction contractor and SCE. Therefore, the word "separate" has been removed from the text in Section H.5.2 in the Final EIS.

F3-573 The commenter requests clarification in Section H.5.4 (Mitigation Monitoring and Reporting, Public Access to Records) of the EIS to clarify that public access to records and reports used to track the monitoring program does not require additional reporting by SCE. The clarification has been made to the Final EIS.

Comment Set F3: Southern California Edison Company (cont.)

Appendix 1 Project Description Information

Pages Ap. Various Pages

DEIR/DEIS Text: F3-574

Table Ap.1A-1. Structure Heights

SCE Comment:

Please see attached file "WODUP_TableAp 1A-X_StructureHeights_Rev A09-11-15.xls" for updates to Appendix 1 structure heights (all segments)

Pages Ap. Various Pages

DEIR/DEIS Text: F3-575

Appendix 1B FAA Hazard Marking Evaluation

SCE Comment:

Please see attached file "WODUP_ Appendix 1B_FAA Hazard Marking Evaluation_Rev.xls" (all segments)

Pages Ap. Various

DEIR/DEIS Text: F3-576

Table Ap.18-2. Preliminary FAA Evaluation

SCE Comment:

Please see attached file "WODUP_Prelim FAA Determination_Rev.xls" (all segments)

Comment Set F3: Southern California Edison Company (cont.)

Pages Ap.1C-3 through 4

DEIR/DEIS Text: F3-577

Tennessee Substation						
Civil				3-4		
¾-Ton Crew Cab 4×4	275	Gas	1		4	2
Dump Trucks	350	Diesel	1	1	2	4
Backhoe	125	Diesel	1		2	6
Electrical				5		
Manlifts/Bucket Truck	250	Diesel	1		10	6
Boom/ Crane Truck	180	Diesel	1		3	4
¾-Ton Crew Cab 4×4	275	Gas	1		14	2
Forklift	75	Diesel	1		8	4
Maintenance				4		
Checker/ Truck	180	Gas/Diesel	1		14	2
¾-Ton Crew Cab 4×4	275	Gas	1		2	2
Gas/Processing Trailer	0	Electric	1		1	6
Test				2		
Utility Truck	180	Gas	1		8	2

SCE Comment:

Please remove the following references to the Tennessee Substation:

~~Tennessee Substation~~						
~~*Civil*~~				~~3-4~~		
~~¾-Ton Crew Cab 4×4~~	~~275~~	~~Gas~~	~~1~~		~~4~~	~~2~~
~~Dump Trucks~~	~~350~~	~~Diesel~~	~~1~~	~~1~~	~~2~~	~~4~~
~~Backhoe~~	~~125~~	~~Diesel~~	~~1~~		~~2~~	~~6~~
~~*Electrical*~~				~~5~~		
~~Manlifts/Bucket Truck~~	~~250~~	~~Diesel~~	~~1~~		~~10~~	~~6~~
~~Boom/ Crane Truck~~	~~180~~	~~Diesel~~	~~1~~		~~3~~	~~4~~
~~¾-Ton Crew Cab 4×4~~	~~275~~	~~Gas~~	~~1~~		~~14~~	~~2~~
~~Forklift~~	~~75~~	~~Diesel~~	~~1~~		~~8~~	~~4~~
~~*Maintenance*~~				~~4~~		
~~Checker/ Truck~~	~~180~~	~~Gas/Diesel~~	~~1~~		~~14~~	~~2~~
~~¾-Ton Crew Cab 4×4~~	~~275~~	~~Gas~~	~~1~~		~~2~~	~~2~~
~~Gas/Processing Trailer~~	~~0~~	~~Electric~~	~~1~~		~~1~~	~~6~~
~~*Test*~~				~~2~~		
~~Utility Truck~~	~~180~~	~~Gas~~	~~1~~		~~8~~	~~2~~

Comment Set F3: Southern California Edison Company (cont.)

Page Ap.1C-4

DEIR/DEIS Text: F3-578

Timoteo Substation							
Civil					3-8		
Auger Truck		210	Diesel	1	2	66	44
¾-Ton Crew Cab 4×4		275	Gas	1		8	2
Boom/Crane Truck		180	Diesel	1	2	66	44
Dump Trucks		350	Diesel	1	1	4	4
Backhoe		125	Diesel	1		4	6
Forklift		75	Diesel	1		88	44
Ditch Digger		75	Diesel	1		55	66
Electrical					7-10		
Manlifts/Bucket Truck		250	Diesel	1		20	6
Boom/ Crane Truck		180	Diesel	1	2	6	4
¾-Ton Crew Cab 4×4		275	Gas	1		25	2
Ditch Digger		75	Diesel	1	1	10	66
Forklift		75	Diesel	1		10	4
Maintenance					3		
Checker/Truck		180	Gas/Diesel	1		25	2
¾-Ton Crew Cab 4×4		275	Gas	1		4	2
Gas/Processing Trailer	0		Electric	1		2	6
Test					2		
Utility Truck		180	Gas	1		15	2

SCE Comment:

As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.

~~Timoteo Substation~~							
~~*Civil*~~					~~3-8~~		
~~Auger Truck~~		~~210~~	~~Diesel~~	~~1~~	~~2~~	~~66~~	~~44~~
~~¾-Ton Crew Cab 4×4~~		~~275~~	~~Gas~~	~~1~~		~~8~~	~~2~~
~~Boom/Crane Truck~~		~~180~~	~~Diesel~~	~~1~~	~~2~~	~~66~~	~~44~~
~~Dump Trucks~~		~~350~~	~~Diesel~~	~~1~~	~~1~~	~~4~~	~~4~~
~~Backhoe~~		~~125~~	~~Diesel~~	~~1~~		~~4~~	~~6~~
~~Forklift~~		~~75~~	~~Diesel~~	~~1~~		~~88~~	~~44~~
~~Ditch Digger~~		~~75~~	~~Diesel~~	~~1~~		~~55~~	~~66~~
~~*Electrical*~~					~~7-10~~		
~~Manlifts/Bucket Truck~~		~~250~~	~~Diesel~~	~~1~~		~~20~~	~~6~~
~~Boom/ Crane Truck~~		~~180~~	~~Diesel~~	~~1~~	~~2~~	~~6~~	~~4~~
~~¾-Ton Crew Cab 4×4~~		~~275~~	~~Gas~~	~~1~~		~~25~~	~~2~~
~~Ditch Digger~~		~~75~~	~~Diesel~~	~~1~~	~~1~~	~~10~~	~~66~~
~~Forklift~~		~~75~~	~~Diesel~~	~~1~~		~~10~~	~~4~~
~~*Maintenance*~~					~~3~~		
~~Checker/Truck~~		~~180~~	~~Gas/Diesel~~	~~1~~		~~25~~	~~2~~
~~¾-Ton Crew Cab 4×4~~		~~275~~	~~Gas~~	~~1~~		~~4~~	~~2~~
~~Gas/Processing Trailer~~	~~0~~		~~Electric~~	~~1~~		~~2~~	~~6~~
~~*Test*~~					~~2~~		
~~Utility Truck~~		~~180~~	~~Gas~~	~~1~~		~~15~~	~~2~~

Responses to Comment Set F3 – Appendix 1 Project Description Information

F3-574 The commenter has provided an updated Table Ap.1A-1 (Structure Heights) from Appendix 1. See Response to Comment F4-6.

F3-575 The commenter has provided an updated Table Ap.1B-1 (FAA Hazard Marking Evaluation) from Appendix 1. See Response to Comment F4-7.

F3-576 The commenter has provided updated Tables Ap.1B-1 (FAA Hazard Marking Evaluation) from Appendix 1. See Response to Comment F4-8.

F3-577 The commenter has requested references to work at the Tennessee Substation be removed since work on the substation is no longer needed as part of the Proposed Project. Therefore, Table Ap.1C-1 (Substation Construction Equipment and Workforce Estimates) in Appendix 1C (Construction Equipment and Workforce Estimates) of the Final EIS has been revised to delete the equipment and workforce information about Tennessee Substation.

F3-578 The commenter has requested references to work at the Timoteo and Tennessee Substations be removed since it is no longer needed as part of the Proposed Project. Therefore, as requested, Table Ap.1C-1 (Substation Construction Equipment and Workforce Estimates) in Appendix 1C (Construction Equipment and Workforce Estimates) of the Final EIS has been revised to delete the equipment and workforce information about Timoteo and Tennessee Substations.

Comment Set F3: Southern California Edison Company (cont.)

Appendix 5 Alternatives Screening Report

Page Ap.5-3

DEIR/DEIS Text: F3-579

Upgrade substation equipment at Timoteo and Tennessee Substations to accommodate 66 kV sub-transmission line relocations;

SCE Comment:

As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.

~~Upgrade substation equipment at Timoteo and Tennessee Substations to accommodate 66 kV sub-transmission line relocations;~~

Comment Set F3: Southern California Edison Company (cont.)

Pages Ap.5-19 to Ap.5-42

DEIR/DEIS Text: F3-580

4.2 Tower Relocation Alternative

SCE Comment:

In several instances, the descriptions included Section 4.2 related to project objectives, feasibility, impacts and environmental advantages and disadvantages are inconsistent with information SCE submitted in response to several Energy Division data requests. SCE's concerns are noted below and SCE requests for this section to be updated based on these concerns.

In describing how this alternative would meet Basic Project Objective 2, the DEIR/DEIS errs by stating that the Tower Relocation Alternative could require a few additional months of construction and that this alternative would not affect California's meeting the RPS. As explained in SCE's responses to data requests ALT-15A and ALT-17D, this alternative would extend the overall project schedule by at least 12 months (as opposed to only a few months) and as indicated in the responses (attached to ALT-17D) received from generators, a delay beyond 2020 would adversely impact generation development. Impairment of generation development could affect utilities' ability to meet the State's RPS.

Regarding feasibility, the DEIR/DEIS does not adequately describe the potential legal and regulatory factors that could deem this alternative infeasible, including the contractual and legal obligations included in the SCE-Morongo agreements and the extended schedule. Regarding technical feasibility, the DEIR/DEIS omits information provided by SCE that explained how shifting structures 50 feet farther from residences in Segments 4 and 6 would not allow for the most efficient and safe working environment for the construction of these towers. While this alternative is not technically infeasible, the DEIR/DEIS should explain how this alternative is less safe to build than SCE's Proposed Project and how future projects in these areas would also be less safe construct as compared to SCE's Proposed Project. Regarding construction timeframe, the DEIR/DEIS should explain how this alternative will increase the project schedule by at least 12 months and how this delay could adversely impact generation development, consistent with SCE's responses to data requests ALT-15A and ALT-17D.

In describing the environmental advantages and disadvantages, the DEIR/DEIS overstates the environmental advantages and understates the environmental disadvantages for this alternative. There is no tangible evidence in the form of either simulations or mapped analyses that have been provided to support the conclusions that the Proposed Project would have substantial visual impacts on views from residences on the south side of the alignment and that the Tower Relocation Alternative would reduce the severity of those impacts. Additionally, impacts related to construction disturbance including, for example, temporary visual impacts, air quality emissions, and noise would all be greater for the Tower Relocation Alternative than SCE's Proposed Project. As SCE explained in response to data request ALT-15A, the construction efforts necessary for relocating towers in Segments 4 and 6 would be significantly extended, because SCE would have to initially build the new southern tower line, string those two new circuits, and then return to the same areas again to perform similar construction activities, such as foundation construction, tower assembly and erection and line stringing, for the second (northern) tower line. Also, given that it would be more difficult to obtain the necessary double-line outages, it would be much more likely that installation of additional shoo-fly facilities would be necessary through these two Segments. As such, , these activities would increase all construction-related impacts including, for example, temporary visual impacts, air quality emissions and noise for the Tower Relocation Alternative as compared to SCE's Proposed Project.

Comment Set F3: Southern California Edison Company (cont.)

Pages Ap.5-46 to Ap.5-56

DEIR/DEIS Text: F3-581

4.4 Phased Build Alternative

SCE Comment:

Please see SCE's accompanying cover letter and attachments for concerns related to the Phased Build Alternative, more specifically, feasibility, and the ability for this alternative to meet project objectives, the increased environmental impacts, the increased schedule impact, and the increased costs.

Responses to Comment Set F3 – Appendix 5 Alternatives Screening Report

F3-579 The commenter requests deletion of reference to Timoteo and Tennessee Substations, which are no longer part of the project. This change has been made in Appendix 5 (Alternatives Screening Report), Section 1.3, Summary of the Proposed Project.

F3-580 The commenter identifies concerns regarding the description and analysis of the Tower Relocation Alternative (EIS Appendix 5, Section 4.2). The concerns are that the alternative: would add 12 months to the construction schedule, would adversely affect the ability to develop renewable energy; would not be consistent with obligations in SCE's agreement with the Morongo Tribe; and that construction may be less safe. The summary of environmental disadvantages and advantages shown in the Alternatives Screening Report (EIS Appendix 5) provides a general and high-level assessment of the alternative, for the purpose of determining whether it should be included in the EIS. The description and analysis in the Alternatives Screening Report clearly indicates that the Tower Relocation Alternative is potentially feasible, it substantially satisfies all three basic project objectives, and it would reduce or avoid certain environmental effects of the Proposed Project. Therefore, the EIS provides substantial evidence indicating that the alternative should be analyzed in the EIS.

The information in Appendix 5 recognizes that the construction schedule could be extended beyond that of the Proposed Project. However, SCE's comment does not support an assertion that 12 months would be added. Throughout the EIS, the project description and impact analysis recognize that "*Specific structure type, foundation type, quantities, height, and spacing would be determined upon final engineering, and would be constructed in compliance with CPUC General Order 95*" (as in Section B.2.1.2, Transmission Line Infrastructure). Since structure "spacing" would be determined by SCE upon final engineering, this alternative, which changes spacing, should not result in any notable change in the engineering schedule.

Contrary to the assertion of the comment, the alternative would need to be constructed in a safe manner and in compliance with BLM and CPUC provisions and all applicable codes, just as the project would be. The individual chapters for each environmental topic in Section D provide substantial evidence in the comparison of impacts from this alternative with those of the Proposed Project. See also Response to Comment F3-410 for more detail and evidence to support the EIS conclusions on visual impacts.

F3-581 Please see Responses to Comments F1-5 through F1-20 regarding SCE's concerns about the Phased Build Alternative.

Comment Set F3: Southern California Edison Company (cont.)

Appendix 6 Air Quality

Page Ap.6-1

DEIR/DEIS Text: F3-582

Modifications to Existing Substations (Upgrades)
Substation Cut/Fill Grading and Surface Improvements

Substation	Task					Materials		
Approximate	Surface Area (sqft)		Approximate volume (cuyd)					
	Substation equipment foundations, cut					Concrete		
	1,109			108		Acres		
	0.1							
Devers Substation	Substation eq		Concr	931		1	PM	0.
	Site Fill	Soil		177	-		PM	0
	Site Cut	Soil		-		9		
El Casco	Substation		Concr	770		4	Acres	0
	Substation		Concr	910		5	PM	0.
	Site Cut	Soil		140		8	PM	0
Vista	Substation		Concr	1,109		1	Acres	0
	Substation eq		Concr	931		1	PM	0.
	Site Fill	Soil		125	-		PM	0
San	Substation eq		Concr	2,797		3	Acres	0
	Substation eq		Concr	1,558		2	PM	1
	Site Fill	Soil		1,239		5	PM	0.
Timoteo	Substation		Concr	68		4	Acres	0.
	Substation		Concr	60		3	PM	0.
	Site Fill	Soil		8		1	PM	0.
Tennessee	Substation		Concr	25	2		Acres	0
	Substation		Concr	30	2		PM	0.
	Site Cut	Soil		5			PM	0.
							2.5/	0

SCE Comment:

As a result of additional engineering analysis, the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.

Devers Substation	Substation		Concrete	931		199	PM10/day	0.5
	Site Fill	Soil		177	-		PM2.5/day	0.1
	Site Cut	Soil		-		92		
El Casco	Substation		Concrete	770		43	Acres	0.0
	Substation		Concrete	910		51	PM10/day	0.4
	Site Cut	Soil		140		8	PM2.5/day	0.1
Vista	Substation		Concrete	1,109		108	Acres	0.0
	Substation		Concrete	931		199	PM10/day	0.5
	Site Fill	Soil		125	-		PM2.5/day	0.1
San	Substation		Concrete	2,797		322	Acres	0.1
	Substation		Concrete	1,558		255	PM10/day	1.3
	Site Fill	Soil		1,239		57	PM2.5/day	0.3
~~Timoteo~~	~~Substation~~		~~Concrete~~	~~68~~		~~4~~	~~Acres~~	~~0.0~~
	~~Substation~~		~~Concrete~~	~~60~~		~~3~~	~~PM10/day~~	~~0.0~~
	~~Site Fill~~	~~Soil~~		~~8~~		~~1~~	~~PM2.5/day~~	~~0.0~~
~~Tennessee~~	~~Substation~~		~~Concrete~~	~~25~~	~~2~~		~~Acres~~	~~0.0~~
	~~Substation~~		~~Concrete~~	~~30~~	~~2~~		~~PM10/day~~	~~0.0~~
	~~Site Cut~~	~~Soil~~		~~5~~			~~PM2.5/day~~	~~0.0~~

Comment Set F3: Southern California Edison Company (cont.)

Page Ap.6-5

DEIR/DEIS Text: F3-583

Modifications to Existing Substations (Upgrades)

Construction Equipment and Workforce Estimates

SCE Comment:

As a result of additional engineering analysis, the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.

Comment Set F3: Southern California Edison Company (cont.)

Page Ap.6-44

DEIR/DEIS Text: F3-584

Total Construction Emissions

Estimated Daily Emissions (lbs/day)

Construction Activity	CO	ROG	NOX	PM10	PM2.5
Devers Substation	19.4	4.3	31.4	2.6	1.6
El Casco Substation	16.3	3.7	28.8	2.0	1.3
Vista Substation	17.0	3.7	28.9	2.2	1.3
San Bernardino Substation	19.4	4.3	31.4	4.1	2.0
Etiwanda Substation	1.0	0.0	0.1	0.0	0.0
Timoteo Substation	2.2	0.1	0.6	0.1	0.0
Tennessee Substation	2.2	0.1	0.6	0.0	0.0
220 kV Transmission Line	2,259.0	525.9	4,009.0	243.4	156.0
Shoo-Fly	837.6	241.3	1,739.3	165.2	87.7
66 kV Subtransmission Line	448.6	111.5	828.2	57.1	34.8
Telecommunications System	54.6	17.4	141.2	9.9	5.6
Total	3,677.3	912.2	6,839.5	486.8	290.4
SCAQMD Regional Threshold	550	75	100	150	55
Exceed SCAQMD Threshold?	TRUE	TRUE	TRUE	TRUE	TRUE

Total Construction Emissions after Implementation of APMs

Estimated Daily Emissions (lbs/day)

Construction Activity	CO	ROG	NOX	PM10	PM2.5
Devers Substation	19.4	4.3	25.1	2.3	1.6
El Casco Substation	16.3	3.7	23.0	1.8	1.2
Vista Substation	17.0	3.7	23.1	1.9	1.3
San Bernardino Substation	19.4	4.3	25.1	3.5	1.8
Etiwanda Substation	1.0	0.0	0.1	0.0	0.0
Timoteo Substation	2.2	0.1	0.5	0.1	0.0
Tennessee Substation	2.2	0.1	0.5	0.0	0.0
220 kV Transmission Line	2,259.0	525.9	3,207.2	195.6	145.9
Shoo-Fly	837.6	241.3	1,391.4	119.0	78.0
66 kV Subtransmission Line	448.6	111.5	662.5	44.1	32.1
Telecommunications System	54.6	17.4	113.0	7.4	5.1
Total	3,677.3	912.2	5,471.6	375.8	267.1
SCAQMD Regional Threshold	550	75	100	150	55
Exceed SCAQMD Threshold?	TRUE	TRUE	TRUE	TRUE	TRUE

SCE Comment:

As a result of additional engineering analysis, the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.

Comment Set F3: Southern California Edison Company (cont.)

F3-584 cont.

Estimated Daily Emissions (lbs/day)

Construction Activity	CO	ROG	NOX	PM10	PM2.5
Devers Substation	19.4	4.3	31.4	2.6	1.6
El Casco Substation	16.3	3.7	28.8	2.0	1.3
Vista Substation	17.0	3.7	28.9	2.2	1.3
San Bernardino Substation	19.4	4.3	31.4	4.1	2.0
Etiwanda Substation	1.0	0.0	0.1	0.0	0.0
~~Timoteo Substation~~	~~2.2~~	~~0.1~~	~~0.6~~	~~0.1~~	~~0.0~~
~~Tennessee Substation~~	~~2.2~~	~~0.1~~	~~0.6~~	~~0.0~~	~~0.0~~
220 kV Transmission Line	2,259.0	525.9	4,009.0	243.4	156.0
Shoo-Fly	837.6	241.3	1,739.3	165.2	87.7
66 kV Subtransmission Line	448.6	111.5	828.2	57.1	34.8
Telecommunications System	54.6	17.4	141.2	9.9	5.6
Total	3,677.3	912.2	6,839.5	486.8	290.4
SCAQMD Regional Threshold	550	75	100	150	55
Exceed SCAQMD Threshold?	TRUE	TRUE	TRUE	TRUE	TRUE

Total Construction Emissions after Implementation of APMs

Estimated Daily Emissions (lbs/day)

Construction Activity	CO	ROG	NOX	PM10	PM2.5
Devers Substation	19.4	4.3	25.1	2.3	1.6
El Casco Substation	16.3	3.7	23.0	1.8	1.2
Vista Substation	17.0	3.7	23.1	1.9	1.3
San Bernardino Substation	19.4	4.3	25.1	3.5	1.8
Etiwanda Substation	1.0	0.0	0.1	0.0	0.0
~~Timoteo Substation~~	~~2.2~~	~~0.1~~	~~0.5~~	~~0.1~~	~~0.0~~
~~Tennessee Substation~~	~~2.2~~	~~0.1~~	~~0.5~~	~~0.0~~	~~0.0~~
220 kV Transmission Line	2,259.0	525.9	3,207.2	195.6	145.9
Shoo-Fly	837.6	241.3	1,391.4	119.0	78.0
66 kV Subtransmission Line	448.6	111.5	662.5	44.1	32.1
Telecommunications System	54.6	17.4	113.0	7.4	5.1
Total	3,677.3	912.2	5,471.6	375.8	267.1
SCAQMD Regional Threshold	550	75	100	150	55
Exceed SCAQMD Threshold?	TRUE	TRUE	TRUE	TRUE	TRUE

Comment Set F3: Southern California Edison Company (cont.)

Page Ap.6-45

DEIR/DEIS Text: F3-585

Activity
Substations
Devers Substation Peak Phase
El Casco Substation Peak Phase
Vista Substation Peak Phase
San Bernardino Substation Peak Phase
Etiwanda Substation Peak Phase
Timoteo Substation Peak Phase
Tennessee Substation Peak Phase

SCE Comment:

As a result of additional engineering analysis, the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.

Activity
Substations
Devers Substation Peak Phase
El Casco Substation Peak Phase
Vista Substation Peak Phase
San Bernardino Substation Peak Phase
Etiwanda Substation Peak Phase
~~Timoteo Substation Peak Phase~~
~~Tennessee Substation Peak Phase~~

Responses to Comment Set F3 – Appendix 6 Air Quality

F3-582 SCE requests that references to the *Substation Cut/Fill Grading and Surface Improvements* at the Timoteo and Tennessee Substations be removed from the table since this work is no longer needed as part of the Proposed Project. The table referenced in the comment is from page E-3 of the PEA, included in the Draft EIR/EIS as part of Appendix 6 (Air Quality, page Ap.6-1). Because the table in the appendix was included as it was shown in the PEA, it has not been updated as a result of this comment. However, the Final EIS updates Section D.3 (Air Quality) and eliminates the air emissions associated with construction activities at the Timoteo and Tennessee Substations.

F3-583 SCE requests that references to the *Construction Equipment and Workforce Estimates* for the Timoteo and Tennessee Substations be removed from the table since this work is no longer needed as part of the Proposed Project. The table referenced in the comment is from page E-7 of the PEA, included in the Draft EIR/EIS as part of Appendix 6 (Air Quality, page Ap.6-5). Because the table in the appendix was included as it was shown in the PEA, it has not been updated as a result of this comment. However, the Final EIS updates Section D.3 (Air Quality) and eliminates the air emissions associated with construction activities at the Timoteo and Tennessee Substations.

F3-584 SCE requests that references to estimated daily emissions for construction activities at the Timoteo and Tennessee Substations be removed from the table since this work is no longer needed as part of the Proposed Project. The table referenced in the comment is from page E-46 of the PEA, included in the Draft EIR/EIS as part of Appendix 6 (Air Quality, page Ap.6-44). Because the table was included in the appendix as it was shown in the PEA, it has not been updated as a result of this comment. However, the Final EIS updates Section D.3 (Air Quality) and eliminates the air emissions associated with construction activities at the Timoteo and Tennessee Substations.

F3-585 SCE requests that references to the Localized Significant Threshold Analysis for activities at the Timoteo and Tennessee Substations be removed from the list since this work is no longer needed as part of the Proposed Project. The list referenced in the comment is from page E-47 of the PEA, included in the Draft EIR/EIS as part of Appendix 6 (Air Quality, page Ap.6-45). Because the list was included in the appendix as it was shown in the PEA, it has not been updated as a result of this comment. However, the Final EIS updates Section D.3 (Air Quality) and eliminates the air emissions associated with construction activities at the Timoteo and Tennessee Substations.

Comment Set F3: Southern California Edison Company (cont.)

Appendix 7 Biological Resources

Page Ap.7-1

DEIR/DEIS Text: F3-586

Appendix 7: Tables of Special Status Plants and Wildlife
Table Ap.7-1 and Table Ap.7-2 list the conservation status and habitat descriptions of special-status plant and wildlife species known from or potentially occurring in the Project Study Area. For species not observed during surveys, the potential for their occurrence was determined by biologists knowledgeable about each species based on the species' habitat requirements, range (including elevation), and previously recorded observations within the region.

The following criteria were used to determine the potential for each species to occur along the Proposed Project route:

- **Present:** Species was observed within the Project Study Area during biological surveys.
- **High:** Suitable habitat is present and there is a documented occurrence of the species within the proposed route or its vicinity (approximately five miles).
- **Moderate:** Either suitable habitat is present, or there is a documented occurrence of the species within the vicinity of the proposed route (approximately five miles).
- **Low:** No documented occurrences of the species exist within the proposed route or vicinity (approximately five miles) or no marginally suitable habitat is present along the route, or both.
- **Not Likely to Occur:** Species was not observed during field surveys, no documented occurrences along the route, and the species is restricted to habitat conditions that do not occur along the proposed route.

Habitat conditions include soil type, elevation range, vegetation, and other factors relevant to each species. The criteria are general guidelines and a species' potential for occurrence may be modified based on biological analysis of habitat quality, isolation, and other factors.

SCE Comment:

These criteria are not found in the Bio sections for Veg and Wildlife. At a minimum, it is recommended that these criteria be inserted in the text in both the Vegetation and Wildlife Sections to allow readers to understand how the terms are used in the document.

The definitions presented in the DEIR/EIS are not entirely consistent with these terms as they were applied in the PEA and can sometimes result in misleading conclusions that indicate several species have high or moderate potential to occur when the available information indicates that such occurrence would be unlikely. For example, there are no records of California gnatcatcher anywhere in Segment 4 and the limited habitat that is present occurs at elevations above where this species normally is found (99% of occurrences area below 2,000'), but the DEIR/DEIS states that this species has a moderate potential to occur in this segment.

In defining the "high potential to occur" the meaning of the phrase "documented occurrence <u>within the proposed route</u>" is unclear. Presumably, "study area" is what was intended. Also, for species with very specific habitat requirements, it should be recognized that using the term "high potential to occur" may be misleading if the study area doesn't actually contain the habitat constituents or if it is not within the species elevational range. For such species, attributing a "high potential to occur" because of documentation within five miles seems excessive and could be misleading.

The definition of "moderate" is also confusing and may easily be misunderstood by readers. It indicates that a species is considered to have a "moderate potential to occur" even if suitable habitat is lacking by using the "either suitable habitat is present or documented occurrence within 5 miles" definition. First, if suitable habitat is absent within the project work areas or immediately adjacent areas, then the definition of "low potential" as it is defined here would apply (i.e., "no marginally suitable habitat is present"). However, it seems misleading to attribute anything more than a low potential or "not expected" for any species for which their habitat requirements are absent from the project study area, regardless of whether there are records documenting occurrence up to five miles away.

The definition of "low potential to occur" is likewise confusing as it seems to overlap the definition of "not likely to occur." It seems reasonable to assume there could be some potential for a species to occur whether or not

Comment Set F3: Southern California Edison Company (cont.)

there are any documented occurrences as long as there is some suitable habitat present and the project area lies within the known range. However, this definition indicates a plant or animal still has a low potential even if both habitat and records are lacking which is actually the definition used to indicate "not expected". F3-586 cont.

Arguably, if no suitable habitat is present then either a species would not be expected to occur at all or the species would not be expected to occur for any substantial period of time (i.e., only during dispersal or migration). This recognition is also lacking from these definitions, although a reference to the consideration is given in the text after the definitions.

In the document, the text often seems to contradict itself to some extent by attributing a "low" or "moderate" potential to occur but then explaining that suitable habitat is lacking or that the project area lies outside the species known range or at least its known breeding range."

Please consider revising the definitions to be consistent with those used in the PEA (included below for reference). At a minimum, please clarify these definitions to avoid the confusion described above.

The definitions presented below are suggested as an alternative to the PEA definitions.

- Present: Species was observed within the Project Study Area during biological surveys
- High: CNDDB or other documented occurrences have been recorded within 1.0 mile of the project area and suitable habitat is present.
- Moderate: CNDDB or other documented occurrences have been recorded within 5 miles of the project area and suitable habitat is present (suitable nesting or roosting habitat or high quality foraging areas). Individuals were not observed during field surveys; however, the species could be present.
- Low: Suitable or at least marginally suitable habitat may occur in the project area but no CNDDB records reported in recent years; records of the species within 5 miles of the project area are suspected to be now extirpated or potentially misidentified with other species; or individuals were not observed during field surveys and are not anticipated to be present. For bird and bat species, this category may be used for species that are documented, but likely to be only transient through the area during foraging or migratory movements, no suitable nesting or roosting habitat is present.

Responses to Comment Set F3 – Appendix 7 Biological Resources

F3-586 The commenter recommends that the criteria used to determine the potential for each species to occur along the project be included in the sections for vegetation and wildlife.

The criteria used to determine potential for occurrence for special-status species are described in Appendix 7 along with the tables that list the potential for occurrence of each species. The Final EIS biological resources sections that discuss vegetation (Section D.4.1.1 Regional Setting and Approach to Data Collection) and wildlife (Section D.5.1.1 Regional Setting and Approach to Data Collection) provide a summary of the potential for occurrence ranks and a reference to Appendix 7 for the criteria used to determine the ranks.

The commenter states that the criteria used to determine potential for occurrence for special-status species are not consistent with the PEA and result in misleading conclusions.

The EIS represents the BLM's independent analysis of the project's environmental setting and expected impacts. The EIS makes extensive use of data provided in the PEA, but does not rely exclusively on the PEA's evaluations of species occurrence likelihood. The occurrence probabilities in the EIS were determined based on careful analysis of all available information, to ensure that all project impacts to special-status species are analyzed and disclosed. The criteria used in the EIS are more conservative than those used in the PEA; nevertheless, they are straightforward and accurate.

The commenter states that there are no records of California gnatcatcher in Segment 4 and the limited habitat present occurs at elevations above where this species normally is found. Contrary to the comment, there is a California gnatcatcher record in the vicinity of Segment 4. The elevational range of California gnatcatcher in Riverside and San Bernardino Counties extends to at least 2600 feet and there are multiple records in the region between 2000 and 2600 feet elevation. Much of Segment 4 is within this elevational range. In addition, habitat in the area is modeled as suitable in a published scientific report, as described in the EIS. In the absence of project-related surveys for California gnatcatcher along Segment 4, the analysis properly relied on these additional information sources.

The commenter states that the phrase "within the proposed route" is unclear and the criteria used to determine potentials for occurrence are confusing and misleading. The commenter states that the text of Appendix 7 contradicts itself in regard to the stated potential for occurrence for species and their criteria rank.

The text of criteria used to determine potential for occurrence for special-status species in Appendix 7 have been revised to state "within the vicinity of the proposed route" rather than "within the proposed route." A species' potential for occurrence is based on a biological analysis of many factors and takes into consideration that knowledge of specific habitat parameters are often incomplete. As general guidelines, the criteria are straightforward and accurate, albeit conservative, evaluations of each species' potential for occurrence.

The commenter requests revising the criteria to be consistent with those in the PEA and provides suggested criteria as an alternative to the PEA. SCE's suggested alternative criteria are somewhat less conservative than the criteria used in the Draft EIR/EIS. The criteria presented in the Draft EIR/EIS is more conservative and is straightforward and is suitable for CEQA and NEPA analysis. Therefore, the requested revisions were not made.

Comment Set F3: Southern California Edison Company (cont.)

Appendix 9 Policy Screening Report

City of Loma Linda, CA Ap.9-44

DEIR/DEIS Text: F3-587

City of Loma Linda

Applicable Policies	Determination	Consistent ?
LAND USE		
Special Planning Area E Implementing Policy j: Implement development of the Mission Road Special Planning Area E through the adoption of a specific plan(s) or planned development(s), so that specific siting of land uses/buildings, architectural design, landscaping, road infrastructure, utilities, and other elements can be planned in a comprehensive, rather than piecemeal, manner throughout the Special Planning Area. Implementing Policy 8.10.7.1: a) Work with Southern California Edison to improve transmission line corridors with attractive, community-serving uses such as ornamental planting and recreational uses, including trails and playing fields. … d. Underground existing overhead utility lines throughout the City with available funding…g. Develop appropriate siting regulations for the installation of utilities and telecommunication facilities to minimize potential impacts to the community.	The Proposed Project improvements in the City of Loma Linda include improvements to Timoteo Substation, and the proposed 220 kV transmission lines, 66 kV subtransmission lines, and telecommunications facilities. The Proposed Project work in Timoteo Substation would involve only modifications to the 66 kV equipment, and work would occur on the 66 kV switchrack and within the MEER. The 220 kV transmission lines work includes replacement of existing transmission infrastructure within an existing transmission line ROW that has been established for several decades. New 66 kV subtransmission line improvements would be constructed primarily in existing public streets.	YES

Comment Set F3: Southern California Edison Company (cont.)

SCE Comment: F3-587 cont.

As a result of additional engineering analysis, the work Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.

City of Loma Linda

Applicable Policies	Determination	Consistent?
LAND USE		
Special Planning Area E Implementing Policy j: Implement development of the Mission Road Special Planning Area E through the adoption of a specific plan(s) or planned development(s), so that specific siting of land uses/buildings, architectural design, landscaping, road infrastructure, utilities, and other elements can be planned in a comprehensive, rather than piecemeal, manner throughout the Special Planning Area. Implementing Policy 8.10.7.1: a) Work with Southern California Edison to improve transmission line corridors with attractive, community-serving uses such as ornamental planting and recreational uses, including trails and playing fields. … d. Underground existing overhead utility lines throughout the City with available funding…g. Develop appropriate siting regulations for the installation of utilities and telecommunication facilities to minimize potential impacts to the community.	The Proposed Project improvements in the City of Loma Linda include ~~improvements to Timoteo Substation~~, ~~and~~ the proposed 220 kV transmission lines, 66 kV subtransmission lines, and telecommunications facilities~~. The Proposed Project work in Timoteo Substation would involve only modifications to the 66 kV equipment, and work would occur on the 66 kV switchrack and within the MEER.~~ The 220 kV transmission lines work includes replacement of existing transmission infrastructure within an existing transmission line ROW that has been established for several decades. New 66 kV subtransmission line improvements would be constructed primarily in existing public streets.	YES

Responses to Comment Set F3 – Appendix 9 Policy Screening Report

F3-587 The comment notes that Timoteo and Tennessee Substations are no longer needed in support of the Proposed Project. Appendix 9 Policy Screening Report, page Ap.9-44, second column, has been revised to delete reference to the Timoteo and Tennessee Substations.

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