Question 10-01:

Wood Pole removal
Reference: PEA Table 3-7

Table 3-7 of the PEA lists 46 wood poles as part of the proposed project telecommunication line features, which would involve approximately 6.6 acres of temporary disturbance. However, in comparing Table 3-7 with the GIS data provided by SCE, it is not clear as to whether the disturbance associated with wood poles has been counted as part of the overall pole replacement impacts layer. Clarify if Table 3-7 includes the removal and replacement of 46 wood poles. If the removal of poles was considered as part of the land disturbance estimates, provide a revised version of Table 3-7 and associated set of GIS files that are consistent with SCE's current plan for proposed work on the telecommunication lines.

Response to Question 10-01:

During development of the PEA, the number of wood distribution poles that would need to be replaced to accommodate the new telecommunications lines was undetermined until a wind-load test could be performed. The number of poles was estimated to be up to approximately 46 poles, or 20 percent of the existing poles. This assumption was made in order to capture the greatest possible number of poles that would be replaced, and therefore allow for a conservative analysis of the Proposed Project’s potential impacts within the PEA. Because the specific pole replacement locations were unknown, they were not included in the geographic information system (GIS) data.

Subsequent to filing the PEA with the CPUC, the wind-load test results showed that existing poles would need to be replaced regardless of the Proposed Project’s telecommunications component. As a result, this work will be performed as part of SCE’s deteriorated pole replacement program (an on-going maintenance program) prior to the start of construction of the Proposed Project. Because the pole replacement will be performed as part of SCE’s operation and maintenance activities, disturbance associated with pole replacement activities would not be associated with the Proposed Project and have therefore been removed from the disturbance calculations table. In response to this data request, a revised Table 3-13: Proposed Project Estimated Land Disturbance has been provided. No changes to the GIS data are necessary in this regard.