

## **A. Comments from Public Agencies**

This section provides responses to comments from seven public agencies and their representatives that provided written comments on the Draft EIR, as listed in Table 3-1.

## Comment Set A1

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**From:** Britt Wilson [mailto:[britt\\_wilson@morongo.org](mailto:britt_wilson@morongo.org)]  
**Sent:** Wed 12/26/2007 11:45 AM  
**To:** E ICasco  
**Cc:** Britt Wilson  
**Subject:** El Casco System Project DEIR SCH#2007071076

Dear Ms. Mosley,

Thank you for the Notice of Availability on the El Casco Project. The Morongo Band of Mission Indians is very interested in this portion of the project (El Casco Substation) and we sent the attached letter to SCE. We ask that this be part of the formal response record on the DEIR.

**A1-1**

Thank you.

Sincerely,

Britt W. Wilson  
Project Manager - Cultural Resources  
Morongo Band of Mission Indians  
Casino Morongo Building  
49750 Seminole Drive  
Cabazon, CA 92230-2200  
Office: (951) 755-5200 Direct: (951) 755-5206  
Mobile: (951) 323-0822  
Fax: (951) 922-8146 E-mail: [Britt\\_wilson@morongo.org](mailto:Britt_wilson@morongo.org)

Wayta 'Yawa' (always believe)

## Comment Set A1, continued

November 29, 2007

Mr. Philippe Lapin, MA, RPA  
Archaeologist  
Southern California Edison  
2244 Walnut Grove Avenue  
Rosemead, CA 91770

Re: El Casco Substation Project

Dear Philippe:

Thank you for contacting the Morongo Band of Mission Indians (the "Tribe") concerning the El Casco Substation Project.

As the Tribe understands it, the El Casco Project includes work along existing power lines in Banning, Beaumont and unincorporated Riverside County. Also, the project calls for the construction of a Substation in San Timoteo Canyon (The project is broader than this but these are the portions in which the Tribe is interested).

The archaeological consultant for this project is LSA and you have provided Morongo with copies of their May 2006 Report (Cultural Resource Assessment Oak Valley Substation) including the confidential site records. As you may know, the Tribe consulted with LSA during their work on this project. Morongo Tribal Historian Ernest Siva and Morongo tribal member Harold Mathews served as consultants (Morongo staff member Britt Wilson was also present).

The LSA report recommends archaeological monitoring for any work done within ¼ mile of the Gilman Ranch in Banning. Based upon the Tribe's records and research, and archaeological records, this was a prehistoric village site and it is important to the people at Morongo. The Tribe concurs with LSA's recommendation but we request that a Native American Monitor also be present during any archaeological monitoring around the Gilman Ranch. The Tribe asks that it be specifically represented by the Native American Monitor; therefore, please contact Britt Wilson to arrange for a monitor.

The Tribe's other concern is the actual construction of the substation in San Timoteo Canyon. As you know, Coos-woot-na (Cahuilla Chief Juan Antonio), and his people settled in San Timoteo Canyon within close proximity to the proposed substation site(s). Juan Antonio was from the Costakiktum clan, one of five known clans living in the Canyon. Research indicates that the remnants of his people moved to, among other areas, the Morongo Indian Reservation after they were driven out of San Timoteo Canyon by white settlers. There is also evidence that a Serrano village may have been located in this area. Tolokabi (or some derivative) is the reputed name but its exact location has not been recorded.

Casino Morongo Building, 49750 Seminole Dr. - Cabazon, CA 92230 - 951-755-5200 - Fax 951-922-8146



A1-2

## Comment Set A1, continued

November 30, 2007  
Mr. Philippe Lapin  
Page 2 of 2

The Tribe feels strongly that archaeological site monitoring should be required for any earthmoving activities in San Timoteo Canyon because of its rich history – particularly in the proposed location at El Casco Lake. As you know, Juan Antonio died and was buried near El Casco Lake (his remains were accidentally dug up in the 1950's). As with the Gilman Ranch portion of this project, the Tribe requests that a Native American Monitor representing Morongo be present during ground disturbing activities.

**A1-2  
Cont.**

The Tribe requests that any pre-historic artifacts that are uncovered on SCE land be given to the Tribe for disposition. The Tribe also asks that it be notified if any human remains are uncovered during this project. The presence of a Native American monitor will ensure that. It is highly likely that Morongo will be the Most Likely Descendant for any human remains uncovered during this project anyway.

**A1-3**

The Tribe is requesting these measures as part of our consultation with SCE but we also request that the mitigation measures noted above (archaeological site monitoring including Native American monitoring, donation of artifacts to Tribe, and notification upon discovery of any human remains) be incorporated into the Draft Environmental Impact Report. Based upon our conversation, it sounded like the comment period is still open.

If you have any questions, please contact me at (951) 755-5206 or [Britt\\_wilson@morongo.org](mailto:Britt_wilson@morongo.org). Thank you for considering our comments.

Sincerely,



Britt W. Wilson  
Project Manager/Cultural Resources Coordinator

- c. Morongo Tribal Council  
Ernest H. Siva, Morongo Tribal Historian  
Thomas E. Linton, Director, Morongo Planning  
Dave Singleton, Native American Heritage Commission

## Comment Set A1, continued

RECEIVED JAN 15 2008

MORONGO  
BAND OF  
MISSION  
INDIANS



A SOVEREIGN NATION

January 9, 2008

Juralynne Mosley  
California Public Utilities Commission  
c/o Aspen Environmental Group  
30423 Canwood Street, Suite 215  
Agoura Hills, Ca 91301

This is to let you know we have moved.  
The new address below is our new address.  
It is the OLD CASINO MORONGO building.  
Our phone number and Fax numbers are still the same.  
Please use the letter head address located on the bottom of this letter  
for further correspondence.

Thank You  
Rita Delgado  
Receptionist  
Morongo Band of Mission Indians Planning & Building Services

*Rita Delgado for Britt Wilson*

**Morongo Band of Mission Indians Planning & Building Services**  
49750 Seminole Drive  
Cabazon, Ca 92230  
Tele: (951) 849-8807  
Fax: (951) 922-8146

**P.S. Our new Chairman is Robert Martin**

49750 SEMINOLE DRIVE - CABAZON, CA 92230 - 951-849-8807 - FAX: 951-922-8146

A1-4

## Responses to Comment Set A1 – Morongo Band of Mission Indians

A1-1 Thank you for your comments.

A1-2 Mitigation Measure CR-1b (in Section D.5, Cultural Resources) has been revised to include Morongo Tribal requests of consultation with SCE regarding construction monitoring and disposition of artifacts.

A1-3 Notification upon discovery of any human remains has been included in the Cultural Resources Treatment Plan (Mitigation Measure CR-1b), in which the Tribe will be notified and Public Resources Codes followed. Changes to the mitigation measure are as follows:

**CR-1b Cultural Resources Treatment Plan (CRTP).** SCE shall develop a Cultural Resources Treatment Plan (CRTP) for all known and newly discovered cultural resources within areas of direct impact of project activities, including:

- Procedures for protection and avoidance of ESAs, evaluation and treatment of the unexpected discovery of cultural resources including Native American burials;
- Provisions and procedures for Native American consultation--specifically with Morongo Band of Mission Indians;
- Detailed reporting requirements by the project Archaeologist;
- Notification of the Morongo Band of Mission Indians upon discovery of human remains;
- Curation Consultation with Morongo Band of Mission Indians to determine disposition of any cultural materials collected during the project; and
- Requirements to specify that archaeologists and other discipline specialists meet the Professional Qualifications Standards mandated by the California Office of Historic Preservation (OHP).

Implementation of the CRTP shall ensure that known and recorded cultural resources will be avoided during construction and operation and maintenance. Specific protective measures shall be defined in the CRTP to reduce the potential adverse impacts on any presently undetected cultural resources to less-than-significant levels. The CRTP shall be submitted to the CPUC for review and approval at least 30 days before the start of construction.

The CRTP shall define construction procedures for areas near known/recorded cultural sites. Wherever a tower, access road, equipment, etc., must be placed or accessed within 100 feet of a recorded, reported, or known archaeological site eligible or potentially eligible for the CRHR, the site will be flagged on the ground as an ESA (without disclosure of the exact nature of the environmental sensitivity [i.e., the ESA is *not* identified as an archaeological site]). Construction equipment shall then be directed away from the ESA, and construction personnel shall be directed not to enter the ESA. Archaeological monitoring of project construction shall be focused in the immediate vicinity of the designated ESAs.

A1-4 The new mailing address for the Morongo Band of Mission Indians has been noted and added to the El Casco System Project mailing list.

## Comment Set A2



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

15000 Aviation Blvd  
Lawndale, CA 90261

JAN 0 4 2008

Ms. Juralynne B. Mosley  
California Public Utilities Commission  
c/o Aspen Environment Group  
30423 Canwood Street Suite 215  
Agoura Hills, CA 91301

RECEIVED JAN 0 8 2008

Dear Ms. Mosley:

This letter is in response to your letter dated December 12, 2007, requesting comments on the Draft Environmental Impact Report for the Proposed El Casco System Project. The Federal Aviation Administration (FAA), Western Service Area, Engineering Services (WSA-ES) reviewed Southern California Edison's request to build and operate the El Casco System Project.

Additional forms are needed to completely evaluate the impact to the National Airspace System (NAS). According to Title 14, Code of Federal Regulations Part 77, Objects Affecting Navigable Airspace, the proponents must submit a copy of the attached FAA Form 7460-1, titled "Notice of Proposed Construction or Alteration." This form can also be downloaded from the following website: [www.oaaaa.faa.gov](http://www.oaaaa.faa.gov).

Receiving FAA Form 7460-1, for the proposed El Casco System Project will begin the Obstruction Evaluation (OE) process, which includes reviewing the frequencies and power outputs that could potentially interfere with FAA radar or navigational aids. The OE process will identify any potential interference to the NAS from the proposed El Casco System Project.

For any additional information regarding FAA Form 7460-1, please call Karen McDonald, at (310) 725-6557.

Sincerely,

  
Alan Hanson  
Manager, Engineering Services, WSA

Enclosure

A2-1

# Comment Set A2, continued

## NOTICE OF PROPOSED CONSTRUCTION OR ALTERATION

### §77.13 Construction or alteration requiring notice.

(a) Except as provided in §77.15, each sponsor who proposes any of the following construction or alteration shall notify the Administrator in the form and manner prescribed in §77.17.

(1) Any construction or alteration of more than 200 feet in height above the ground level at its site.  
(2) Any construction or alteration of greater height than imaginary surface extending outward and upward at one of the following slopes:

(i) 1 00 to 1 for horizontal distance of 20,000 feet from the nearest point of the nearest runway of each airport specified in paragraph (a)(1)(5) or this section with at least one runway more than 3,200 feet in actual length, excluding heliports.

(ii) 50 to 1 for horizontal distance of 10,000 feet from the nearest point of the nearest runway of each airport specified in paragraph (a)(1)(5) of this section with its longest runway no more than 3,200 feet in actual length, excluding heliports.

(iii) 25 to 1 for a horizontal distance of 5,000 feet from the nearest point of the nearest landing and takeoff area of each heliport specified in paragraph (a)(5) of this section.

(3) Any highway, railroad, or other traverse way for mobile objects, of a height which, if adjusted upward 17 feet for an Interstate Highway that is part of the National System of Military and Interstate Highways where overcrossings are designed for a minimum of 17 feet vertical distance, 16 feet for any other public roadway, 10 feet or the height of the highest mobile object that would normally traverse the road, whichever is greater, for a private road, 23 feet for a railroad, and for a waterway or any other traverse way not previously mentioned, an amount equal to the height of the highest mobile object that would normally traverse it, would exceed a standard of paragraph (a)(1) or (2) of this section.

(4) When requested by the FAA, any construction or alteration that would be in an instrument approach area (defined in the FAA standards governing instrument approach procedures) and available information indicates it might exceed a standard of Subpart C of this part.

(5) Any construction or alteration on any of the following airports (including heliports):

(i) An airport that is available for public use and is listed in the Airport Directory of the current Airman's Information Manual or in either the Alaska or Pacific Airman's Guide and Chart Supplement.

(ii) An airport under construction, that is the subject of a notice or proposal on file with the Federal Aviation Administration, and except for military airports, it is clearly indicated that airport will be available for public use.

(iii) An airport that is operated by an armed force of the United States.

(b) Each sponsor who proposes construction or alteration that is the subject of a notice under paragraph (a) of this section and is advised by an FAA regional office that a supplemental notice is required shall submit that notice on a prescribed form to be received by the FAA regional office at least 48 hours before the start of construction or alteration.

(c) Each sponsor who undertakes construction or alteration that is the subject of a notice under paragraph (a) of this section shall, within 5 days after that construction or alteration reaches its greatest height, submit a supplemental notice on a prescribed form to the FAA regional office having jurisdiction over the region involved, if—

(1) The construction or alteration is more than 200 feet above the surface level of its site; or

(2) An FAA regional office advises him that submission of the form is required.

### §77.15 Construction or alteration not requiring notice.

No person is required to notify the Administrator for any of the following construction or alteration:

(a) Any object that would be shielded by existing structures of a permanent and substantial character or by natural terrain or topographic features of equal or greater height, and would be located in the congested area of a city, town, or settlement where it is evident beyond all reasonable doubt that the structure so shielded will not adversely affect safety in air navigation.

(b) Any antenna structure of 20 feet or less in height except one that would increase the height of another antenna structure.

(c) Any air navigation facility, airport visual approach or landing air, aircraft arresting device, or meteorological device, of a type approved by the Administrator, or an appropriate military service on military airports, the location and height of which is fixed by its functional purpose.

(d) Any construction or alteration for which notice is required by any other FAA regulation.

### §77.17 Form and time of notice

(a) Each person who is required to notify the Administrator under §77.13 (a) shall send one executed form set of FAA Form 7460-1, Notice of Proposed Construction or Alteration, to the Manager, Air Traffic Division, FAA Regional Office having jurisdiction over the area within which the construction or alteration will be located. Copies of FAA Form 7460-1 may be obtained from the headquarters of the Federal Aviation Administration and the regional offices.

(b) The notice required under §77.13 (a)(1) through (4) must be submitted at least 30 days before the earlier of the following dates—

(1) The date the proposed construction or alteration is to begin.

(2) The date an application for a construction permit is to be filed.

However, a notice relating to proposed construction or alteration that is subject to the licensing requirements of the Federal Communications Act may be sent to the FAA at the same time the application for construction is filed with the Federal Communications Commission, or at any time before that filing.

(c) A proposed structure or an alteration to an existing structure that exceeds 2,000 feet in height above the ground will be presumed to be a hazard to air navigation and to result in an inefficient utilization of airspace and the applicant has the burden of overcoming that presumption. Each notice submitted under the pertinent provisions of this part 77 proposing a structure in excess of 2,000 feet above ground, or an alteration that will make an existing structure exceed that height, must contain a detailed showing, directed to meeting this burden. Only in exceptional cases, where the FAA concludes that a clear and compelling showing has been made that it would not result in an inefficient utilization of the airspace and would not result in a hazard to air navigation, will a determination of no hazard be issued.

(d) In the case of an emergency involving essential public services, public health, or public safety that required immediate construction or alteration, the 30 day requirement in paragraph (b) of this section does not apply and the notice may be sent by telephone, telegraph, or other expeditious means, with an executed FAA Form 7460-1 submitted within five (5) days thereafter. Outside normal business hours, emergency notices by telephone or telegraph may be submitted to the nearest FAA Flight Service Station.

(e) Each person who is required to notify the Administrator by paragraph (b) or (c) of §77.13, or both shall send an executed copy of FAA Form 7460-2, Notice of Actual Construction or Alteration, to the Manager, Air Traffic Division, FAA Regional Office having jurisdiction over the area involved.

## ADDRESSES OF THE REGIONAL OFFICES

### Alaska Region

AK  
Alaskan Regional Office  
Air Traffic Division, AAL-530  
222 West An Avenue  
Anchorage, AK 99513  
Tel: 907-271-5893

### Central Region

IA, KS, MO, NE  
Central Regional Office  
Air Traffic Division, ACE-520  
60 East 12<sup>th</sup> Street  
Kansas City, MO 64106  
Tel: 816-426-3408 or 3409

### Eastern Region

DC, DE, MD, NJ, NY, PA, VA, WV  
Eastern Regional Office  
Air Traffic Division, AAE-520  
JFK International Airport  
Fitzgerald Federal Building  
Jamaica, NY 11430  
Tel: 718-553-2616

### Great Lakes Region

IL, IN, MI, MN, ND, OH, SD  
Great Lakes Regional Office  
Air Traffic Division, AGL-520  
2300 East Devon Avenue  
Des Plaines, IL 60018  
Tel: 847-294-7568

### New England Region

CT, MA, ME, NH, RI, VT  
New England Regional Office  
Air Traffic Division, ANE-520  
12 New England Executive Park  
Burlington, MA 01803-5299  
Tel: 781-238-7520

### Northwest Mountain Region

CO, ID, MT, OR, UT, WA, WY  
Northwest Mountain Regional Office  
Air Traffic Division, ANM-520  
1601 Lind Avenue, SW  
Renton, WA 98055-4056  
Tel: 425-327-2020

### Southern Region

AL, FL, GA, KY, MS, NC, PR  
SC, TN, VA  
Southern Regional Office  
Air Traffic Division, ASO-520  
1701 Columbia Avenue  
College Park, GA 30337  
Tel: 404-305-5685

### Southwest Region

AR, LA, NM, OK, TX  
Southwest Regional Office  
Air Traffic Division, ASW-520  
2601 Meacham Boulevard  
Fort Worth, TX 76137-0520  
Tel: 817-222-9531

### Western Pacific Region

HI, CA, NV, AZ, GU  
Western-Pacific Regional Office  
Air Traffic Division, AWP-520  
15000 Aviation Boulevard  
Hawthorne, CA 90290  
Tel: 310-725-6557

## Comment Set A2, continued

### INSTRUCTIONS FOR COMPLETING FAA FORM 7460-1

**PLEASE TYPE or PRINT**

**ITEM #1.** Please include the name, address and phone number of a personal contact point as well as the company name.

**ITEM #2.** Please include the name, address and phone number of a personal contact point as well as the company name.

**ITEM #3.** New Construction would be a structure that has not yet been built.

Alteration is a change to an existing structure such as the addition of a side mounted antenna, a change to the marking and lighting, a change to power and/or frequency, or a change to the height. The nature of the alteration shall be included in **ITEM #21** "Complete Description of Proposal".

Existing would be a correction to the latitude and/or longitude, a correction to the height, or if filing on an existing structure which has never been studied by the FAA. The reason for the notice shall be included in **ITEM #21** "Complete Description of Proposal".

**ITEM #4.** If Permanent, so indicate. If Temporary, such as a crane or drilling derrick, enter the estimated length of time the temporary structure will be up.

**ITEM #5.** Enter the date that construction is expected to start and the date that construction should be completed.

**ITEM #6.** Please indicate the type of structure. **DO NOT LEAVE BLANK.**

**ITEM #7.** In the event that obstruction marking and lighting is required, please indicate type desired. If no preference, check "other" and indicate "no preference" **DO NOT LEAVE BLANK.** **NOTE:** High Intensity lighting shall be used only for structures over 500' AGL. In the absence of high intensity lighting for structures over 500' AGL, marking is also required.

**ITEM #8.** If this is an existing tower that has been registered with the FCC, enter the FCC Antenna Structure Registration number here.

**ITEM #9 and #10.** Latitude and longitude must be geographic coordinates, accurate to within the nearest second or to the nearest hundredth of a second if known. Latitude and longitude derived solely from a hand-held GPS instrument is **NOT acceptable.** A hand-held GPS is only accurate to within 100 meters (328 feet) 95 percent of the time. This data, when plotted, should match the site depiction submitted under **ITEM #20.**

**ITEM #11.** NAD 83 is preferred; however, latitude and longitude may be submitted in NAD 27. Also, in some geographic areas where NAD 27 and NAD 83 are not available other datums may be used. It is important to know which datum is used. **DO NOT LEAVE BLANK.**

**ITEM #12.** Enter the name of the nearest city and state to the site. If the structure is or will be in a city, enter the name of that city and state.

**ITEM #13.** Enter the full name of the nearest public-use (*not private-use*) airport or heliport or military airport or heliport to the site.

**ITEM #14.** Enter the distance from the airport or heliport listed in #13 to the structure.

**ITEM #15.** Enter the direction from the airport or heliport listed in #13 to the structure.

**ITEM #16.** Enter the site elevation above mean sea level and expressed in whole feet rounded to the nearest foot (e.g. 17'3" rounds to 17', 17'6" rounds to 18'). This data should match the ground contour elevations for site depiction submitted under **ITEM #20.**

**ITEM #17.** Enter the total structure height above ground level in whole feet rounded to the next highest foot (e.g. 17'3" rounds to 18'). The total structure height shall include anything mounted on top of the structure, such as antennas, obstruction lights, lightning rods, etc.

**ITEM #18.** Enter the overall height above mean sea level and expressed in whole feet. This will be the total of **ITEM #16 + ITEM #17.**

**ITEM #19.** If an FAA aeronautical study was previously conducted, enter the previous study number.

**ITEM #20.** Enter the relationship of the structure to roads, airports, prominent terrain, existing structures, etc. Attach an 8-1/2" x 11" non-reduced copy of the appropriate 7.5 minute U.S. Geological Survey (USGS) Quadrangle Map MARKED WITH A PRECISE INDICATION OF THE SITE LOCATION. To obtain maps, contact USGS at 1-800-435-7627 or via internet at "<http://mapping.usgs.gov>". If available, attach a copy of a documented site survey with the surveyor's certification stating the amount of vertical and horizontal accuracy in feet.

**ITEM #21.**

- For transmitting stations, include maximum effective radiated power (ERP) and all frequencies.
- For antennas, include the type of antenna and center of radiation (Attach the antenna pattern, if available).
- For microwave, include azimuth relative to true north.
- For overhead wires or transmission lines, include size and configuration of wires and their supporting structures (Attach depiction).
- For each pole/support, include coordinates, site elevation, and structure height above ground level or water.
- For buildings, include site orientation, coordinates of each corner, dimensions, and construction materials.
- For alterations, explain the alteration thoroughly.
- For existing structures, thoroughly explain the reason for notifying the FAA (e.g. corrections, no record or previous study, etc.).

Filing this information with the FAA does not relieve the sponsor of this construction or alteration from complying with any other federal, state or local rules or regulations. If you are not sure what other rules or regulations apply to your proposal, contact local/state aviation and zoning authorities.

**Paperwork Reduction Work Act Statement:** This information is collected to evaluate the effect of proposed construction or alteration on air navigation and is not confidential. Providing this information is mandatory for anyone proposing construction or alteration that meets or exceeds the criteria contained in 14 CFR, part 77. We estimate that the burden of this collection is an average 19 minutes per response. An agency may not conduct or sponsor, and a person is not required to respond to a collection of information unless it displays a currently valid OMB control number. The OMB control number for this collection is 2120-0001. Comments concerning the accuracy of this burden and suggestions for reducing the burden should be directed to the FAA at: 800 Independence Ave. SW, Washington, DC 20591, Attn: Information Collection Clearance Officer, ABA-20



## Responses to Comment Set A2 – Federal Aviation Administration

**A2-1** Thank you for providing the appropriate forms and documentation to allow for the El Casco System Project to be in compliance with FAA requirements. The forms and documentation you have provided have been forwarded to SCE, the Proposed Project Applicant to ensure SCE's compliance with the FAA's request for information. SCE has indicated that they will submit the Form 7460-1, "Notice of Proposed Construction or Alteration" when final engineering plans for the subtransmission line and towers have been completed and the required information is known. It should be noted that Applicants often do not finalize engineering plans for proposed projects undergoing CEQA review until the environmental review process has been completed.

According to SCE, the antenna towers at the Mill Creek and El Casco Substation sites have received Determinations of No Hazard to Air Navigation as follows:

- Mill Creek Communication Site: determination issued 12/7/2006, to expire on 6/07/2008 (Aeronautical Study No. 2006-AWP-6839-OE)
- El Casco Communication Site: determination issued 12/12/2006, to expire on 6/12/2008 (Aeronautical Study No. 2006-AWP-6846-OE)

SCE has indicated that they will apply to renew these determinations as necessary based on the construction schedule that is as yet to be determined. The CPUC will ensure that SCE is in compliance with FAA requirements as part of the CEQA-required Mitigation Monitoring, Compliance, and Reporting Program for the El Casco System Project.

# Comment Set A3

## LAND USE SERVICES DEPARTMENT



COUNTY OF SAN BERNARDINO  
PUBLIC AND SUPPORT  
SERVICES GROUP

ADVANCE PLANNING DIVISION  
385 North Arrowhead Avenue • San Bernardino, CA 92415-0182 (909) 387-4147  
<http://www.sbcounty.gov/landuseservices> Fax (909) 387-3223

JULIE RYNERSON ROCK  
Director

January 9, 2008

RECEIVED JAN 11 2008

Ms. Juralynne Mosley  
California Public Utilities Commission  
c/o Aspen Environmental Group  
30423 Canwood Street, Suite 215  
Agoura Hills, CA 91301

RE: COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE EL CASCO SYSTEM PROJECT

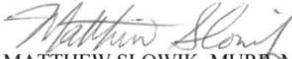
Attn. Ms. Mosley:

Thank you for providing San Bernardino County with a copy of the Draft Environmental Impact Report (EIR- December, 2007) for the El Casco System Project. We have reviewed the Draft EIR and have the following comment relative to the segment of the proposed project located in unincorporated San Bernardino County:

- In accordance with our NOP Comment Letter dated August 14, 2007 (copy attached), please incorporate to the EIR specific identification and evaluation of potential environmental impact(s) to heritage and/or significant trees (i.e. palm trees) along San Bernardino Ave (San Bernardino County).

San Bernardino County requests (when available) a copy of the Final EIR. If you have any questions, please call me at (909) 387-4147.

Sincerely,

  
MATTHEW SLOWIK, MURP, MPA  
Senior Planner  
Advance Planning Division

Attachment: NOP Comment Letter (August 14, 2007)

Cc: Julie Rynerson Rock, Director LUSD  
Pat McGuckian, Principal Planner  
File Copy, Advance Planning Division

Slowik/El Casco System Project Comments on Draft EIR\_January 9 2008.doc

MARK H. UFFER  
County Administrative Officer  
NORMAN A. KANOLD  
Assistant County Administrator  
Public and Support  
Services Group

Board of Supervisors			
BRAD MITZELFELT .....	First District	DENNIS HANSBERGER .....	Third District
PAUL BIANE .....	Second District	GARY C. OVITT .....	Fourth District
		JOSIE GONZALES .....	Fifth District

A3-1

# Comment Set A3, continued

## LAND USE SERVICES DEPARTMENT



COUNTY OF SAN BERNARDINO  
PUBLIC AND SUPPORT  
SERVICES GROUP

ADVANCE PLANNING DIVISION  
385 North Arrowhead Avenue • San Bernardino, CA 92415-0182 (909) 387-4147  
http://www.sbcounty.gov/landuseservices Fax (909) 387-3223

JULIE RYNERSON ROCK  
Director

August 14, 2007

Ms. Juralynne Mosley  
California Public Utilities Commission  
c/o Aspen Environmental Group  
30423 Canwood Street, Suite 215  
Agoura Hills, CA 91301

RE: COMMENTS ON NOTICE OF PREPARATION OF AN ENVIRONMENTAL  
IMPACT REPORT FOR THE EL CASCO SYSTEM PROJECT

Attn. Ms. Mosley:

Thank you for providing San Bernardino County with a copy of the Notice of Preparation of an Environmental Impact Report (EIR) for the El Casco System Project. We have reviewed the Notice of Preparation and have the following comments relative to the segment of the proposed project located in unincorporated San Bernardino County:

1. The proposed project should be evaluated regarding potential aesthetic impacts, including:
  - a) scenic vistas
  - b) the existing visual character of the site and surroundings, and
  - c) impacts due to possible damage/impact to heritage and/or significant trees (i.e. palm trees) along San Bernardino Avenue.
2. Evaluate disruption to traffic and circulation.
3. The proposed project should include evaluation of the alternative of undergrounding the facilities.

San Bernardino County requests (when available) a copy of the Draft and Final EIR. If you have any questions, please call me at (909) 387-4147.

Sincerely,

MATTHEW SLOWIK, MURP, MPA  
Senior Planner  
Advance Planning Division

Cc: Julie Rynerson Rock, Director LUSD  
Pat McGuckian, Principal Planner  
File Copy, Advance Planning Division

Slowik/El Casco System Project Comments on NOP\_August 14 2007.doc

WARF HOFFER  
County Administrative Officer  
NORMAN E. FANOLD  
Assistant County Administrative  
Officer, Public and Support  
Services Group

SHARON M. HENNINGSON  
County Clerk  
JAMES HANSEN  
County Treasurer  
DANIELA C. GARCIA  
County Registrar

## Responses to Comment Set A3 – County of San Bernardino Land Use Services Department

- A3-1 Please note that scoping comments received from the San Bernardino County Land Use Services Department were incorporated into the Draft EIR as appropriate. Section B (Project Description) indicates that construction activities in this area would be limited to the placement of fiber optic cable within an existing duct bank. As such there would not be any effects to the large palm tress located on San Bernardino Ave.

## Comment Set A4

WARREN D. WILLIAMS  
General Manager-Chief Engineer



1995 MARKET STREET  
RIVERSIDE, CA 92501  
951.955.1200  
FAX 951.788.9965  
www.floodcontrol.co.riverside.ca.us

### RIVERSIDE COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT

January 8, 2008

Ms. Juralynne B. Mosley  
California Public Utilities Commission  
c/o Aspen Environmental Group  
30423 Canwood Street, Suite 215  
Agoura Hills, CA 91301

RECEIVED JAN 11 2008

Dear Ms. Mosley:

Re: Draft Environmental Impact Report  
for the El Casco System Project

This letter is written in response to the Draft Environmental Impact Report (DEIR) for the El Casco System Project proposed by Southern California Edison (SCE). The project includes the proposed El Casco Substation site, upgrades to the Zanja and Banning Substations and the SCE's Mill Creek Communication site, upgrading of a total of 15.4 miles of existing 115kV subtransmission line and associated structures, and the installation of fiber optic cables within existing conduits in public streets and on existing SCE structures between the cities of Redlands and Banning. A partial underground alternative is being considered through the Sun Lakes community for the 115kV subtransmission line as well as a northerly alignment. The District commented on the Notice of Preparation of the DEIR on August 6, 2007.

The Riverside County Flood Control and Water Conservation District has the following comments/concerns:

1. Existing District facilities are located within the proposed project area and may be impacted, especially along the proposed northern alignment alternative. Any work that involves District right-of-way, easements or facilities will require an encroachment permit from the District. The construction of facilities within road right-of-way that may impact District storm drains should also be coordinated with us. To obtain further information on encroachment permits or existing facilities, contact Ed Lotz of the District's Encroachment Permit Section at 951.955.1266.
2. The proposed project is located within the District's Banning and Beaumont Master Drainage Plan (MDP) boundaries. When fully implemented, these MDP facilities will provide flood protection to relieve those areas within the MDP boundary of the most serious flooding problems and will provide adequate drainage outlets. The EIR should address potential impacts to proposed facilities within the project area. To obtain more information on the MDPs, please contact Dale Anderson of the District's Planning Section at 951.955.1345.
3. Portions of the proposed project are located within Zone A limits as delineated on the Federal Flood Insurance Rate Map (FIRM) issued in conjunction with the National Flood Insurance Program (NFIP). If the proposed project will have significant impact on the watercourses that have floodplains associated with them, the DEIR should address potential direct and indirect floodplain impacts. Impacted floodplains will likely need to be studied and mapped. For any work or alteration of the FEMA mapped floodplains, the City is responsible for compliance with the FEMA floodplain management regulations within the city limits.

A4-1

A4-2

A4-3

## Comment Set A4, continued

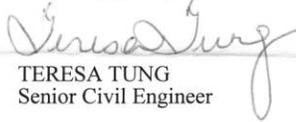
Ms. Juralynne B. Mosley  
Re: Draft Environmental Impact Report  
for the El Casco System Project

-2-

January 8, 2008

Thank you for the opportunity to review the DEIR. Please forward any subsequent environmental documents regarding the project to my attention at this office. Any further questions concerning this letter may be referred to me at 951.955.1233 or Art Diaz at 951.955.4643.

Very truly yours,



TERESA TUNG  
Senior Civil Engineer

c: TLMA  
Attn: David Mares  
Ed Lotz  
Dale Anderson

AD:mcv  
P8\117449

## Responses to Comment Set A4 – Riverside County Flood Control and Water Conservation District

**A4-1** The requirement for an encroachment permit for any work that involves Riverside County Flood Control and Water Conservation District rights-of-way, easements, or facilities has been noted. Table A-1 (Permits Required for the El Casco System Project) notes that Riverside County and the Cities of Beaumont and Banning roads and highways would require Roadway Closure and Encroachment Permits for construction within and temporary closure of roadways. The CPUC will ensure that SCE complies with all applicable permits requirements as part of the El Casco System Project Mitigation Monitoring, Compliance, and Reporting Program.

**A4-2** The Riverside County Flood Control and Water Conservation District's (District) Master Drainage Plan (MDP) maps, specifically for Banning and Beaumont, have been reviewed online at <http://www.floodcontrol.co.riverside.ca.us/districtsite/default.asp>.

Tables D.8-2 and D.8-5 list all surface water crossings in the Proposed Project subtransmission line route and the Route Alternative Option 3 subtransmission line route, respectively. As the fiber optic communication lines would be installed on existing structures and within existing conduits, no impacts to the District's existing or proposed facilities would occur. As stated in the EIR, Impact HYD-7 (Transmission towers or other above-ground project features located in a floodplain or watercourse could result in flooding, flood diversions, or erosion) was found to be significant, but mitigable (Class II) within the District's jurisdiction. Although the project description states that if any project construction requires that a watercourse be altered or relocated, the flood carrying capacity of the altered or relocated portion of the watercourse would be maintained (APM HYDRO-2B), the EIR includes additional mitigation to protect project facilities from flooding, and dictates that project-related facilities be placed outside of the current and reasonably expected future flow path of watercourses and the site shall be designed such that drainage and erosion patterns will not be altered with respect to adjacent properties so as not to induce flooding or erosion damage (Mitigation Measure HYD-7, Aboveground Structures Shall Be Protected Against Flood and Erosion Damage, Section D.8.3.3). The proposed mitigation would reduce this impact to a less-than-significant level. Therefore, in addition to the implementation of the APMs and proposed mitigation measures, and because the subtransmission lines would be overhead and could span any major watercourses and drainage outlets included in the District's MDPs, impacts to existing and proposed MDP facilities in the project area have been considered and were found to be less than significant. As stated in Response A4-1, the requirement for an encroachment permit for any work that involves the District rights-of-way, easements, or facilities has been noted. In addition, the CPUC will ensure that SCE complies with all applicable permits requirements as part of the El Casco System Project Mitigation Monitoring, Compliance, and Reporting Program.

**A4-3** As discussed in Section D.8 of the EIR, portions of the Proposed Project and alternatives that are located within Zone A limits, as delineated on the Federal Flood Insurance Rate Map (FIRM), are noted in Table D.8-3 (Flood Hazards for the Proposed 115 kV Subtransmission Line Route) and Table D.8-6 (Flood Hazards for the CPUC's Northerly Route Alternative Option 3).

## Responses to Comment Set A4 – Riverside County Flood Control and Water Conservation District, continued

The potential impacts associated with the placement of a structure within a Special Flood Hazard Area (Zone A) are addressed under the discussion of Impact HYD-7, and those potential impacts are reduced to a less-than-significant level through implementation of Mitigation Measure HYD-7, which requires that all project related facilities be placed outside the current and reasonably expected future flow path of watercourses. Mitigation Measure HYD-7 also requires the project to be designed such that drainage and erosion patterns will not be altered with respect to adjacent properties so as not to induce flooding or erosion damage. Therefore, potential impacts with regard to floodplains would be less than significant.

Additionally, the following text of the EIR (page D.8-6) has been revised:

### **“Flooding Potential**

The Federal Emergency Management Agency (FEMA) is responsible for mapping the areas that are predicted to flood during 100-year and 500-year storm events. Flood hazard zones are identified by FEMA on Flood Insurance Rate Maps. The maps indicate the estimated level of inundation under various conditions and intensities. ~~There are no areas within the Proposed Project that are within the 100-year flood hazard zones (SCE, 2007a).”~~

## Comment Set A5

	United States	Forest	San Bernardino National Forest	602 South Tippecanoe Ave
	Department of	Service	Supervisor's Office	San Bernardino, CA 92408
	Agriculture			Phone: 909-382-2600
				Fax: 909-383-5770
				TTD: 909-383-5616

File Code: 1950-1/2700  
Date: JAN 24 2008

Juralynne B. Mosley  
California Public Utilities Commission  
c/o Aspen Environmental Group  
30423 Canwood Street  
Suite 215  
Agoura Hills, CA 91301

Dear Ms. Mosley:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the El Casco System Project. These comments address the proposal to install telecommunications equipment at the existing Mill Creek Communication Site on Yucaipa Ridge (T.1S, R.1W, Section 17, North ½) as well as general visual quality recommendations regarding transmission line towers.

Although the Mill Creek Communication Site is on private land along Road 1S09, it is surrounded by National Forest System land. The only discussion of potential issues or impacts we found related to this site is in Attachment 1 of the Notice of Preparation and the Alternatives Screening Report, both of which state, "Permanent impacts to habitat would occur adjacent to the existing communications building at the Mill Creek Communications Site as a result of the installation of the microwave antenna tower and temporary impacts would occur to a 60-foot by 60-foot staging area. While construction would largely affect disturbed habitat and non-native grassland, chaparral habitat would also be disturbed by these activities" (DEIS Appendix 2 and DEIS Appendix 1, page 9). No details are provided regarding height or other characteristics of the microwave antenna tower.

A5-1

### Visual Quality

Although the microwave antenna and transmission towers proposed in the El Casco Project are not on National Forest lands, they are visible from at many points and interfere with the visibility of the Mountains as seen from within the communities as well as I-10 which is a major viewing corridor for the National Forest backdrop. One mission of the National Forest is to preserve Scenic Vistas and retain the beauty of the National Forests as seen from major travel ways.

A5-2

Transmission towers and the microwave antenna are visible both in back drops and silhouette, and in distant and near views. Mitigation proposed depends on the situation. However, it is possible to reduce the visibility of the transmission lines and antenna when seen against mountain backdrops such as towers viewed from I-10 and the foothill/mountains of the San Bernardino National Forest. In this situation, the towers and antenna would be best a dark color, preferably olive drab (which is a Forest Green subdued with black, all with a matte finish). The transmission lines should be non-specular, which is galvanized metal dipped in an acid bath to reduce the reflectivity. The darker the line, the better.



Caring for the Land and Serving People



## Comment Set A5, continued

Towers and antenna when silhouetted against the skyline are usually visible and color is not often the issue because the contrast of any color in most sky is a silhouette from one about 70% of the viewing area. A light color to match the sky would only be useful in about 5% of most viewing conditions, and in about 95% of most viewing conditions the lighter colors stand out against the backdrop of the sky attracting visibility attention. All sky silhouetted colors are best if dark since darker colored shapes recede and lighter colors advance in visibility.

**A5-2  
Cont.**

When viewed from close distances (less than 3/4 mi.), monopole towers are better looking since they are more cohesive and sculptural. When in distance views (3/4 mi.) or with strong backdrops, lattice towers do drop out of visibility faster. Underground power lines save the visual resources better than either previous problem if they are on shallow slopes with limited vegetation and rock.

### Wildlife

With regard to the Mill Creek Communications Site upgrade, we recommend that you analyze and mitigate any potential impacts to peregrine falcon and golden eagle, both of which are Forest Service sensitive species present in the vicinity of the site. Golden eagles are found to the east of the site, and peregrine falcons are found to the south. We request that you incorporate raptor-safe design into the microwave antenna tower, and we are attaching raptor guidelines from our Forest Land Management Plan for your reference.

**A5-3**

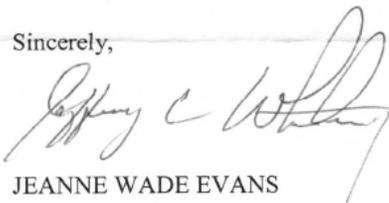
### Land Use

We would like more information on whether the existing right-of-way over Forest Service land is sufficient for road access and electricity to the Mill Creek Communications Site. We would also like to know whether you foresee a need for any additional permit from the Forest Service.

**A5-4**

Again, thank you for the opportunity to comment. If you have any questions, please contact Richard Thornburgh, Environmental Coordinator, at 909-382-2642.

Sincerely,



*for*  
JEANNE WADE EVANS  
Forest Supervisor

cc: John Wambaugh, Richard M Thornburgh  
encs: Appendix G- Guidelines for Protection and Conservation of Bird Species at Mountain Top Communications Sites, San Bernardino National Forest Land Management Plan, Part 3 Design Criteria (September 2005)

## Comment Set A5, continued

Part 3: Design Criteria for Southern California National Forests September 2005

### **Appendix G- Guidelines for Protection and Conservation of Bird Species at Mountain Top Communications Sites, USDA Forest Service**

The four southern California national forests are comprised of the Angeles, Cleveland, Los Padres and San Bernardino National Forests. A major program administered by these national forests is the issuance and administration of special-use authorizations for communication facilities at designated communication sites. The following guidelines have been developed and adopted by the four southern California national forests as a supplement to Communications Site Plans, for the protection and conservation of bird species covered by the Migratory Bird Treaty Act and/or Endangered Species Act of 1973, as amended.

#### **I: Guidelines for Communication Tower Siting, Construction, Operation, Maintenance and Decommissioning**

New towers shall be the same or lesser tower height as existing towers at the site and no more than 199 feet above ground level (AGL), and shall not require guy wires.

Towers shall be unlighted if Federal Aviation Administration (FAA) regulations permit. If towers requiring lights for aviation safety must be constructed, the minimum amount of pilot warning and obstruction avoidance lighting required by the FAA should be used. Unless otherwise required by the FAA, only white (preferable) or red strobe lights should be used at night, and these should be the minimum number, minimum intensity, and minimum number of flashes per minute (longest duration between flashes) allowable by the FAA. The use of solid red or pulsating red warning lights at night should be avoided.

Any existing tower using guy wires shall have daytime visual markers on the wires to prevent collisions by diurnally moving species. Spacing of markers should be at 10-foot intervals for smaller 'tags' and at 20-foot intervals for larger more linear 'flight diverter' structures.

In order to reduce the number of towers needed in the future, providers shall design new towers structurally and electrically to accommodate the applicant/licensee's antennas and comparable antennas for multiple users.

Security lighting for on-ground facilities and equipment should be down-shielded to keep light within the boundaries of the site.

Towers, facilities and structures no longer in use or determined to be obsolete should be removed.

Road access to mountain top communication sites must be adequate to support construction, maintenance and demolition of facilities. Communication service providers responsible for construction activities must notify the Forest Service prior to removal of equipment and structures to assess access needs.

#### **II: Additional Guidelines for Other Structures Associated with Communication Towers and Sites**

Place anti-perching materials along the top of open horizontal surfaces at tower tops or protruding arms of other tall vertical structures.

Place anti-perching materials or devices along the top edge of flat rooftops or roof ridges of equipment buildings or other similar structures located within the communication site.

## Comment Set A5, continued

Cover all microwave dishes with radome covers and place anti-perching materials or devices along the top quarter-arch of the front edge of dishes capable of supporting a perching condor (approximately 20 pounds per bird).

Place anti-perching materials or devices along the top surface of horizontal coverings or tracks holding wave-guides capable of supporting a condor.

Keep all trash, garbage or excess scrap materials removed from the communication site, or placed in enclosed structures not accessible to condors or other large bird species.

Secure all loose wires or netting to prevent accidental entrapment of large birds. Placement of wires in conduit is also recommended where feasible.

Cover or otherwise protect external fiberglass type insulation or other soft materials which could be ripped apart or ingested by condors or other large birds.

Cover all spill retention or catchment basins or other open structures that may collect and hold water or other liquids, which condors or other birds may attempt to drink.

Cover or screen all large drains, conduits or other similar openings, which are large enough for a condor to walk into to prevent potential entrapment.

All doors and windows on buildings or other structures shall be designed to ensure they remain closed when not occupied by personnel to prevent accidental entry and entrapment of condors or other species.

Cyclone type fencing or other similar security fencing or walls surrounding equipment or other structures should be designed and located to avoid the potential for accidental entrapment of condors or eagles.

Place raptor guards or other anti-perching materials or devices along the upper surface of the horizontal cross arms of electrical power poles at communication facilities, which could serve as perches for larger birds.

Fuel storage tanks associated with generators and other facilities shall meet current fire department, federal, state, and local safety and hazardous materials requirements. Fuel storage shall be consolidated into one tank large enough to accommodate all tenants in a facility.

(For guidance on markers and other anti-perching devices, see *Avian Power Line Interaction Committee (APLIC). 1994. Mitigating Bird Collisions with Power Lines: The State of the Art in 1994. Edison Electric Institute, Washington, D.C., 78 pp*, and *Avian Power Line Interaction Committee (APLIC). 1996. Suggested Practices for Raptor Protection on Power Lines. Edison Electric Institute/Raptor Research Foundation, Washington, D.C., 128 pp*.

Copies can be obtained via the Internet at <http://www.eei.org/resources/pubcat/enviro>, or by calling 1-800-334-

## Responses to Comment Set A5 – San Bernardino National Forest

- A5-1** As stated in the Project Description (page B-39), the Mill Creek Communications Site antenna tower would be a 110-foot tall, three-legged, self-supporting steel lattice structure that would be constructed adjacent to the existing communications building. In addition to the Draft EIR Project Description (Section B), Sections D.3 (Land Use), D.4 (Biological Resources), D.11 (Traffic and Transportation), and D.12 (Visual Resources) provide a discussion of the Proposed Project as it relates to the Mill Creek Communications Site. The commenter is referred to these sections of the Draft EIR for more detailed information.
- A5-2** The commenter is referred to the full text of the Project Description in Section B of the Draft EIR, which details the activities that are proposed to occur at SCE's existing Mill Creek Communications site. Please note that as described in detail in the Project Description, there would be no subtransmission lines or associated wires at this site. Therefore, your comments about tower types are not applicable. Based on information provided by SCE on February 12, 2008, SCE Corporate Real Estate Representatives attended a quarterly meeting with the SBNF on January 29, 2008, at which the Forest Supervisor, Jeanne Wade Evans was present. At the January 29, 2008 meeting, the Forest Supervisor clarified that the SBNF El Casco DEIR comments regarding the olive drab painting on the communication tower and antenna at the Mill Creek Communications Site were written prior to SBNF's "no paint" decision being made. This discussion came up at the aforementioned quarterly SBNF-SCE meeting when an unrelated agenda item was discussed regarding the question of tower painting in SBNF areas on SCE's DPV2 Project. In that discussion, the Forest Supervisor reiterated that the SBNF does not want painted towers in the forest. It is understood from these communications that the SBNF Supervisor has communicated to the Applicant (SCE) that structures are not to be painted (contrary to this comment). Therefore, the Draft EIR has not been revised to include the painting of structures.
- A5-3** Impacts to bird species, including golden eagle and peregrine falcon, are discussed in Draft EIR Section D.4.5, Proposed Project Impact Analysis under Impact B-4 (The Project would result in a loss of nesting birds [Class II]), Impact B-8 (The Project would result in habitat loss or disturbance to listed birds, including migratory birds and raptors [Class II]), and Impact B-15 (The Project would result in the loss of foraging habitat or disruption of nesting for special-status raptor species [Class II]). Mitigation proposed for these impacts includes Mitigation Measure B-4, which states:

**Conduct Pre-Construction Surveys and Monitoring for Breeding Birds.** SCE shall conduct protocol-level surveys for nesting birds if construction activities are scheduled to occur during the breeding season for raptors and other migratory birds. Surveys shall be conducted in areas within 500 feet of tower sites, laydown/staging areas, substation sites, and access road/spur road locations. If active nests are found, a biological monitor shall establish a 300-foot buffer around the nest and no activities will be allowed within the buffer until the young have fledged from the nest or the nest fails. The biological monitor shall conduct regular monitoring of the nest to determine success/failure and to ensure that Project activities are not conducted within the 300-foot buffer until the nesting cycle is complete or the nest fails. The biological monitor shall be responsible for documenting the results of the

surveys and the ongoing monitoring. The 300-foot buffer may be adjusted to accommodate environmental conditions (background noise, existing level of disturbance, nest location) with the approval of the CPUC monitor and the CDFG.

Thank you for your comment addressing potential collision effects to birds with the communication structure at the Mill Creek site. The commenter is correct that the discussion did not provide specific language regarding the placement of anti-perch and anti-collision structures on the Mill Creek Communication site. The intent of the Draft EIR was to utilize the anti-collision language from the existing APLIC standards at the site. However, as the tower would be located on lands surrounded by National Forest System Lands the comment is warranted and the text will be revised to include the standard mitigation from Appendix G of the Forest Land Management Plan. Revisions to the Draft EIR include:

Revision to Impact heading B-10 Page D.4-71. Impact B-10: The Project would result in subtransmission line/communication tower collisions by listed bird species (Class II).

Revision to paragraph 1 under Impact heading B-10 Page D.4-71. A primary issue with respect to birds and the Proposed Project is the collision hazard that subtransmission towers and lines present to birds. Collisions may also occur to the proposed communication tower at Mill Creek. Bird collisions with power lines and other structures generally occur when: (1) a power line or other aerial structure transects a daily flight path used by a concentration of birds, and (2) migrants are traveling at reduced altitudes and encounter tall structures in their path (Brown, 1993).

Revision to paragraph 3 under Impact heading B-10 Page D.4-72. It is difficult to predict the magnitude of collision-caused bird mortality without extensive information on bird species and movements in the project vicinity. These data are not available for the proposed subtransmission line study area. However, it is generally expected that collision mortality would be greatest where the movements of susceptible species are the greatest such as along waterways or over riparian areas like those San Timoteo Creek. The communication tower at Mill Creek may also pose a collision risk during inclement weather. The operation of the Proposed Project may result in mortality of listed or sensitive bird species and this would be considered a significant impact (Class II). However, most of the listed species present in the Project area are Covered Species under the MSHCP and impacts of the Proposed Project would be fully mitigated through compliance with the MSHCP. However, areas including the Mill Creek communications site are not covered by the MSHCP. In addition, the proposed subtransmission line would replace existing lines and general conditions would not substantially change from existing conditions. While the new towers would be taller, the line would replace the existing line in the same area and be constructed utilizing line-collision avoidance technology. Implementation of Mitigation Measure B-10 (Utilize Collision-Reducing Techniques) would minimize the potential for line collisions by listed and sensitive bird species such that impacts would be reduced to a less-than-significant level.

#### ***Mitigation Measure for Impact B-10***

- B-10**      **Utilize Collision-Reducing Techniques.** SCE shall install the subtransmission line utilizing APLIC standards for collision-reducing techniques as outlined in “Mitigating Bird Collisions with Power Lines: The State of the Art in 2006 (APLIC, 2006).” At the Mill Creek site SCE shall implement the guidelines identified in Appendix G of the Forest Land Management Plan. Modification to

the Guidelines identified in Appendix G of the Forest Land Management Plan may be implemented upon consultation with the Forest and approval of the CPUC.

- A5-4** Based on information provided by SCE on February 12, 2008, the existing ROW would be sufficient for road access and electricity up to the Mill Creek Communications Site. SCE does not foresee any need to expand or alter the ROW, and no additional ROW over Forest Service land would be necessary for the proposed project. In addition, SCE Electricity would be provided to the site along an existing flume on SCE fee-owned property. No additional permits from the USDA Forest Service would be necessary.

## Comment Set A6

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY

ARNOLD SCHWARZENEGGER, Governor

**DEPARTMENT OF TRANSPORTATION**  
DIVISION OF AERONAUTICS – M.S.#40  
1120 N STREET  
P. O. BOX 942873  
SACRAMENTO, CA 94273-0001  
PHONE (916) 654-4959  
FAX (916) 653-9531  
TTY 711



*Flex your power!  
Be energy efficient!*

January 24, 2008

Ms. Juralynne Mosley  
California Public Utilities Commission  
c/o Aspen Environmental Group  
30243 Canwood Street, Suite 215  
Agoura Hills, CA 91301

Dear Ms. Mosley:

Draft Environmental Impact Report for the El Casco System Project; SCH# 2007071076

The California Department of Transportation (Caltrans), Division of Aeronautics (Division), reviewed the above-referenced document with respect to airport-related noise and safety impacts and regional aviation land use planning issues pursuant to the California Environmental Quality Act (CEQA). The Division has technical expertise in the areas of airport operational safety, noise and airport land use compatibility. We are a funding agency for airport projects, and we have permit authority for public-use and special-use airports and heliports.

The proposal is for construction of the new 220/115/12 kV El Casco Substation along with upgrades to the existing Zanja and Banning Substations. The proposal also includes new steel poles and towers that will be between 70 to 130 feet in height.

Although the Draft Environmental Impact Report (DEIR) states that the Banning Substation is approximately one mile west of the Banning Municipal Airport, the substation appears to be only 3,750 feet from the west end of Banning Municipal Airport's runway 8-26. The substation is also located beneath the extended runway centerline.

Public Utilities Code Section 21658 prohibits construction of utility poles or pole lines that could be a structural hazard on or near an airport. The DEIR refers to the Federal Aviation Regulation (FAR), Part 77, Section 77.23 (a)(2), stating "an existing or future object would be an obstruction to air navigation if it is of greater height than 200 feet above ground level within three nautical miles of an airport. Therefore, since no features of the Proposed Project would be greater than 79 feet in height from the ground surface in this area, the Proposed Project would have no impact on aviation activities at the Banning Municipal Airport." FAR Part 77.13 a)(2)(i), however, requires a Notice of Proposed Construction or Alteration (Form 7460-1) be submitted to the FAA if the proposed construction is of greater height than an imaginary surface extending outward at a 100:1 for a horizontal distance of 20,000 feet from the nearest point of a runway which is greater than 3,200 feet in length. Since Banning Municipal Airport has a 5,200-foot long runway, any structure exceeding 37.5 feet in height will require submission of Form 7460-1 to the FAA. The FAA then determines if the proposal is or is not a hazard. FAR Part 77.13 a)(2)(i) also applies to Redlands Municipal Airport and San Bernardino International Airport. Form 7460-1 is available at <https://oeaaa.faa.gov/oeaaa/external/portal.jsp> and should be submitted electronically to the FAA.

*"Caltrans improves mobility across California"*

A6-1

A6-2

## Comment Set A6, continued

Ms. Juralynne Mosley  
January 24, 2008  
Page 2

The proposal should be submitted to the Riverside County Airport Land Use Commission (ALUC) for a consistency determination. The proposal should also be coordinated with the Banning Municipal Airport staff to ensure that the proposal will be compatible with future as well as existing airport operations.

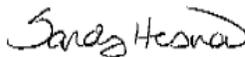
A6-3

The protection of airports from incompatible land use encroachment is vital to California's economic future. Banning Municipal Airport is an economic asset that should be protected through effective airport land use compatibility planning and awareness. Although the need for compatible and safe land uses near airports in California is both a local and a State issue, airport staff, airport land use commissions and airport land use compatibility plans are key to protecting an airport and the people residing and working in the vicinity of an airport. Consideration given to the issue of compatible land uses in the vicinity of an airport should help to relieve future conflicts between airports and their neighbors.

These comments reflect the areas of concern to the Division with respect to airport-related noise and safety impacts and regional airport land use planning issues. We advise you to contact our Caltrans District 8 office concerning surface transportation issues.

Thank you for the opportunity to review and comment on this proposal. If you have any questions, please call me at (916) 654-5314.

Sincerely,



SANDY HESNARD  
Aviation Environmental Specialist

c: State Clearinghouse, Riverside County ALUC, Banning Municipal Airport

*"Caltrans improves mobility across California"*

## Responses to Comment Set A6 – California Department of Transportation

- A6-1** The distance from the Banning Substation to the Banning Municipal Airport was approximated as one mile. It is correct that the actual distance from the substation to the western boundary of runway 8-26 is on the order of 3,750 to 4,000 feet, and the substation is beneath the extended runway centerline.
- A6-2** The commenter is referred to the FAA's comment letter (Comment Set A-2) on the Draft EIR regarding the same subject, and the associated responses to comments. Please see response to comment A2-1.
- A6-3** The CPUC will ensure that SCE complies with all applicable permits requirements as part of the CEQA-required El Casco System Project Mitigation Monitoring, Compliance, and Reporting Program.

## Comment Set A7

Jan 25 2008 10:40AM City of Calimesa

909-795-6187

p. 1



# City Of Calimesa

January 24, 2008

Juralynne B. Mosley  
California Public Utilities Commission  
C/o Aspen Environmental Group  
30423 Canwood Street, Suite 215  
Agoura Hills, CA 91301

Sent via fax: (877) 576-8342 and certified mail

Re: Comments on the Draft Environmental Impact Report for the Proposed El Casco System Project (SCH# 2007071076)

Dear Ms. Mosley:

Thank you for providing the City of Calimesa the opportunity to review and comment on the Draft Environmental Impact Report (EIR) for the proposed El Casco System Project. The City of Calimesa understands that the project consists of the following Southern California Edison (SCE) improvements:

- A new 220/115/12 kV substation – the El Casco Substation;
- Improvements to the existing Zanja and Banning Substations and the Mill Creek Communications Site;
- Upgrades to a total of 15.4 miles of 111 kV electric subtransmission line and associated structures; and
- A new overhead fiber optic line from Redlands to Banning.

None of the proposed improvements are located in the City of Calimesa, other than the proposed fiber optic line following the City's southwestern border. Of note, the proposed El Casco Substation is located immediately southwest of the City of Calimesa.

The City of Calimesa has the following general comments on the Draft EIR. However, responses are not necessary:

1. The proposed El Casco Substation is located within the Norton Younglove Reserve and adjacent to dedicated open space/wildlife movement land in the City of Calimesa. Calimesa has expended considerable effort to assemble wildlife corridors through the City in order to preserve habitat linkages between the San Bernardino National Forest and the San

A7-1

## Comment Set A7, continued

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Timoteo Badlands. As such, impacts to established wildlife corridors are always a concern to the City of Calimesa. That being said, the *Impact B-3* and *Section D.4.5.6* of the Draft EIR appear to adequately and thoroughly analyze the proposed El Casco Substation's impacts on wildlife and wildlife movement and the City appreciates the efforts placed on this section.

A7-1  
Cont.

2. The proposed project will impact southwest-facing views from San Timoteo Road, which currently consist of naturally vegetated rolling terrain in the Norton Younglove Reserve. The proposed project will add the El Casco Substation and transmission towers into this view immediately adjacent to the City of Calimesa. *Impacts V-3 and V-4* of the Draft EIR analyze the project's impact on this viewshed; and the Draft EIR concludes that *Impacts V-3 and V-4* are significant and mitigation is required to reduce this impact to a less than significant level. The City of Calimesa agrees with this conclusion. The proposed mitigation consists of (1) screening the substation with native plants including Coast Live Oak, Black Willow, understory shrubs, and riparian species (along San Timoteo Canyon); and (2) minimizing and directing night lighting. The proposed mitigation measures appear adequately to reduce *Impacts V-3 and V-4* to a less than significant level.

A7-2

Once again, the City of Calimesa appreciates this opportunity to comment on the Draft EIR for the El Casco System project. Should you have any questions, please do not hesitate to contact me at (909) 795-9801 x229.

Respectfully submitted,



Gus Romo  
Community Development Director

C: David Lane, City Manager  
El Casco Subject File

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## Responses to Comment Set A7 – City of Calimesa

- A7-1 Thank you for providing your comment, which acknowledges that the issues of concern related to Biological Resources have been addressed in the Draft EIR.
- A7-2 Thank you for providing your comment, which acknowledges that the issues of concern related to Visual Resources have been addressed in the Draft EIR.