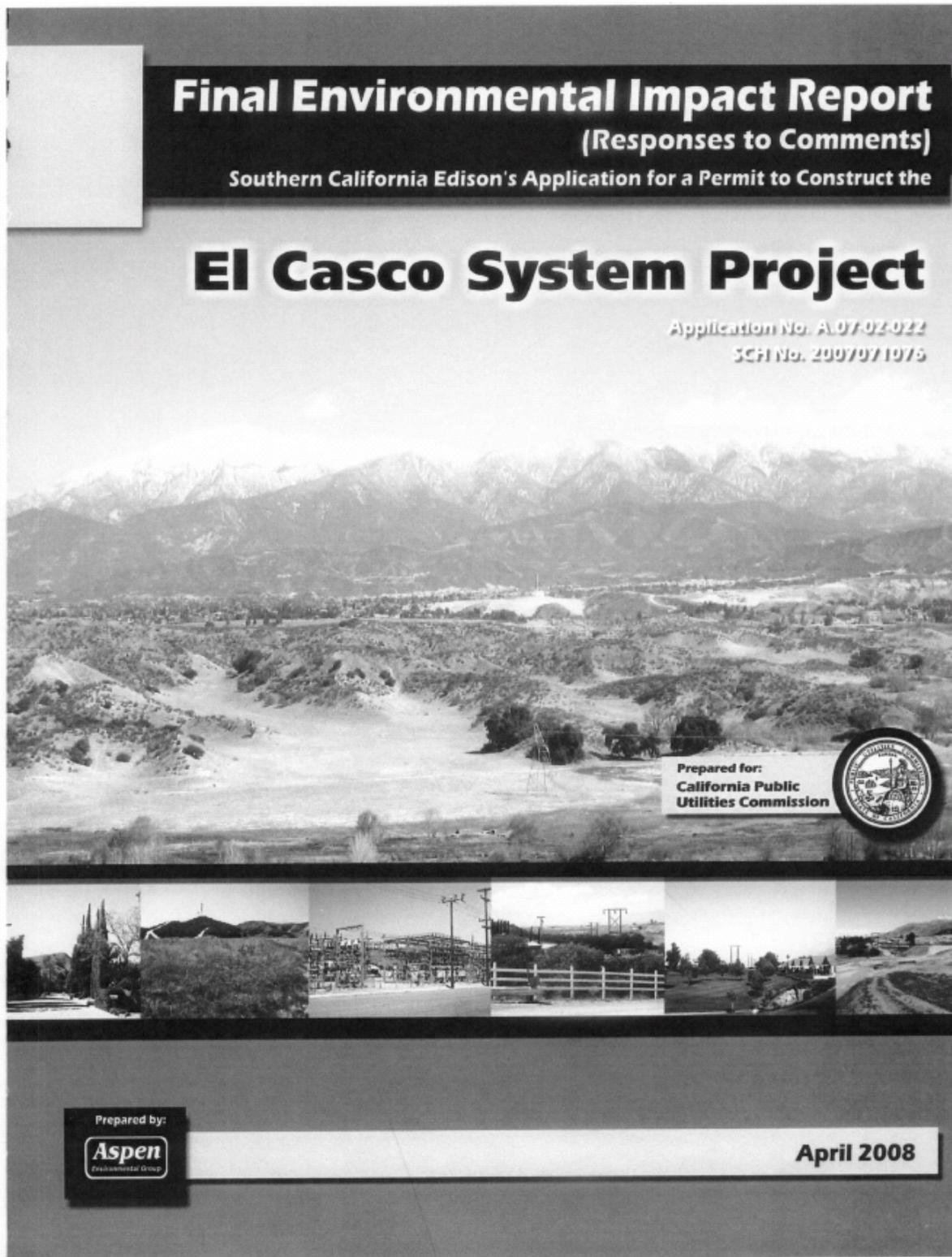


Comment Set C62, continued

Attachment B

Comment Set C62, continued



Comment Set C62, continued

FINAL

Environmental Impact Report (Responses to Comments)

Southern California Edison Company's Application for a Permit to Construct the El Casco System Project

Application No. A.07-02-022
SCH No. 2007071076

Prepared for:

**California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102**

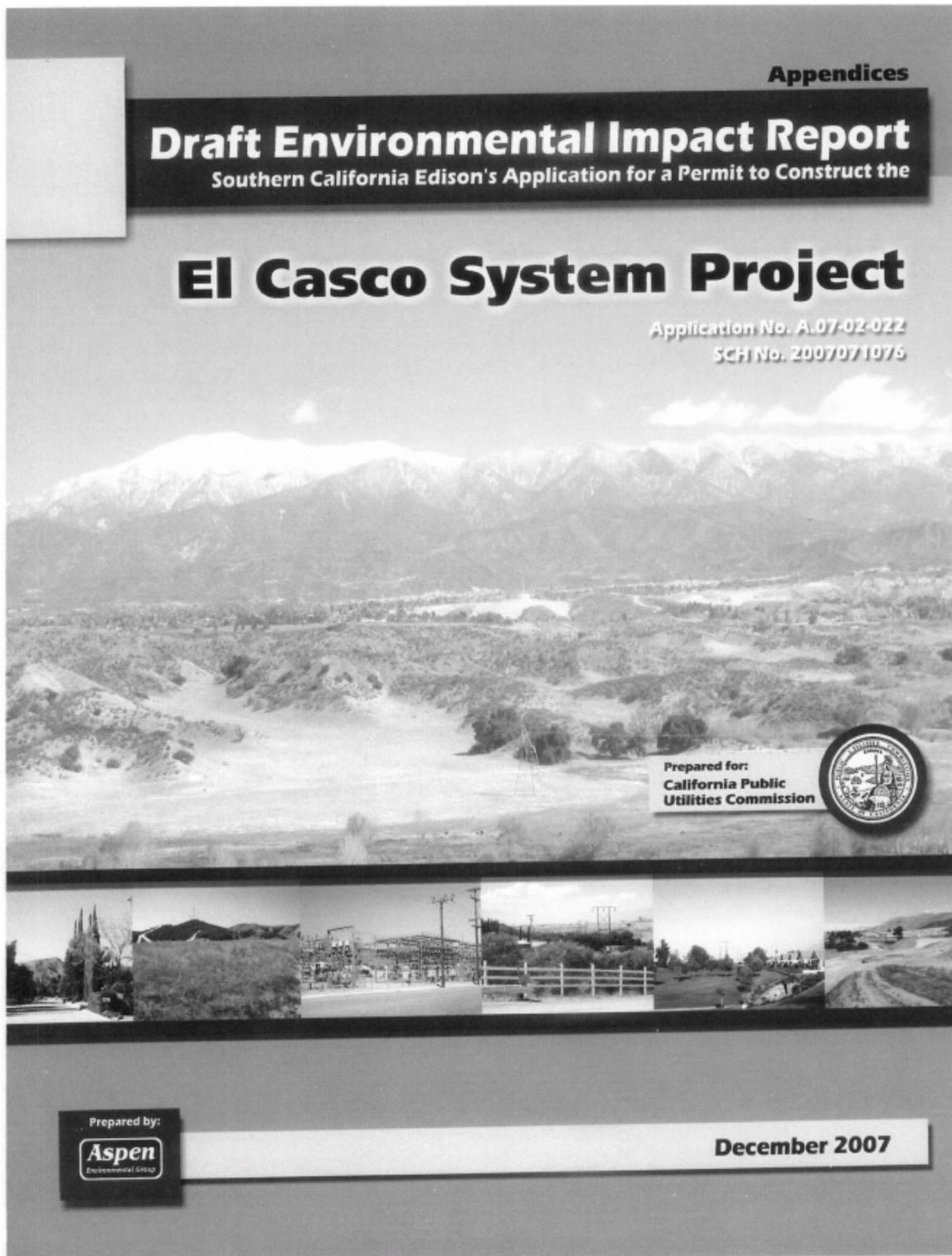
Prepared by:

Aspen Environmental Group



April 2008

Comment Set C62, continued



Comment Set C62, continued

Draft

Environmental Impact Report

**for the
El Casco System Project**

Prepared for:

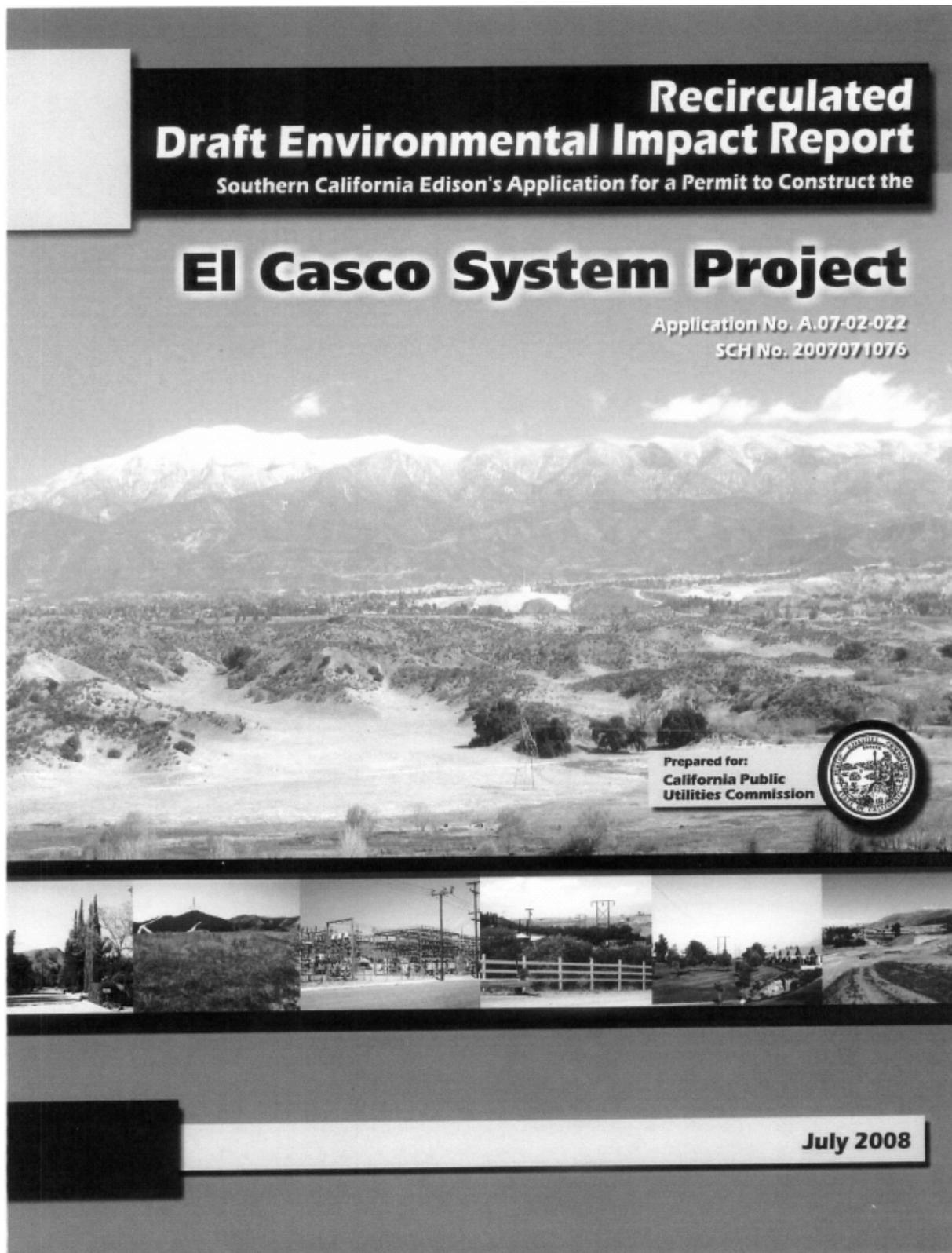
**California Public Utilities Commission
San Francisco, California
SCH #2007071076**

Prepared by:

Aspen Environmental Group

December 2007

Comment Set C62, continued



Comment Set C62, continued

Recirculated Draft Environmental Impact Report

for the El Casco System Project

Prepared for:

**California Public Utilities Commission
San Francisco, California
SCH #2007071076**

July 2008

Comment Set C62, continued

Attachment C

Comment Set C62, continued

Page 1 of 1

Ed and Sonja Leonhardt

From: "E ICasco" <ECasco@aspeneg.com>
To: "Ed and Sonja Leonhardt" <ehlsml2@msn.com>
Sent: Tuesday, July 15, 2008 10:16 AM
Attach: Recirc DEIR_NOA-rev1 to CPUC.doc
Subject: RE: Proceeding 07-02-022

Mr. Leonhardt,

Following the release of the Final Environmental Impact Report (EIR) on the El Casco System Project in April 2008, the California Public Utilities Commission (CPUC) received updated information from Southern California Edison regarding the ambient noise levels adjacent to the existing single-circuit 115 kV subtransmission line. Based on this new information, the CPUC decided that it would be necessary to recirculate the Draft EIR as required by the California Environmental Quality Act (CEQA Guidelines Section 15088.5). The Recirculated Draft EIR was released on July 9, 2008 for public review. Attached is a copy of the Notice of Availability of the Recirculated (Revised) Draft EIR for the El Casco System Project. As a result of recirculating the Draft EIR, the CPUC Decision on the El Casco System Project has been postponed and is anticipated to occur in November 2008.

Sincerely,
The El Casco System Project EIR Team

From: Ed and Sonja Leonhardt [mailto:ehlsml2@msn.com]
Sent: Wed 7/2/2008 4:16 PM
To: E ICasco; jbm@cpuc.gov
Subject: Proceeding 07-02-022

To Whom It May Concern:

My name is Edward H. Leonhardt. I filed a formal protest to SCE's Application 07-02-022. I wish to be advised as to the status of Proceeding 07-02-022.

The Ruling and Scoping Memo released 03/20/2008 stated that a final decision was projected for June 12, 2008. That memo indicated that one of the objectives for the proceeding was to be rigorous about keeping on schedule to issue a timely decision.

I look forward to hearing from you as to my request on the status of Proceeding 07-02-022.

Edward H. Leonhardt, P.E.

7/15/2008

Comment Set C62, continued

Attachment D

Comment Set C62, continued

El Casco System Project
EXECUTIVE SUMMARY

Table ES-3. Proposed Project vs. CPUC's Northerly Route Alternative Option 3 and Partial Underground Alternative

Issue Area	Proposed Project	Route Alternative Option 3	Partial Underground Alternative
Air Quality	No Preference. Construction would result in the lowest construction emissions. Operation and maintenance would result in less than significant long-term emissions.	No Preference. Construction would result in higher NOx and PM10 construction emissions when compared to the Proposed Project. Operation and maintenance would result in similar less than significant long-term emissions in comparison to the Proposed Project.	No Preference. Construction would result in the highest NOx and PM10 emissions and highest localized impacts to sensitive receptors due to the large amount of grading and extended construction period in the Sun Lakes community. Operation and maintenance would result in similar less than significant long-term emissions in comparison to the Proposed Project.
Land Use	Would traverse adjacent to (approximately 237 residential structures) in existing 115 kV subtransmission line ROW resulting in less than significant long term land use impacts.	Would traverse a large amount of residential development (approximately 303 residential structures) within the City of Banning. Operation and maintenance would have significant long-term impacts on a greater number of residences when compared to the Proposed Project.	Preferred. Similar to the Proposed Project, would traverse adjacent to (approximately 237 residential structures) in existing 115 kV subtransmission line ROW. For duration of 10-month construction activities, land uses would be precluded. However, when compared to the Proposed Project, long-term use of the golf course in Sun Lakes would be improved.
Biological Resources	No Preference. Construction would result in the least amount of ground disturbance. Operation and maintenance would result in similar less than significant long-term biological resource impacts.	No Preference. Reroute of 115 kV subtransmission line would increase total ground disturbance and cross a broad riparian area north of San Timoteo Creek during construction. Operation and maintenance would result in similar less than significant long-term biological resource impacts.	No Preference. Extended duration of construction at underground segment would increase wildlife disruption. Operation and maintenance would result in similar less than significant long-term biological resource impacts.
Cultural Resources	Preferred. Construction would have the least potential to impact undiscovered cultural resources. Operation and maintenance would result in no long-term cultural resource impacts.	Similar construction impacts to cultural resources as the Proposed Project. Operation would result in significant long-term impacts to a potential historic district along Summit Drive in the City of Banning	Increased amount of required grading during construction would result in the highest possibility of encountering undiscovered buried resources. Similar to the Proposed Project, operation and maintenance would result in no long-term cultural resource impacts.
Geology and Soils	No Preference. Construction would result in the least amount of ground disturbance during construction. Operation and maintenance would result in less than significant long-term geology and soils impacts.	No Preference. Would increase the total number of subtransmission line poles required and amount of ground disturbed during construction. Operation and maintenance would result in similar less than significant long-term geology and soils impacts when compared to the Proposed Project.	No Preference. Extensive trenching required would increase amount of soil disturbed and risk of erosion during construction. Operation and maintenance would result in similar less than significant long-term geology and soils impacts when compared to the Proposed Project.
Hazards and Hazardous Materials ²	No Preference. Has fewest identified contaminated sites near construction zones. Operation and maintenance would result in less than significant long-term hazards and hazardous materials impacts.	No Preference. Has the most identified contaminated sites near construction zones. Operation and maintenance would result in similar less than significant long-term hazards and hazardous materials impacts when compared to the Proposed Project.	No Preference. Required trenching would increase construction activities and risk of hazardous materials used during construction. Operation and maintenance would result in similar less than significant long-term hazards and hazardous materials impacts when compared to the Proposed Project.

² EMF impacts are not considered in this analysis as EMF is not considered a CEQA issue.

Comment Set C62, continued

El Casco System Project
EXECUTIVE SUMMARY

Table ES-3. Proposed Project vs. CPUC's Northerly Route Alternative Option 3 and Partial Underground Alternative

Issue Area	Proposed Project	Route Alternative Option 3	Partial Underground Alternative
Hydrology and Water Quality	No Preference. Construction would result in the least amount of ground disturbance and potential surface water quality impacts. Operation and maintenance would result in less than significant long-term hydrology and water quality impacts.	No Preference. Would increase the total amount of ground disturbed thus increasing the risk to surface water quality during construction. Operation and maintenance would result in similar less than significant long-term hydrology and water quality impacts when compared to the Proposed Project.	No Preference. Extensive trenching required would increase the possibility of impacts to groundwater during construction. Operation and maintenance would result in similar less than significant long-term hydrology and water quality impacts when compared to the Proposed Project.
Noise	Construction would result in the least amount of residences impacted. Operation would result in significant long-term corona noise impacts.	Construction would result in the most amount of residences impacted. Operation would result in more residential receptors exposed to significant long-term corona noise impacts when compared to the Proposed Project.	Preferred. Construction would result in the identical number of residences impacted as the Proposed Project. However, extensive construction noise for 10 months would occur at underground segment. Once operational, the underground subtransmission line would reduce corona noise impacts on residential receptors in the Sun Lakes Community when compared to the Proposed Project.
Public Services and Utilities	No Preference. Construction would result in the least amount of generated solid waste and shortest construction schedule. Operation and maintenance would result in less than significant long-term public services and utilities impacts.	No Preference. Construction would require the removal of more poles during construction, thus increasing solid waste. Operation and maintenance would result in similar less than significant long-term public services and utilities impacts when compared to the Proposed Project.	No Preference. Construction would result in an increase in soil spoils due to underground construction. Trenching would require an increase in water use for dust suppression. However, operation and maintenance would result in similar less than significant long-term public services and utilities impacts when compared to the Proposed Project.
Transportation and Traffic	No Preference. Construction would travel through the least amount of residential development. Operation and maintenance would result in less than significant long-term transportation and traffic impacts.	No Preference. Construction activities within City of Banning residential neighborhoods would likely result in more traffic delays. Operation and maintenance would result in similar less than significant long-term transportation and traffic impacts when compared to the Proposed Project.	No Preference. Extended construction duration within the Sun Lakes community would increase roadway delays. However, operation and maintenance would result in similar less than significant long-term transportation and traffic impacts when compared to the Proposed Project.
Visual Resources	Construction would result in the least amount of residences impacted. Operation would require mitigation to decrease long-term visual impacts.	Construction would result in the most amount of residences impacted. Operation would result in a significant unavoidable visual impact to views from Summit Drive.	Preferred. Construction would result in the identical number of residences impacted as the Proposed Project. However, the underground segment of subtransmission line would eliminate existing above-ground visible 115 kV subtransmission line wood poles in the Sun Lakes Community.

Note: Impacts associated with construction (i.e., temporary or short-term) or those that are easily mitigable to less-than-significant levels are considered to be less important than the long-term effects when comparing project alternatives.

The Partial Underground Alternative is preferred over the Proposed Project in three issue areas (land use, noise, and visual) along the approximate one-mile portion of the route through the Sun Lakes community. Any benefits along the one-mile underground portion would only be experienced in the long-term once the project is implemented.

Comment Set C62, continued

El Casco System Project
 E. COMPARISON OF ALTERNATIVES

Short-Term and Temporary Construction-Related Impacts

During construction of the Partial Underground Alternative, an increase in the amount of air quality emissions would occur due to an increase in overall construction activities and intensity required. In addition, due to the longer schedule required for construction of the underground portion (10 months versus 2 months to construct the overhead subtransmission line in the same one-mile area), the duration of exposure to air quality impacts would also be longer with this alternative than that experienced with the Proposed Project. Therefore, no reduction in construction-related air quality impacts would occur as compared to the Proposed Project, and construction-related air quality impacts would actually be greater due to the ground-disturbing activities associated with underground construction.

Construction of the underground segment of the 115 kV subtransmission line replacements would cross Sun Lakes Country Club golf course, requiring extensive excavation and construction and disrupting use of the golf course for up to 10 months. While the Partial Underground Alternative would ultimately remove the existing wooden 115 kV subtransmission poles and lines from the Sun Lakes Country Club golf course, the disruption of the golf course for 10 months is considered a significant and unavoidable land use impact on the recreational resource, which is an impact specific to the Partial Underground Alternative.

Long-Term Operation-Related Impacts

As significant (Class I) long-term operation-related impacts would be the same for the Proposed Project and the Partial Underground Alternative, no further comparison is provided here.

E.2.2 Environmentally Superior Alternative

Table E-1 shows that out of the three options for implementation of the Proposed El Casco System Project, the Proposed Project (as described in detail in Section B of the December 2007 Draft EIR) would result in the least number of significant, unmitigable (Class I) environmental impacts. It should be noted that the only significant and unmitigable impacts of the Proposed Project (air quality impacts) are identical and shared among all three options. As shown in Table E-2, below, out of the 11 environmental resource areas analyzed in detail, the Proposed Project and the Partial Underground Alternative result in identical long-term impacts. Route Alternative Option 3 would result in new long-term cultural resource and visual impacts as compared to either the Proposed Project or Partial Underground Alternative and is not preferred.

Table E-2. Proposed Project vs. CPUC's Northerly Route Alternative Option 3 and Partial Underground Alternative

Issue Area	Proposed Project	Route Alternative Option 3	Partial Underground Alternative
Air Quality	Preferred. Construction would result in the lowest construction emissions. Operation and maintenance would result in less than significant long-term emissions.	Construction would result in higher NOx and PM10 construction emissions when compared to the Proposed Project. Operation and maintenance would result in similar less than significant long-term emissions in comparison to the Proposed Project.	Construction would result in the highest NOx and PM10 emissions and highest localized impacts to sensitive receptors due to the large amount of grading and extended construction period in the Sun Lakes community. Operation and maintenance would result in similar less than significant long-term emissions in comparison to the Proposed Project.
Land Use	Preferred. Would traverse adjacent to (approximately 237 residential structures) in existing 115 kV subtransmission line ROW resulting in less than significant long term land use impacts.	Would traverse a large amount of residential development (approximately 303 residential structures) within the City of Banning. Operation and maintenance would affect a greater number of residences when compared to the Proposed Project., however all long-term impacts are less than significant	Similar to the Proposed Project, would traverse adjacent to approximately 237 residential structures in existing 115 kV subtransmission line ROW. For the 10-month construction period, land uses would be precluded resulting in a significant and unavoidable land use impact. Although, long-term use of the golf course in Sun Lakes would be

Comment Set C62, continued

El Casco System Project
 E. COMPARISON OF ALTERNATIVES

Table E-2. Proposed Project vs. CPUC's Northerly Route Alternative Option 3 and Partial Underground Alternative

Issue Area	Proposed Project	Route Alternative Option 3	Partial Underground Alternative
Biological Resources	Preferred. Construction would result in the least amount of ground disturbance. Operation and maintenance would result in similar less than significant long-term biological resource impacts.	Reroute of 115 kV subtransmission line would increase total ground disturbance and cross a broad riparian area north of San Timoteo Creek during construction. Operation and maintenance would result in similar less than significant long-term biological resource impacts.	Improved when compared to existing conditions, these existing conditions are not considered an impact of the Proposed Project. Extended duration of construction at underground segment would increase wildlife disruption. Operation and maintenance would result in similar less than significant long-term biological resource impacts.
Cultural Resources	Preferred. Construction would have the least potential to impact undiscovered cultural resources. Operation and maintenance would result in no long-term cultural resource impacts.	Not Preferred. Similar construction impacts to cultural resources as the Proposed Project. Operation would result in significant long-term impacts to a potential historic district along Summit Drive in the City of Banning	Increased amount of required grading during construction would result in the highest possibility of encountering undiscovered buried resources. Similar to the Proposed Project, operation and maintenance would result in no long-term cultural resource impacts.
Geology and Soils	Preferred. Construction would result in the least amount of ground disturbance during construction. Operation and maintenance would result in less than significant long-term geology and soils impacts.	Would increase the total number of subtransmission line poles required and amount of ground disturbed during construction. Operation and maintenance would result in similar less than significant long-term geology and soils impacts when compared to the Proposed Project.	Extensive trenching required would increase amount of soil disturbed and risk of erosion during construction. Operation and maintenance would result in similar less than significant long-term geology and soils impacts when compared to the Proposed Project.
Hazards and Hazardous Materials ¹	Preferred. Has fewest identified contaminated sites near construction zones. Operation and maintenance would result in less than significant long-term hazards and hazardous materials impacts.	Has the most identified contaminated sites near construction zones. Operation and maintenance would result in similar less than significant long-term hazards and hazardous materials impacts when compared to the Proposed Project.	Required trenching would increase construction activities and risk of hazardous materials used during construction. Operation and maintenance would result in similar less than significant long-term hazards and hazardous materials impacts when compared to the Proposed Project.
Hydrology and Water Quality	Preferred. Construction would result in the least amount of ground disturbance and potential surface water quality impacts. Operation and maintenance would result in less than significant long-term hydrology and water quality impacts.	Would increase the total amount of ground disturbed thus increasing the risk to surface water quality during construction. Operation and maintenance would result in similar less than significant long-term hydrology and water quality impacts when compared to the Proposed Project.	Extensive trenching required would increase the possibility of impacts to groundwater during construction. Operation and maintenance would result in similar less than significant long-term hydrology and water quality impacts when compared to the Proposed Project.
Noise	Preferred. Construction would result in the least amount of sensitive receptors impacted and would occur over the	Construction would result in the most amount of sensitive receptors impacted. Operation would result in similar less than significant corona noise impacts when compared to the	Construction would result in the same number of sensitive receptors subject to noise as the Proposed Project but would result in the most construction intensity and longest duration of

¹ EMF impacts are not considered in this analysis as EMF is not considered a CEQA issue.

Comment Set C62, continued

El Casco System Project
 E. COMPARISON OF ALTERNATIVES

Table E-2. Proposed Project vs. CPUC's Northerly Route Alternative Option 3 and Partial Underground Alternative

Issue Area	Proposed Project	Route Alternative Option 3	Partial Underground Alternative
	shortest duration. Operation would result in less than significant long-term corona noise impacts.	Proposed Project.	construction to receptors impacted. Operation would result in similar less than significant corona noise impacts when compared to the Proposed Project.
Public Services and Utilities	Preferred. Construction would result in the least amount of generated solid waste and shortest construction schedule. Operation and maintenance would result in less than significant long-term public services and utilities impacts.	Construction would require the removal of more poles during construction, thus increasing solid waste. Operation and maintenance would result in similar less than significant long-term public services and utilities impacts when compared to the Proposed Project.	Construction would result in an increase in soil spoils due to underground construction. Trenching would require an increase in water use for dust suppression. Operation and maintenance would result in similar less than significant long-term public services and utilities impacts when compared to the Proposed Project.
Transportation and Traffic	Preferred. Construction would travel through the least amount of residential development. Operation and maintenance would result in less than significant long-term transportation and traffic impacts.	Construction activities within City of Banning residential neighborhoods would likely result in more traffic delays. Operation and maintenance would result in similar less than significant long-term transportation and traffic impacts when compared to the Proposed Project.	Extended construction duration within the Sun Lakes community would increase roadway delays. However, operation and maintenance would result in similar less than significant long-term transportation and traffic impacts when compared to the Proposed Project.
Visual Resources	Preferred. Construction would result in the least amount of residences impacted. Operation would require mitigation to decrease long-term visual impacts.	Not Preferred. Construction would result in the highest amount of residences impacted. Operation would result in a significant unavoidable visual impact to views from Summit Drive.	Construction would result in the identical number of residences impacted as the Proposed Project. While, the underground segment of subtransmission line would eliminate existing above-ground visible 115 kV subtransmission line wood poles in the Sun Lakes Community, existing conditions are not considered an impact of the Proposed Project.

Note: Impacts associated with construction (i.e., temporary or short-term) or those that are easily mitigable to less- than- significant levels are considered to be less important than the long-term effects when comparing project alternatives.

Conclusion

The Route Alternative Option 3 would result in the greatest significant long-term impacts and is not, therefore, considered environmentally superior to either the Proposed Project or the Partial Underground Alternative. The Proposed Project and the Partial Underground Alternative would result in identical long-term environmental impacts. Although the Partial Underground Alternative would improve existing conditions by removing the existing 115 kV subtransmission line wood poles along a one mile portion of the route through the Sun Lakes Community, the improvement in existing conditions is not considered in the determination of the environmentally superior alternative for the reasons explained above in Section E.1. Because the long-term environmental impacts of the Proposed Project and the Partial Underground Alternative are so similar, the determination of the environmentally superior alternative must also consider short-term construction impacts. The Partial Underground Alternative would result in greater short-term construction impacts in all resource areas analyzed in the EIR over a longer period of time due to the intense construction activities that would occur during the 10 month construction period required to construct this alternative. In addition, short-term construction impacts for the Partial Underground Alternative would be significant and unavoidable with respect to land use.

Responses to Comment Set C62 – Edward H. Leonhardt

- C62-1** Your protest to the proposed Project is noted. With regards to the comment “requesting that the CPUC require an EIR be prepared for the portion of the proposed Project where 13 miles of existing single-circuit 115 kV lines (three lines) are replaced with new, higher capacity double-circuit 115 kV lines (six larger lines) and taller poles”, it is presumed that the 13 mile segment referred to in the comment is the portion of the proposed Project traveling through the Sun Lakes Community. It should be noted that this segment of proposed 115kV subtransmission line replacement identified within this comment is part of the CPUC “Proposed Project” evaluated in both the originally published Draft and Final EIRs as well as the Recirculated Draft EIR. The analysis presented within these EIRs as prepared by the CPUC fulfills this request.
- C62-2** The legal requirements for recirculation under CEQA are provided in Recirculated Draft EIR Section A.1 (Legal Authority), followed by a discussion of the specific reasons for recirculating the Draft EIR for the proposed Project in Section A.2 (Summary of Revisions Made to Previously Circulated EIR). Please see General Response GR-1 for a discussion of the change to the environmentally superior alternative. The CPUC determined that the El Casco System Project EIR should be recirculated in light of new noise information provided by SCE and the change in the determination of the environmentally superior alternative. It is within the CPUC’s discretion as Lead Agency to determine what is “significant” and to allow every opportunity for the public to comment on this new information and the changes to the originally published Draft and Final EIRs, thus complying with CEQA §15088.5(a). Nothing in CEQA limits what the Lead Agency may circulate for public review.
- C62-3** Please refer to General Response GR-1 for a detailed description as to how the noise analysis and determination of the environmentally superior alternative changed based on new information provided subsequent to publishing of the original Draft and Final EIRs. Furthermore, as discussed in Recirculated Draft EIR Section D.9 (Noise), the new information provided by SCE shows that the Proposed Project would result in a decrease in corona discharge noise compared to the corona noise generated by the existing 115 kV subtransmission line. Therefore, a reduction in existing ambient noise conditions immediately adjacent to the right-of-way would occur in the Sun Lakes Community with implementation of the Proposed Project. This reduction in ambient noise conditions is considered a long-term effect and benefit of the Proposed Project. As discussed in both General Response GR-1 and Recirculated Draft EIR Section E (Comparison of Alternatives), both long-term and short-term effects of the Proposed Project and alternatives were considered in the determination of the environmentally superior alternative.
- C62-4** Recirculation is required whenever significant new information is added to an EIR after publication of the draft EIR “but before certification” of the final EIR (see CEQA Guidelines §15088.5[a]). On May 23, 2008, when SCE submitted new information regarding the ambient noise levels adjacent to the existing single-circuit 115 kV subtransmission line, the EIR had not yet been certified. Accordingly, recirculation was appropriate in response to the significant new information. To prevent the CPUC from disclosing significant new information to the public would be antithetical to CEQA, which requires public disclosure of all such information.
- C62-5** Like the original Draft and Final EIRs, the Recirculated Draft EIR was prepared by Aspen Environmental Group pursuant to Public Resources Code §21082.1(a) and CEQA Guidelines

§15084(d). All iterations of the EIR have been independently reviewed and analyzed by the CPUC and reflect the CPUC's independent judgment. (See Pub. Res. Code § 21082.1[c][1], [2]; CEQA Guidelines § 15084[e].) Where, as here, the revisions to the original EIR are limited to a few chapters or portions of the EIR, only those sections that have been modified must be recirculated per CEQA Guidelines §15088.5(c). Originally published Draft EIR Section K (List of Preparers) identified all individuals and their associated firm who prepared all Draft and Final EIR documents. As no changes to this section occurred as a result of the new information provided by SCE to CPUC, it was not included in the Recirculated Draft EIR. Therefore, the Recirculated Draft EIR was in full compliance of CEQA Guidelines §15129.

C62-6 The decision to recirculate the Draft EIR was made by the CPUC as the Lead Agency as required by CEQA Guidelines §15088.5(a). Commissioner, Dian M. Grueneich and ALJ, Victoria S. Kolakowski, were fully informed of this decision.

C62-7 Per CEQA Guidelines §15100, public agencies are required to prepare and review EIRs within a reasonable period of time and not cause undue delays in the processing of applications for permits. The purpose of the EIR is to inform the public on the environmental setting and impacts of the Proposed Project and alternatives. The EIR will be used by the CPUC in conducting the proceeding to determine whether to grant SCE's requested "Permit to Construct" (PTC). Per CEQA Guidelines § 15088.5(d), recirculation of the Draft EIR requires a public comment period consistent with CEQA Guidelines §15087 and consultation pursuant to CEQA Guidelines §15086. While these activities have extended the CEQA process duration, this extension was reasonable to ensure meaningful comments from the public and public agencies.

C62-8 Your comment is noted as to your concern regarding when the additional information from SCE was received. Please refer to General Response GR-1 for details as to the data request and response timeline regarding noise information provided by SCE. As noted in General Response GR-1, new information presented to CPUC from SCE was requested but unavailable during the originally published Draft and Final EIR stages. Per CEQA Guidelines § 15088.5(d), recirculation of the Draft EIR requires a public comment period consistent with CEQA Guidelines §15087 and consultation pursuant to CEQA Guidelines §15086, which has ensured that public and agency comment and input are received on the Recirculated Draft EIR.

C62-9 As described in Section A.2 (Summary of Revisions Made to Previously Circulated EIR):

This recirculated EIR contains a new noise analysis in Section D.9 (Noise) that reflects the new information provided by SCE regarding changes in the baseline conditions for the existing single-circuit 115 kV subtransmission line, an updated cumulative noise effects analysis, and updated portions of the Executive Summary summarizing the changes.

Additionally, portions of Section E (Comparison of Alternatives) have been revised to reflect the updated noise analysis and to be consistent with the constitutional requirement that there be "rough proportionality" between the impacts of the project and the measures identified to reduce or avoid those impacts, and an essential nexus (i.e., connection) between a legitimate governmental interest and the measures identified to further that interest (CEQA Guidelines §15126.4[a][4]).

- Table ES-2, Proposed Project vs. CPUC's Northern Route Alternative Option 3 and Partial Underground Alternative, provided in Section ES.4.3 of the Recirculated Draft EIR, is identical to Table E-2, Proposed Project vs. CPUC's Northern Route Alternative Option 3 and Partial Underground Alternative, in Section E.2.2. Changes to these tables reflect the discussion in Section E.2.1.2 (Proposed Project vs. Partial Underground Alternative), which was updated substantially in the Recirculated Draft EIR compared to the original Draft EIR published in December 2007. Please see General Response GR-1 for a discussion of the methodology used to determine the environmentally superior alternative.
- C62-10** Please refer to General Response GR-1 for details as to the methodology and assumptions used in the originally published Draft and Final EIR documents noise analysis. The CPUC determined that the original assumptions for ambient noise conditions through the Sun Lake Community was incorrect, and based on the new information provided by SCE, a new analysis has been completed and is reflected in the Recirculated Draft EIR published in July 2008.
- C62-11** This comment supports the CPUC's determination that the originally published Draft EIR was incorrect in assuming that the existing 115 kV line does currently not emit corona discharge noise. As discussed in General Response GR-1 and Recirculated Draft EIR Section D.9 (Noise), information provided to the CPUC by SCE indicates that the Proposed Project would decrease corona discharge noise over existing conditions due to the replacement of existing 115 kV conductor wire with larger conductor wire, which decreases corona noise generation. In addition, SCE plans to install polymer (Silicon Rubber) insulators when rebuilding the existing subtransmission lines. This material is hydrophobic (i.e., repels water), and is able to transfer this hydrophobicity to surface contaminants (e.g., soot, dirt, etc.). This inhibits contaminant build-up on the insulators' surface, which reduces the potential for corona noise to be generated at the pole locations. Therefore, while placement of the subtransmission line underground would eliminate any corona discharge noise during operation, the Proposed Project would also result in a decrease in corona discharge noise over existing conditions.
- C62-12** Please refer to General Response GR-1 for a detailed explanation of the methodology used to determine the environmentally superior alternative and updates to the information provided in Recirculated Draft EIR Table E-2, Proposed Project vs. CPUC's Northern Route Alternative Option 3 and Partial Underground Alternative (replaces original Draft EIR Table ES-3, Proposed Project vs. CPUC's Northern Route Alternative Option 3 and Partial Underground Alternative).
- C62-13** Comment noted. As discussed in detail in originally published Draft EIR Section D.7 (Hazards and Hazardous Materials), and Appendix 5 (Electric and Magnetic Fields – Field Management Reports), which includes the EMF field management reports specific to the Proposed Project and alternatives, the Partial Underground Alternative would result in the lowest EMF levels. Please note that the CPUC does not consider magnetic fields in the context of CEQA or the determination of environmental impacts, first because there is no agreement among scientists that EMF creates a potential health risk, and second because there are no defined or adopted CEQA standards for defining health risk from EMF. As a result, EMF information is presented for the benefit of the public and decision makers and will be considered by the CPUC decisionmakers in evaluating the Project.
- C62-14** Please refer to General Response GR-1 for a detailed description as to how the noise analysis and determination of the environmentally superior alternative changed based on new information provided subsequent to publishing of the original Draft and Final EIRs. The Recirculated Draft EIR was prepared to inform the public of changes to the originally published

Draft and Final EIR documents resulting from new information provided by SCE regarding the ambient noise levels adjacent to the existing single-circuit 115 kV subtransmission line. It is important to note that the El Casco System Project recirculated EIR is an informational document; it does not make a recommendation regarding the approval or denial of the Project. The purpose of the EIR is to inform the public of the environmental setting and impacts of the Proposed Project and alternatives. The EIR will be used by the CPUC in conducting the proceeding to determine whether to grant SCE's requested "Permit to Construct" (PTC).

- C62-15** Comment noted. Both Recirculated Draft EIR Sections A (Introduction) and D.9 (Noise) state that subsequent to publishing the noise analysis presented in the original Draft EIR in December 2007 and the Final EIR on April 11, 2008, SCE supplied the CPUC with several data documents regarding corona noise levels generated by the existing 115 kV subtransmission line and those to be generated by the proposed El Casco System Project. Please refer to General Response GR-1 for details regarding the timeline related to data request and response from SCE regarding corona noise information from the existing 115 kV subtransmission line. Please note that recirculation is required whenever significant new information is added to an EIR after publication of the draft EIR "but before certification." (See CEQA Guidelines § 15088.5[a].) As the EIR has not yet been certified, recirculation was appropriate in response to significant new information.
- C62-16** Comment noted. The legal requirements for recirculation under CEQA are provided in Recirculated Draft EIR Section A.1 (Legal Authority), followed by a discussion of the specific reasons for recirculating the Draft EIR for the Proposed Project in Section A.2 (Summary of Revisions Made to Previously Circulated EIR). Per CEQA Guidelines §15100, public agencies are required to prepare and review EIRs within a reasonable period of time and not cause undue delays in the processing of applications for permits. It is important to note that the El Casco System Project recirculated EIR is an informational document; it does not make a recommendation regarding the approval or denial of the project. The purpose of the EIR is to inform the public on the environmental setting and impacts of the proposed Project and alternatives. The EIR will be used by the CPUC in conducting the proceeding to determine whether to grant SCE's requested "Permit to Construct" (PTC). Per CEQA Guidelines §15088.5(d), recirculation of the Draft EIR requires a public comment period consistent with CEQA Guidelines §15087 and consultation pursuant to CEQA Guidelines §15086. While these activities have extended the CEQA process duration, it has ensured that public and agency comment and input are received throughout the process.