

## Comment Set E2

January 2008

### EL CASCO DRAFT ENVIRONMENTAL IMPACT REPORT SCE COMMENTS & SUGGESTED REVISIONS

No.	Section	Page	Comment	Suggested Revision
<b>Executive Summary</b>				
1.	ES	Global	<ul style="list-style-type: none"> <li>The Executive Summary should be revised to incorporate the comments and suggested revisions made by SCE.</li> </ul>	<ul style="list-style-type: none"> <li>Revise Executive Summary to be consistent with the remainder of the document.</li> </ul>
2.	ES	ES-3	<ul style="list-style-type: none"> <li>The discussion states that the Proposed Project is the Environmentally Superior Alternative. Although SCE agrees with this conclusion, it is not consistent with the conclusion reached in Section E of the DEIR.</li> </ul>	<ul style="list-style-type: none"> <li>Revise Section E to be consistent with the conclusion that the Proposed Project is the Environmentally Superior Alternative.</li> </ul>
<b>A - Introduction/Overview</b>				
3.	A.1	A-2	<ul style="list-style-type: none"> <li>The discussion regarding SCE's existing subtransmission line mischaracterizes the purpose of the emergency line. The purpose of the line is to serve as an emergency electrical source between Banning and Maraschino Substations.</li> </ul>	<ul style="list-style-type: none"> <li>Delete the first two sentences of the third paragraph, and replace with: "Currently, SCE's existing subtransmission line right -of-way (ROW) between Maraschino and Banning Substations contains an active line fed from the Devers System. This line serves as an emergency electrical source to Maraschino Substation in the event that the preferred line serving Maraschino from the Vista System experiences an outage. When the preferred line is operating normally, no load travels through the emergency 115 kV subtransmission line."</li> </ul>
4.	A.3.1	A-10	<ul style="list-style-type: none"> <li>Discussion states that the decision and evidentiary hearings "will cover issues of Project need, Project cost, and other considerations." However, pursuant to GO 131-D, Section IX 1.F, Project need and cost are not elements of a permit to construct. Furthermore, at the August 1, 2007 prehearing conference, ALJ Kolakowski acknowledged that unlike for a CPCN, this project would likely not require evidentiary hearings on cost and need.</li> </ul>	<ul style="list-style-type: none"> <li>Revise discussion accordingly.</li> </ul>
5.	A.3.2 Table A-1	A-11	<ul style="list-style-type: none"> <li>Grading and building permits will be issued by the County of Riverside, not by the Cities of Banning, Beaumont, or Yucaipa.</li> </ul>	<ul style="list-style-type: none"> <li>Revise Table A-1 accordingly.</li> </ul>
6.	A.3.2 Table A-1	A-11	<ul style="list-style-type: none"> <li>Authority to construct from SCAQMD should not be required for this project.</li> </ul>	<ul style="list-style-type: none"> <li>Eliminate that entry from Table A-1.</li> </ul>

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<b>B - Project Description</b>				
7.	B.2	B-2	<ul style="list-style-type: none"> <li>The discussion states that "as part of the new fiber optic system" microwave towers would be installed at El Casco Substation. The reference to "fiber optic system" is not accurate because it should be referred to as a telecommunications system.</li> </ul>	<ul style="list-style-type: none"> <li>Replace "fiber optic" with "telecommunications".</li> </ul>
8.	B.2 Figure B-2	B-2	<ul style="list-style-type: none"> <li>Figure B-2 includes substations that are not relevant to the project.</li> </ul>	<ul style="list-style-type: none"> <li>Remove Banning Heights and Beaumont Substations from Figure B-2.</li> </ul>
9.	B.4.1.1.3	B-9	<ul style="list-style-type: none"> <li>Road width is currently designed at 30 feet, instead of 24.</li> </ul>	<ul style="list-style-type: none"> <li>Change "24" to "30".</li> </ul>
10.	B.4.1.1.4	B-9	<ul style="list-style-type: none"> <li>Section B 4.1.1.4 references Figure B-2. However, the correct reference should be to Figure B-3A.</li> </ul>	<ul style="list-style-type: none"> <li>Change reference accordingly.</li> </ul>
11.	B.6.1.2	B-33	<ul style="list-style-type: none"> <li>Discussion states that "overhead groundwires would be installed on the peaks of the towers."</li> </ul>	<ul style="list-style-type: none"> <li>Revise sentence as follows: "overhead groundwires would be installed below the phase conductors."</li> </ul>
12.	B.7.1	B-36	<ul style="list-style-type: none"> <li>Discussion states that the lines would terminate at the south side of San Timoteo Canyon Road, when in fact they will terminate on the north side.</li> </ul>	<ul style="list-style-type: none"> <li>Change "south" to "north".</li> </ul>
13.	B 8.1.2.6 Table B-12	B-43	<ul style="list-style-type: none"> <li>Construction equipment will likely include a backhoe or auger truck for excavating tower foundations.</li> </ul>	<ul style="list-style-type: none"> <li>Revise Table B-12 accordingly.</li> </ul>
<b>C - Alternatives</b>				
14.	C.4.2.1	C-12	<ul style="list-style-type: none"> <li>Discussion states that "SCE would need to energize its existing 115 kV line between Banning and Maraschino Substations" under Northerly Route Alternative Option 3. However, this line is currently energized but does not continuously carry load. Under the alternative, the line would carry load at all times.</li> </ul>	<ul style="list-style-type: none"> <li>Revise discussion accordingly throughout the document.</li> </ul>
15.	C.4.2.1	C-19	<ul style="list-style-type: none"> <li>SCE would need to obtain easement rights (or franchise rights) from the City of Banning in order to implement Northerly Route Alternative 3. This should be included in the analysis of feasibility for this alternative.</li> </ul>	<ul style="list-style-type: none"> <li>Revise discussion accordingly.</li> </ul>
16.	C.4.2.1	C-19	<ul style="list-style-type: none"> <li>The discussion states that Route Alternative Option 3 would result in a "reduction in environmental impacts" because it would avoid approximately six miles of Proposed Project</li> </ul>	<ul style="list-style-type: none"> <li>Revise discussion consistent with the analysis of visual impacts to reflect determination that Northerly Route Alternative 3 would result in greater visual impacts.</li> </ul>

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			activities between Maraschino and Banning Substations. However, this statement is not entirely accurate. Route Alternative Option 3 would not in fact "reduce" impacts but would simply relocate the impacts between Maraschino and Banning Substations to a different location (i.e., the northerly route).	
17.	C.4.2.2	C-20	<ul style="list-style-type: none"> <li>The discussion states that the PUA "would require approximately 10 fewer new steel poles" than the Proposed Project. However, the discussion does not recognize that this would be offset by the addition of four new riser poles, two at each end of the underground section.</li> </ul>	<ul style="list-style-type: none"> <li>Revise discussion accordingly.</li> </ul>
18.	C.4.2.2 Figure C-6	C-23	<ul style="list-style-type: none"> <li>Figure C-6 shows a new finished grade that "may have to be benched to create working area for vehicles for the two duct banks." In fact, the new finished grade would be identical to the existing grade, and the duct banks would simply be buried deeper than depicted in the Figure. Benching this new finished grade may create visual and recreational impacts to the use of the golf course.</li> </ul>	<ul style="list-style-type: none"> <li>Revise Figure C-6 to remove bench.</li> </ul>
19.	C.4.2.2	C-25	<ul style="list-style-type: none"> <li>Vault Installation does not discuss the potential for de-watering during construction.</li> </ul>	<ul style="list-style-type: none"> <li>Revise discussion to address depth to ground water and potential need for de-watering and other mitigation during this construction, if applicable.</li> </ul>
20.	C.4.2.2	C-27	<ul style="list-style-type: none"> <li>The summary of environmental impacts for the PUA does not accurately describe the full range of impacts created by undergrounding.</li> </ul>	<ul style="list-style-type: none"> <li>Revise discussion to more accurately reflect impacts that will be created by the PUA, including the visual change that will result from the addition of four riser poles. Suggested revisions to environmental analysis of PUA are discussed in greater detail within each CEQA resource area.</li> </ul>
21.	C.4.2.2	C-27	<ul style="list-style-type: none"> <li>The feasibility discussion does not address the economic feasibility issues related to the PUA. The cost differential of the PUA is approximately \$9 million.</li> </ul>	<ul style="list-style-type: none"> <li>Revise discussion accordingly.</li> </ul>
22.	C.5.2.2	C-33	<ul style="list-style-type: none"> <li>The discussion states that the Alternative Substation Site "would result in nonconformity with the Oak Valley Specific Plan" and this is cited as the basis for eliminating this alternative. Pursuant to GO 131D, electrical facility projects are exempt from local land use and zoning regulations.</li> </ul>	<ul style="list-style-type: none"> <li>Revise discussion to clarify that nonconformity with the Oak Valley Specific Plan is not the sole basis for eliminating the alternative from further consideration. See discussion on page D.3-16 of the DEIR.</li> </ul>

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			Therefore, while SCE does not disagree with the CPUC's decision to exclude the alternative substation site from further consideration, the discussion should not reference the Oak Valley Specific Plan as a basis for infeasibility. In fact, other factors also make this site infeasible.	
23.	C.6	C-34	<ul style="list-style-type: none"> <li>The No Project Alternative description is not accurate. The 28 MVA transformer and two 12kV distribution lines at Maraschino Substation were constructed in 2007. In addition, switchrack rebuilds at Banning and Zanja Substations would only be constructed as part of a larger project. Therefore, rebuilds at Banning and Zanja Substations should not be included in the description of the No Project Alternative. Consequently, the No Project Alternative would likely have fewer impacts than the Proposed Project and the other alternatives.</li> </ul>	<ul style="list-style-type: none"> <li>The environmentally superior alternative would likely be the No Project Alternative. CEQA requires identification of an environmentally superior alternative among the other alternatives if the no project alternative is the environmentally superior alternative. (CEQA Guidelines Section 15126.6(e)(2).) The DEIR has already complied with this requirement. Furthermore, the No Project Alternative does not meet any of the project objectives. Therefore, no revision is necessary.</li> </ul>
<b>D.1 – Introduction</b>				
24.	D.1.2.2	D.1-2	<ul style="list-style-type: none"> <li>The discussion states that mitigation measures were identified for all classes of impacts (except beneficial impacts). In several instances throughout the DEIR, mitigation measures require more than is necessary to mitigate the potential impact and are thus not proportionate to the impact. In addition, CEQA Guidelines Section 15126.4(a)(3) states that mitigation measures are not required for effects which are not found to be significant. The El Casco DEIR should not impose mitigation measures where impacts are already less than significant without mitigation.</li> </ul>	<ul style="list-style-type: none"> <li>Revise the entire DEIR accordingly. See SCE Mitigation Measure Comment Table.</li> </ul>
25.	D.1.2.2	D.1-2	<ul style="list-style-type: none"> <li>The classification of impacts (as Class I, II, III, or IV) is not common CEQA nomenclature.</li> </ul>	<ul style="list-style-type: none"> <li>Classify impacts in accordance with common practice and CEQA Guidelines Appendix G, as significant and unavoidable, less than significant with mitigation, less than significant, or no impact.</li> </ul>
<b>D.2 - Air Quality</b>				
26.	D.2 Table D.2-3	D.2-3	<ul style="list-style-type: none"> <li>The Federal Designation for CO should be "attainment".</li> </ul>	<ul style="list-style-type: none"> <li>Revise table accordingly.</li> </ul>
27.	D.2 Table D.2-9	D.2-11	<ul style="list-style-type: none"> <li>Significant figures in Table D.2-9 (as well as in other tables) are inappropriate.</li> </ul>	<ul style="list-style-type: none"> <li>Reduce significant figures to the appropriate level of presumed accuracy, relevant standard or criteria.</li> </ul>

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28.	D.2 Table D.2-9	D.2-11	<ul style="list-style-type: none"> <li>Table D.2-9 addresses the entire state of California, not SCE's territory.</li> </ul>	<ul style="list-style-type: none"> <li>Include only SCE's territory or the area served by the Proposed Project.</li> </ul>
29.	D.2.3.1	D.2-16	<ul style="list-style-type: none"> <li>The DEIR establishes a significance threshold for climate change whereby an impact is considered significant if the project causes a "net increase" of GHG emissions. However, as stated in the DEIR, there are no State or local criteria for assessing climate change and it is not appropriate to set a quantitative significance threshold at this time.</li> </ul>	<ul style="list-style-type: none"> <li>If a GHG analysis is included in the DEIR, a different significance threshold should be applied. See SCE cover letter for additional discussion.</li> </ul>
30.	D.2.3.2	D.2-18	<ul style="list-style-type: none"> <li>SCAQMD Rule 403 is written to allow for a slight modification of each measure to accommodate particular jurisdictional requirements. SCE erroneously drafted its APMs (AQ 10 through 16) in a manner that does not clearly reflect the modification options for each measure. Therefore, consistent with SCAQMD Rule 403, APM AQ 10 through AQ 16 should be revised.</li> </ul>	<ul style="list-style-type: none"> <li>See SCE Attachment 1 for revised language.</li> </ul>
31.	D.2.3.3 Table D.2-15	D.2-21	<ul style="list-style-type: none"> <li>Table D.2-15 has no units for the data.</li> </ul>	<ul style="list-style-type: none"> <li>Include units (lbs/day) in the table.</li> </ul>
32.	D.2.5.2 Table D.2-18	D.2-27	<ul style="list-style-type: none"> <li>Table D.2-18 has no units for the data.</li> </ul>	<ul style="list-style-type: none"> <li>Include units (lbs/day) in the table.</li> </ul>
<b>D.3 - Land Use</b>				
33.	D.3.1	D.3-14	<ul style="list-style-type: none"> <li>The discussion states that Mill Creek Communications Site would be located within the SBNF. However, the discussion fails to note that the Site is in fact located on SCE fee owned property.</li> </ul>	<ul style="list-style-type: none"> <li>Revise description accordingly.</li> </ul>
34.	D.3.3.1	D.3-21	<ul style="list-style-type: none"> <li>The significance criteria are not consistent with the CEQA Guidelines. Specifically, according to these criteria, the impacts of the proposed project or alternatives would be considered significant if they would "disrupt recreational activities, which would adversely affect the recreational values of existing facilities."</li> </ul>	<ul style="list-style-type: none"> <li>The analysis of potential recreational impacts should utilize significance criteria from CEQA guidelines Appendix G. Under Appendix G disruption of recreational activities is not considered a basis for a significance determination. See SCE cover letter for further discussion.</li> </ul>
35.	D.3.3.3	D.3-23	<ul style="list-style-type: none"> <li>The analysis states that construction activities on the golf course would disrupt use of the course "for less than one week." Nevertheless, the analysis concludes that this impact would be considered significant. The analysis also states</li> </ul>	<ul style="list-style-type: none"> <li>Revise analysis accordingly. Impact finding should be less than significant (Class III) for all land use significance criteria as they relate to the Proposed Project.</li> </ul>

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			that the Proposed Project would “substantially restrict” use of the golf course during construction. These findings are not supported by substantial evidence. Furthermore, under the Appendix G significance criteria, disruption of golf course use is not considered a significant impact.	
36.	D.3.3.7	D.3-27	<ul style="list-style-type: none"> <li>The discussion of Impact LU-8 states that construction activities would occur on the fairway, when in fact all structures are located away from the fairways along the length of the golf course. Ground-disturbing activities would not take place on the fairways. Furthermore, analysis of this impact is based on a significance criterion that is not included in CEQA Guidelines Appendix G. Therefore, construction and operational activities that would disrupt use of the golf course should not be considered significant impacts.</li> </ul>	<ul style="list-style-type: none"> <li>Revise analysis accordingly.</li> </ul>
37.	D.3.5.2	D.3-39	<ul style="list-style-type: none"> <li>The analysis states that construction of the 115 kV line underground through the Sun Lakes golf course would not substantially preclude any uses. This statement is incorrect. In order to safely maintain and operate the underground lines, SCE would require unrestricted and unimpeded access to the ROW at all times.</li> </ul>	<ul style="list-style-type: none"> <li>Revise Impact LU-3 accordingly.</li> </ul>
38.	D.3.5.2	D.3-40 to D.3-41	<ul style="list-style-type: none"> <li>The analysis of Impact LU-8 states that operation of the PUA would “ultimately benefit” the Sun Lakes golf course as it would remove the existing poles and lines from the golf course. This analysis is incorrect because it mischaracterizes the appropriate baseline for evaluating impacts. Because the existing setting includes the presence of poles and overhead 115 kV lines through the golf course, the Proposed Project as compared to this baseline does not result in a significant impact. Therefore, the supposed benefit to the golf course from the PUA is not relevant to the analysis.</li> </ul>	<ul style="list-style-type: none"> <li>Revise analysis accordingly. See SCE cover letter for additional discussion.</li> </ul>
39.	D.3.5.2	D.3-40 to D.3-41	<ul style="list-style-type: none"> <li>The analysis concludes that the PUA would result in two significant and unavoidable land use impacts. However, the DEIR concludes that these</li> </ul>	<ul style="list-style-type: none"> <li>Revise analysis to account for both duration and intensity of impacts.</li> </ul>

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			<p>"short-term" (for duration of construction period) impacts are preferred as compared to the "long-term" impact of the Proposed Project. This analysis is flawed for two reasons. First, the Proposed Project does not have "long-term" impacts because it simply maintains existing conditions at the golf course. Second, even though impacts may be "short-term" they may be significant due to their intensity. The DEIR fails to balance the duration of impacts against their intensity.</p>	
<b>D.4 - Biological Resources</b>				
40.	D.4.1.2	D.4-3	<ul style="list-style-type: none"> <li>As stated in the DEIR, SCE did not survey "[a]reas where the fiber optic equipment would be installed on existing lines or within existing facilities." However, these areas would not be avoided during the breeding season for migratory birds. SCE would implement APM BIO-2, Pre-Construction Nesting Surveys.</li> </ul>	<ul style="list-style-type: none"> <li>Remove the second half of the sentence, from "as these areas" to the end of the sentence.</li> </ul>
41.	D.4.1.3.2	D.4-17	<ul style="list-style-type: none"> <li>The DEIR incorrectly states that a red-tailed hawk nest was observed within the fenced boundary of the Zanja Substation. In fact, as stated in SCE's PEA, the red-tailed hawk nest was not identified inside the fenced boundary, but in a subtransmission line tower at the perimeter fence immediately adjacent to the substation.</li> </ul>	<ul style="list-style-type: none"> <li>Revise discussion accordingly.</li> </ul>
42.	D.4.1.4.4	D.4-19	<ul style="list-style-type: none"> <li>It appears the DEIR intended to identify 15 sensitive plant species, not just "15 plant species".</li> </ul>	<ul style="list-style-type: none"> <li>Insert "sensitive".</li> </ul>
43.	D.4.1.3.5	D.4-25	<ul style="list-style-type: none"> <li>Under the moderate classification for potential to occur, it is not clear what constitutes a known occurrence in the database search. Please clarify how far away these occurrences could be located. In addition, the number of USGS quads reviewed beyond the Proposed Project area was overbroad especially considering some of the species.</li> </ul>	<ul style="list-style-type: none"> <li>Please clarify the area covered under this classification for a "known occurrence in the database search."</li> <li>Please reduce the number of USGS quads outside the Proposed Project area.</li> </ul>
44.	D.4.1.3.5	D.4-25 to D.4-43	<ul style="list-style-type: none"> <li>The appropriate risk potential needs to be assigned to the species in Table D.4-4 and the following test as well as in the impact section of the document. Proper evidence has not been provided to justify the potential to occur</li> </ul>	<ul style="list-style-type: none"> <li>The following species should be reclassified based on the criteria outlined in DEIR (D.4-25): <ul style="list-style-type: none"> <li>o Two-striped garter snake</li> <li>o Sharpshinned hawk</li> <li>o Bell's sage sparrow</li> </ul> </li> </ul>

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			classification as specified in the DEIR.	<ul style="list-style-type: none"> <li>o Western mastiff bat</li> <li>o American badger</li> <li>• Revise classification accordingly or provide supporting documentation.</li> </ul>
45.	D.4.1.4.7	D.4-45 and 46	<ul style="list-style-type: none"> <li>• The DEIR states that there will be a temporary impact to a concrete V-ditch. SCE will not be impacting the V-ditch. Final engineering will ensure the structure will not be placed within this ditch.</li> </ul>	<ul style="list-style-type: none"> <li>• Revise language to clarify that the V-ditch will not be impacted due to further engineering.</li> </ul>
46.	D.4.2.3	D.4-50	<ul style="list-style-type: none"> <li>• The DEIR states "SCE will be acquiring coverage under the MSHCP by participating as a developer. . ." This statement is only true if a discretionary permit is required by the county or other signatory.</li> </ul>	<ul style="list-style-type: none"> <li>• Revise discussion accordingly.</li> </ul>
47.	D.4 Table D.4-6	D.4-56	<ul style="list-style-type: none"> <li>• These numbers do not correspond to those provided in SCE's PEA.</li> </ul>	<ul style="list-style-type: none"> <li>• Provide explanation for the source of this information.</li> </ul>
48.	D.4.5.2	D.5-57	<ul style="list-style-type: none"> <li>• The DEIR states "However, in some locations the proposed towers are located in ephemeral washes." This statement is not accurate. While there are poles currently located in ephemeral washes, the replacement poles will be located outside the wash.</li> <li>• The DEIR states "This process will require SCE to document the total acres of habitat subject to disturbance and provide fees that mitigate for the loss of covered habitats." SCE will only be subject to the requirement to provide additional fees or mitigation if the impact to the MSHCP covered species exceeds 10%.</li> </ul>	<ul style="list-style-type: none"> <li>• Revise discussion accordingly.</li> <li>• Revise discussion accordingly.</li> </ul>
49.	D.4.5.2	D.4-58	<ul style="list-style-type: none"> <li>• The DEIR statement that foraging habitat may be permanently lost in some small drainages is not supported by evidence nor is it accurate. There will be no permanent impacts to drainage; therefore foraging may only be temporarily impacted during construction.</li> <li>• SCE disagrees that there would be significant impact to foraging or breeding habitat for wildlife. As stated, the only relatively large permanent impact is the El Casco Substation. The proposed substation site is comprised predominately with ruderal non-native species. The existing habitat is</li> </ul>	<ul style="list-style-type: none"> <li>• Delete statement or provide substantial evidence of permanent impacts to these areas.</li> <li>• Revise discussion accordingly.</li> </ul>

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			not conducive for breeding birds and does not provide ideal breeding habitat. The substation site is also a relatively small parcel compared to the existing open space provided at the Norton Younglove Reserve. The larger areas of open space immediately adjacent to the substation site contain higher quality habitat are more likely to be used for breeding and foraging. The impact should be clarified as "Less than Significant" and the mitigation measures deleted.	
50.	D.4.5.2	D.4-59	<ul style="list-style-type: none"> <li>The southwestern pond turtle is listed as unlikely to occur within the project region so there does not seem to be any significance to Burke and Gibbons example.</li> </ul>	<ul style="list-style-type: none"> <li>Delete the Burke and Gibbons example.</li> </ul>
51.	D.4.5.2	D.4-60	<ul style="list-style-type: none"> <li>SCE has never planned to use anything but native landscaping at the El Casco Substation, so there will not be any spread of exotic species or a significant impact from the landscaping at the substation as stated.</li> </ul>	<ul style="list-style-type: none"> <li>Delete or revise the last sentence of the paragraph.</li> </ul>
52.	D.4.5.2	D.4-63	<ul style="list-style-type: none"> <li>The Rottenborn study is not relevant to the Proposed Project as the study was conducted in the Santa Clara Valley.</li> <li>This project is not considered urbanization.</li> <li>The Reijnen study has no relevance to the Proposed Project. It is referring to species that do not exist within the project area. Bird species have different levels of tolerance for noise. Noise tolerance can even vary within a species specific to the area where they are found.</li> <li>60 dBA is the accepted level in California. Documentation has not been provided to support the potential for adverse effects to breeding success.</li> <li>Haas' personal communication is not peer-reviewed, published information. There could be a number of factors that are not being considered in this part of the discussion. The project area has a high existing level of noise due to the train and frequently traveled road immediately adjacent to the creek.</li> </ul>	<ul style="list-style-type: none"> <li>Revise or delete irrelevant study information.</li> <li>Revise the discussion accordingly.</li> <li>Delete the information related to the Reijnen study.</li> <li>Revise discussion accordingly.</li> <li>Delete the Haas study information.</li> </ul>

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			<ul style="list-style-type: none"> <li>SCE is not mitigating the impact to species through the acquisition of mitigation land. SCE is acquiring land to replace the PQP lands that are being developed for the substation within the Norton Younglove Reserve. While this is part of the MSHCP, this is a separate requirement of the County. SCE will not be purchasing any additional land for mitigation.</li> <li>Please note, SCE has not proposed motion activated lighting to illuminate the locked gate at night, and does not anticipate doing so. Therefore, the discussion is irrelevant.</li> </ul>	<ul style="list-style-type: none"> <li>Revise discussion accordingly.</li> <li>Revise discussion accordingly.</li> </ul>
53.	D.4.5.3	D.4-67	<ul style="list-style-type: none"> <li>The DEIR does not include reference documentation to support the statement that host plants for the Quino Checkerspot butterfly occur in the project vicinity.</li> <li>It is unclear what is meant by vicinity.</li> </ul>	<ul style="list-style-type: none"> <li>Provide documentation or revise the discussion accordingly. The impact should be reduced to less than significant if host plants are not present in the project area.</li> <li>Clarify use of vicinity.</li> </ul>
54.	D.4.5.3	D.4-70	<ul style="list-style-type: none"> <li>Bald eagles are not included in Table D.4-4 (Known and Potential Occurrence of Sensitive Wildlife Species within and Adjacent to the Proposed Project), and do not have potential to occur in the project area.</li> </ul>	<ul style="list-style-type: none"> <li>Revise discussion accordingly.</li> </ul>
55.	D.4.5.3	D.4-71	<ul style="list-style-type: none"> <li>There is no documentation provided to support the discussion stating that San Timoteo Canyon and San Gorgonio Pass areas are likely migratory pathways for birds.</li> </ul>	<ul style="list-style-type: none"> <li>Provide documentation, or revise discussion accordingly.</li> </ul>
56.	D.4.5.4	D.4-72	<ul style="list-style-type: none"> <li>The discussion states that the Proposed Project will result in significant impacts to listed or sensitive bird species for subtransmission line collisions.</li> <li>SCE has experienced only minimal occurrences of listed or sensitive bird species collisions on 115 kV subtransmission lines.</li> </ul>	<ul style="list-style-type: none"> <li>Revise discussion accordingly.</li> </ul>
57.	D.4.5.4	D.4-74	<ul style="list-style-type: none"> <li>The DEIR states that the Proposed Project will result in significant impacts to listed or sensitive bird species from subtransmission line collisions. SCE has experienced only minimal collision occurrences of any bird species on 115 kV subtransmission lines.</li> </ul>	<ul style="list-style-type: none"> <li>Revise discussion accordingly.</li> </ul>

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58.	D.4.5.4	D.4-75	<ul style="list-style-type: none"> <li>The DEIR states "While this information comes from studies of tiger salamander, it is very likely that the western spadefoot toad exhibits similar movement ecology." Documentation has not been provided to support this statement. Further, tiger salamanders are not present in the Project area.</li> </ul>	<ul style="list-style-type: none"> <li>Revise discussion accordingly.</li> </ul>
59.	D.4.5.4	D.4-75	<ul style="list-style-type: none"> <li>The discussion states "however, these APMs will not be sufficient to ensure impacts to sensitive reptiles are avoided or fully mitigated." There is no reference to any regulation that requires this compliance.</li> </ul>	<ul style="list-style-type: none"> <li>Identify regulation or revise discussion accordingly.</li> </ul>
60.	D.4.5.4	D.4-77	<ul style="list-style-type: none"> <li>The discussion states the construction of the El Casco Substation will result in significant impacts to foraging habitat of special status raptor species. There is no documentation provided to substantiate that there would be a significant impact.</li> </ul>	<ul style="list-style-type: none"> <li>Provide documentation or revise discussion accordingly.</li> </ul>
61.	D.4.5.4	D.4-78	<ul style="list-style-type: none"> <li>The discussion states "as this species is not covered by the MSHCP impacts would be considered significant, absent mitigation." There have been no documented occurrences in the last 100 years of the American badger in the project area.</li> </ul>	<ul style="list-style-type: none"> <li>Revise discussion accordingly.</li> </ul>
62.	D.4.5.6	D.4-80	<ul style="list-style-type: none"> <li>The discussion states construction of El Casco Substation would result in interference to the movement of native resident or migratory fish species. There is no documentation provided to substantiate this statement. Further, the discussion states that LWSs and TSPs would be placed in the wash. Final engineering is not yet complete, and LWSs and TSPs would not be placed in a wash in any event. Where existing poles are currently located within the wash, they will be removed and will not be replaced in the same location.</li> </ul>	<ul style="list-style-type: none"> <li>Provide documentation to substantiate that construction of the El Casco Substation would interfere with resident or migratory fish species movement; otherwise, delete this statement.</li> <li>Revise discussion accordingly.</li> </ul>

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63.	D.4.5.7	D.4-83	<ul style="list-style-type: none"> <li>The discussion states SCE has the ability to choose to participate in the MSHCP as a developer. SCE would be required to participate as a developer if discretionary permits are required. Since multiple signatory jurisdictions are involved, there has been no determination of how SCE will choose to participate.</li> </ul>	<ul style="list-style-type: none"> <li>Revise discussion accordingly.</li> </ul>
64.	D.4.6.1.3	D.4-91	<ul style="list-style-type: none"> <li>The discussion states "burrows are scarce in the area, however, there are several that could be utilized by this species." As stated, it is difficult to determine if burrows are scarce, or how many burrows exist. Further, no burrowing owls were observed during surveys of the project area.</li> </ul>	<ul style="list-style-type: none"> <li>Revise discussion accordingly.</li> </ul>
<b>D.5 - Cultural Resources</b>				
65.	D.5	D.5-2	<ul style="list-style-type: none"> <li>The discussion is missing a reference regarding receipt of a letter from the Morongo Band of Mission Indians.</li> </ul>	<ul style="list-style-type: none"> <li>Add a reference acknowledging the receipt of the Morongo Band of Mission Indians response letter. Add letter to Appendix 6.</li> </ul>
66.	D.5	D.5-13	<ul style="list-style-type: none"> <li>The Gilman Historic Ranch is not in the vicinity of the proposed route, or that of any of the alternatives.</li> </ul>	<ul style="list-style-type: none"> <li>Remove reference to the ranch.</li> </ul>
67.	D.5.1.4	D.5-16	<ul style="list-style-type: none"> <li>The reference in the first paragraph, second to last sentence, fourth line: "cultural resources" is inaccurate.</li> </ul>	<ul style="list-style-type: none"> <li>Change "cultural resources" to "historical resources"</li> </ul>
68.	D.5.11	D.5-21	<ul style="list-style-type: none"> <li>Table D.5-8 Cultural Resources Recorded within the Study Area of Banning Substation to Tower M17-T1 Fiber Optic Segment. Record # P-33-8347H has no citation next to its listing.</li> </ul>	<ul style="list-style-type: none"> <li>Identify the resource for providing the listing to the register.</li> </ul>
69.	D.5.3.3	D.5-28	<ul style="list-style-type: none"> <li>The reference in the second to last paragraph, fifth line: "cultural resources" is inaccurate.</li> </ul>	<ul style="list-style-type: none"> <li>Change "cultural resources" to "historical resources"</li> </ul>
70.	D.5.3.3	D.5-29	<ul style="list-style-type: none"> <li>There are two instances where again the term "Cultural resources" is used inaccurately. (first paragraph, sixth line, and second paragraph, fifth line)</li> </ul>	<ul style="list-style-type: none"> <li>Change "cultural resources" to "historical resources"</li> </ul>
71.	D.5.3.3	D.5-32	<ul style="list-style-type: none"> <li>The third paragraph under the Zanja and Banning Substation heading is inaccurate. The Banning Substation is located on recent alluvium that overlays significant formations. Furthermore, the proposed impacts within the substation will occur in soils that have been previously impacted by</li> </ul>	<ul style="list-style-type: none"> <li>Revise the paragraph to read: "The area within the Banning Substation is designated as a High Paleontologic Sensitivity Area because of San Timoteo Formation localities. However, the soils within the Banning Substation have been substantially disturbed. Therefore, no impacts to</li> </ul>

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			substation construction. The new construction has a low probability of impacting soils that contain significant paleontological resources.	paleontological resources are anticipated, and therefore no mitigation measures are needed." Revise Mitigation Monitoring Program table D.5-11 accordingly to reflect no mitigation is needed.
<b>D.6 - Geology and Soils</b>				
72.	D.6.5.2	D.6-23	<ul style="list-style-type: none"> <li>The DEIR incorrectly concludes (Impact GEO-5) that the PUA impacts are identical to the Proposed Project and require the same mitigation measure.</li> </ul>	<ul style="list-style-type: none"> <li>The DEIR should provide a detailed analysis of potential liquefaction and lateral spreading hazards at the underground location. Potential adverse impacts to buried facilities from liquefaction and lateral spreading are not the same as to above ground structures. Additional mitigation measures may be required.</li> </ul>
<b>D.7 - Hazards and Hazardous Materials</b>				
73.	D.8.2.2	D.7-5 to D.7-6	<ul style="list-style-type: none"> <li>Section is labeled incorrectly as D.8.2.2 and D.8.2.3.</li> </ul>	<ul style="list-style-type: none"> <li>Change numbering to D.7.2.2 and D.7.2.3 respectively</li> </ul>
74.	D.7.7	D.7-26	<ul style="list-style-type: none"> <li>EMF is not a CEQA issue. Although the DEIR recognizes that EMF is not considered in the context of CEQA (see pages ES-26, D.7-26 and E-3), the discussion of EMF is inappropriately included within the actual DEIR document for informational purposes. Including this information within the Hazards and Hazardous Materials Section (or anywhere within the main body of the document) is misleading to the public and is beyond the scope of CEQA. In addition, as also recognized in the DEIR, there are no federal or state standards relating to human exposure to EMF, and there is a lack of consensus in the scientific community regarding this issue.</li> </ul>	<ul style="list-style-type: none"> <li>The EMF discussion needs to be removed from the DEIR. EMF information can be included in a separate document or as an appendix to the EIR.</li> <li>Suggested revisions to the EMF discussion are included below so that they may be incorporated into the analysis after it is moved from the DEIR.</li> </ul>
75.	D.7.7	D.7-26	<ul style="list-style-type: none"> <li>The DEIR addresses concerns "related to power line fields." This term is not a recognized or defined industry term.</li> </ul>	<ul style="list-style-type: none"> <li>Refer to "electric lines" rather than "power line fields." Revise entire discussion accordingly.</li> </ul>
76.	D.7.7.5	D.7-30	<ul style="list-style-type: none"> <li>The discussion of EMF states that research has been conducted for more than 20 years. In fact, research has been conducted for more than 30 years.</li> </ul>	<ul style="list-style-type: none"> <li>Revise discussion accordingly.</li> </ul>
77.	D.7.7.5	D.7-30	<ul style="list-style-type: none"> <li>Footnote 1 defines the ELF standard as 3 Hz to 300 Hz. This is incorrect.</li> </ul>	<ul style="list-style-type: none"> <li>ELF standard should be defined as 3 Hz to 3,000 Hz.</li> </ul>
78.	D.7.7.5	D.7-31	<ul style="list-style-type: none"> <li>The discussion references exposure to EMF and</li> </ul>	<ul style="list-style-type: none"> <li>Revise sentence as follows: "Numerous panels of</li> </ul>

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			associated "adverse health effects." This is incorrect because the discussion relates specifically to chronic low-intensity exposure where there are potential health risks, and not adverse health effects.	expert scientists have convened to review the data relevant to the question of whether chronic low-intensity exposure to power-frequency EMF is associated with potential health risks."
79.	D.7.7.6	D.7-36	<ul style="list-style-type: none"> <li>In discussing the EMF levels of the proposed project, the discussion refers to "estimated" results. However, these are in fact "calculated" results as opposed to "estimated" results.</li> <li>The calculated results are provided only for the purpose of comparing the relative differences in magnetic field levels between subtransmission line design alternatives under a specific set of modeling assumptions. The calculated results are not intended to be predictors of the actual magnetic field levels at any given time or at any specific location if and when the project is constructed. Using the term "estimated" is therefore misleading and the proper term for the results is "calculated."</li> </ul>	<ul style="list-style-type: none"> <li>Revise discussion accordingly.</li> </ul>
80.	D.7.7.6	D.7-36, Table D.7-5	<ul style="list-style-type: none"> <li>Table D.7-5 is titled: "Comparison of Baseline and Expected Magnetic Fields Levels (mG) – Proposed Project." This title is misleading. For the reasons discussed above, the title should be revised as follows: "A Design Comparison of Magnetic Fields from Existing Design vs. Proposed Design"</li> </ul>	<ul style="list-style-type: none"> <li>Revise title as appropriate</li> </ul>
81.	D.7.7.6	D.7-36, Table D.7-5	<ul style="list-style-type: none"> <li>Table D.7-5 contains an error in numbering the Segment IDs. Currently, the first segment ID is not numbered.</li> </ul>	<ul style="list-style-type: none"> <li>Revise table accordingly.</li> </ul>
82.	D.7.7.6	D.7-42	<ul style="list-style-type: none"> <li>The discussion only references the CPUC's 1993 EMF decision (D.93-11-013) and does not include a reference to the CPUC's more recent decision (D.06-01-042).</li> </ul>	<ul style="list-style-type: none"> <li>Revise discussion accordingly.</li> </ul>
83.	D.7.7.6	D.7-44	<ul style="list-style-type: none"> <li>The discussion states that: "EMF levels along the underground portion of the ROW within the Sun Lakes community would be reduced compared to the Proposed Project." This statement violates the intent of the CPUC with respect to EMF issues. CPUC decisions D.93-11-013 and D.06-01-042</li> </ul>	<ul style="list-style-type: none"> <li>The discussion should clearly set forth the CPUC's policy with respect to EMF reduction measures.</li> <li>Include the following explanation in the analysis: "Partially undergrounding the proposed 115 kV subtransmission line through the Sun Lakes Community would conflict with the CPUC's "no-cost</li> </ul>

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			<p>established a “no-cost and low-cost” EMF policy whereby 4% of the total project cost is utilized as a benchmark for developing low-cost EMF reduction measures. In addition, these decisions provide that any low-cost reduction measures must be 15% or greater at the utility ROW while meeting the 4% cost criterion.</p> <ul style="list-style-type: none"> <li>For the EMF analysis to fully and accurately present a comparison of the Proposed Project and the PUA, the discussion needs to clearly incorporate the CPUC’s decisions. Therefore, simply stating that the PUA would reduce EMF as compared to the Proposed Project is not a complete representation of the EMF analysis. The discussion should clearly state that the PUA would exceed the 4% cost benchmark established by the CPUC.</li> <li>The CPUC’s decisions also direct utilities to favor schools, day care facilities, and hospitals over residential areas when applying low-cost EMF reduction measures. Therefore, in the context of the Proposed Project, any funds available for EMF reduction measures would first be applied to the types of facilities specified above. Any remaining funds would then be allocated to residential areas. The PUA is contrary to the CPUC’s decisions because (1) the allocation here favors residential areas over those specified by the CPUC, and (2) all available funds would be allocated to a single residential area, rather than distributed equally to other residential areas along the project route.</li> </ul>	<p>and low-cost” EMF Policy for the following reasons:</p> <ol style="list-style-type: none"> <li>The total cost of undergrounding is significantly greater than 4% of the total project cost; and</li> <li>Because there are other established and proposed residential communities adjacent to the subtransmission line route, undergrounding only one community is inconsistent with CPUC Decision 06-01-042’s directive to consider all residential communities in the same group prioritization for land use.”</li> </ol>
84.	D.7.7.6	D.7-36	<ul style="list-style-type: none"> <li>The discussion states that “the Proposed Project would generate lower magnetic fields as compared to the existing design.” This statement is misleading because EMF levels at any given time depend on a variety of factors, and could change accordingly. Therefore it is not accurate to include a blanket statement that the Proposed Project would result in lower (or greater) EMF levels than currently exist.</li> </ul>	<ul style="list-style-type: none"> <li>Delete from the entire discussion any statements comparing EMF levels of the Proposed Project to existing conditions (these statements occur on pages D.7-36 to D.7-40).</li> </ul>

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85.	D.7.8.2	D.7-46	<ul style="list-style-type: none"> <li>The analysis of impact HAZ-9 is inaccurate. There is no evidence that the existing subtransmission line has caused any radio or television interference. Because the voltage level of the proposed subtransmission lines would be the same as the existing lines (i.e. 115 kV), radio and television interference associated with the Proposed Project is not expected to be perceptibly different from any interference caused by the existing subtransmission lines. In addition, due to the use of larger conductors and taller poles and the installation of new polymer insulators to replace the porcelain insulators installed in 1971, any radio or television interference that might occur under existing conditions would likely remain the same. Therefore, the Proposed Project would have a less than significant impact without mitigation.</li> </ul>	<ul style="list-style-type: none"> <li>Revise discussion accordingly.</li> </ul>
86.	D.7.8.2	D.7-47	<ul style="list-style-type: none"> <li>The analysis of impact HAZ-10 is inaccurate. As required by the Commission, SCE designs and constructs its overhead transmission, subtransmission, and distribution facilities to meet or exceed the requirements of GO 95, Rules for Overhead Electric Line Construction. GO 95 establishes the minimum design and construction requirements for overhead transmission, subtransmission, and distribution facilities constructed within the State of California. In addition to the requirements of GO 95, SCE utilizes other applicable industry standards in the design of its overhead electric facilities. The Proposed Project will meet or exceed the requirements of GO 95 and these other applicable safety standards.</li> <li>Alternating magnetic fields induce voltages at the open ends of conducting loops. Nearby objects such as fences, irrigation pipes, pipelines, electrical distribution lines, and/or telephone lines can form the conducting loop. The earth to which the conductor is grounded forms the other portion</li> </ul>	<ul style="list-style-type: none"> <li>Revise discussion accordingly.</li> </ul>

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			of the loop. Standard construction measures that are used for electric field induction, such as grounding and breaking electrical continuity, also reduce magnetic field induction effects. Based on grounding practices and the standard construction measures for the Proposed Project, magnetically induced voltages and currents are expected to be minimal and not adverse.	
<b>D.8 - Hydrology</b>				
87.	D.8	D.8-34	<ul style="list-style-type: none"> <li>The use of the word "sewer" in the first paragraph is inaccurate.</li> </ul>	<ul style="list-style-type: none"> <li>Replace "sewer" with "storm water drainage system"</li> </ul>
88.	D.8.6	D.8-37 to D.8-38	<ul style="list-style-type: none"> <li>The description of the No Project Alternative in section D.8.6 is inaccurate. See comment to C.6, page C-34.</li> </ul>	<ul style="list-style-type: none"> <li>Revise discussion accordingly.</li> </ul>
<b>D.9 - Noise</b>				
89.	D.9.1.3	D.9-4	<ul style="list-style-type: none"> <li>The discussion of the existing noise environment does not include any measurements of the ambient noise levels in the project vicinity. Without these measurements, it is not possible to calculate whether the Proposed Project would trigger the significance criteria comparing the project impacts to the current ambient noise levels.</li> </ul>	<ul style="list-style-type: none"> <li>Provide measurements of existing ambient noise levels.</li> <li>Revise analysis to determine whether the Proposed Project would in fact cause a substantial increase in ambient noise levels in the project vicinity above levels existing without the project.</li> </ul>
90.	D.9.3.3	D.9-11	<ul style="list-style-type: none"> <li>The discussion states that helicopters <u>would</u> be used during construction at SCE's Mill Creek Communications Site and during installation of the fiber optic cable between the Cities of Redlands and Banning. This is not accurate. Helicopters <u>may</u> be used for the construction of the Mill Creek Communications Site. A helicopter would be used only for the installation of the fiber optic cable adjacent to tower M30-T3.</li> </ul>	<ul style="list-style-type: none"> <li>Revise discussion accordingly.</li> </ul>

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91.	D.9.3.3	D.9-17	<ul style="list-style-type: none"> <li>The analysis concludes that corona noise from the project would be a "significant and unavoidable impact." This is not correct. The 115 kV line would not produce a "substantial permanent increase in ambient noise levels" within the meaning of the significance thresholds (see SCE cover letter). Furthermore, any corona noise generated by the line would be below the limits established by the City of Banning. Therefore, this cannot be considered a significant impact.</li> </ul>	<ul style="list-style-type: none"> <li>Revise analysis to state that noise impacts of the Proposed Project would be less than significant.</li> </ul>
<b>D.10 - Public Services and Utilities</b>				
92.	D.10.3.3	D.10-5	<ul style="list-style-type: none"> <li>The analysis of impact U-1 states that potentially significant impacts could occur if new underground facilities are required to install the new fiber optic cables. However, it is unlikely that new underground facilities would be required. In addition, it is further unlikely that underground facilities would be located in proximity to natural gas and water pipelines. Furthermore, SCE would probe for existing buried utilities prior to any excavation work. Therefore, this impact is less than significant without mitigation.</li> </ul>	<ul style="list-style-type: none"> <li>Revise analysis to state that installation of fiber optic cables would result in a less than significant impact without the need for mitigation.</li> </ul>
<b>D.11 - Transportation and Traffic</b>				
93.	D.11.3.3	D.11-7	<ul style="list-style-type: none"> <li>The analysis of Impact T-1 incorrectly concludes that temporary road closures "could increase traffic levels and constrain circulation in the area, resulting in potentially significant impacts." Therefore, mitigation measures are recommended to reduce the impact to less than significant levels. Under CEQA, the analysis of traffic impacts should evaluate whether the project causes an increase in traffic which is substantial in relation to the <u>existing traffic conditions</u> as the appropriate baseline. However, the discussion of Impact T-1 does not include any information regarding the existing traffic conditions. Therefore, it is not possible to evaluate whether the Proposed Project would in fact cause an increase in traffic that rises to a level of significance requiring mitigation.</li> </ul>	<ul style="list-style-type: none"> <li>Revise analysis to recognize that although the project would result in temporary road and lane closures, such impacts cannot be classified as significant unless the existing traffic conditions are discussed.</li> </ul>

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94.	D.11.3.3	D.11-10 to D.11-11	<ul style="list-style-type: none"> <li>The analysis of Impacts T-4, T-5, T-6, and T-8 is speculative and is not supported by any data or other evidence. Therefore, the conclusion that these impacts rise to a level of significance requiring mitigation is unsubstantiated.</li> </ul>	<ul style="list-style-type: none"> <li>Revise analysis to state that impacts would be less than significant without mitigation.</li> </ul>
95.	D.11.3.3	D.11-11 to D.11-12	<ul style="list-style-type: none"> <li>Regarding analysis of Impact T-9, SCE is a state regulated utility and is subject to the Franchise Act of 1937. Under the Act, SCE is required to pay the local agencies the cost of all "repairs made necessary by its operation under franchise." (California Public Utilities Code 6295) SCE is already contractually obligated to repair the property to its original condition pursuant to applicable franchise agreements.</li> </ul>	<ul style="list-style-type: none"> <li>Revise analysis to reflect existing franchise agreement(s).</li> </ul>
<b>D.12 - Visual Resources</b>				
96.	D.12.1.3	D.12-4	<ul style="list-style-type: none"> <li>The description of the existing visual setting is not completely accurate. This description must include the existing Devers-Valley No.1 500 kV transmission line (which borders the southern boundary of the Sun Lakes Community) and the Banning-Garnet-Maraschino-Windfarm 115 kV subtransmission line (which traverses the Sun Lakes Community golf course). These two lines should be incorporated in the baseline for determining impacts.</li> </ul>	<ul style="list-style-type: none"> <li>Revise discussion accordingly.</li> </ul>
97.	D.12.3.2	D.12-19	<ul style="list-style-type: none"> <li>The final significance criterion is based on consistency with local regulations, plans, and standards applicable to the protection of visual resources. However, because the CPUC has preemptive jurisdiction over the project, no local plan consistency evaluations are required (see DEIR page D.3-16). The discussion should clearly state that the Proposed Project is not subject to these local plans and standards relating to visual resources.</li> </ul>	<ul style="list-style-type: none"> <li>Revise discussion accordingly.</li> </ul>
98.	D.12.3.3	D.12-22	<ul style="list-style-type: none"> <li>The analysis recommends a mitigation measure "even though the impact is less than significant without mitigation." As discussed in SCE's cover letter, mitigation measures should not be imposed in this case.</li> </ul>	<ul style="list-style-type: none"> <li>Revise discussion accordingly and delete mitigation measure.</li> </ul>

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No.	Section	Page	Comment	Suggested Revision
99.	D.12.3.3	D.12-29	<ul style="list-style-type: none"> <li>The analysis states that the visual impact (V-10) of Zanja Substation would be significant because the substation is "highly exposed to nearby residences with direct views of the substation, and additional residences are being built to the north and west." However, the visual impacts of the project must be compared to the existing setting. The residences in this area are currently "highly exposed" to views of Zanja Substation, and future impacts must be measured against this baseline. Therefore, the analysis is incorrect and the impact would be less than significant without mitigation.</li> </ul>	<ul style="list-style-type: none"> <li>Revise analysis so that visual impacts at Zanja Substation are measured against the baseline of the existing visual setting.</li> </ul>
100.	D.12.5.3	D.12-41	<ul style="list-style-type: none"> <li>The analysis concludes that visual impacts of the PUA would be less than significant, and no mitigation is proposed. This is not correct and is inconsistent with the analysis in the DEIR. The DEIR recognizes that views of the riser poles (transition structures) from points external to the Sun Lakes development would actually experience the negative impacts of the structures without the positive benefit of removing the existing line (see page D.12-38). In addition, the DEIR states that the proposed riser poles would "introduce considerable structural complexity and industrial character" to the area. Consequently, the PUA would in fact have more adverse impacts than the Proposed Project.</li> </ul>	<ul style="list-style-type: none"> <li>Revise analysis accordingly.</li> </ul>
101.	Figures D.12-5B, 6B, 7B	D.12-59 to D.12-63	<ul style="list-style-type: none"> <li>The scale of the visual simulations is not accurate. The height of the existing wood H-frame structures is 60 to 75 feet and the height of the new steel poles is 70 to 85 feet. However, the visual simulations appear to exaggerate the difference in height between the existing structures and the new poles.</li> </ul>	<ul style="list-style-type: none"> <li>Revise figures D.12-5B, 6B, and 7B such that the visual simulations reflect a consistent and accurate scale.</li> </ul>
102.	Figure D.12-16	D.12-77	<ul style="list-style-type: none"> <li>This visual simulation is misleading because it portrays a view of the Sun Lakes golf course from a viewpoint that excludes the adverse visual effect of the riser poles.</li> </ul>	<ul style="list-style-type: none"> <li>Revise figure to more accurately portray the visual environment resulting from the PUA.</li> </ul>
<b>D.13 - Effects not Found to be Significant</b>				
No Comments				

E2-110

E2-111

E2-112

E2-113

## Comment Set E2, continued

January 2008

No.	Section	Page	Comment	Suggested Revision
<b>E - Comparison of Alternatives</b>				
103.	E.2	E-2 Table E-1	<ul style="list-style-type: none"> <li>As discussed above, the Proposed Project does not result in significant and unavoidable impacts with respect to GHG emissions and operational noise.</li> </ul>	<ul style="list-style-type: none"> <li>Remove AQ-3 and N-3 from the Class I impacts listed for the Proposed Project and alternatives.</li> </ul>
104.	E.2.1	E-3	<ul style="list-style-type: none"> <li>The discussion states that the PUA would reduce land use conflicts and visual impacts to "the approximate one-mile portion of the route that would be undergrounded." This statement is incorrect for two reasons. First, CEQA requires the EIR to evaluate the alternative in its entirety. Therefore, the analysis should not focus on only a segment of the PUA and should evaluate the impacts of this alternative as a whole. Second, as discussed above, the PUA does not in fact reduce land use conflicts (because impacts to noise and recreation are already less than significant for the Proposed Project), nor does the PUA reduce visual impacts (because visual impacts are already less than significant for the Proposed Project).</li> </ul>	<ul style="list-style-type: none"> <li>Revise discussion accordingly.</li> </ul>
105.	E.2.1	E-3	<ul style="list-style-type: none"> <li>The discussion notes that "EMF impacts would be least" with implementation of the PUA. This statement is inappropriate to include in the comparison of alternatives under CEQA for two reasons. First, as repeatedly noted in the DEIR, EMF "is not a CEQA issue." Therefore, EMF should not be mentioned or discussed for purposes of comparing alternatives. Second, the discussion is not consistent with the CPUC's directive with respect to EMF. CPUC decisions D.93-11-013 and D.06-01-042 established a "no-cost and low-cost" EMF policy whereby 4% of the total project cost is utilized as a benchmark for developing low-cost EMF reduction measures. In addition, these decisions provide that any low-cost reduction measures must be 15% or greater at the utility ROW while meeting the 4% cost criterion. Therefore, the approach should focus on whether the project and alternatives comply with</li> </ul>	<ul style="list-style-type: none"> <li>Revise discussion accordingly.</li> </ul>

E2-114

E2-115

E2-116

## Comment Set E2, continued

January 2008

No.	Section	Page	Comment	Suggested Revision
			low-cost and no-cost EMF policy and a comparison of the level of EMF impacts is not relevant. As discussed above, the Proposed Project complies with the CPUC's EMF policies, and the PUA is not an appropriate low-cost measure.	
106.	E.2.1.1	E-4	<ul style="list-style-type: none"> <li>The discussion states that Route Alternative Option 3 would result in significant unavoidable noise impacts due to the operational corona noise. This statement is incorrect. As discussed above, 115 kV subtransmission lines do not create significant corona noise levels. Therefore, this alternative does not result in a significant unavoidable noise impact.</li> </ul>	<ul style="list-style-type: none"> <li>Revise discussion accordingly.</li> </ul>
107.	E.2.1.2	E-5	<ul style="list-style-type: none"> <li>In discussing the construction-related impacts of the PUA, the DEIR notes that "these impacts are short-term for the duration of construction activities." This statement is misleading. The construction period for the PUA is longer than for the Proposed Project, and construction of the PUA requires more extensive ground-disturbing activities (which would result in greater impacts to air quality, land use, noise, etc.). Therefore, although these impacts are characterized as "short-term," the PUA may in fact create greater impacts during a longer construction period. The discussion should take into account both the duration and the intensity of impacts.</li> </ul>	<ul style="list-style-type: none"> <li>Revise discussion accordingly.</li> </ul>
108.	E.2.1.2	E-5	<ul style="list-style-type: none"> <li>The discussion states that "the PUA would eliminate visual impacts, improve golf course use, and eliminate corona noise within the portion of the alternative that traverses the Sun Lakes Community." This statement is inaccurate. First, as discussed above, the Proposed Project does not create significant visual, land use, or noise impacts. Therefore, the PUA does not avoid any significant impacts that would result from the Proposed Project. Second, even if the PUA did reduce these impacts to any extent, this would only be true for a small segment of this</li> </ul>	<ul style="list-style-type: none"> <li>Revise discussion accordingly.</li> </ul>

E2-116  
Cont.

E2-117

E2-118

E2-119

## Comment Set E2, continued

January 2008

No.	Section	Page	Comment	Suggested Revision
			<p>alternative. The remainder of the alternatives would experience impacts that are identical to those resulting under the Proposed Project. The discussion should more accurately describe the impacts of the PUA for the alternative as a whole as compared to the Proposed Project.</p>	
109.	E.2.2	E-5	<ul style="list-style-type: none"> <li>The analysis concludes that the PUA is preferred over the Proposed Project in 3 issue areas. This is inaccurate for several reasons. First, the evaluation of the PUA's impacts is based only on the small portion of this alternative that traverses the Sun Lakes Community. This is inconsistent with CEQA, which requires that a project and alternative be evaluated as a whole. The DEIR must discuss the overall impacts of the entire PUA, and the impact determinations must be based on the impact of the underground portion and the remaining approximately 14 miles of the subtransmission line. Second, the discussion notes 3 areas where the PUA is preferred but fails to mention that the Proposed Project is preferred with respect to cultural resources. In addition, the Proposed Project should be preferred with respect to air quality because it would result in the lowest construction emissions. Therefore, the net benefit (if any) of the PUA would be offset by the benefits of the Proposed Project in other resource areas. Third, as discussed above, the Proposed Project does not result in significant impacts with respect to land use, noise, and visual resources. Therefore, the Proposed Project, not the PUA, should be considered the environmentally superior alternative. Fourth, the discussion makes a distinction between "long-term" versus "short-term" impacts but does not take into account the intensity of the impacts. The discussion should account for both duration and intensity. Although the PUA's impacts are characterized as "short-term" because they occur during construction, these impacts may be more adverse than the</li> </ul>	<ul style="list-style-type: none"> <li>The DEIR analysis must be revised so that the comparison of the Proposed Project and alternatives more accurately reflects the impacts created under each option. The resulting conclusion would establish the Proposed Project as the environmentally superior alternative.</li> </ul>

**E2-119  
Cont.**

**E2-120**

## Comment Set E2, continued

January 2008

No.	Section	Page	Comment	Suggested Revision
			Proposed Project due to the extensive ground-disturbing activities.	
110.	E.2.2	Table E-2	<p>The following comments apply to Table E-2:</p> <ul style="list-style-type: none"> <li>• Air quality – the Proposed Project should be preferred because it “would result in the lowest construction emissions.”</li> <li>• Land use – the Proposed Project should be preferred (see comments for section D.3).</li> <li>• Biological resources - the Proposed Project should be preferred because it “would result in the least amount of ground disturbance.”</li> <li>• Geology and soils - the Proposed Project should be preferred because it “would result in the least amount of ground disturbance.”</li> <li>• Hazards and hazardous materials - the Proposed Project should be preferred because it has “the fewest identified contaminated sites near construction zones.”</li> <li>• Hydrology and water quality - the Proposed Project should be preferred because it “would result in the least amount of ground disturbance and potential surface water quality impacts.”</li> <li>• Noise – delete in Proposed Project, Route Alternative Option 3, and PUA columns the discussion of long-term corona noise impacts. Change to “no preference.”</li> <li>• Public services and utilities - the Proposed Project should be preferred because it “would result in the least amount of generated solid waste, and shortest construction schedule.”</li> <li>• Traffic and transportation - the Proposed Project should be preferred because it “would travel through the least amount of residential development.”</li> <li>• Visual resources – The table does not consider that views external to the Sun Lakes development would in fact experience more adverse visual impacts due to the riser poles required for the PUA. Change to “no preference.”</li> </ul>	<ul style="list-style-type: none"> <li>• Revise table accordingly.</li> </ul>
111.		E-8	<ul style="list-style-type: none"> <li>• The DEIR concludes that the Environmentally</li> </ul>	<ul style="list-style-type: none"> <li>• Revise conclusion accordingly.</li> </ul>

E2-120  
 Cont.

E2-121

E2-122

## Comment Set E2, continued

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No.	Section	Page	Comment	Suggested Revision
			Superior Alternative would be the PUA. This conclusion is erroneous and based on flawed methodology. As noted in SCE's comments to Table E-2, the Proposed Project is preferred in more resource areas than the PUA. Importantly, the conclusion that the PUA is preferred is substantially based on the false assumption that the PUA would result in beneficial visual impacts. However, the discussion fails to note that the subtransmission line was in existence prior to construction of the Sun Lakes Community and the golf course. Therefore, the Proposed Project does not create any significant visual impacts and this is the appropriate benchmark for analyzing the impacts of the PUA. The Proposed Project is in fact the Environmentally Superior Alternative.	
112.	E.3	E-9	<ul style="list-style-type: none"> <li>Because the Proposed Project is in fact the Environmentally Superior Alternative, Section E.3 should compare the Proposed Project to the No Project Alternative.</li> </ul>	<ul style="list-style-type: none"> <li>Revise discussion accordingly.</li> </ul>
<b>F - Other Considerations</b>				
113.	F.1.2	F-1	<ul style="list-style-type: none"> <li>Although construction of the Proposed Project would require the consumption of some non-renewable resources, the long-term operation of the Proposed Project would not result in the consumption of such resources. Therefore, this initial, short-term commitment of resources is not significant.</li> </ul>	<ul style="list-style-type: none"> <li>Revise discussion accordingly.</li> </ul>
114.	F.1.4.2 Table F-2	F-6	<ul style="list-style-type: none"> <li>The inclusion of related project A-2 is misleading. The discussion currently describes this project, the Devers-Palo Verde No. 2 transmission line (DPV2), as a 230-mile 500 kV transmission line and includes all of DPV2 as a related project. However, only one portion of the DPV2 project is in the vicinity of the Proposed Project. This portion, known as the Devers-Valley No. 2 transmission line, is approximately 42 miles long and would be located south of the Sun Lakes Community and immediately adjacent to and south of the existing Devers-Valley No. 1 line. The</li> </ul>	<ul style="list-style-type: none"> <li>Revise Table F-2 accordingly.</li> </ul>

E2-122  
Cont.

E2-123

E2-124

E2-125

## Comment Set E2, continued

January 2008

No.	Section	Page	Comment	Suggested Revision
			related projects list should not reference DPV2 but should include only the relevant portion of this project, which is Devers-Valley No. 2.	
115.	F.1.5	F-30 to F-97	<ul style="list-style-type: none"> <li>In evaluating the impacts of the PUA, the analysis focuses only on the underground portion of this alternative and does not evaluate the remainder of the alternative. For example, the analysis for Impact U-1 for the PUA states that "no cumulative projects would occur within this specific segment of ROW, therefore no cumulative impacts would occur." This analysis is not consistent with CEQA. An environmental analysis must evaluate the project as a whole. Therefore, the analysis of the PUA should take into consideration not only the specific segment of ROW that traverses the Sun Lakes Community, but should also account for the remainder of this alternative. As currently written, the DEIR understates the cumulative impacts of the PUA. Therefore, the analysis of all cumulative impacts of the PUA must be revised to taken into account the entire alternative (as defined for this alternative) consistent with CEQA.</li> </ul>	<ul style="list-style-type: none"> <li>Revise analysis accordingly.</li> </ul>
116.	F.1.5.1	F-31	<ul style="list-style-type: none"> <li>For the same reasons as discussed above with respect to section D.2, the DEIR analysis of cumulative climate change impacts should be revised according to a different significance threshold.</li> </ul>	<ul style="list-style-type: none"> <li>Revise analysis of impact AQ-3.</li> </ul>
117.	F.1.5.3	F-45	<ul style="list-style-type: none"> <li>Regarding Impact B-7, as noted in SCE's comments regarding the Quino Checkerspot butterfly discussion on page D.4-70, the host plants necessary to support the butterfly are not located within the Project Area. As noted in the discussion of Impact B-7 on page F-45, "There is no indication that any rare or listed invertebrates occur within the Proposed Project area," such as the Quino Checkerspot butterfly. Consequently, it is inappropriate to classify Impact B-7 as Class I.</li> </ul>	<ul style="list-style-type: none"> <li>Revise analysis accordingly, with respect to the Proposed Project and Alternatives.</li> </ul>
118.	F.1.5.3	F-45	<ul style="list-style-type: none"> <li>Regarding Impact B-9, very few bird electrocutions have occurred in the Project Area. Most, if not all, future distribution circuits would be</li> </ul>	<ul style="list-style-type: none"> <li>Revise analysis accordingly, with respect to the Proposed Project and Alternatives.</li> </ul>

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Cont.

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E2-127

E2-128

E2-129

## Comment Set E2, continued

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No.	Section	Page	Comment	Suggested Revision
			constructed underground. Consequently the future potential for bird electrocutions would be eliminated. Therefore, bird electrocutions are not Class I impacts.	
119.	F.1.5.3	F-45	<ul style="list-style-type: none"> <li>Regarding Impact B-10, no known collisions have occurred in the Project Area. Most, if not all, future distribution circuits would be constructed underground. Consequently the future potential for bird collisions would be eliminated. Therefore, bird collisions are not Class I impacts.</li> </ul>	<ul style="list-style-type: none"> <li>Revise analysis accordingly, with respect to the Proposed Project and Alternatives.</li> </ul>
120.	F.1.5.3	F-46	<ul style="list-style-type: none"> <li>Regarding Impact B-11 and B-12, the Proposed Project would not fragment existing habitat.</li> </ul>	<ul style="list-style-type: none"> <li>Revise analysis accordingly, with respect to the Proposed Project and Alternatives.</li> </ul>
121.	F.1.5.3	F-47	<ul style="list-style-type: none"> <li>Regarding Impact B-16, very few bird electrocutions have occurred in the Project Area. Most, if not all, future distribution circuits would be constructed underground. Consequently the future potential for bird electrocutions would be eliminated. Therefore, bird electrocutions are not a Class I impacts.</li> </ul>	<ul style="list-style-type: none"> <li>Revise analysis accordingly, with respect to the Proposed Project and Alternatives.</li> </ul>
122.	F.1.5.3	F-47	<ul style="list-style-type: none"> <li>Regarding Impact B-17, no known collisions have occurred in the Project Area. Most, if not all, future distribution circuits would be constructed underground. Consequently the future potential for bird collisions would be eliminated. Therefore, bird collisions are not Class I impacts.</li> </ul>	<ul style="list-style-type: none"> <li>Revise analysis accordingly, with respect to the Proposed Project and Alternatives.</li> </ul>
123.	F.1.5.3	F-47	<ul style="list-style-type: none"> <li>Regarding Impact B-18, no documentation is provided stating that the species has been observed in the project area.</li> </ul>	<ul style="list-style-type: none"> <li>Revise discussion accordingly.</li> </ul>
124.	F.1.5.6	F-65	<ul style="list-style-type: none"> <li>Although the Proposed Project, when combined with other projects in the area could contribute to a cumulative impact with respect to wildland fires, the incorporation of mitigation measures would reduce the overall potential for this impact to occur. Therefore, Impact HAZ-8 would be less than significant with mitigation.</li> </ul>	<ul style="list-style-type: none"> <li>Revise discussion to clarify that related projects will likely have mitigation measures imposed similar to those for the Proposed Project.</li> <li>Revise discussion to state that impacts would be less than significant.</li> </ul>
125.	F.1.5.7	F-69 to F-70	<ul style="list-style-type: none"> <li>With the imposition of mitigation measures for the related projects, the cumulative effect of impacts HYD-1, HYD-2, and HYD-3 would be less than significant.</li> </ul>	<ul style="list-style-type: none"> <li>Revise discussion to clarify that related projects will likely have mitigation measures imposed similar to those for the Proposed Project.</li> <li>Revise discussion to state that impacts would be less than significant.</li> </ul>

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Cont.

E2-130

E2-131

E2-132

E2-133

E2-134

E2-135

E2-136

## Comment Set E2, continued

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No.	Section	Page	Comment	Suggested Revision
126.	F.1.5.8	F-74 to 75	<ul style="list-style-type: none"> <li>In defining the geographic scope of impacts, the analysis initially identifies 600 feet as the appropriate range for cumulative impacts. However, the discussion of the Proposed Project's cumulative impacts includes all related projects within 0.25 miles in the analysis.</li> </ul>	<p>than significant.</p> <ul style="list-style-type: none"> <li>Revise analysis to correct inconsistencies in geographic scope.</li> </ul>
127.	F.1.5.8	F-76	<ul style="list-style-type: none"> <li>Any corona noise from operation of the subtransmission lines would only be audible for a limited distance from the ROW, and that distance is substantially less than 600 feet (Note: for a 500 kV line corona noise is less than 50 dBA at a reference point of 600 feet, therefore, the 115 kV subtransmission line would clearly be less than 50 dBA at that distance). Furthermore, noise intensity is dissipated with distance. Therefore, corona noise would not combine with noise generated by other projects to the extent that it would create a cumulatively significant impact. Use of a geographic scope of 600 feet for analyzing noise is inappropriate as it relates to corona noise. Impact N-4 would be less than significant.</li> </ul>	<ul style="list-style-type: none"> <li>Revise discussion accordingly.</li> </ul>
128.	F.1.5.11	F-93	<ul style="list-style-type: none"> <li>As discussed above, DPV2 should not be included in the cumulative visual analysis because it is not in the vicinity of the Proposed Project. The discussion should reference the Devers-Valley No. 2 transmission line only.</li> <li>The analysis states that in conjunction with the "highly industrial character" of the DPV2 project, the Proposed Project would result in a cumulatively significant visual impact. However, the relevant portion of the project in this case is the Devers-Valley No. 2 transmission line which would be built adjacent to and south of the existing Devers-Valley No. 1 transmission line. Therefore, the existing visual environment already includes views of "industrial character" due to both the Devers-Valley No. 1 transmission line and the subtransmission line through the Sun Lakes Community. Any impact resulting from</li> </ul>	<ul style="list-style-type: none"> <li>Revise discussion accordingly.</li> </ul>

E2-136  
Cont.

E2-137

E2-138

E2-139

E2-140

## Comment Set E2, continued

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No.	Section	Page	Comment	Suggested Revision
			construction of the Proposed Project and the Devers-Valley No. 2 transmission line would be adverse but not significant as compared to the baseline. Therefore, cumulative visual impacts would be less than significant.	
129.	F.2.1	F-97	<ul style="list-style-type: none"> <li>As discussed above and in SCE's cover letter, climate change impacts should not be included in the DEIR.</li> </ul>	<ul style="list-style-type: none"> <li>Delete discussion accordingly.</li> </ul>
130.	F.2.3	F-102 to F-103	<ul style="list-style-type: none"> <li>As discussed in SCE's cover letter, terrorism impacts should not be included in the DEIR.</li> </ul>	<ul style="list-style-type: none"> <li>Delete discussion accordingly.</li> </ul>
131.	F.2.4	F-104	<ul style="list-style-type: none"> <li>As discussed above and in SCE's cover letter, EMF impacts should not be included in the DEIR.</li> </ul>	<ul style="list-style-type: none"> <li>Delete discussion accordingly.</li> </ul>
<b>G - Mitigation Monitoring and Reporting</b>				
No Comments				
<b>H - Public Participation</b>				
No Comments				
<b>I - References and Organizations Consulted</b>				
No Comments				
<b>J - Glossary</b>				
No Comments				
<b>K - Preparers</b>				
No Comments				
<b>Appendix 1: Alternative Screening Report</b>				
Please refer to SCE cover letter and comment table for comments and concerns relating to the alternatives discussion.				
<b>Appendix 2: Notice of Preparation</b>				
No Comments				
<b>Appendix 3: Air Quality Calculations</b>				
No Comments				
<b>Appendix 4: Biological Resources</b>				
No Comments				
<b>Appendix 5: Electric and Magnetic Fields (EMF) Field Management Reports</b>				
No Comments				
<b>Appendix 6: Cultural Resources – Tribal Consultations</b>				
No Comments				
<b>Appendix 7: Soils in the Project Area</b>				
No Comments				

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Cont.

E2-141

E2-142

E2-143

## Responses to Comment Set E2 – Southern California Edison Company

- E2-1** Please see responses to Comment Sets E1 through E4. Please note that a new Executive Summary was included in the Recirculated Draft EIR, and many of the comments received are no longer pertinent to the new Executive Summary.
- E2-2** Please see Response C3-1. The Environmentally Superior Alternative has been re-evaluated and is identified in the Recirculated Draft EIR, Section E (July 2008) as the Proposed Project. Please see General Response GR-1 for a discussion regarding the change in determination of the Environmentally Superior Alternative.
- E2-3** Text has been revised as follows: “Currently, SCE’s existing subtransmission line right-of-way (ROW) ~~is an active line between Maraschino and Banning Substations~~ contains an active line fed from the Devers System. ~~servicing as an overload~~ This line serves as an emergency electrical source to Maraschino Substation in the event that the preferred line ~~serving Maraschino from the between the Devers and Vista 115 kV Systems in the event either system reaches capacity~~ experiences an outage. When the ~~Devers and Vista Systems are preferred~~ line is operating normally, no load travels through the ~~existing emergency-115 kV subtransmission line.~~” [See Final EIR (April 2008), Section 4.1 (Executive Summary)]
- E2-4** The text has been revised as follows: “The CPUC has assigned Administrative Law Judge (ALJ) Victoria Kolakowski to oversee the hearings on the Proposed Project, and Commissioner Dian Grueneich is the Assigned Commissioner for the PTC application. The ALJ will issue a Proposed Decision on the Project in ~~Spring~~ Winter 2008. The Commission may, at its discretion, hold Evidentiary Hearings to define the scope of the proceeding in regard to issues of Project need, Project cost, and other considerations.” [See Final EIR (April 2008), Section 4.2 (Section A – Introduction).]
- E2-5** Table A-1 has been revised as follows [See Final EIR (April 2008), Section 4.2 (Section A – Introduction)]:

**Table A-1. Permits Required for the El Casco System Project**

Permits	Agency	Jurisdiction/Purpose
<b>Federal Agencies</b>		
Nationwide or Individual Permit (Section 404 of the Clean Water Act)	U.S. Army Corps of Engineers	Waters of the United States, including wetlands, ephemeral drainages
Section 7 consultation (through U.S. Army Corps of Engineer’s review process)	U.S. Fish and Wildlife Service (USFWS)	Consultation on federally listed species; incidental take authorization (if required)
Lift Plan Permit	Federal Aviation Administration (FAA)	Potential Helicopter Construction Plans at the Mill Creek Communications Site (if applicable)
<u>Form 7460-1</u>	<u>Federal Aviation Administration (FAA)</u>	<u>Evaluation of impacts to National Airspace System (NAS)</u>
Section 106 of the NHPA Review (through U.S. Army Corp of Engineer’s review process)	Advisory Council on Historic Preservation	Cultural Resource Management Plan (if appropriate)

**Table A-1. Permits Required for the El Casco System Project**

Permits	Agency	Jurisdiction/Purpose
<b>State Agencies</b>		
Permit to Construct	CPUC	Overall Project approval and CEQA environmental review process
National Pollutant Discharge Elimination System – General Construction Stormwater Permit Section 402	California Regional Water Quality Control Boards (RWQCB), Regions 7 and 8	This permit applies to all construction Projects that disturb more than 5 acres
Section 401 Water Quality Certification (or waiver thereof)	RWQCB	Requests RWQCB's certification that the Project is consistent with State water quality standards
Road Closures	Caltrans	Permit to install guard poles in roadway ROWs, temporary road closures, and potential stringing activities across I-10 (for Route Alternative Option 3)
Endangered Species consultation 2081	California Department of Fish and Game (CDFG)	Consultation on State-listed species; incidental take authorization (if required)
Section 1602 Streambed Alteration Agreement	CDFG	Modifications to bank of San Timoteo Creek, Jurisdictional Washes near Smith Creek
Consultation (through CEQA review process)	State Historic Preservation Officer	Cultural resources management (if appropriate)
Authority to Construct/Permit to Operate	South Coast Air Quality Management District	Demolition of existing towers
<b>Local Agencies</b>		
Western Riverside County Multi-Species Habitat Conservation Plan	Riverside County	Compliance with MSHCP, documentation of HANS process or receive local waiver
Roadway Encroachment and Closure Permit	Riverside County, San Bernardino County	Permit to install guard poles in roadway ROWs, temporary road closures
Roadway Encroachment and Closure Permit	City of Beaumont, City of Banning, City of Redlands	Permit to install guard poles in roadway ROWs, temporary road closures
Grading and Building Permits	<del>City of Beaumont, City of Banning, City of Yucaipa</del> Riverside County	Permission to conduct grading and building activities

**E2-6** Please see Response E2-5.

**E2-7** The text has been revised as follows: “As part of the new ~~fiber optic~~ telecommunications system, microwave towers would be installed at El Casco Substation and the existing Mill Creek Communications Site, located on SCE-owned property within the San Bernardino National Forest.” [See Final EIR (April 2008), Section 4.3 (Section B – Project Description)]

**E2-8** The Banning Heights Substation and Beaumont Substation have been removed from Figure B-2. The revised Figure B-2 can be found in Section 4.0 of the Final EIR. [See Final EIR (April 2008), Section 4.3 (Section B – Project Description)]

- E2-9** The text has been revised as follows: “An approximately ~~24~~ 30-foot wide asphalt concrete paved entry road located to the north and west of the substation site would be constructed to provide access to the substation from San Timoteo Canyon Road.” [See Final EIR (April 2008), Section 4.3 (Section B – Project Description)]
- E2-10** The text has been revised as follows: “The access road would be constructed in accordance with the proposed substation site plan, as depicted in Figure B-2 ~~3a~~, El Casco Substation Site Plan.” [See Final EIR (April 2008), Section 4.3 (Section B – Project Description)]
- E2-11** The text has been revised as follows: “Overhead ground wires would be installed ~~on the peaks of the steel poles~~ below the phase conductors.” [See Final EIR (April 2008), Section 4.3 (Section B – Project Description)]
- E2-12** The text has been revised as follows: “At the northeast substation corner, the duct banks would enter separate 26 inch (internal dimension) bore casings, spaced six feet apart, which would be installed underground for about 300 feet, beneath both the San Timoteo Creek and the adjacent railroad tracks, and then terminate in separate vaults on the ~~south~~ north side of San Timoteo Canyon Road (see Figure B-3b, El Casco Substation Site Plan Aerial View).” [See Final EIR (April 2008), Section 4.3 (Section B – Project Description)]
- E2-13** Thank you for providing information regarding the use of additional construction equipment. Because it is unknown when in the schedule this machine would be used, the emissions data used in the analysis are based on estimates, and the amount of pollution caused by this single truck would fall within the error margins of those estimates, this addition will not affect any impact conclusions. Text has been added to Table B-12 as follows [See Final EIR (April 2008), Section 4.3 (Section B – Project Description)]:

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Table B-12 Construction Personnel And Equipment Summary (Microwave System)

Construction Element	Number of Personnel	Number of Days (per site)	Equipment Requirements
Antenna Tower Construction Crew	4	30 (Ph. 1) 0 (Ph. 2)	2 - Crew Trucks (Gas/Diesel) 1 - 100' Crane (Diesel) – El Casco 1 - 150' Crane (Diesel) – Mill Creek <sup>1</sup> 1 - 100' Lift Truck (Diesel) – El Casco 1 - 150' Lift Truck (Diesel) – Mill Creek <sup>1</sup> <u>1 - Backhoe or Auger Truck</u>
Telecommunications Installation Crew	4	15 (Ph. 1) 10 (Ph. 2)	1 - 2-ton Truck (Gas/Diesel) 1 - Crew Truck (Gas)

- E2-14** Information regarding the load flow through the 115 kV line included in the Draft EIR was based on information provided by SCE in its PEA and in responses to data requests regarding the CPUC’s Northerly Route Alternative Option 3. However, the following text on page C-12 has been revised to clarify language based on the comment [See Final EIR (April 2008), Section 4.4 (Section C – Alternatives)]:

“In addition, it should be noted that with implementation of this alternative, SCE would need to ~~energize its use its existing~~ energize its use of its existing 115 kV line between Banning and Maraschino Substations to carry load at all times (i.e., Green Line shown on Figure C-1).”

- E2-15** As noted in both Draft EIR Appendix 1 (Alternatives Screening Report) on page Ap.1-33, and Section C (Alternatives) on page C-16, SCE may need to obtain additional easement rights (or franchise rights) from the City of Banning for implementation of the CPUC's Northerly Route Alternative 3. It should be noted that this would also be the case for the CPUC's Northerly Route Alternative Options 1 and 2 (described in Appendix 1). However, obtaining local franchise rights is not considered to be a major feasibility issue (i.e., would not render an alternative infeasible), because if such easements are necessary, they can be obtained by the SCE from local agencies. No text revisions are necessary.
- E2-16** As stated on page C-19, *"the visual character of the six-mile portion would not change from existing conditions."* In addition, the discussion on page C-19 (referenced by the commenter) clearly and specifically states that there would be a reduction of environmental impacts for the segment located between Maraschino and Banning Substations. Issues associated with impacts resulting from other segments of the CPUC's Northerly Route Alternative are discussed in detail in each issue area subsection in Section D (Environmental Analysis) of the original Draft EIR (December 2007) and Section D.9 (Noise) of the Recirculated Draft EIR (July 2008). Note that the information in Section C (Alternatives) includes the description of alternatives carried forward for full analysis in the EIR, whereas the analysis of impacts for each alternative is included in Section D. No text revisions are necessary.
- E2-17** Please note the text further down on page C-20 of the original Draft EIR under the heading "Riser Poles," which specifically states:
- "Since there are two sets of conductors (i.e., a double circuit with three wires on each circuit), two riser poles would be required at each transition point, similar to those shown in Figure C-5. The underground cables would be routed down from the pole cross arms through rigid conduits. A set of two riser poles would be constructed within the existing corridor just east of the intersection with Highland Springs Avenue, and another set would be constructed east of S. Riviera Avenue and west of S. Highland Home Road."*
- Therefore, no text revisions are necessary.
- E2-18** The Figure is not intended to show the cross section view for the entire one-mile portion of the Partial Underground Alternative. Note that Figure C-6 depicts a typical cross-section in portions of the Partial Underground Alternative where hills occur. For example, as the Partial Underground Alternative approaches Highland Home Road, the route would need to traverse hilly areas. The figure is intended to show that, in fact, in such hilly areas, the ducts would be buried deeper than the hilly grade, and that the hill would be restored to its current grade. Figure C-6 has been modified to clarify this issue and can be found in Section 4.0 of the original Final EIR. [See Final EIR (April 2008)]
- E2-19** As noted on Draft EIR page D.8-36 in Section D.8, Hydrology and Water Quality, *"The total depth of excavation for placement of underground infrastructure is approximately eight feet. Therefore, it is extremely unlikely that groundwater would be encountered during construction activities. If groundwater resources are encountered during construction, APM HYDRO-4 would ensure that any potential impact would be minimized."* No text revisions are necessary.

- E2-20** As noted in Response E2-16, Section C (Alternatives) includes the description of alternatives carried forward for full analysis in the EIR. The complete analysis of impacts for each alternative is included in Section D of the original Draft EIR (December 2007) and Section D.9 (Noise) of the Recirculated Draft EIR (July 2008). Therefore, no text revisions are necessary.
- E2-21** Please note that an EIR must discuss alternatives “*even if these alternatives... would be more costly.*” (CEQA Guidelines § 15126.6(b)). Whereas economic feasibility will be considered by the decisionmakers in deciding whether to approve the project, the issue of project cost is not generally considered in determining whether or not to carry an alternative forward for analysis in the EIR. Also, see Response E1-4. No text revisions are necessary.
- E2-22** As noted in detail in Section 4.4 (Alternative Substation Site) in Appendix 1 (Alternatives Screening Report) of the Draft EIR and in Section C.5.2.2, the Alternative Substation Site was eliminated for several reasons, including higher levels of impacts than the Proposed Project in the areas of aesthetics, land use, and cultural resources. As noted in Responses E2-16 and E2-20, Draft EIR Section C includes the description of alternatives carried forward for full analysis in the EIR. Therefore, Section C is not intended to include details regarding the alternatives that were screened out from full consideration. No text revisions are necessary.
- E2-23** Thank you for your comment. The No Project Scenario description was based on information provided by SCE in their PEA outlining the electrical system upgrades that would be needed in the area in the event that the Proposed Project does not get implemented.
- E2-24** Please see responses to Comment Set E3 regarding SCE’s specific comments on Draft EIR mitigation measures.
- E2-25** Note that the classification of impacts is consistent with CEQA Guidelines Appendix G (Environmental Checklist Form) classification of impacts. The numbering of impact classes is intended to streamline the referencing of impact conclusions in the Impact Summary Tables in the Executive Summary, and aids in conducting comparison of alternatives. As defined in several sections in the Draft EIR (including, but not limited to, page ES-13 and D.1-2):
- “...the classification of the impacts was uniformly applied in accordance with the following definitions:
- *Class I: Significant; cannot be mitigated to a level that is less than significant*
  - *Class II: Significant; can be mitigated to a level that is less than significant*
  - *Class III: Adverse, less than significant*
  - *Class IV: Beneficial impact*”
- Also, please note that this classification system is commonly used in EIRs and has been used in several CPUC EIRs since the mid 1990s (including several EIRs for SCE projects). No text revisions are necessary.
- E2-26** Table D.2-3 has been revised according to the comment. Associated text noting CO nonattainment also revised to show area is (as of 7/2007) in attainment of the federal CO standards. See Section 4.5 (Air Quality). [See Final EIR (April 2008)]

- E2-27** Several of the emission summary tables were revised to reduce the number of digits reported (see Section 4.5, Air Quality) [See Final EIR (April 2008)]. These revisions do not change any impact conclusions. In addition, emission totals in Table D.2-9 are as reported in the citation from the California Energy Commission. No revisions are needed.
- E2-28** The Lead Agency has the discretion to determine the appropriate geographic scope of analysis. Emission totals in Table D.2-9 are as reported in the citation from the California Energy Commission. The comment does not provide any basis to limit the geographic scope to the SCE service territory. No revisions are needed.
- E2-29** Please see Responses E1-8 and E1-9.
- E2-30** Revisions related to “or” were incorporated. Revisions related to “activities outside of SCAQMD” were not incorporated as they are not relevant to this project that is wholly within SCAQMD territory. Edited versions of the other requested revisions to APM AQ-16 were added (see Section 4.5, Air Quality) [See Final EIR (April 2008)].
- E2-31** Units of “lb/day” added to Table D.2-15. See Section 4.5 (Air Quality) [See Final EIR (April 2008)].
- E2-32** Units of “lb/day” added to Table D.2-18. See Section 4.5 (Air Quality) [See Final EIR (April 2008)].
- E2-33** The discussion of the San Bernardino National Forest on page D.3-14 has been revised to include this clarification. The paragraph has been modified as follows [See Final EIR (April 2008), Section 4.6 (Section D.3 – Land Use)]:
- San Bernardino National Forest.** The Mill Creek Communications Site would be located within the San Bernardino National Forest on SCE fee-owned property, north of the Cities of Yucaipa and Redlands. This National Forest offers over 500 miles of hiking trails within 700,000 acres of forest land. The San Bernardino National Forest offers a variety of recreational opportunities including hiking and backpacking, trail riding by horse, bicycling, off-highway vehicle use, camping and picnicking, and fishing, as well as winter activities such as snowshoeing and cross-country and alpine skiing (USDA Forest Service, 2007b).
- E2-34** Please see Response E1-12. The significance criteria used in an EIR is not limited to the questions provided in Appendix G. As described on page D.3-21, the significance criteria used were derived from previous environmental impacts assessments as well as from the CEQA Guidelines (Appendix G, Environmental Checklist Form, Section IX). The significance criteria used in this analysis have been utilized in many CPUC EIRs and have been determined to be appropriate by the CPUC in accordance with their discretion as lead agency. (See CEQA Guidelines § 15064(b).)
- E2-35** Please see Response E2-34 regarding the discussion of significance criteria. The significance determination for impacts associated with the disruption of recreational resources which affect the recreational value of the resources is based not only on the duration of the impact, but also on severity of the impact. The use of heavy construction equipment, and blocked access to the ROW would restrict the use of the golf course Although the duration of the impact would be a relatively short period (one week), the severity of the impact during the period construction would occur, as discussed previously in the referenced paragraph on

page D.3-22, would be sufficient to deem the impact significant. No change has been made to the discussion.

- E2-36** Please see Response E2-34 regarding the discussion of significance criteria. Whether the activities occur on the fairway or off the fairway, the proximity of the construction activities to where golfers would be using the course is close enough that the impact would not change. The discussion of the location of construction with regard to the Sun Lakes Country Club golf course, however, has been revised as follows: “Construction activities would occur ~~on~~ along the fairway, and would temporarily disturb approximately 0.6 acre.” [See Final EIR (April 2008), Section 4.6 (Section D.3 – Land Use)]
- E2-37** As discussed in the Draft EIR, the underground 115 kV subtransmission line would be constructed within a golf course and the construction of structures on top of the vaults and duct banks would be prohibited. Access for SCE maintenance personnel would be available at all times. However, this would not preclude use of the golf course, because operation and maintenance activities only would occur periodically. The existing ROW through the golf course must also be able to be accessed by SCE personnel at all times in order to safely maintain and operate the overhead lines. No text revisions are necessary.
- E2-38** While discussion of potential benefits is not required by CEQA, EIRs often discuss the potential benefits of a project and its alternatives in addition to potentially significant adverse impacts. This is not the equivalent of using an improper baseline. While the EIR acknowledges that the PUA would ultimately benefit the Sun Lakes golf course as it would remove the existing wooden 115 kV subtransmission poles and lines from the course, it does not interpret this ultimate benefit over baseline conditions to mean that the Proposed Project would have a significant impact. Rather, the EIR concludes on page D.3-27 that the Proposed Project would not result in a substantial long-term reduction in recreational values. No change has been made to the discussion.
- E2-39** The EIR acknowledges that both the severity and the duration of impacts to recreational resources under the construction of the Partial Underground Alternative would be greater than the Proposed Project. Whether, the operational benefits of the removal of overhead subtransmission lines through the Sun Lakes Country Club golf course and the enhancement to the recreation resource that this would represent outweigh the significant adverse impacts of the PUA will be a decision for the decisionmakers at the time of project approval. No change has been made to the discussion.
- E2-40** The text on page D.4-3 has been revised to reflect the SCE comment. SCE would not avoid construction during the breeding season for this section of the Proposed Project but would implement APM Bio-2 (Pre-construction Bird Surveys) during construction of the Proposed Project. The discussion has been corrected as follows: “Areas where the fiber optic equipment would be installed on existing lines or within existing facilities were not surveyed. ~~as these areas would be avoided during the breeding season for migratory birds.~~” [See Final EIR (April 2008), Section 4.7 (Section D.4 – Biological Resources)]
- E2-41** The clarification of the nest site location has been made. The discussion has been corrected as follows: “Additionally, red-tailed hawk nests were observed on subtransmission line towers in the vicinity of the proposed El Casco Substation site and immediately adjacent to ~~within the fenced boundaries of~~ the existing Zanja Substation.” [See Final EIR (April 2008), Section 4.7 (Section D.4 – Biological Resources)]

- E2-42** This comment points out a text error. Addition of the word “sensitive” has been added. The discussion has been corrected as follows: “The CNDDDB and CNPS literature search identified 15 sensitive plant species that are known to occur within the vicinity of the Proposed Project and that have a moderate to high potential to occur within the survey area.” [See Final EIR (April 2008), Section 4.7 (Section D.4 – Biological Resources)]
- E2-43** As indicated in Section D.4.1.3.5 (Sensitive Wildlife Species), a species has been determined to have a “high” potential to occur in the project area if there is suitable habitat for the species on-site and if the species has been documented within five miles of the project site within the past 20 years. The request by SCE to reduce the number of USGS quads reviewed for the Proposed Project area has been considered. However, due to the linear nature of the Proposed Project, and the wide-ranging distributions of many of the species known to occur in the Proposed Project area (Table D.4-4) the number of quads reviewed would be appropriate to evaluate the potential for sensitive species to occur in the project region. SCE’s claim that the review was “overbroad” is unfounded. Therefore, the parameters of the literature review have not been changed.
- E2-44** SCE has requested that additional evidence be provided to justify the current risk potential/occurrence potential for a number of species. Table D.4-4 identifies the following potential for occurrence for each species identified by SCE and includes two-striped garter snake (High), sharp shinned hawk (High), Bell’s sage sparrow (High), western mastiff bat (High), and American badger (Moderate). Specific information regarding the risk potential/occurrence potential for each species is described below:

**Two-striped garter snake.** According to the CNDDDB (2007) this species was documented in 1997 in the Thurman Flats Picnic Area, on the north side of Mill Creek. This record is located less than one mile from the Mill Creek Communications Tower project element. Additionally, this species is closely associated with streams with rocky beds bordered by willows (Stebbins 1985). Suitable habitat for this species occurs along portions of San Timoteo Creek, adjacent to the El Casco Substation site and it is known to occur in the Mill Creek area. Furthermore, in Table 3.4-3 of the PEA, SCE indicates that this species has a “high” potential to occur. Therefore, the classification of “high” potential is considered accurate for this species. No change to the risk classification has been made.

**Sharp-shinned hawk.** Suitable habitat occurs for this species in and adjacent to the Proposed Project area. Locations for this species have been recorded within the U.C. Riverside Database and include migrant and wintering observations within the City of Banning. In addition, SCE’s PEA also classifies the potential for this species as “high” (URS 2007). Therefore, the classification of “high” potential is considered accurate for this species. No change to the risk classification has been made.

**Bell’s sage sparrow.** The closest CDFG record for this species is approximately eight miles east of the El Casco Substation site, north-northeast of Sunnymead (CNDDDB 2007). This species may occur in sage scrub and chamise chaparral habitats in the project area. It was not found during 2007 surveys (Haas, 2007) but may occur during post-breeding dispersal, during periodic irruptive years, and as a migrant/transient. In Section 3.4 (page 3.4-20) Table 3.4-3 of the PEA, SCE indicates that this species has a “moderate” potential to occur. Based on the presence of this species nearby, the presence of suitable habitat in the project area, and the fact this classification does not change the content or significance call of the

document, the classification of “high” potential is considered conservative but accurate for this species. No change to the risk classification has been made.

**Western mastiff bat.** While the closest CDFG record for this species is approximately 8 miles northwest of the Mill Creek site along Little Mill Creek (CNDDDB 2007), this species has been recorded on Potrero Creek which crosses the project alignment (see [http://www.fs.fed.us/psw/publications/documents/psw\\_gtr195/psw](http://www.fs.fed.us/psw/publications/documents/psw_gtr195/psw)). The USDA forest Service report summarized numerous sightings of this species. In addition, suitable riparian habitat occurs along much of San Timoteo creek and abandoned structures are common in the area. While the PEA does not address this species, based on the presence of this species nearby, the presence of suitable habitat in the project area, and the fact this classification does not change the content or significance call of the document, the classification of “high” potential is considered accurate for this species. No change to the risk classification has been made.

**American Badger.** The MSHCP lists the Badlands, Banning, and Beaumont areas as key populations in the MSHCP Planning Area. Surveys conducted by Haas (2007) of the project area located an abandoned badger burrow in the vicinity of the ROW but did not detect the presence of the species. This species was documented in 1989 within 1.5 miles of the Mill Creek site. CNDDDB records indicate that one dead adult individual was identified on Highway 38, approximately one-half mile east of Mountain Home Village. In Table 3.4-3 of the PEA, SCE indicates that this species has a “low” potential to occur. Based on the presence of this species nearby, the presence of suitable habitat in the project area, and the fact this classification does not change the content or significance call of the document, the classification of “moderate” potential is considered accurate for this species. No change to the risk classification has been made.

**E2-45** Table 3 of the SCE Wetland Delineation Report submitted to the CPUC indicated that temporary impacts would occur at the V-ditch. Page 24 of the report specifically indicates that 0.004 acre of USACE non-wetland waters; 0.00 acre of USACE wetland waters; 0.008 acre of CDFG; 0.004 acre of RWQCB; and, 0.008 acre of MSHCP would be affected. Based on the new information provided by SCE indicating the V-ditch will not be impacted, the text on page D.4-45 and D.4-46 of the Draft EIR is revised to read: “Temporary impacts are expected to occur along portions of San Timoteo Creek, an ephemeral tributary to San Timoteo Creek, ~~a concrete V-ditch located north of Fourth Street in the City of Beaumont,~~ and the unnamed ephemeral drainage located approximately 400 feet east of the intersection of Bobcat Road and Turtle Dove Lane in unincorporated Riverside County south of the City of Banning.” [See Final EIR (April 2008), Section 4.7 (Section D.4 – Biological Resources)]

**E2-46** The SCE comment regarding participation as a developer under the MSHCP has been considered. According to Section 1.0 (page 1) of the Biological Resources Technical Report prepared by SCE, SCE will be acquiring coverage under the MSHCP by participating as a developer and obtaining the required permits from the County of Riverside and the cities of Banning and Beaumont.

However, it is recognized that there are several methods that SCE may utilize to comply with the provisions of the MSHCP. It is important to note that these various mechanisms all consist of compliance with the key areas identified of the MSHCP. As such, the text on page D.4-50 of the EIR is revised as follows: “If discretionary permits are required, SCE will be

acquiring coverage under the MSHCP by participating as a developer and obtaining the required permits from the County of Riverside, ~~and~~ the cities of Banning and Beaumont, and any other coordinating MSHCP signatories. [See Final EIR (April 2008), Section 4.7 (Section D.4 – Biological Resources)]

**E2-47** The evaluation of impact acreage in the Draft EIR was based on several factors including the estimation of towers, laydown areas, and the proposed construction footprint of the El Casco substation site. However, it should be noted that the estimated acreages identified by SCE in the PEA and in two Biotechnical reports completed in 2007 also differ. The intent of the impact analysis is to provide an estimate of the total acreage that would be affected by the Proposed Project. As indicated by SCE the total or actual acreages may be slightly different based on construction and final engineering of the Proposed Project. Therefore, as the acreages are intended to provide the decision maker with a reasonable expectation of the impacts, the slight differences in acreages provided in Table D.4-6 are not noteworthy. No change to the table has been made.

**E2-48** Review of the SCE Wetland Delineation Report submitted to the CPUC indicated that (Page 26-27) permanent impacts to jurisdictional waters would occur from the placement of new culverts within San Timoteo Creek. In addition, the report states that temporary impacts would occur within Montgomery Creeks for the removal of existing towers. Table 4 of the SCE Wetland Delineation Report further identifies permanent impacts to several CDFG and MSHCP jurisdictional areas. Some of these are defined as Pole Upgrade areas and include Impact Areas 3 (Pole Upgrade #1), 4 (Pole Upgrade #2), 7 (Pole Upgrade #5), and 8 (Pole Upgrade #6). Figure 6, Figure 7, Figure 9, and Figure 10 of the SCE report identify several pole locations within jurisdictional boundaries. These figures clearly indicate locations for the Proposed Transmission Line Poles Installation/Replacement that fall within CDFG Waters of the State and MSHCP Jurisdiction.

The SCE comment regarding the placement of towers outside jurisdictional waters is correct and the text is revised to read: “However, in some locations ~~the proposed towers are located in~~ project activities such as the placement of culverts near the proposed substation would result in the loss of ephemeral washes or riparian habitat.” [See Final EIR (April 2008), Section 4.7 (Section D.4 – Biological Resources)]

**E2-49** Paragraph 2, page D.5-57 has been modified to reflect the comment provided by SCE as follows: “SCE would also mitigate the loss of vegetation through the implementation of the MSHCP process. APM BIO-4 indicates SCE would comply with all regulations outlined in the MSHCP. Provided SCE complies with the Best Management Practices identified in the MSHCP (Volume 1-Appendix C of the MSHCP) and provides the appropriate fees, Project impacts to vegetation are mitigated. ~~This process would require SCE to document the total acres of habitat subject to Project disturbance and provide fees that mitigate for the loss of covered habitats.~~” [See Final EIR (April 2008), Section 4.7 (Section D.4 – Biological Resources)]

**E2-50** Review of the SCE Wetland Delineation Report submitted to the CPUC indicated that (Page 26-27) permanent impacts to jurisdictional waters would occur from the placement of new culverts within San Timoteo Creek. However, the discussion related to the loss of foraging habitat within the ephemeral drainages was based on tower footings being placed within these areas. Because of the now clarified fact that SCE would not place footings within those areas, the discussion under Impact B-2 has been corrected as follows: “~~Foraging habitat may~~

~~also be lost in some of the small drainages that would be subject to Project disturbance. These areas are known to support several sensitive mammal species including the Los Angeles pocket mouse.” [See Final EIR (April 2008), Section 4.7 (Section D.4 – Biological Resources)]~~

**E2-51** The response to the SCE comment regarding the need to present substantial evidence regarding the importance of the habitat present at the proposed substation site to wildlife is provided in detail within Section D.4 (Biological Resources) of the EIR. Some of the evidence articulated in the Draft EIR includes the following text: “Burke and Gibbons (1995) found that nesting and terrestrial hibernation, both necessary stages of freshwater turtle life cycles, occurred exclusively outside of riparian borders delineated by federal protection. Holland and Bury (2003) studied 275 southwestern pond turtle nests and found that, in undisturbed habitats, nests averaged 150 feet from the water and ranged up to 1300 feet from the shoreline. Riparian habitats and their vegetated uplands are important areas utilized by many semi-aquatic and riparian species guilds. However, in California more than 95 percent of riparian habitats that were present prior to European settlement have been severely degraded or destroyed (Smith, 1977; Katibah, 1984). Although riparian zones naturally account for a low percentage of the total landscape (often less than one percent), they typically accommodate a disproportionately high number of species and provide a larger degree of ecological function than surrounding upland areas (Fischer and Fischenich, 2000). Many aquatic and semi-aquatic species rely on adjacent terrestrial habitats to complete their life cycles (Semlitsch and Bodie, 2003; Spinks et al., 2003; Burke and Gibbons, 1995) and riparian vegetation provides necessary foraging and nesting habitat for many bird species (Rottenborn, 1999; Bolger et al., 1997).” (See Section D.4, Biological Resources).

The information provided above and the location of the site, relatively flat ground adjacent to an important riparian area supporting several State and federally listed species, is adequate to present the relative importance of the habitat. The fact that the area supports populations of exotic species does not support the contention that the area is poor foraging habitat. Further, most of the non-native grasslands in Southern California are highly disturbed by both Mediterranean and Eurasian weeds, yet they still support many prey items and play important roles for foraging. In addition, Section 3.4, page 3.4-17 of the PEA indicated this area supports foraging habitat for a variety of species, including bobcat, coyote, and red-tailed hawk. White tailed kites are also present in the project area and are known to routinely forage in upland areas adjacent to riparian areas. Therefore no change to text regarding this issue has been made.

**E2-52** The context of the Burke and Gibbons reference is intended to demonstrate the importance of upland habitat located adjacent to riparian corridors for a variety of species. While the current conditions at the site likely limit the potential for pond turtles to occur at this location, the information is still accurate regarding the importance of this habitat type for aquatic and semi aquatic species. Therefore no change to text regarding this issue has been made.

**E2-53** Section 2.4.1.1.7 (Landscaping) of the PEA indicates that primarily native plants would be utilized at the proposed substation site. The section also identifies that SCE would conform to the County of Riverside’s guidelines provided they do not conflict with safety considerations. In addition, APM Bio-6 indicates that cut areas would be planted with native species consistent with an approved restoration plan. While these measures provide sound

language regarding the use of native plantings at the proposed substation site, the current mitigation and mitigation language in the Draft EIR is intended to clarify the use of native or non-invasive species and provide a mechanism to ensure this action occurs. Therefore no change to text regarding this issue has been made.

- E2-54** The SCE comment regarding the request to delete scientific studies that do not occur in the Proposed Project area has been considered. However, the scientific studies and information regarding the behavior of birds and other species to noise, lighting, and other urban effects conducted throughout the United States and Europe provides a mechanism to understand and evaluate how construction projects affect various species of birds. While various species have differing tolerances to noise and disturbance, the claim that studies conducted in other areas or on different species is irrelevant and should not be used is misguided. Further, the comment provided by SCE infers that only studies conducted on the exact species subject to project disturbance and conducted in the same region should be used. While this approach would provide the best mechanism to evaluate impacts, it is not practicable and minimizes or devalues solid scientific studies conducted in other areas that clearly have relevance to this project. Likewise, studies conducted by APLIC, of which SCE is a participating member, routinely utilize bird strike information for many European and North American species. In summary, the use of the scientific literature cited in the Draft EIR is intended to provide the decision makers and the general public information that illustrates how different species react to various types of disturbance. Therefore the citations are considered relevant and no change to the document has been made.
- E2-55** The SCE comment stating that the Proposed Project is not considered urbanization has been considered. However, the placement of the proposed substation would result in a land use change from vegetated land to development. This action would constitute one component of urbanization. No changes to the text have been made.
- E2-56** Please see Response E2-54 regarding the use of scientific studies in the EIR.
- E2-57** Please see Response E2-54 regarding the use of scientific studies in the EIR.
- E2-58** The SCE comment that personnel communication or unpublished studies should be deleted from the Draft EIR has been considered. The use of recognized experts, unpublished data, and contact with professional biologists is routinely practiced by both applicants and regulatory staff. In fact, the PEA completed by SCE cites several unpublished studies and reports. No change to the text has been made.
- E2-59** The SCE comment regarding the acquisition of MSHCP lands to mitigate impacts has been struck from the text as follows: “~~By providing the MSHCP development fee (Section D.4.1.3.1 Special Habitat Management Areas Overview – Western Riverside County MSHCP) SCE would mitigate impacts to species by the acquisition of mitigation land within the MSHCP Core Area.~~” [See Final EIR (April 2008), Section 4.7 (Section D.4 – Biological Resources)]
- E2-60** The text has been revised as follows: “~~Similar to other stations, SCE may propose motion-activated lighting to illuminate the locked gate at night. Motion activated lighting can be triggered by animals as well as maintenance vehicles, and therefore, would create adverse lighting effects in the nighttime landscape even when no maintenance vehicle is present.~~” [See Final EIR (April 2008), Section 4.7 (Section D.4 – Biological Resources)]

**E2-61** Documentation to support the presence of Quino checkerspot host plants is provided in SCE's PEA as Appendix B. As indicated, several plant species that are associated with the Quino checkerspot occur in the project area. These include the primary larval host-plant, plantain (*Plantago erecta*) and secondary larval host-plants, Coulter snapdragon (*Antirrhinum coulterianum*) and Indian paintbrush (*Castilleja exserta*). Additionally, adults will nectar on several small annuals documented in the project area, including plants of the genera *Lasthenia* ssp., *Cryptantha* ssp., and *Gilia* ssp. Chia (*Salvia columbariae*) is another plant utilized by this species which was observed in the project area. The presence of these plant species was also noted by Aspen biologists during reconnaissance surveys of the project area. While the document addresses potential impacts to this species, the intent of the EIR is to provide general information regarding this species should it occur. As the MSHCP does not require focused surveys for this species and it is generally known to occur outside the project alignment the inclusion of the animal in the EIR is cautionary. Therefore, no change to text regarding this issue has been made.

Regarding the comment that it is unclear what is meant by the statement that host plants occur in the project "vicinity"; the host plants occur in and adjacent to the project ROW.

**E2-62** The use of the bald eagle as an example of the largest bird that could come in contact with the subtransmission line is intended to provide the decision-makers and general public information regarding the size range of species with the potential to come into contact with the proposed subtransmission lines, not to suggest this species is present. While the likelihood of a bald eagle striking the line is extremely low, the bald eagle has the potential to occur in the project area. However, the occurrence of this species in the project area would be considered rare and infrequent and does not warrant an individual analysis in the EIR. The MSHCP Species Account for bald eagle indicates that the species is primarily a migrant and wintering species within western Riverside County, and, although it is generally rare and local in southern California, the species could turn up virtually anywhere within western Riverside County in suitable habitats. This species has been documented in a variety of habitats in western Riverside County, including grasslands, chaparral, riparian, croplands, residential, and open space (Western Riverside County Multiple Species Habitat Conservation Plan Species Accounts, 2003). Therefore, no change to the text has been made.

**E2-63** SCE has requested that documentation be provided that supports the assertion that the San Timoteo Creek and San Gorgonio Pass areas are likely to be used by bird species as migratory pathways. Information provided by SCE in the PEA and two Biotechnical reports indicated that San Timoteo Creek support a variety of protected neo-tropical migrants including the least Bell's vireo, southwestern willow flycatcher, and yellow-billed cuckoo. The presence of these species, and the importance of riparian corridors to migrant species, is well documented and considered common knowledge for both professional and amateur ornithologists. Nonetheless SCE's comment has been considered and citations have been added to the text of the EIR as follows: "The relatively low-elevation San Timoteo Canyon and San Gorgonio Pass area is a likely migratory pathway for birds, including raptors, moving between the desert/inland areas and coastal ranges (EPA, 2007; England and Laudenslayer, Jr., 1995)." [See Final EIR (April 2008), Section 4.7 (Section D.4 – Biological Resources)]

**E2-64** The Draft EIR specifically states on page D.4-71 that "Recent extrapolations from various databases indicate that tens to hundreds of thousands of birds die each year in North

American from power line electrocutions (Manville II2, 2005). The majority of raptor electrocutions are caused by lines that are energized at voltage levels less than 69 kV (APLIC, 2006; Manville II2, 2005). The Proposed Project's voltage level is 115 kV, so the likelihood of electrocution is low based on SCE's commitment to construct raptor-safe LWS and TSPs." Therefore, the discussion acknowledges that it is possible that federally protected species could be electrocuted but the likelihood is low. However, as the risk remains, the text is considered accurate and no changes to the document have been made.

**E2-65** Please see Response E2-64. The Draft EIR specifically cites relevant information regarding bird strike information in the text on Page D.4-71. Specifically "Passerines (i.e., songbirds) and waterfowl (such as ducks) are known to collide with wires (APLIC, 1994), particularly during nocturnal migrations or poor weather conditions (Avery et al., 1978)." Regarding the comment that SCE has experienced only minimal collisions on 115 kV subtransmission lines, this may be accurate; however, supporting documentation has not been presented to the CPUC. Estimates of the number of bird fatalities attributable to interactions with utility structures vary considerably. Nationwide, it is estimated that hundreds of thousands to as many as 175 million birds are lost annually to fatal collisions with transmission and distribution lines alone (Erickson et al., 2001). In California, even general estimates are unavailable, although it is plausible that such collisions result in the deaths of hundreds of thousands of birds each year (Hunting, 2002). Power line electrocutions result in additional losses in the range of tens to hundreds of thousands of birds annually in the U.S. (Erickson et al., 2001). Fatal collisions and or electrocutions with utility structures have been documented for about 350 avian species nationwide (Manville, 2001). No revision to the text has been made.

**E2-66** Section D.4.5.4 of the Draft EIR provides examples of similar species' movement patterns with regard to spatial habitat use. The document does not suggest that tiger salamanders are present in the area but rather provides information on how a particular species utilizes habitat in the context of its life history. Information provided in Section D.4 (Biological Resources) of the Draft EIR does provide references relevant to the movement patterns of western spadefoot toads. However, supplemental information to clarify the movement of this and other semiaquatic species is stated here.

Spadefoot toads have been documented at least 1,000 feet from the nearest water source and 35 feet to 1,175 feet from the closest breeding sites (Hunt, L.E., 1998. Vernal pool amphibian management plan, Los Alamos Valley, Santa Barbara County, California. Prep. for Co. of Santa Barbara, Planning & Development Dept., Santa Barbara, CA.42 pp.). A minimum conservation area needed to conserve populations of pond-breeding amphibians in the eastern United States, based on upland habitat use, has been calculated to be approximately 1,200 feet in radius from the edge of the breeding site, or approximately 105 acres (Semlitsch, R. and J.R. Brodie, Jr. 2003. Biological criteria for buffer zones around wetlands and riparian habitats for amphibians and reptiles. *Conservation Biology* 17(5): 1219-1228 and Semlitsch, Raymond D. and J.R. Brodie, 1998. Are small, isolated wetlands expendable? *Conservation Biology* 12(5): 1129-1133.). Additionally, these studies documented another feature of the movement ecology of pond-breeding amphibians: a significant segment of the breeding population (at least 20% of breeding adults) move between breeding sites that are within 0.5-1 mile of each other. This means that subpopulations and their breeding sites have to be interconnected by extensive, unfragmented upland habitats for metapopulation stability and to prevent inbreeding (U.S. Fish

and Wildlife Service. 2005. Recovery plan for vernal pool ecosystems of California and southern Oregon. Region 1, Portland, OR. 235 pp, plus appendices). While this information comes from studies of tiger salamanders, it is very likely that the western spadefoot toad exhibits similar movement ecology because of somewhat similar life histories.

No revision to the text has been made.

- E2-67** One of the thresholds of significance set forth in Section D.4.3 of the EIR is whether the project would “[h]ave a substantial adverse effect, either directly or through habitat modifications on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFG, USFWS, or USDA Forest Service.” The conclusion of the analysis of potential loss of special-status reptile species is that impacts would be significant even after the APMs have been implemented. Three sensitive species – silvery legless lizard, coast patch-nosed snake, and two-striped garter snake – have a moderate to high potential to occur in the project area. These species are not covered under the MSHCP and therefore require additional measures to reduce project impacts to a less than significant level. Although APM BIO-4 indicates SCE would comply with all regulations and policies outlined in the MSHCP, additional mitigation is needed to reduce significant impacts to those species not covered under the MSHCP.
- E2-68** Please see Responses E2-50 and E2-51. No revision to the text has been made.
- E2-69** Please see Response E2-44. Evidence of this species has been documented in the project region. No revision to the text has been made.
- E2-70** This comment points out a text error. The discussion has been corrected as follows: “With the exception of the proposed El Casco substation, the Proposed Project would not substantially interfere with the movement of any native resident or migratory fish species.”
- The text has also been revised to reflect SCE’s commitment to avoid the placement of poles within wash communities. The discussion has been corrected as follows: “Riparian or wash habitat in the Project area would also be spanned by the 115 kV subtransmission line, ~~and where the LWS and TSPs would be placed within a wash, impacts would be short term and would not substantially alter the existing conditions at the sites.~~” [See Final EIR (April 2008), Section 4.7 (Section D.4 – Biological Resources)]
- E2-71** Please see Response E2- 46.
- E2-72** The SCE comment stating that it is difficult to determine if burrows are scarce based on the statement “burrows are scarce in the project area; however, there are several that could be utilized by this species” has been considered. However, pellets from burrowing owls were found in the project area during surveys for the Proposed Project, and while no evidence of nesting owls was determined, it appears this species may forage or at least use portions of the ROW as a passage corridor. No revision to the text has been made.
- E2-73** Suggested revision accepted and added to text as follows: “SCE provided Morongo with a copy of the Cultural Resources Technical Study on June 13, 2007. On November 29, 2007, Morongo responded and made requests related to monitoring during construction and disposition of artifacts.” [See Final EIR (April 2008), Section 4.8 (Section D.5 – Cultural and Paleontological Resources)]

- E2-74** The Draft EIR inadvertently stated that the Proposed Project crosses the Gilman Ranch. The Proposed Project does not cross the Gilman Ranch and the Northern Alternative is more than 0.5 mile from the Ranch complex. The reference to the Gilman Ranch was revised, but not removed. Text has been revised as follows: “In 1869, Noble sold the 160-acre Williams/Chapin Ranch to James Gilman. Gilman took up residence in Pope's adobe. After Gilman married, he built a new home and converted the adobe into a blacksmith shop. In addition to ranching and the businesses surrounding the stagecoach stop, Gilman also established a sawmill and the area's first general store, and also provided pastureland for nearby farmers (Swope, 1987; Hughes, 1938). ~~A portion of the 115 kV subtransmission line corridor crosses the vast Gilman Ranch (P 33-1701). The Ranch is listed on the National Register. The Gilman Ranch is more than a 1/2-mile from the Proposed Project and all alternatives.~~” [See Final EIR (April 2008), Section 4.8 (Section D.5 – Cultural and Paleontological Resources)]
- E2-75** Suggested revision accepted changed in text as follows: “None of the newly recorded resources in this portion of the project area are recommended eligible for listing on the NRHP or are considered to be ~~cultural~~ historical resources for the purposes of CEQA. However, two structures (P-33-8334 and P-33-9150) are eligible for local listing or designation.” [See Final EIR (April 2008), Section 4.8 (Section D.5 – Cultural and Paleontological Resources)]
- E2-76** Suggested revision accepted and added to table. See Section 4.8 (Cultural and Paleontological Resources). [See Final EIR (April 2008)]
- E2-77** Suggested revision accepted and changed in text. See Section 4.8 (Cultural and Paleontological Resources). [See Final EIR (April 2008)]
- E2-78** Suggested revision accepted and changed in text. See Section 4.8 (Cultural and Paleontological Resources). [See Final EIR (April 2008)]
- E2-79** Suggested revision accepted and the text has been changed as follows: “The area within the Banning Substation is designated as a High Paleontologic Sensitivity Area because ~~both the Mount Eden and of San Timoteo Formations are considered to have a high potential to contain significant non renewable paleontological resources. Construction within this area may cause inadvertent impacts to paleontological resources. This impact is potentially significant (Class II), but mitigable to less than significant levels with implementation of Mitigation Measures CR 3a (Inventory Paleontological Resources in Final APE), CR 3b (Develop Paleontological Monitoring and Treatment Plan), CR 3c (Monitor Construction for Paleontology), CR 3d (Conduct Paleontological Data Recovery), and CR 3e (Train Construction Personnel).~~ localities. However, the soils within the Banning Substation have been substantially disturbed. Therefore, no impacts to paleontological resources are anticipated, and consequently no mitigation measures are needed.” [See Final EIR (April 2008), Section 4.8 (Section D.5 – Cultural and Paleontological Resources)]
- E2-80** The underground portion of the PUA represents only a small portion of the entire subtransmission route alternative. Thus, the analysis presented in Section D.6.5 applies to the entire alternative route, not just the underground portion. Since this alternative follows the same route and crosses the same faults, geologic formations, and soil types as the Proposed Project, the potential for impacts related to damage by seismically induced groundshaking and ground failure, including liquefaction and lateral spreading to occur

would be identical to that of the Proposed Project. The text in section D.6.5 has been revised for clarity (see Section 4.9, Geology and Soils). Furthermore, Mitigation Measure GEO-5b requires SCE to perform design-level geotechnical investigations to assess the potential for liquefaction and lateral spreading hazards to affect the *approved Project*, and recommends that where these hazards are found to exist, appropriate engineering design and construction measures shall be incorporated into the Project design. Therefore, if the PUA becomes the approved project, Mitigation Measure GEO-5 would be adequate to reduce the potential for damage related to liquefaction and lateral spreading to occur.

- E2-81** Draft EIR Sections D.8.2.2 and D.8.2.3 have been changed to Sections D.7.2.2 and D.7.2.3 on Pages D.7-5 and D.7-6.
- E2-82** As recognized by the commenter, the DEIR acknowledges that although EMF is not a CEQA issue, the information is for the public and decision makers. Disclosure of such information is consistent with the EIR's role as "an informational document." (Pub. Res. Code § 21061.) The CPUC has included EMF in EIRs since 2003. EMF discussion has appeared within different chapters within different CPUC documents at the discretion of the CPUC. For example, for SCE's Devers-Palo Verde 500 kV No. 2 (DPV2) Transmission Line Project, EMF discussion was also included within the main body of the document. See also Response E1-10.
- E2-83** The words "power line fields" have been replaced with "electric lines" in Draft EIR Section D.7.7 on Page D.7-26. [See Final EIR (April 2008), Section 4.10 (Section D.7 – Hazards and Hazardous Materials)]
- E2-84** The number "20" has been replaced with "30" in Draft EIR Section D.7.7.5 on Page D.7-30. [See Final EIR (April 2008), Section 4.10 (Section D.7 – Hazards and Hazardous Materials)]
- E2-85** The number "300" has been replaced with "3,000" in Draft EIR Section D.7.7.5 within footnote 1 on Page D.7-29. [See Final EIR (April 2008), Section 4.10 (Section D.7 – Hazards and Hazardous Materials)]
- E2-86** The following sentence has been added to Draft EIR Section D.7.7 on Page D.7-31: "Numerous panels of expert scientists have convened to review the data relevant to the question of whether chronic low-intensity exposure to power-frequency EMF is associated with potential health risks." [See Final EIR (April 2008), Section 4.10 (Section D.7 – Hazards and Hazardous Materials)]
- E2-87** The word "estimated" has been replaced with "calculated" in Draft EIR Section D.7.7.6 on Page D.7-35. [See Final EIR (April 2008), Section 4.10 (Section D.7 – Hazards and Hazardous Materials)]
- E2-88** Table D.7-5 within Draft EIR Section D.7.7.6 on Page D.7-35 has been renamed "A Design Comparison of Magnetic Fields from Existing Design vs. Proposed Design". [See Final EIR (April 2008), Section 4.10 (Section D.7 – Hazards and Hazardous Materials)]
- E2-89** The "Segment ID" column within Table D.7-5 within Draft EIR Section D.7.7.6 on Page D.7-35 has been renumbered "1 through 5" accordingly. See Draft EIR Section D.7 (Hazards and Hazardous Materials). [See Final EIR (April 2008), Section 4.10 (Section D.7 – Hazards and Hazardous Materials)]

- E2-90** The text has been revised as follows: “SCE’s plan for reducing magnetic fields for the Proposed Project is consistent with the CPUC’s ~~Interim EMF Opinion Decisions No. D.93-11-013 and D.06-01-042 (“1993 CPUC Decision”)~~ and also with recommendations made by the U.S. National Institute of Environmental Health Sciences.” [See Final EIR (April 2008), Section 4.10 (Section D.7 – Hazards and Hazardous Materials)]
- E2-91** The analysis of EMF related to the PUA presented in Section D.7 does not suggest that the PUA be implemented as EMF mitigation, it simply indicates that in comparison, EMF levels at the edge of the ROW within the community of Sun Lakes would be lower for the PUA (0.2 mG) than for the Proposed Project (5.7 mG), a 96.5 percent reduction. Therefore the assertion that construction of the PUA would exceed 4 percent of the cost of Proposed Project construction is not relevant. Further, while CPUC decisions D.93-11-013 & D.06-01-042 set limits for the costs of reducing EMFs, these are not absolute limits. The CPUC has stated, “ORA recommends that the Commission not consider 4% as an absolute cap.” (D.06-01-042, section IV.) Additionally, the nearest schools, hospitals, or day care centers to the Proposed Project are located at least 0.25 mile from the alignment, and would therefore be unlikely to be affected by EMF emanating from the Proposed Project. Therefore, any funds available for EMF reduction measures would not need to be applied to these types of facilities and would be available for allocation to residential areas. Also, please Response E1-10.
- E2-92** As noted on page D.7-26 in Draft EIR Section D.7.7 (Electric and Magnetic Fields and Other Field-Related Concerns), *“this section does not consider magnetic fields in the context of CEQA and determination of environmental impacts...”* The discussion is provided as a point of information for the public and decision makers recognizing “that there is a great deal of public interest and concern regarding the potential health effects from exposure” to EMF. Also, please see Response E1-10.
- E2-93** Please see Responses E1-10, E2-91, and E2-92.
- E2-94** Analysis presented in Section D.7 is based on measured and estimated data provided by SCE that clearly show differences in EMF levels between the existing conditions and the Proposed Project, and therefore is not a “blanket statement”.
- E2-95** As shown in Recirculated Final EIR Section 4.2 (Revisions to the Draft EIR, Section D.7 – Hazards and Hazardous Materials), the analysis of Impact HAZ-9 has been updated. Independent analysis conducted by the CPUC has determined that the Proposed Project would not result in a conductor surface electrical gradient, as this condition does not occur on subtransmission lines energized at less than 200 kV. Therefore, radio/television/equipment interference would not increase over existing conditions and this impact would be less than significant (Class III). Consequently, no mitigation is required and Mitigation Measures HAZ-9a and HAZ-9b have been removed.

~~The fact that SCE has not received reports of radio or television interference from the existing subtransmission line does not mean such interference has not occurred in the past nor does it eliminate the possibility for such interference to occur with the Proposed Project. As SCE points out in Comment E2-3 and as described in Draft EIR Sections A (Introduction) and B (Project Description), when the existing 115 kV subtransmission line is operating normally, no load travels through the emergency 115 kV subtransmission line between Maraschino and Banning Substations. With implementation of the Proposed~~

~~Project, the new double circuit 115 kV subtransmission line would carry load at all times. Therefore, reports of interference along the emergency portion of the line may not have been received due to the fact that no interference would occur if load is not flowing through the line at all times. With the Proposed Project, the potential for such interference exists. Text has been added to Impact HAZ-9 to clarify this issue as follows: “The existing single circuit 115 kV subtransmission operating, operating under normal conditions, does not carry any electric load in some portions (i.e., between Maraschino and Banning Substations). Corona or gap discharges related to high frequency radio and television interference impacts are dependent upon several factors, including the strength of broadcast signals, and are anticipated to be very localized if they occur. With implementation of the Proposed Project, the new double circuit 115 kV subtransmission line would carry load at all times, which may result in radio and television interference. Individual sources of adverse radio/television interference impacts can be located and corrected on the power lines. Conversely, magnetic field interference with electronic equipment such as computer monitors can be corrected through the use of software, shielding, or changes at the monitor location.” Mitigation Measures HAZ-9a and HAZ-9b, as presented in the EIR, are intended to ensure that impacts due to such interference are minimized.~~

- E2-96** It is acknowledged that SCE will follow GO 95 in the design of the Proposed Project or alternatives. However, as stated in Mitigation Measure HAZ-10 (page D.7-47), GO 95 does not have specific requirements for grounding objects that could be subject to induced current. This Mitigation Measure is intended to ensure that SCE shall take reasonable actions to prevent and respond to induced currents caused by their facilities.
- E2-97** SCE states that grounding measures included in Mitigation Measure HAZ-10 would be implemented as standard construction practice. Since these standard construction practices were not made available to the authors of the EIR, Mitigation Measure HAZ-10 was recommended to ensure impacts would not occur. Additionally, the analysis presented for Impact HAZ-10 already acknowledges that these impacts do not pose a threat in the environment if the conducting objects are properly grounded.
- E2-98** The text has been revised as follows: “Although there are no natural watercourses or drainages located along this portion of the route, drainage from the construction area would run into the ~~sewer system~~ storm water drainage system within the roads of the Sun Lakes Community,...” [See Final EIR (April 2008), Section 4.11 (Section D.8 – Hydrology and Water Quality)]
- E2-99** Please see Response E2-23.
- E2-100** ~~As stated in Draft EIR Section D.9.3.1, Significance Criteria, on Page D.9-10, impacts associated with the proposed Project and alternatives were evaluated based on the potential to “Cause a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project” and/or “Cause a substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project.” Therefore, the noise impact assessment was based on existing noise sources within the ROW and substation locations. As the proposed Project and Alternatives would create a new noise source over existing conditions within the ROW and substation locations, permanent noise source impacts were determined to be significant and unavoidable. Noise modeling was provided by SCE on May 28, 2008. As a result of this information, an updated noise analysis was prepared for the Recirculated Draft EIR (July 2008). With this~~

new information, it was determined that the Proposed Project would not cause significant and unavoidable corona noise impacts to sensitive receptors between the Banning and Maraschino Substations. Also, please see Response E1-15 and General Response GR-1.

- E2-101** The Recirculated Draft EIR (July 2008) text has been revised as follows: “Construction of the Project would require short-term use of cranes, augers, compressors, air tampers, generators, trucks, and other equipment, as identified in Section B (Project Description). As helicopters Helicopters would could be used at SCE’s existing Mill Creek Communications Site within the San Bernardino National Forest for construction of the microwave system, and would be used during installation of fiber optic cable at locations between the Cities of Redlands and Banning, to ensure that construction noise impacts associated with helicopter construction are considered, helicopter use is evaluated for all possible locations where they may and would be used.” [See Recirculated Final EIR, Section 4, Revisions to the Recirculated Draft Environmental Impact Report]
- E2-102** Please see Responses E1-15 and E2-100. The analysis of corona noise contained in the Recirculated Draft EIR (July 2008) concludes that corona noise would be a less-than-significant impact.
- E2-103** The text has been revised as follows: “As described above, SCE is required by State law to contact Underground Service Alert and manually probe for existing buried utilities in the Proposed Project corridor prior to any powered-equipment drilling or excavation. Therefore, While it is unlikely that underground facilities would be located in proximity to natural gas and water pipelines, and SCE is required to probe for existing buried utilities prior to any excavation work, potential utility disruptions cannot be ruled out. the risk of accidental upset of existing utility lines within the street is unlikely. However, natural Natural gas and water pipelines are likely located within public streets and service could potentially be temporarily disrupted during planned construction of the underground fiber optic cable installation if required.” [See Final EIR (April 2008), Section 4.13 (Section D.10 – Public Services and Utilities)]
- E2-104** As stated in Draft EIR Section D.11.3.1, Significance Criteria, on Page D.11-6, traffic impacts associated with the construction of the Proposed Project and alternatives were evaluated based on the following: “The installation of the subtransmission line within, adjacent to, or across a roadway would reduce the number of, or the available width of, one or more travel lanes during the peak traffic periods, resulting in a temporary disruption to traffic flow and/or increased traffic congestion.” Therefore, the traffic impact assessment was based on existing conditions within roadway facilities. As the construction of the Proposed Project and alternatives would require lane disruptions over existing conditions, mitigation measures were proposed to minimize any potential impacts to a less-than-significant level.
- E2-105** As discussed above in Response E2-104, this analysis is based on Draft EIR Section D.11.3.1, Significance Criteria, on Page D.11-6. The impact assessment was based on existing conditions described in detail in Section D.11.1 (Environmental Setting for the Proposed Project). Given the multiple types of land uses and roadways affected by Proposed Project activities, the potential for access and parking restrictions is highly likely, and are not speculative. As the construction of the Proposed Project and alternatives would require lane disruptions over existing conditions, mitigation measures were proposed to minimize any potential impacts to less-than-significant levels.

- E2-106** The text has been revised as follows: “However, there is the potential for unexpected physical damage to roads, sidewalks, medians, etc., within public roads or sidewalks to occur as a result of construction-related vehicle and equipment use. This would be potentially significant, but reduced to less-than-significant levels (Class II) with implementation of Mitigation Measure T-9 (Repair Damaged Road ROWs). It should be noted that SCE is a State-regulated utility and is subject to the Franchise Act of 1937. Under the Act, SCE is required to pay the local agencies the cost of all repairs made necessary by its operation under franchise (CPUC Code Section 6295).” [See Final EIR (April 2008), Section 4.14 (Section D.11 – Transportation and Traffic)]
- E2-107** The text has been revised as follows: “This portion of the route is characterized by predominantly natural appearing and rural residential landscapes. Continuing southeast and east, the route spans SR-79 and then passes adjacent and through newly developed suburban residential areas including a one-mile segment through the Sun Lakes residential/golf community. Two existing transmission lines are located in the immediate vicinity of the Sun Lakes Community. The wood-pole, H-frame Banning-Garnet-Maraschino-Windfarm 115 kV subtransmission line traverses the Sun Lakes Community golf course (visible in Figures D.12-7A and D.12-15A). The steel-lattice Devers-Valley No. 1 500 kV transmission line borders the southern boundary of the Sun Lakes development. Continuing east, the Project would again pass through rural residential landscape before turning north at Wesley Street for approximately 0.65 mile through predominantly residential areas to Banning Substation.” [See Final EIR (April 2008), Section 4.15 (Section D.12 – Visual Resources)]
- E2-108** While it is true that the CPUC has preemptive jurisdiction over the Proposed Project, the CPUC also looks closely at the consistency of a project with local plans and standards during the evaluation of the project consistent with CEQA Guidelines Appendix G. The Visual Resources impact criterion pertaining to consistency with local regulations, plans, and standards is included to aid the Commission in its understanding of the local implications of project approval. Furthermore, this approach is consistent with other environmental documents issued by the CPUC. Therefore, no change has been made to the text.
- E2-109** Mitigation Measures V-1a and V-1b are recommended for Impact V-1 because this impact is significant without mitigation for the substation and staging areas. Therefore, mitigation Measures V-1a and V-1b have not been deleted. However, as this impact is less than significant (Class III) for the subtransmission line, loop-ins, and fiber optic route, the text has been revised as follows: “~~To ensure that viewers are not unnecessarily impacted during construction, Mitigation Measures V-1a (Reduce Visibility of Construction Activities and Equipment) is recommended, even though the impact is less than significant without mitigation.~~” [See Final EIR (April 2008), Section 4.15 (Section D.12 – Visual Resources)]
- E2-110** The analysis published in the Draft EIR was erroneously changed from an adverse but less-than-significant (Class III) visual impact to a significant but mitigable (Class II) visual impact. The text has been changed back to an adverse but less than significant (Class III) visual impact. [See Final EIR (April 2008), Section 4.15 (Section D.12 – Visual Resources)]
- E2-111** As stated in the discussion of Impact V-16, the visual impact on views external to the Sun Lakes Development (from South Highland Home Road in this case) would be adverse. However, with removal of the existing facilities, the incremental visual change would not be significant though it would be adverse. While it is true that a very few residences adjacent

to the structure locations at the west and east borders of the Sun Lakes development would experience adverse visual impacts associated with the structural complexity and industrial character of the transition structures, these impacts would pale in comparison to the overall positive visual benefit that would be experienced by the majority of residences and all of the golfers along the ROW within the development, as a result of the removal of the existing facilities as illustrated in Figure D.12-16. Therefore, no change has been made to the text.

- E2-112** The comment correctly points out a minor scaling error in three of the visual simulations, which occurred as a result of a misunderstanding of the height of the existing structures. It was mistakenly understood that the low end of the existing structure height range was 50 feet and not 60 feet. Therefore, several structures have been adjusted in Figures D.12-5B, 6B, and 7B. The revised figures can be found at the end of the Final EIR Section 4.0 [See Final EIR (April 2008), Section 4.15 (Section D.12 – Visual Resources)]. It should be noted that the minor changes to the structure heights have no effect on the conclusions presented in the text.
- E2-113** The purpose of Figure D.12-16 is to illustrate the positive visual benefit that would be experienced by the majority of the Sun Lakes residences along the right of way and all of the golfers on the course. Therefore, no change to the simulation is warranted. Readers are referred to Figure D.12-15B for an example of a visual impact associated with the transition structures.
- E2-114** This comment pertains to the significant unavoidable environmental determination of operational greenhouse gas impacts within the Draft EIR. The reader is referred to Responses E1-8 and E1-9 regarding this comment. In addition, this comment pertains to the methodology used and the determination within the Draft EIR of significant unavoidable operational noise impacts occurring with the Proposed Project. A response to this comment has been presented above in Responses E1-15 and E2-100. Please note that Section D.9 (Noise) and Section E (Comparison of Alternatives) of the Recirculated Draft EIR (July 2008) identify corona noise as a less-than-significant impact (Class III), and thus it is not included as a significant impact in Table E-1. As discussed within these responses, the noise impact assessment was based on existing noise sources within the ROW and substation locations. As the Proposed Project and alternatives would create a new permanent noise source over existing conditions within the ROW and substation locations, operational noise impacts were determined to be significant and unavoidable.
- E2-115** Draft EIR Section E.1, Comparison Methodology, CEQA Guidelines Section 15126.6(d), Evaluation of Alternatives, states:

*“The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project.”*

As the Partial Underground Alternative would be identical to the Proposed Project with the exception of the one-mile portion of the 115 kV route, the Draft EIR evaluates the potential impacts of the underground component of the Partial Underground Alternative and compares those impacts to the impacts that would be caused by the Proposed Project along that same segment of the route. This analysis results in an accurate comparison of the impacts of the Partial Underground Alternative versus the impacts of the Proposed Project and is appropriate under CEQA.

Please refer to Responses E1-15 and E2-100 and General Response GR-1 regarding the significant unavoidable less than significant environmental determination of operational noise impacts within the Recirculated Draft EIR. As discussed within these responses, the noise impact assessment was based on existing noise sources within the ROW and substation locations. ~~As the Proposed Project and Alternatives would create a new permanent noise source over existing conditions within the ROW and substation locations, operational noise impacts were determined to be significant and unavoidable.~~ As discussed in Recirculated Draft EIR Section D.9, Noise, Subsection D.9.5.2, Partial Underground Alternative – Environmental Impacts and Mitigation Measures, operation of the Partial Underground Alternative would limit the amount of corona discharge noise from the proposed 115 kV subtransmission line to those segments located above ground. For the segment of proposed new 115 kV subtransmission line to be located underground, residential receptors located along the one-mile portion of the alignment through the Sun Lakes community beginning just east of Highland Springs Avenue and ending just east of S. Riviera Avenue and west of S. Highland Home Road would not experience any operational corona discharge noise. This reduction is considered a benefit of the Partial Underground Alternative as compared to the Proposed Project. ~~While the overall environmental impact significance determination for the remaining portion of the Partial Underground Alternative would remain significant unavoidable for operational noise, this reduction in operational noise within the underground segment is considered a reduction in impact severity.~~ The remaining sections of the above ground subtransmission line would have identical existing and projected operational corona noise as that described for the Proposed Project, which would not result in an increase to ambient noise levels over existing conditions and would be less than significant (Class III).

~~With regard to land use conflict impact determinations for recreational facilities, as stated in Draft EIR Section E, Comparison of Alternatives, Subsection E.2.2, Environmentally Superior Alternative, any benefits along the one mile underground portion would only be experienced in the long term once the project is implemented. By removing the existing H-frame wood poles through the Sun Lakes community, and placing the new 115 kV double-circuit line underground, it was determined that in the long term the new 115 kV underground segment of line would no longer obstruct activities associated with the golf course resulting in permanent beneficial impacts to an existing recreational facility as compared to the Proposed Project.~~

As stated in Recirculated Draft EIR Section E.1 (Comparison of Alternatives – Comparison Methodology), “the comparison of alternatives does not consider the beneficial impacts of any alternative above and beyond its ability to reduce or avoid significant effects of the Proposed Project. This is consistent with constitutional requirement that there be ‘rough proportionality’ between the impacts of the project and the measures identified to reduce or avoid those impacts (*Dolan v. City of Tigard* (1994) 512 U.S. 374) and the constitutional requirement that there be an essential nexus (i.e., connection) between a legitimate governmental interest and the measures identified to further that interest (*Nollan v. California Coastal Commission* [1987] 483 U.S. 825). These requirements are also set forth in CEQA Guidelines §15126.4(a)(4). Therefore, the environmental superiority of alternatives is based on a comparison of significant impacts that would result from the Proposed Project and the alternatives identified in the EIR; in keeping with the constitutional requirements discussed above, it does not consider whether the Proposed Project or an alternative would improve existing environmental conditions.”

As illustrated in Recirculated Draft EIR Section E.2 (Comparison of Alternatives – Environmentally Superior Alternative), the Proposed Project and the Partial Underground Alternative would have identical long-term operation-related impacts, and thus the comparison of the Proposed Project and the Partial Underground Alternative focused on short-term construction-related effects. These effects were determined to be greater for the Partial Underground Alternative than for the Proposed Project in all resource issue 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 the Partial Underground Alternative.

It should be noted that the Draft EIR addresses the fact that the existing subtransmission line is considered within the existing conditions of the Sun Lakes Area, as discussed in Draft EIR Section D.12, Visual Resources, Subsection D.12.5.1 (Partial Underground Alternative – Environmental Setting). As compared to existing conditions, the removal of existing above ground subtransmission line structures and the placement of the proposed new 115 kV subtransmission line underground would result in a beneficial visual impact to receptors within the Sun Lakes Community for the Partial Underground Alternative as compared to the Proposed Project. However, as stated in Recirculated Draft EIR Section E.1 (Comparison of Alternatives – Comparison Methodology) and described above, “the comparison of alternatives does not consider the beneficial impacts of any alternative above and beyond its ability to reduce or avoid significant effects of the Proposed Project... Therefore, the environmental superiority of alternatives is based on a comparison of significant impacts that would result from the Proposed Project and the alternatives identified in the EIR; in keeping with the constitutional requirements discussed above, it does not consider whether the Proposed Project or an alternative would improve existing environmental conditions.”

**E2-116** As stated in Draft EIR Section D.7, Hazards, Subsection D.7.7, Electric and Magnetic Fields and Other Field-Related Concerns:

*“This section does not consider magnetic fields in the context of CEQA and determination of environmental impacts, first because there is no agreement among scientists that EMF does create 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.”*

Furthermore, as stated in Recirculated Draft EIR Section E, Comparison of Alternatives, Subsection E.1, Comparison Methodology:

*“Although this EIR identifies an environmentally superior alternative, it is possible that the ultimate decision makers could balance the importance of each impact area differently and reach a different conclusion. The following comparison highlights situations where an alternative would create impacts in an issue area as an unintended consequence of avoiding impacts to another area.”*

Therefore, the determination and inclusion within Recirculated Draft EIR Section E, Comparison of Alternatives, that the Partial Underground Alternative would be environmentally superior to the Proposed Project with regard to EMF is presented for

decision makers only and is not based on CEQA requirements. Furthermore, the Recirculated Draft EIR states in the same section:

“With respect to electric and magnetic fields (“EMF”), it should be noted that although EMF would be reduced by the Partial Underground Alternative, EMF are not considered in the context of CEQA because there is no agreement among scientists that EMF creates a potential health risk and because there are no defined or adopted CEQA standards for defining health risk from EMF. Accordingly, EMF is not a factor in the comparison of environmental impacts for alternatives.”

This comment also includes the methodology of cost-based EMF decisions and methodology to be considered by the CPUC. The PUA was not developed as mitigation for EMF; therefore, the comment does not apply. Please see Response E1-10 for further discussion regarding this comment.

**E2-117** ~~This comment pertains to the methodology used and the determination within the Draft EIR of significant unavoidable operational noise impacts occurring with the Proposed Project. Please see Responses E1-15 and E2-100. As discussed within these responses, the noise impact assessment was based on existing noise sources within the ROW (including the Route Alternative Option 3 ROW) and substation locations. As the proposed Project and Alternatives would create a new permanent noise source over existing conditions within the affected ROWs and substation locations, operational noise impacts were determined to be significant and unavoidable. Corona noise impacts of the Route Alternative Option 3 were found to be less than significant (Class III). Please see Recirculated Draft EIR Section D.9.4.2 (Noise – CPUC’s Northerly Route Alternative Option 3 – Environmental Impacts and Mitigation Measures).~~

**E2-118** As stated in Recirculated Draft EIR Section E, Comparison of Alternatives, Subsection E.2.1, Subtransmission Line Route Alternatives:

*“The Partial Underground Alternative would result in greater ground-disturbing activities during construction in the underground portions of the route and a longer construction schedule, both of which mean that construction-related impacts would be more intense for a longer duration of time.”*

**E2-119** ~~This comment pertains to the methodology used and the determination within the Draft EIR of the Partial Underground Alternative selected as the Environmentally Superior Alternative. A response to this comment has been presented above in Response E2-115. Further, it should be noted that the statement quoted by SCE does not state that visual impacts or land use impacts are significant with the Proposed Project. It simply states that impacts for these issue areas, in addition to noise impacts, would be lessened or eliminated by the PUA as compared to the Proposed Project. The Environmentally Superior Alternative has been re-evaluated and is identified in the Recirculated Draft EIR (July 2008), Section E (Comparison of Alternatives) as the Proposed Project. Please see General Response GR-1 for a discussion regarding the change in determination of the Environmentally Superior Alternative.~~

**E2-120** ~~This comment pertains to the methodology used and the determination within the Draft EIR of the Partial Underground Alternative selected as the Environmentally Superior Alternative. A response to this comment has been presented above in Response E2-115. The Environmentally Superior Alternative has been re-evaluated and is identified in the~~

Recirculated Draft EIR (July 2008), Section E (Comparison of Alternatives) as the Proposed Project. Please see General Response GR-1 for a discussion regarding the change in determination of the Environmentally Superior Alternative.

As discussed in Draft EIR Section D.5, Cultural and Paleontological Resources, while the amount of ground disturbed would increase with the Partial Underground Alternative, the one-mile underground segment was not found to contain an increase in risk to cultural resource disturbance based on literature review and the identical screening criteria conducted for the remaining portion of the proposed 115 kV route.

With regard to the Proposed Project being preferred to the Partial Underground Alternative in the area of construction air quality emissions, Recirculated Draft EIR Section E, Comparison of Alternatives, Subsection E.2.1.2, Proposed Project vs. Partial Underground Alternative, states:

*“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.”*

With regard to the evaluation of long-term impacts versus short-term construction based impacts in determining the environmentally superior alternative, Recirculated Draft EIR Section E, Comparison of Alternatives, Subsection E.1, Comparison Methodology, states:

*“CEQA does not provide specific direction regarding the methodology of alternatives comparison. Each project must be evaluated for the issues and impacts that are most important; this will vary depending on the project type and the environmental setting. Issue areas that are generally given more weight in comparing alternatives are those with long-term impacts (e.g., visual impacts and permanent loss of habitat or loss of use of recreational facilities). 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 relatively less important, although are still considered.”*

Based on this methodology, and the reduction in long-term impacts associated with the Partial Underground Alternative determination that the Proposed Project and the Partial Underground Alternative would have identical long-term effects, the short-term construction-related effects were considered in the comparison of these two alternatives. It was determined that the Proposed Project would have fewer short-term impacts than the Partial Underground Alternative, and thus is the Environmentally Superior Alternative. See General Response GR-1 for further discussion of the determination of the Environmentally Superior Alternative. it was determined that the Partial Underground Alternative would

~~result in a reduction in levels and/or the elimination of long term operational impacts to the underground segment area as compared to the Proposed Project.~~

**E2-121** Recirculated Draft EIR (July 2008) Section E (Comparison of Alternatives) has been updated to reflect the comparison of alternatives analysis methodology presented in Subsection E.1, Comparison Methodology, which states:

*“The comparison of alternatives does not consider the beneficial impacts of any alternative above and beyond its ability to reduce or avoid significant effects of the Proposed Project. This is consistent with constitutional requirement that there be “rough proportionality” between the impacts of the project and the measures identified to reduce or avoid those impacts (Dolan v. City of Tigard (1994) 512 U.S. 374) and the constitutional requirement that there be an essential nexus (i.e., connection) between a legitimate governmental interest and the measures identified to further that interest (Nollan v. California Coastal Commission [1987] 483 U.S. 825). These requirements are also set forth in CEQA Guidelines §15126.4(a)(4).*

*Therefore, the environmental superiority of alternatives is based on a comparison of significant impacts that would result from the Proposed Project and the alternatives identified in the EIR; in keeping with the constitutional requirements discussed above, it does not consider whether the Proposed Project or an alternative would improve existing environmental conditions. The language in Table E-2, below, has been revised since the December 2007 Draft EIR to reflect these principles. This has resulted in changes to the preferences assigned to land use and visual impacts. The preference assigned to noise impacts has also been changed based on the updated impact analysis in Section D.9 of this recirculated EIR, which resulted from the new baseline noise information provided by SCE subsequent to the publication of the Final EIR.”*

~~Draft EIR Section E, Comparison of Alternatives, Table E-2, Proposed Project vs. CPUC’s Northerly Route Alternative Option 3 and Partial Underground Alternative, evaluates the Proposed Project and Alternatives for environmental impact significance preference based on Draft EIR Section E, Comparison of Alternatives, Subsection E.1, Comparison Methodology, which states:~~

~~*“CEQA does not provide specific direction regarding the methodology of alternatives comparison. Each project must be evaluated for the issues and impacts that are most important; this will vary depending on the project type and the environmental setting. Issue areas that are generally given more weight in comparing alternatives are those with long term impacts (e.g., visual impacts and permanent loss of habitat or loss of use of recreational facilities). 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 relatively less important, although are still considered.”*~~

The long-term impacts of the Proposed Project and the Partial Underground Alternative were determined to be identical. Therefore, short-term construction-related impacts were not compared to determine a preference in Proposed Project versus alternative. Within the evaluation text of Draft EIR Section E, Comparison of Alternatives, Table E-2, Proposed Project vs. CPUC’s Northerly Route Alternative Option 3 and Partial Underground

Alternative, it is noted that short-term construction-related impacts would be less severe for the Proposed Project compared to the alternatives.

- E2-122** ~~This comment pertains to the methodology used and the determination within the Draft EIR of the Partial Underground Alternative selected as the Environmentally Superior Alternative. A response to this comment has been presented above in Response E2-115. In addition, this comment states disagreement with the Draft EIR determination that long term visual impacts would be reduced with the Partial Underground Alternative. However, compared with the Proposed Project, the lack of overhead subtransmission lines associated with the PUA would result in a beneficial impact in this area as it would remove the industrial element from the golf course. The Environmentally Superior Alternative has been re-evaluated and is identified in the Recirculated Draft EIR, Section E (July 2008) as the Proposed Project. Please see General Response GR-1 for a discussion regarding the change in determination of the Environmentally Superior Alternative.~~
- E2-123** ~~This comment pertains to the methodology used and the determination within the Draft EIR of the Partial Underground Alternative selected as the Environmentally Superior Alternative. A response to this comment has been presented above in Response E2-115. The Environmentally Superior Alternative has been re-evaluated and is identified in the Recirculated Draft EIR, Section E (July 2008) as the Proposed Project. Please see General Response GR-1 for a discussion regarding the change in determination of the Environmentally Superior Alternative. Recirculated Draft EIR Section E.3 (Comparison of Alternatives – No Project Alternative vs. the Environmentally Superior Alternative) compares the Proposed Project with the No Project Alternative.~~
- E2-124** As noted in the comment, construction of the Proposed Project or alternative would result in the consumption of *non-renewable* resources. As such, this would result in “an irretrievable commitment of natural resources from direct consumption of fossil fuels, construction materials, the manufacture of new equipment that largely cannot be recycled at the end of the project’s useful lifetime, and energy required for the production of materials. Additionally, construction would require the manufacture of new materials, some of which would not be recyclable at the end of the Proposed Project’s lifetime, and the energy required for the production of these materials, which would also result in an irretrievable commitment of natural resources.” (pages F-1 to F-2). Because some resources necessary for the construction of the Proposed Project or alternatives are not renewable, it does not matter if they are consumed over a short period or a long period; consumption of nonrenewable resources is significant. No revisions to the text are necessary.
- E2-125** The Devers-Valley No. 2 Transmission Line (D-V2) is one segment of SCE’s overall Devers-Palo Verde No. 2 Transmission Line Project (DPV2), and is not a stand-alone project. The D-V2 was an alternative developed by the CPUC and analyzed in the DPV2 EIR/EIS to replace SCE’s proposed West of Devers upgrades, which were found to be infeasible due to legal reasons associated with the negotiation of land lease issues with the Morongo Indians. The description noted by the commenter in Table F-2 is for the entire DPV2 project, but notes the D-V2, which is the portion of DPV2 applicable to the cumulative projects list for the El Casco System Project. Because D-V2 was developed by the CPUC during the DPV2 EIR/EIS process and the CPUC recently approved the D-V2 portion of the DPV2 project, the CPUC is fully aware of the location and details associated with this segment of the DPV2 project. The location of the D-V2 portion of DPV2 is

accurately described in Table F-2 and depicted in Draft EIR Figure F-1b. Therefore, no revisions are necessary.

- E2-126** As discussed in numerous places throughout the Draft EIR and in Response E1-3, the Partial Underground Alternative is identical to the Proposed Project with the exception of the one-mile portion between approximately Highland Springs Avenue and S. Highland Home Road, through the community of Sun Lakes. In all other areas, project elements would be the same as the Proposed Project, and as stated in the text, impacts for each issue area would be the same for the Partial Underground Alternative as for the Proposed Project in these areas. Therefore, since the impacts were already described for the Proposed Project, they were not repeated for the Partial Underground Alternative analysis but instead the Proposed Project analysis was referenced. Analyses then focused on the underground portion through Sun Lakes, which is the only place where the Partial Underground Alternative differs from the Proposed Project. Therefore, no changes have been made to the text.
- E2-127** Please see Responses E1-8 and E1-9.
- E2-128** Please see Response E2-61, which states that SCE's PEA identified Quino checkerspot host plants as occurring in the Proposed Project area. It is correct that the Draft EIR states that there is "no indication that rare or endangered invertebrates occur within the Proposed Project area." However, as is also stated on page F-45, "...region wide several listed species are known to occur. Because habitat for the Quino checkerspot butterfly is present within the Proposed Project area the MSHCP automatically assumes the species could be present and provides mitigation through the MSHCP fee structure. The Proposed Project would remove habitat potentially utilized by this species but the impacts would be small and fully mitigated. *However, the continued loss of habitat region wide will likely result in continued adverse impacts to this species. When combined with impacts from past, present, or reasonable future projects, these impacts would be considered cumulatively significant and unavoidable (Class I).*" [Italics added for emphasis].
- E2-129** It is unknown at this time whether future distribution lines would be constructed aboveground or belowground, and because the cumulative scenario includes *past*, present, and reasonably foreseeable future projects, existing distribution lines that are aboveground are also included. Thus, electrocution risks do exist in the project area, and future aboveground distribution lines, subtransmission lines, and transmission lines, including the Proposed Project, will add to these risks. Mitigation Measure B-9 has been recommended to reduce the impacts of the Proposed Project a level of adverse, but less than significant. However, the Proposed Project would still pose some risk of electrocution, and would therefore combine with the risks posed by other past, present, and foreseeable future projects. Therefore no change to the text has been made.
- E2-130** Please see Responses E2-64 and E2-65. Because it is likely that subtransmission and transmission projects will occur in the project area in the future, impacts related to avian collisions would be cumulatively significant. Mitigation Measure B-10 has been recommended to reduce the impacts of the Proposed Project a level of adverse, but less than significant. However, the Proposed Project would still pose some risk of collision, and would therefore combine with the risks posed by other past, present, and foreseeable future projects. Therefore no change to the text has been made.

- E2-131** The Proposed Project would occur in an area subject to rapid development and increasing habitat fragmentation. Because habitat fragmentation is already significant in the region, the Proposed Project’s contribution, while minor, is considered significant. No changes to the text have been made.
- E2-132** Please see Responses E2-64 and E2-129. No revisions to the text have been made.
- E2-133** Please see Responses E2-65 and E2-129. No revisions to the text have been made.
- E2-134** Please see Response E2-44. This species has been documented in the project area. No revisions to the text have been made.
- E2-135** Although the Proposed Project would include mitigation that would *reduce* the risk of wildland fires, mitigation cannot fully eliminate the potential for ignition. In addition, the Proposed Project lies within the high fire probability zone, as would any other current or reasonable future projects in the project area. Even with mitigation, this impact is considered cumulatively significant.

It is true that current and future projects in the area would likely include mitigation similar to the Proposed Project. Therefore, the text has been revised as follows: “The proposed development projects identified in Table F-2 (Cumulative Project List) would likely include mitigation similar to that of the Proposed Project; however, the mitigation would not eliminate the potential for ignition and so these projects would also increase the potential for a fire to occur within the project area.” [See Final EIR (April 2008), Section 4.16 (Section F – Other Considerations)]

- E2-136** As noted in Section F.1.5.7 (Hydrology and Water Quality), present and foreseeable future projects would likely have similar mitigation imposed. However, these measures would reduce, but not eliminate, sedimentation and potential for release of hazardous substances during construction and operation. As such, impacts of individual projects may be less than significant with mitigation, but cumulatively, these individually small impacts would be regionally significant. Therefore, no revisions to the text have been made.
- E2-137** Recirculated Draft EIR Section F.1.5.8 D.9.8, Cumulative Impact Analysis – Noise, stated: “cumulative impacts related to noise is limited to the areas of simultaneous active construction and would generally be localized, mainly within approximately 600 feet from any noise source and rarely more than one-quarter mile (1,300 feet) away.” Because this range was given, the Recirculated Draft EIR analyzed all projects within 0.25 mile of the Proposed Project route to represent the most adverse conditions. As cumulative development within 0.25 mile can contribute significant daily vehicle traffic noise to areas depending on trip distribution and average daily traffic that can impact long-term ambient noise levels, all projects within 0.25 mile were considered. However, the focus of cumulative noise impacts was on projects within 600 feet of the Proposed Project facilities. As discussed in Response E1-15, long-term operational corona noise of the Proposed Project was found to ~~have the potential to result in less than significant impacts.~~ Therefore, the Proposed Project was found to result in a less than significant cumulative contribution. ~~because the Proposed Project was found to have the potential to contribute project specific significant noise impacts to sensitive receptors and contribute to ambient noise levels along the ROW, it was found to have the potential to have a significant cumulative contribution to an increase in ambient noise levels to the area in conjunction with future development.~~

- E2-138** Please see Response E2-137 above for the methodology used, geographic scope, and determination of significance of cumulative noise impacts within the Recirculated Draft EIR.
- E2-139** Please see Response E2-125.
- E2-140** As noted in Response E1-125, the description is accurate. It should be noted that with implementation of the Proposed Project and the D-V2 portion of the DPV2 project, the southern portion of the Sun Lakes community would be sandwiched in between two 500 kV transmission lines (the existing D-V1 and proposed D-V2, which include two sets of lattice steel structures each up to 150 in height) and the El Casco System Project 115 kV subtransmission line (tubular steel poles between 65-85 feet in height). Therefore, the analysis of the cumulative visual effect of the Proposed Project in conjunction with the D-V1 and DV-2 transmission lines discussed on page F-93 of the Draft EIR is accurate. No text revisions are necessary.
- E2-141** Please see Responses E1-8 and E1-9.
- E2-142** Please see Response E1-11.
- E2-143** Please see Response E1-10.