

Appendix 1

Scoping Summary

Scoping Summary

Southern California Edison Company's Valley South Subtransmission Project

Application No. A.14-12-013

SCH No. 2015051012

CEQA Lead Agency:
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Contact: Eric Chiang
Phone: (415) 778-5879



July 2015

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Introduction

This scoping report documents the public scoping effort conducted by the California Public Utilities Commission (CPUC) for the Valley South Subtransmission Project (VSSP). Southern California Edison (SCE), the project applicant, has filed an application with the CPUC for a Certificate of Public Convenience and Necessity (A.14-12-013) for approval to construct the project. In compliance with CEQA, the CPUC held a 30-day public scoping period to allow the members of the public, regulatory agencies, and interested parties an opportunity to comment on the scope of the Environmental Impact Report (EIR) and to identify issues that should be addressed in the environmental document. This summary report documents the notification that occurred during scoping and the written comments received during the scoping period.

Project Scoping

This section describes the methods used to notify the public and agencies about the scoping process conducted for VSSP. It outlines how information was made available for public and agency review and identifies the different avenues available for providing comments on the project (email, fax, and mail). The 30-day scoping period began on May 5, 2015 and ended on June 8, 2015. As allowed by CEQA, no scoping meeting was held for this project. However, the CPUC did provide different avenues for comment on the project as described in this summary report.

Notice of Preparation

On May 5, 2015, the CPUC issued a Notice of Preparation (NOP) consistent with CEQA Guidelines Section 15082, which summarized the proposed project, stated its intention to prepare an EIR, and requested comments from interested parties (see Appendix A). More than 680 NOPs were mailed to responsible, trustee, and interested agencies, State Clearinghouse, tribal governments, and property owners/residents within 300 feet of the project alignment.

Newspaper Advertisements

The preparation of the EIR was advertised in three newspapers. Advertisements provided a brief synopsis of the proposed project, included a map of the project route, information about the scoping period, the address for submitting written comments on the project, and the address for the project website. Table 1 lists the newspapers where the advertisements were published and Appendix B includes the proof of publication for these newspapers with a copy of the advertisement.

Publication	Language	Date
Anza Valley Outlook (Temecula, Murrieta, Lake Elsinore, Wildomar, Menifee, Sun City, French Valley)	English	Fri, May 15
The Californian (Temecula)	English	Fri, May 8
The Press Enterprise (Riverside County)	English	Fri, May 8

Other Outreach

The CPUC provided opportunities for the public and agencies to ask questions or comment on the project. A project information hotline, email address, and website were established and available during the public

comment period, and will be available throughout the project. Information on these outreach efforts are described below.

Project Information Hotline

To offer an opportunity to inquire about the proposed project, a project-specific phone line (888-400-3930) was established to answer questions about the project or the EIR process. Telephone messages were retrieved and all calls were promptly addressed.

Email Address

An email address (Valley-South-Project@aspeneq.com) was established for the project to provide another means of submitting comments on the scope and content of the EIR. The email address was provided on the NOP that was distributed at the start of the scoping period, posted on the website, and included in the newspaper advertisements. Comments received by email will be considered in the EIR and have been incorporated into this scoping summary.

Internet Website

The CPUC established a project-specific website to provide ongoing information about the project. During the scoping period, the website included electronic versions of the application and information about the scoping period and how comments could be provided. The website provided, and will continue to provide throughout the project, additional public venues to learn about the project. The website will remain a public information resource for the project. The website address is:

<http://www.cpuc.ca.gov/environment/info/aspeneq/valleysouth/ValleySouth.htm>

Distribution List

The CPUC has compiled a project-specific mailing list with over 680 entries. This list includes responsible, trustee, and interested agencies, State Clearinghouse, tribal governments, property owners/residents within 300 feet of the project alignment, and local libraries (document repository sites).

The mailing list was updated based on contact information from the comment letters received during the scoping comment period. This mailing or distribution list will continue to be used throughout the environmental review process for the project to distribute public notices and will continue to be updated to ensure all interested parties are notified of key project milestones.

Scoping Comments

A total of nine written comment letters were submitted by mail or by email. Table 2 lists the comment letters that were submitted during scoping and provides a summary of the key comments from each of these letters. Appendix C of this summary includes copies of all comment letters in their original format.

Table 2. Comments Letters Received and Summary of Comments

Date Received	Commenter	Type	Summary of Comments
Public Agencies			
May 21, 2015 <i>(Letter dated: May 15, 2015)</i>	South Coast Air Quality Management District Jillian Wong PhD Program Supervisor	Letter	Recommendations regarding the analysis of potential air quality impacts from the project that should be included in the draft CEQA document. SCAQMD requested a copy of the Draft EIR with all appendices or technical documents related to air quality and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files. Original emission calculation spreadsheets and modeling files to be included. If the project generates significant adverse air quality impacts, mitigation measures are required that go beyond what is required by law during construction and operation.
June 4, 2015	Riverside County Flood Control and Water District Mike Wong PE Engineering Project Manager	Letter <i>(by email and mail)</i>	The project may require an encroachment permit from the District. In order to procure the permit, the applicant must be able to provide a consistency report that demonstrates all construction related activities are in compliance with the MSHCP. The Draft EIR should also address any potential impact on the watercourses that have floodplains within the project area. The EIR should address any potential impacts to proposed flood control facilities within the project location.
June 5, 2015 <i>(Letter dated: June 5, 2015)</i>	CA Department of Fish and Wildlife Leslie McNair Acting Regional Manager	Email With attachment letter	The Draft EIR should include an assessment of the flora and fauna within and adjacent to the project area with particular emphasis on rare or endangered species and their habitats. This should also include an analysis of any direct, indirect or cumulative impacts on these resources. Mitigation measures should be included with the analysis. This project is located within the Multiple Species Habitat Conservation Plan (HCP) and the Stephens Kangaroo Rat HCP fee area boundary. The Draft EIR should include an assessment of the project's consistency with these plans. If any activity will alter a Lake or Streambed the applicant must provide notice to the Department.
June 5, 2015 <i>(Letter dated: June 4, 2015)</i>	City of Menifee Ryan Fowler Associate Planner	Email	The City is requesting that the "Proposed Project" site be utilized over the SCE alternative alignment. Use the City's newly adopted City of Menifee Circulation Element when designing power pole alignment and address aesthetic concerns where lines traverse areas within the City. The City is asking for coordination with the SCE on pole placement. An encroachment permit will be required. The City is requesting that all future notices on the project also be sent to their Community Development Department.
Tribal Governments			
June 5, 2015 <i>(Letter dated: June 1, 2015)</i>	Soboba Band of Luiseno Indians Joseph Ontiveros Director of Cultural Resources	Letter	The tribe is requesting a consultation with the project proponents and lead agency. Ongoing, timely receipt of notices is requested. The tribe will act as the consulting tribal agency for this project. The tribe also requests that their Native American Monitor be present during any ground disturbing procedures.

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Date Received	Commenter	Type	Summary of Comments
June 9, 2015	Pechanga Band of Luiseno Indians Anna M. Hoover Cultural Analyst	Email With attachment letter	The tribe has worked on this project with the CPUC and SCE since 2012 including several field visits and meetings. The project passes through two tribal villages and the alternative route goes through a third village. The tribe is requesting that the EIR address visual and cultural impacts to archaeological and tribal cultural resources. The tribe is also requesting that their Native American Monitor be present during any ground disturbing procedures and for any archaeological surveys, studies or excavations performed.
Private Citizens			
May 22, 2015	Charles Green	Letter	Would like SCE to provide additional alternate routes. Suggested that a route down Highway 79 to Temecula should be considered.
May 22, 2015	Kirk Douglas	Email	Property owner is concerned about the adverse effect on the aesthetics of the area from the project transmission lines/poles. There are underground lines in the newer neighborhood and he feels it does not make sense to put lines up when there are lines underground. Feels the project is of no benefit to the area since it is for new housing in another location. Indicated that power is being directed to an area with no current water resources in the current drought. Wants consideration of undergrounding lines along Leon Road.
May 27, 2015	Kevin Jass	Email	Property owner indicated that the developer had the existing lines placed underground during the properties' development. He feels that SCE should apply the same approach to keep consistency and aesthetic value to the properties impacted. He also believes while there is greater cost initially that there would be less ongoing maintenance on the underground lines in the future.

Appendix A

Notice of Preparation

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

NOTICE OF PREPARATION

Environmental Impact Report for the Valley South Subtransmission Project

Application No. A.14-12-013
May 5, 2015

Introduction

The California Public Utilities Commission (CPUC) intends to prepare an Environmental Impact Report (EIR) for the Valley South Subtransmission Project (VSSP or proposed Project) proposed by Southern California Edison (SCE). The CPUC is the lead agency for the California Environmental Quality Act (CEQA). The CPUC invites written comments on the scope of the environmental analysis and identification of potential issues related to the EIR.

The proposed Project includes construction and operation of a new 115-kilovolt (kV) subtransmission line. The subtransmission line would extend from SCE's existing Valley Substation in the City of Menifee, California, south approximately 15.4 miles, to just west of SCE's existing Triton Substation in the City of Temecula, California (see attached project location map). The purpose of the proposed VSSP is to provide additional capacity to serve long-term forecasted electrical demand, enhance electrical system reliability, provide greater operational flexibility, and provide safe and reliable electrical service.

Notice of Preparation

This Notice of Preparation (NOP) is being sent to the Office of Planning and Research, responsible and trustee agencies, organizations, and interested parties, as well as property owners located within 300 feet of the Project alignment. The purpose of the NOP is to inform recipients that the CPUC is beginning preparation of an EIR for the VSSP and to solicit information that will be helpful in the environmental review process. This notice includes a description of the proposed Project, a summary of potential Project impacts, information on how to provide comments to the CPUC, and information on where you can obtain Project updates and Project-related documents.

Summary Description of the Proposed Project

The proposed VSSP includes construction of a new 115-kV subtransmission line extending approximately 15.4 miles from SCE's Valley Substation in the City of Menifee to just west of SCE's Triton Substation in the City of Temecula. The proposed Project includes minor modifications to the existing Valley Substation, construction of a new approximately 12-mile 115-kV subtransmission line between the Valley Substation and a tubular steel pole (TSP) located at the intersection of Leon Road and Benton Road (Segment 1), and replacement of approximately 3.4 miles of existing 115-kV conductor from the Leon/Benton Road TSP to an existing TSP (Terminal TSP) located just outside Triton Substation (Segment 2). Additionally, existing distribution and telecommunication lines would be relocated from old poles to the new poles, and telecommunications facilities would be installed to connect the new subtransmission line to SCE's telecommunication system.

Project Details

- **115-KV Subtransmission Line: Segment 1** exits the Valley Substation and proceeds approximately 1,600 feet southeasterly on a private SCE access road/farm road between Menifee Road and Briggs Road in a

new underground duct bank. The new line would then rise to an overhead configuration and continue east to the intersection of Briggs Road/McLaughlin Road, where existing pole heads would be modified to create double-circuit poles. The new line would continue south on Briggs Road to Case Road, which would also require existing pole heads to be reconfigured to a double-circuit configuration. The line would continue southeast for approximately one mile to the intersection of Leon Road/Grand Avenue, requiring replacement of existing wood poles, and then south approximately nine miles along Leon Road to Benton Road in a combination of new, franchise, and existing right-of-way (ROW).

- **115-kV Subtransmission Line: Segment 2** begins at the intersection of Benton Road/Leon Road and continues south on Leon Road to the existing Terminal TSP on the south side of Nicolas Road, near the Triton Substation. Segment 2 involves reconductoring approximately 3.4 miles of existing double-circuit 115-kV subtransmission line; existing 653 thousand circular mil (kcmil) aluminum steel-reinforced conductor would be replaced with non-specular 954 kcmil stranded aluminum conductor.
- **Telecommunications** infrastructure would be added to connect the proposed 115-kV subtransmission line to SCE's telecommunications system, and provide Supervisory Control and Data Acquisition, data transmission, and telephone services. Existing SCE and third-party telecommunication cables would be transferred to the new 115-kV subtransmission poles installed as part of Segments 1 and 2. These cables would be attached with wood cross-arms and/or metallic suspension side clamps. Channel equipment would also be installed in the existing Mechanical and Electrical Equipment Rooms at the Valley and Triton Substations.
- **Distribution** infrastructure (12-kV and 33-kV) would be adjusted/lowered in elevation outside Valley Substation to allow for double-circuiting of the existing poles, and would be transferred from existing poles to the new poles along Leon Road. Approximately 230 existing distribution wood poles would be removed and replaced by the new subtransmission poles as part of these activities.

Construction Schedule

SCE anticipates that construction of the proposed VSSP would take approximately 16 months. In order to meet the June 2020 operating date, construction would need to start in March 2018 and would last through July 2019, followed by cleanup activities through November 2019. The operating date may be accelerated if the regulatory processes can be expedited or SCE can compress its construction schedule, as necessary.

Construction would include installation of approximately 243 wood poles, 12 light-weight steel poles, 30 TSPs, and 18 wood guy stub poles. To accommodate the underground portion of the 115-kV subtransmission line at the Valley Substation, approximately 1,600 feet of underground duct bank and one approximately 100-foot TSP riser pole would be installed. To support construction, up to six staging yards and approximately 40 pulling, tensioning, and splicing set-up locations would be utilized.

Project Alternatives

In its application to the CPUC, SCE identified a potential alternative to the proposed Project. This alternative includes a re-route of the proposed 115-kV subtransmission line beginning at the intersection of Leon Road/Scott Road. The alternative would proceed west along Scott Road, south on Menifee Road, east on unimproved Clinton Keith Road to the existing TSP on Benton Road (end point of Segment 1). This alternative alignment would be 3.6 miles longer than the proposed route. The CPUC will consider this alternative in the EIR as well as other potential alternatives, including a No Project Alternative.

Potential Environmental Effects

The EIR will identify and discuss the significant adverse environmental effects of the VSSP, and will identify mitigation measures to avoid or reduce significant adverse effects to the extent feasible. It also will discuss the significant environmental effects of the alternatives and mitigation measures to reduce those effects.

Construction and operation of the VSSP may result in significant adverse effects related to the following environmental resource and issue areas, which will be addressed in the EIR:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation and Traffic
- Utilities and Service Systems

No determinations have been made as to the significance of these potential effects. Such determinations will be made in the EIR after the issues are thoroughly analyzed. The CPUC invites interested parties, and all affected, responsible, and trustee agencies, to suggest specific areas of analysis to be addressed within these general categories, or other issues not included above, to be considered in the EIR. In addition, the EIR will analyze the potential for growth-inducing impacts, and cumulative effects of the VSSP in combination with other past, present, and reasonably foreseeable future projects in the area.

Comments

The CPUC is seeking comments from all CEQA responsible and trustee agencies, all other public agencies with jurisdiction by law with respect to the Project, as well as public input, as to the scope and content of the environmental information to be included in the EIR. Agency responses should identify the issues to be considered in the EIR, including significant environmental issues, alternatives, mitigation measures, and whether the responding agency will be a responsible or trustee agency, and the basis for that determination. Due to the time limits mandated by State law, your response must be sent at the earliest possible date, but must be postmarked within 30 days from the date of receipt of this NOP or no later than **June 8, 2015**. Please send your comments to:

Valley South Subtransmission or Valley-South-Project@aspeneq.com
Project Scoping Comments c/o
Aspen Environmental Group
5020 Chesebro Road, Suite 200
Agoura Hills, CA 91301

Although no public scoping meeting is planned for this Project, there will be future public meetings on the Project when the public draft EIR is published, and possibly through the application review process conducted by the CPUC Administrative Law Judge.

Additional Information

Project Website. Information and documents related to the environmental review process for the VSSP will be posted on the CPUC's website (see address below).

<http://www.cpuc.ca.gov/environment/info/aspen/valleysouth/ValleySouth.htm>

SCE's Proponent's Environmental Assessment (PEA) is currently available for review on the website. The PEA includes a full description of the Project, as well as SCE's evaluation of the potential impacts of the Project.

Project Voicemail. To request Project information, send an e-mail to Valley-South-Project@aspeneq.com or leave a voice message or send a fax to (888) 400-3930.

Project Location Map



Appendix B

Newspaper Advertisements

AFFIDAVIT OF PUBLICATION ANZA VALLEY OUTLOOK

COUNTY OF RIVERSIDE, STATE OF CALIFORNIA

I am a citizen of the United States, over twenty-one years of age, I am herein mentioned the Account Manager/Bookkeeper of said newspaper The Anza Valley Outlook, ISSN 0883-6124.

The Anza Valley Outlook is a newspaper adjudicated by the Superior Court, County of Riverside, State of California as a newspaper of general circulation and published in Riverside County once a week in said newspaper.

The Notice

NOTICE OF PREPARATION FOR THE VALLEY SOUTH SUBTRANSMISSION PROJECT
DAILY JOURNAL CORP
CNS#2748605

Legal Number: N/A which the attached is a true printed copy, and published newspaper for 1 week(s), and following day(s):
5/15/15

in the regular issue of said newspaper The Anza Valley Outlook, 1588 S. M. Fallbrook, CA 92028.

I certify and declare under penalty that the statement is true and correct to the best of my knowledge.

Dated: MAY 15, 2015



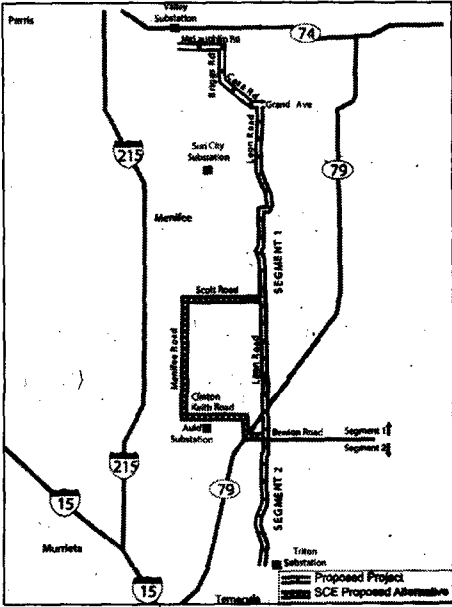
Signature

Lisa Hasler
Accounting Manager/Bookkeeper

NOTICE OF PREPARATION FOR THE VALLEY SOUTH SUBTRANSMISSION PROJECT
INTENT TO PREPARE AN ENVIRONMENTAL IMPACT REPORT

The California Public Utilities Commission (CPUC) intends to prepare an Environmental Impact Report (EIR) for the Valley South Subtransmission Project proposed by Southern California Edison (SCE). The CPUC is the lead agency for the California Environmental Quality Act. The CPUC invites written comments on the scope of the environmental analysis and identification of potential issues related to the EIR.

Background. The proposed Project includes construction and operation of a new 115-kilovolt subtransmission line. The subtransmission line would extend from SCE's existing Valley Substation in the City of Menifee, California, south approximately 15.4 miles, to just west of SCE's existing Triton Substation in the City of Temecula, California. The proposed Project includes two segments; Segment 2 only involves reconductoring. The purpose of the proposed Project is to provide additional capacity to serve long-term forecasted electrical demand, enhance electrical system reliability, provide greater operational flexibility, and provide safe and reliable electrical service.



Scoping. The EIR public scoping period will go from May 5 through June 8, 2015. During this period, comments on the scope and content of the document may be mailed to: Valley South Subtransmission Project Scoping Comments, c/o Aspen Environmental Group, 5020 Chesebrough Road, Suite 200, Agoura Hills, CA 91301. Comments may also be sent via e-mail to: Valley-South-Project@aspeneg.com. **Written comments are requested by June 8, 2015.**

Although no public scoping meeting is planned for this Project, there will be future public meetings on the Project when the public Draft EIR is published and possibly through the application review process conducted by the CPUC Administrative Law Judge.

Information. Project-related documents can be reviewed by visiting the Project website at: <http://www.cpuc.ca.gov/environment/info/aspen/valleysouth/ValleySouth.htm>.



**PROOF OF PUBLICATION
(2015.5 C.C.P.)**

Proof of Publication of

**STATE OF CALIFORNIA
County of Riverside**

I am a citizen of the United States and a resident of the County aforesaid: I am over the age of 18 years and not a party to or interested in the matter. I am the principal depositor of the matter.

THE CALIFORNIAN
An Edition of the UT San Diego

A newspaper of general circulation, DAILY in the City of Temecula, California, County of Riverside, Three Lake Judicial District and which newspaper has been adjudged to be a newspaper of general circulation by the Court of the County of Riverside, State of California, under the date of February 26, 1991, Case No. 209105; that the notice, of which the attached printed copy (set in type not smaller than nonpareil), has been published in each regular issue of said newspaper and no supplement thereof, on the following date:

May 8TH, 2015

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Dated at TEMECULA, California, this
8TH day of May, 2015

Cathy Viars
Legal Advertising
The Californian

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VALLEY SOUTH SUBTRANSMISSION PROJECT
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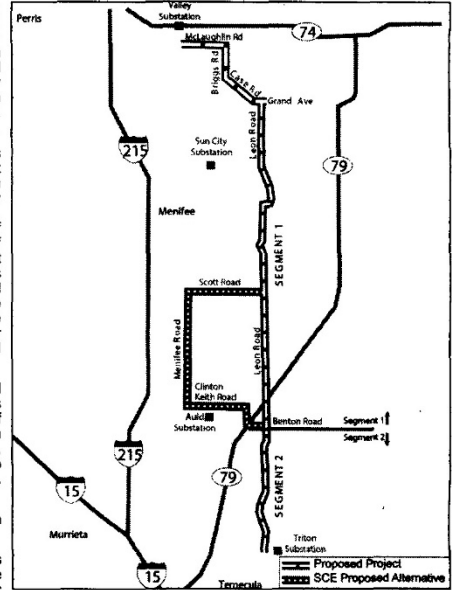
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THE PRESS-ENTERPRISE

Ad Copy:

1825 Chicago Ave, Suite 100
Riverside, CA 92507
951-684-1200
951-368-9018 FAX

PROOF OF PUBLICATION (2010, 2015.5 C.C.P)

Publication(s): The Press-Enterprise

PROOF OF PUBLICATION OF

Ad Desc.: / 2748604

I am a citizen of the United States. I am over the age of eighteen years and not a party to or interested in the above entitled matter. I am an authorized representative of THE PRESS-ENTERPRISE, a newspaper in general circulation, printed and published daily in the County of Riverside, and which newspaper has been adjudicated a newspaper of general circulation by the Superior Court of the County of Riverside, State of California, under date of April 25, 1952, Case Number 54446, under date of March 29, 1957, Case Number 65673, under date of August 25, 1995, Case Number 267864, under date of February 4, 2013, Case Number RIC 1215735, under date of July 25, 2013, Case Number RIC 1305730, and under date of September 16, 2013, Case Number RIC 1309013; that the notice, of which the annexed is a printed copy, has been published in said newspaper in accordance with the instructions of the person(s) requesting publication, and not in any supplement thereof on the following dates, to wit:

05/08/2015

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Date: May 08, 2015
At: Riverside, California



CALIF NEWSPAPER SERV BUREAU
PO BOX 60460
LOS ANGELES, CA 90060

Ad Number: 0010046536-01

P.O. Number: 2748604





NOTICE OF PREPARATION FOR THE VALLEY SOUTH SUBTRANSMISSION PROJECT INTENT TO PREPARE AN ENVIRONMENTAL IMPACT REPORT

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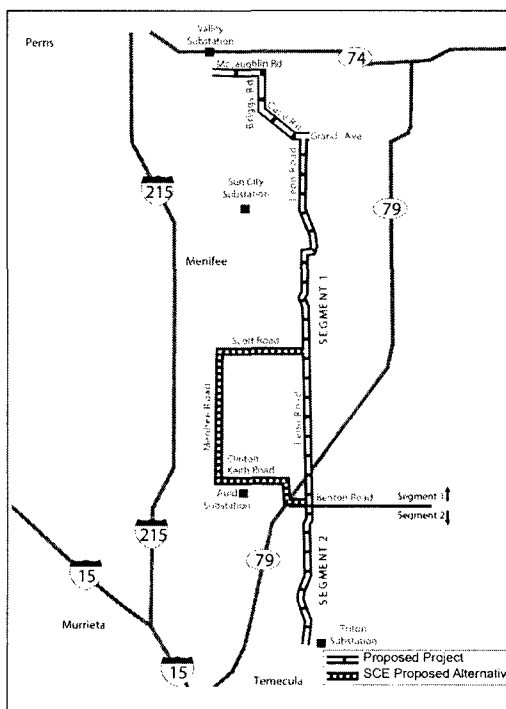
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Appendix C

Written Comment Letters Received During
Scoping Period

Agency Comment Letters



South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

May 15, 2015

RECEIVED
MAY 21 2015

BY:.....

Valley South Substation
Project Scoping Comments
c/o Aspen Environmental Group
5020 Chesebro Road, Suite 200
Agoura Hills, CA 91301

Notice of Preparation of a CEQA Document for the Valley South Substation Project

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the draft CEQA document. Please send the SCAQMD a copy of the CEQA document upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to the SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address in our letterhead. **In addition, please send with the draft EIR all appendices or technical documents related to the air quality and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files. These include original emission calculation spreadsheets and modeling files (not Adobe PDF files). Without all files and supporting air quality documentation, the SCAQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. More recent guidance developed since this Handbook was published is also available on SCAQMD's website here: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). SCAQMD staff also recommends that the lead agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.calemod.com.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

The SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD staff requests that the lead agency quantify criteria pollutant emissions and compare the results to the recommended regional significance thresholds found here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>. In addition to analyzing regional air quality impacts, the SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts

when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Perspective*, which can be found at the following internet address: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process.

Mitigation Measures

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying possible mitigation measures for the project, including:

- Chapter 11 of the SCAQMD *CEQA Air Quality Handbook*
- SCAQMD's CEQA web pages at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>.
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>.
- SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions
- Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf?sfvrsn=4>.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's webpage (<http://www.aqmd.gov>).

The SCAQMD staff is available to work with the Lead Agency to ensure that project emissions are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at Jwong1@aqmd.gov or call me at (909) 396-3176.

Sincerely,

Jillian Wong

Jillian Wong, Ph.D.

Program Supervisor

Planning, Rule Development & Area Sources

WARREN D. WILLIAMS
General Manager-Chief Engineer



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www.rcflood.org

RIVERSIDE COUNTY FLOOD CONTROL
AND WATER CONSERVATION DISTRICT

June 4, 2015

RECEIVED
JUN 08 2015

Sent via email to: Valley-South-Project@aspeneg.com

Aspen Environmental Group
5020 Chesebro Road, Suite 200
Agoura Hills, CA 91301

BY:.....

Ladies and Gentlemen:

Re: Notice of Preparation of an
Environmental Impact Report for the
Valley South Subtransmission Project

This letter is written in response to the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Valley South Subtransmission Project proposed by Southern California Edison Company (SCE).

The Valley South Subtransmission Project is proposed to be located in southwestern Riverside County. The proposed project is summarized below:

- Modification of SCE's existing Valley 500/115-kV substation would include equipping an existing 115-kV line position and providing protection equipment as required.
- Construction of a new 115-kV subtransmission line originating at SCE's existing Valley 500/115-kV substation and connecting at a Tubular Steel Pole (TSP) located at the southeast corner of Leon Road and Benton Road. The TSP is the common point of the three-terminal existing Valley-Auld-Triton 115-kV subtransmission line. The new construction and associated reconfiguration would result in the formation of the Valley-Auld No. 2 and Valley-Triton 115-kV subtransmission lines. The new 115-kV subtransmission line is approximately 12 miles long and is referred to as Segment 1 of the proposed project.
- Replacement of a segment of overhead conductor of the existing Valley-Auld-Triton 115-kV subtransmission line beginning at the TSP (located at the southeast corner of Benton Road and Leon Road) continuing south to the Terminal TSP located on the south side of Nicolas Road, approximately 250 feet west of Los Chorus Ranch Road in the city of Temecula. This reconductor segment is approximately 3.4 miles long and is referred to as Segment 2 for the proposed project.
- Relocation of existing distribution and telecommunication lines to support the installation of Segments 1 and 2 for the new 115-kV subtransmission line.
- Installation of telecommunication equipment at Triton and Valley substations to support Segments 1 and 2 for the new 115 kV subtransmission line.


Re: Notice of Preparation of an
Environmental Impact Report for the
Valley South Subtransmission Project

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

1. Existing District facilities are located within the proposed project areas and may be impacted. Any work that involves District right of way, easements, or facilities will require an encroachment permit from the District. The construction of facilities within road right of way that may impact District storm drains should also be coordinated with the District. To obtain further information on encroachment permits or existing facilities, contact Amy McNeill of the District's Encroachment Permit Section at 951.955.1266.
2. The District is a signatory to the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). For purposes of procuring an encroachment permit from the District, the permit applicant will need to demonstrate that all construction-related activities within the District right of way or easement are consistent with the MSHCP. To accomplish this, the CEQA document should include an MSHCP consistency report with all of its supporting documents and provide adequate mitigation in accordance with all applicable MSHCP requirements. The MSHCP consistency report should address, at a minimum, Sections 3.2, 3.2.1, 6.1.2, 6.1.3, 6.1.4, 6.3.2, 7.5.3 and Appendix C of the MSHCP.
3. The proposed projects are located within and/or adjacent to the District's Romoland, Homeland, and Salt Creek Master Drainage Plan (MDP) boundaries. When fully implemented, these MDP facilities will provide flood protection to relieve those areas within each MDP boundary of the most serious flooding problems and will provide adequate drainage outlets. The EIR should address potential impacts to proposed flood control facilities within each project area. The District's MDP facility maps can be viewed online at <http://rcflood.org/content/MDPADP.htm>. To obtain more information on the MDPs, please contact Edwin Quinonez of the District's Planning Section at 951.955.1345.
4. Portions of the proposed project are located within Zone A limits as delineated on the federal Flood Insurance Rate Map (FIRM) issued in conjunction with the National Flood Insurance Program (NFIP). If the proposed project will have significant impact on the watercourses that have floodplains associated with them, the DEIR should address potential direct and indirect floodplain impacts. Impacted floodplains will likely need to be studied and mapped. For any work or alteration of the FEMA mapped floodplains, the City is responsible for compliance with the FEMA floodplain management regulations within the city limits.

Thank you for the opportunity to review the NOP. Please forward any subsequent environmental documents regarding the project to my attention at this office. Any questions concerning this letter may be referred to me at 951.955.1233 or Arlene Chun at 951.955.5418.

Very truly yours,


MIKE WONG, P.E.
Engineering Project Manager

cc: Amy McNeill
Edwin Quinonez
ABC:cw
P8170283

Melissa Jordan

From: Valley-South- Project
Sent: Wednesday, June 10, 2015 12:09 PM
To: Melissa Jordan
Subject: Fw: CDFW comments on NOP of DEIR Valley South Subtransmission Project, SCH# 2015051012
Attachments: NOP_DEIR_Valley South Subtransmission Project SCH 2015051012.pdf

From: Gibson, Joanna@Wildlife <Joanna.Gibson@wildlife.ca.gov>
Sent: Friday, June 5, 2015 5:01 PM
To: Valley-South- Project
Cc: state.clearinghouse@opr.ca.gov
Subject: CDFW comments on NOP of DEIR Valley South Subtransmission Project, SCH# 2015051012

Mr. Chiang,

Please find attached the California Department of Fish and Wildlife's comments on the above-mentioned project.

If you should have any questions, please contact me.

Joanna Gibson

Environmental Scientist
CA Department of Fish and Wildlife
Inland Deserts Region
3602 Inland Empire Blvd., Suite C-220
Ontario, CA 91764
(909) 987-7449 (voice)
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State of California - Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Inland Deserts Region
3602 Inland Empire Blvd., Suite C-220
Ontario, CA 91764
(909) 484-0459
www.wildlife.ca.gov

EDMUND G. BROWN, Jr., Governor
CHARLTON H. BONHAM, Director



June 5, 2015

Mr. Eric Chiang
Project Manager
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

Subject:

Notice of Preparation of a Draft Environmental Impact Report
Valley South Subtransmission Project
State Clearinghouse No. 2015051012

Dear Mr. Chiang:

The Department of Fish and Wildlife (Department) appreciates the opportunity to comment on the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Valley South Subtransmission Project (project) [State Clearinghouse No. 2015051012]. Pursuant to The Guidelines for the Implementation of CEQA (Cal. Code Regs., tit. 14, § 15000 *et seq.*; hereafter CEQA Guidelines), the Department has reviewed the NOP and offers comments and recommendations on those activities involved in the project that are within the Department's area of expertise and germane to its statutory responsibilities, and/or which are required to be approved by the Department (CEQA Guidelines, §§ 15086, 15096 & 15204).

The project is being proposed by Southern California Edison (SCE) to provide additional capacity to serve long-term forecasted electrical demand, enhance electrical system reliability, provide greater operational flexibility, and provide safe and reliable electrical service. The project includes construction and operation of a new 115-kilovolt (kV) subtransmission line extending from SCE's existing Valley Substation in the City of Menifee, south approximately 15.4 miles, to just west of SCE's existing Triton Substation in the City of Temecula.

CEQA ROLE

The Department has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and the habitat necessary for biologically sustainable populations of those species (i.e., biological resources); and administers the Natural Community Conservation Planning Program (NCCP Program). The Department is a Trustee Agency with responsibility under CEQA for commenting on projects that could affect biological resources. As a Trustee Agency, the Department is responsible for

Conserving California's Wildlife Since 1870

providing, as available, biological expertise to review and comment upon environmental documents and impacts arising from project activities (CEQA Guidelines, § 15386; Fish & G. Code, § 1802).

The Department will also act as a Responsible Agency based on its discretionary authority regarding project activities that impact streams and lakes (Fish & G. Code, §§ 1600 – 1616), or result in the “take” of any species listed as candidate, threatened, or endangered pursuant to the California Endangered Species Act (CESA; Fish & G. Code, § 2050 et seq.).

COMMENTS AND RECOMMENDATIONS

The Department offers the comments and recommendations presented below to assist the California Public Utilities Commission (CPUC; the CEQA lead agency) in adequately identifying and/or mitigating the project’s significant, or potentially significant, impacts on biological resources. The comments and recommendations are also offered to enable the Department to adequately review and comment on the proposed project with respect to impacts on biological resources (i.e., the Department’s area of statutory responsibility; CEQA Guidelines § 15082(b)), and the project’s consistency with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). The Department recommends that the following information be included in the DEIR:

1. A complete discussion of the purpose and need for the proposed project, with a detailed description of project elements including all access roads, permanent and temporary project components, and staging areas. The long-term operation and maintenance needs of the proposed facilities should be clearly identified and described. The project description should also include any and all reasonably foreseeable future phases of the proposed project. Note that the project description needs to contain sufficient information to evaluate and review the project’s environmental impact (CEQA Guidelines, §§ 15063, 15124 & 15378).
2. A description of the environmental setting that contains sufficient information to understand the project’s, and its alternative’s (if applicable), significant impacts on the environment (CEQA Guidelines, §§ 15063, 15125 & 15360). The analysis of feasible project alternatives should be fully considered and evaluated (CEQA Guidelines § 15126.6), and should include a range of alternatives that avoid or otherwise minimize impacts to sensitive biological resources.
3. The identification of environmental impacts of the proposed project (CEQA Guidelines, §§ 15063, 15065, 15126, 15126.2, 15126.6 & 15358); and
4. A description of feasible mitigation measures to avoid potentially significant impacts, and/or mitigate significant impacts, of the proposed project on the environment (CEQA Guidelines, §§ 15021, 15063, 15071, 15126.2, 15126.4 & 15370).

Assessment of Biological Resources

Section 15125(c) of the CEQA Guidelines states that knowledge of the regional setting of a project is critical to the assessment of environmental impacts and that special emphasis should be placed on environmental resources that are rare or unique to the region. To enable Department staff to adequately review and comment on the project, the DEIR should include a complete assessment of the flora and fauna within and adjacent to the project footprint, with particular emphasis on identifying rare, threatened, endangered, and other sensitive species and their associated habitats. The Department recommends the DEIR specifically include:

1. An assessment of the various habitat types located within the project footprint, and a map that identifies the location of each habitat type. The Department recommends that floristic, alliance- and/or association based mapping and assessment be completed following *The Manual of California Vegetation*, second edition (Sawyer et al. 2009). Adjoining habitat areas should also be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions;
2. A general biological inventory of the fish, amphibian, reptile, bird, and mammal species that are present or have the potential to be present within each habitat type onsite and within adjacent areas that could be affected by the project. The Department's California Natural Diversity Database (CNDDDB) in Sacramento should be contacted at (916) 322-2493 or bdb@dfg.ca.gov to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code, in the vicinity of the proposed project. The Department recommends that CNDDDB Field Survey Forms be completed and submitted to CNDDDB to document survey results. Online forms can be obtained and submitted at http://www.dfg.ca.gov/biogeodata/cnddb/submitting_data_to_cnddb.asp

Please note that the Department's CNDDDB is not exhaustive in terms of the data it houses, nor is it an absence database. The Department recommends that it be used as a starting point in gathering information about the *potential presence* of species within the general area of the project site.

3. A complete, *recent* inventory of rare, threatened, endangered, and other sensitive species located within the project footprint and within offsite areas with the potential to be effected, including California Species of Special Concern (CSSC) and California Fully Protected Species (Fish and Game Code § 3511). Species to be addressed should include all those which meet the CEQA definition (CEQA Guidelines § 15380). The inventory should address seasonal variations in use of the project area and should not be limited to resident species. Focused species-specific/MSHCP surveys, completed by a qualified biologist and conducted at the

appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Department and the U.S. Fish and Wildlife Service, where necessary. Note that the Department generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed project may warrant periodic updated surveys for certain sensitive taxa, particularly if the project is proposed to occur over a protracted time frame, or in phases, or if surveys are completed during periods of drought.

4. A thorough, recent, floristic-based assessment of special status plants and natural communities, following the Department's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (see <http://www.dfg.ca.gov/habcon/plant/>);
5. Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region (CEQA Guidelines § 15125[c]);

Analysis of Direct, Indirect, and Cumulative Impacts to Biological Resources

The DEIR should provide a thorough discussion of the direct, indirect, and cumulative impacts expected to adversely affect biological resources as a result of the project. To ensure that project impacts to biological resources are fully analyzed, the following information should be included in the DEIR:

1. A discussion of potential impacts from lighting, noise, human activity, and wildlife-human interactions created by zoning of development projects or other project activities adjacent to natural areas, exotic and/or invasive species, and drainage. The latter subject should address project-related changes on drainage patterns and water quality within, upstream, and downstream of the project site, including: volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site.
2. A discussion of potential indirect project impacts on biological resources, including resources in areas adjacent to the project footprint, such as nearby public lands (e.g. National Forests, State Parks, etc.), open space, adjacent natural habitats, riparian ecosystems, wildlife corridors, and any designated and/or proposed reserve or mitigation lands (e.g., preserved lands associated with a Natural Community Conservation Plan, or other conserved lands).

Please note that the project area supports significant biological resources and contains habitat connections, providing for wildlife movement across the broader

landscape, sustaining both transitory and permanent wildlife populations. The Department encourages project design that avoids and preserves onsite features that contribute to habitat connectivity. The DEIR should include a discussion of both direct and indirect impacts to wildlife movement and connectivity, including maintenance of wildlife corridor/movement areas to adjacent undisturbed habitats.

3. An evaluation of impacts to conserved lands from both the construction of the project and long-term operational and maintenance needs. Based on review of aerial photography, the "SCE proposed Alternative" has the potential to impact conserved lands managed by the Western Riverside County Regional Conservation Authority (RCA). The Department encourages the CPUC to contact the RCA to determine if any portion of the project will impact conserved lands, and to work collaboratively with these entities to avoid and minimize impacts.
4. A cumulative effects analysis developed as described under CEQA Guidelines § 15130. Please include all potential direct and indirect project related impacts to riparian areas, wetlands, vernal pools, alluvial fan habitats, wildlife corridors or wildlife movement areas, aquatic habitats, sensitive species and other sensitive habitats, open lands, open space, and adjacent natural habitats in the cumulative effects analysis. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

Mitigation Measures for Project Impacts to Biological Resources

The DEIR should include appropriate and adequate avoidance, minimization, and/or mitigation measures for all direct, indirect, and cumulative impacts that are expected to occur as a result of the construction and long-term operation and maintenance of the project. When proposing measures to avoid, minimize, or mitigate impacts, the Department recommends consideration of the following:

1. *Fully Protected Species*: At least one Fully Protected Species (Fish and Game Code § 3511) has the potential to occur within or adjacent to the project area, including, but not limited to: White-tailed kite (*Elanus leucurus*). Fully protected species may not be taken or possessed at any time. Project activities described in the DEIR should be designed to completely avoid any fully protected species that have the potential to be present within or adjacent to the project area. The Department also recommends that the DEIR fully analyze potential adverse impacts to fully protected species due to habitat modification, loss of foraging habitat, and/or interruption of migratory and breeding behaviors. The Department recommends that the Lead Agency include in the analysis how appropriate avoidance, minimization and mitigation measures will reduce indirect impacts to fully protected species.
2. *Sensitive Plant Communities*: The Department considers sensitive plant communities to be imperiled habitats having both local and regional significance.

Plant communities, alliances, and associations with a statewide ranking of S-1, S-2, S-3, and S-4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by querying the CNDDDB and are included in *The Manual of California Vegetation* (Sawyer et al. 2009). The DEIR should include measures to fully avoid and otherwise protect sensitive plant communities from project-related direct and indirect impacts.

3. *Mitigation*: The Department considers adverse project-related impacts to sensitive species and habitats to be significant to both local and regional ecosystems, and the DEIR should include mitigation measures for adverse project-related impacts to these resources. Mitigation measures should emphasize avoidance and reduction of project impacts. For unavoidable impacts, onsite habitat restoration and/or enhancement should be evaluated and discussed in detail. If onsite mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, offsite mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed.

The DEIR should include measures to perpetually protect the targeted habitat values within mitigation areas from direct and indirect adverse impacts in order to meet mitigation objectives to offset project-induced qualitative and quantitative losses of biological values. Specific issues that should be addressed include restrictions on access, proposed land dedications, long-term monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.

4. *Habitat Revegetation/Restoration Plans*: Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant restoration techniques. Plans should identify the assumptions used to develop the proposed restoration strategy. Each plan should include, at a minimum:
 - (a) the location of restoration sites and assessment of appropriate reference sites;
 - (b) the plant species to be used, sources of local propagules, container sizes, and seeding rates;
 - (c) a schematic depicting the mitigation area;
 - (d) a local seed and cuttings and planting schedule;
 - (e) a description of the irrigation methodology;
 - (f) measures to control exotic vegetation on site;
 - (g) specific success criteria;
 - (h) a detailed monitoring program;
 - (i) contingency measures should the success criteria not be met; and
 - (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity. Monitoring of restoration areas should extend across a sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought.

The Department recommends that local onsite propagules from the project area and nearby vicinity be collected and used for restoration purposes. Onsite seed collection should be initiated in the near future in order to accumulate sufficient propagule material for subsequent use in future years. Onsite vegetation mapping at the alliance and/or association level should be used to develop appropriate restoration goals and local plant palettes. Reference areas should be identified to

help guide restoration efforts. Specific restoration plans should be developed for various project components as appropriate.

Restoration objectives should include protecting special habitat elements or re-creating them in areas affected by the project; examples could include retention of woody material, logs, snags, rocks, and brush piles.

5. *Nesting Birds and Migratory Bird Treaty Act*: Please note that it is the project proponent's responsibility to comply with all applicable laws related to nesting birds and birds of prey. Migratory non-game native bird species are protected by international treaty under the federal Migratory Bird Treaty Act (MBTA) of 1918, as amended (16 U.S.C. 703 *et seq.*). In addition, sections 3503, 3503.5, and 3513 of the Fish and Game Code (FGC) also afford protective measures as follows: Section 3503 states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by FGC or any regulation made pursuant thereto; Section 3503.5 states that it is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by FGC or any regulation adopted pursuant thereto; and Section 3513 states that it is unlawful to take or possess any migratory nongame bird as designated in the MBTA or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the MBTA.

The Department recommends that the DEIR include the results of avian surveys, as well as specific avoidance and minimization measures to ensure that impacts to nesting birds do not occur. Project-specific avoidance and minimization measures may include, but not be limited to: project phasing and timing, monitoring of project-related noise (where applicable), sound walls, and buffers, where appropriate. The DEIR should also include specific avoidance and minimization measures that will be implemented should a nest be located within the project site. If pre-construction surveys are proposed in the DEIR, the Department recommends that they be required no more than three (3) days prior to vegetation clearing or ground disturbance activities, as instances of nesting could be missed if surveys are conducted sooner.

6. *Translocation of Species*: The Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species as studies have shown that these efforts are experimental in nature and largely unsuccessful.

California Endangered Species Act

The Department is responsible for ensuring appropriate conservation of fish and wildlife resources including threatened, endangered, and/or candidate plant and animal

species, pursuant to the California Endangered Species Act (CESA). The Department recommends that a CESA ITP be obtained if the project has the potential to result in "take" (California Fish and Game Code Section 86 defines "take" as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill") of State-listed CESA species, either through construction or over the life of the project. CESA ITPs are issued to conserve, protect, enhance, and restore State-listed CESA species and their habitats. The Department encourages early consultation, as significant modification to the proposed project and mitigation measures may be necessary to obtain a CESA ITP. Revisions to the California Fish and Game Code, effective January 1998, require that the Department issue a separate CEQA document for the issuance of a CESA ITP unless the Project CEQA document addresses all Project impacts to listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of a CESA permit.

Western Riverside County Multiple Species Habitat Conservation Plan

Within the Inland Deserts Region, the Department issued Natural Community Conservation Plan Approval and Take Authorization for the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) per Section 2800, *et seq.*, of the California Fish and Game Code on June 22, 2004. The MSHCP establishes a multiple species conservation program to minimize and mitigate habitat loss and provides for the incidental take of covered species in association with activities covered under the permit.

Compliance with approved habitat plans, such as the MSHCP, is discussed in CEQA. Specifically, Section 15125(d) of the CEQA Guidelines requires that the CEQA document discuss any inconsistencies between a proposed Project and applicable general plans and regional plans, including habitat conservation plans and natural community conservation plans. An assessment of the impacts to the MSHCP as a result of this Project is necessary to address CEQA requirements. To obtain additional information regarding the MSHCP please go to: <http://rctlma.org/epd/WR-MSHCP>.

The proposed Project occurs within the MSHCP area and is subject to the provisions and policies of the MSHCP. In order to be considered a covered activity, Permittees must demonstrate that proposed actions are consistent with the MSHCP and its associated Implementing Agreement. The CPUC is the lead agency but is not signatory to the MSHCP, therefore, in order to participate in the MSHCP they would need to act as a Participating Special Entity (PSE). If the CPUC chooses to act as a PSE and obtain take through the MSHCP then the following MSHCP policies and procedures may apply to this project: Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools (MSHCP Section 6.1.2), Protection of the Narrow Endemic Plant Species (MSHCP Section 6.1.3), Additional Survey Needs and procedures (MSHCP section 6.3.2), and Urban/Wildland Interface Guidelines (MSHCP section 6.1.4).

If the project is not processed through the MSHCP for covered species, then the project may be subject to the Federal Endangered Species Act (FESA) and/or CESA for threatened, endangered, and/or candidate species.

Whether take of threatened and/or endangered species is obtained through the MSHCP or through a CESA ITP, the DEIR needs to address how the proposed project will affect the policies and procedures of the MSHCP. Therefore, all surveys required by the MSHCP policies and procedures listed above to determine consistency with the MSHCP should be conducted and results included in the DEIR so that the Department can adequately assess whether the project will impact the MSHCP.

Stephens' Kangaroo Rat Habitat Conservation Plan

The project occurs within the Stephens' kangaroo rat (*Dipodomys stephensi*) Habitat Conservation Plan (SKR HCP) fee area boundary. The SKR HCP provides Take Authorization for Stephens' kangaroo rat within its boundaries, and the MSHCP provides Take Authorization for Stephens' kangaroo rat outside of the boundaries of the SKR HCP, but within the Plan Area boundaries. The DEIR should identify if any portion of the project will occur on SKR HCP lands, or on Stephens' kangaroo rat habitat lands outside of the SKR HCP, but within the MSHCP. Note that the SKR HCP allows for encroachment into the Stephens' kangaroo rat Core Reserve for public projects, however, there are no provisions for encroachment into the Core Reserve for privately owned projects. If impacts to Stephens' kangaroo rat habitat will occur from the proposed project, the DEIR must specifically identify the total number of permanent impacts to Stephens' kangaroo rat core habitat and the appropriate mitigation to compensate for those impacts.

Lake and Streambed Alteration Program

For any activity that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of a river or stream or use material from a streambed, the project applicant (or "entity") must provide written notification to the Department pursuant to Section 1602 of the Fish and Game Code. Based on this notification and other information, the Department then determines whether a Lake and Streambed Alteration (LSA) Agreement is required. The Department's issuance of an LSA Agreement is a "project" subject to CEQA (see Pub. Resources Code 21065). To facilitate issuance of an LSA Agreement, if necessary, the DEIR should fully identify the potential impacts to the lake, stream, or riparian resources, and provide adequate avoidance, mitigation, and monitoring and reporting commitments. Early consultation with the Department is recommended, since modification of the proposed project may be required to avoid or reduce impacts to fish and wildlife resources. To obtain a Lake or Streambed Alteration notification package, please go to <http://www.dfg.ca.gov/habcon/1600/forms.html>.

The following information will be required for the processing of a Notification of Lake or Streambed Alteration and the Department recommends incorporating this information

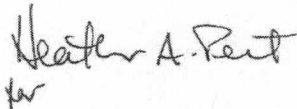
into the CEQA document to avoid subsequent documentation and project delays. Please note that failure to include this analysis in the project's environmental document could preclude the Department from relying on the Lead Agency's analysis to issue an LSA Agreement without the Department first conducting its own, separate Lead Agency subsequent or supplemental analysis for the project:

1. Delineation of lakes, streams, and associated habitat that will be temporarily and/or permanently impacted by the proposed project (include an estimate of impact to each habitat type);
2. Discussion of avoidance and minimization measures to reduce project impacts; and,
3. Discussion of potential mitigation measures required to reduce the project impacts to a level of insignificance. Please refer to section 15370 of the CEQA Guidelines for the definition of mitigation.

Further Coordination

The Department appreciates the opportunity to comment on the NOP of a DEIR for the Valley South Subtransmission Project (SCH No. 2015051012). If you should have any questions pertaining to the comments provided in this letter, please contact Joanna Gibson at (909) 987-7449 or at Joanna.gibson@wildlife.ca.gov.

Sincerely,



Leslie MacNair
Acting Regional Manager

Literature Cited

Sawyer, J. O., T. Keeler-Wolf, and J. M. Evens. 2009. A manual of California Vegetation, 2nd ed. California Native Plant Society Press, Sacramento, California.
<http://vegetation.cnps.org/>



Scott A. Mann
Mayor

John V. Denver
Mayor Pro Tem

Wallace W. Edgerton
Councilmember

Greg August
Councilmember

Matthew Liesemeyer
Councilmember

June 4, 2015

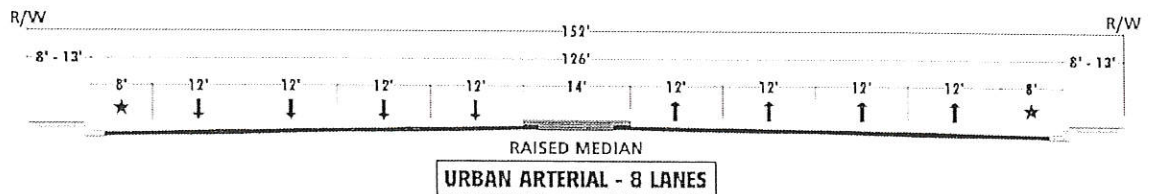
Valley South Subtransmission
Project Scoping Comments
c/o Aspen Environmental Group
5020 Chesebro Road, Suite 200
Agoura Hills, CA 91301

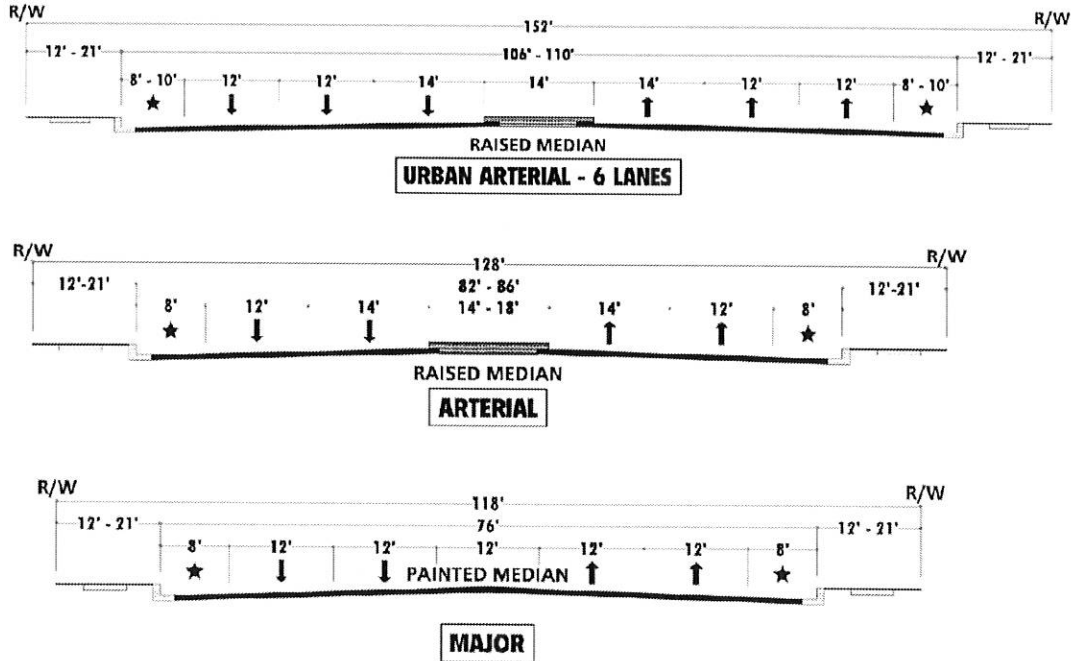
RE: Valley South Subtransmission Project (Application No. A.14-12-013)

Dear Aspen Environmental Group:

Thank you for providing an opportunity for the City of Menifee Community Development Department to review the Notice of Preparation for the Valley South Subtransmission Project (VSSP). Menifee's Community Development Department has reviewed the notice and has the following comments:

1. The City requests that the preferred "Proposed Project" alignment be selected as opposed to the "SCE Proposed Alternative" alignment, since the Proposed Project alignment would traverse fewer residential subdivisions and, therefore would have less potential to impacts the urban population of not only the City of Menifee, but the residents within the adjacent County of Riverside, as well.
2. SCE should take into consideration the recently approved (December 2013) City of Menifee Circulation Element when designing the power pole alignment within the City limits. The poles should be placed at their ultimate location per the City's Circulation Element roadway cross-sections. The poles should be located either within the right-of-way's parkway or completely outside of the public rights-of-way within a private easement, but they should not be placed within the ultimate planned pavement, curb, gutter, trails, or sidewalks. For your reference, Briggs Road is designated as a Major (4 lanes, divided) roadway, McLaughlin Road as a Collector / Interconnected Local (2 lane) roadways, Scott Road as an Urban Arterial (6 lanes, divided) roadway, and Menifee Road as an Arterial (4 lanes, divided) . Refer to the corresponding cross-sections below.





3. The City requests that SCE address concerns related to transmission line aesthetics where lines are proposed within the City of Menifee, such as locating smaller distribution lines on the same poles wherever feasible to reduce visual clutter and following the existing utility corridors along McLaughlin Road, Briggs Road, and Case Road.
4. An encroachment permit shall be required for all improvements constructed within the City public right-of-way.
5. The City of Menifee would like to coordinate with SCE on the placement of individual poles to be proposed within the City's rights-of-way.
6. The City of Menifee Community Development Department requests to receive subsequent notices on this project and any environmental documents prepared for the project.

Thank you again for the opportunity to review the project proposal. Please forward any environmental documents and/or hearing notices regarding the project, to my attention at this office.

Sincerely,

 Ryan Fowler
 Associate Planner
 Community Development Department

Tribal Comment Letters

June 1, 2015

Valley South Subtransmission
Project Scoping Comments
C/O Aspen Environmental Group
5020 Chesebro Road, Suite 200
Agoura Hills, CA 91301



Re: Valley South Subtransmission Project, Application No. A.14-12-013

The Soboba Band of Luiseño Indians appreciates your observance of Tribal Cultural Resources and their preservation in your project. The information provided to us on said project has been assessed through our Cultural Resource Department, where it was concluded that although it is outside the existing reservation, the project area does fall within the bounds of our Tribal Traditional Use Areas. This project location is in proximity to known sites, is a shared use area that was used in ongoing trade between the tribes, and is considered to be culturally sensitive by the people of Soboba.

Soboba Band of Luiseño Indians is requesting the following:

1. To initiate a consultation with the project proponents and lead agency.
2. The transfer of information to the Soboba Band of Luiseno Indians regarding the progress of this project should be done as soon as new developments occur.
3. Soboba Band of Luiseño Indians continues to act as a consulting tribal entity for this project.
4. Working in and around traditional use areas intensifies the possibility of encountering cultural resources during the construction/excavation phase. For this reason the Soboba Band of Luiseño Indians requests that Native American Monitor(s) from the Soboba Band of Luiseño Indians Cultural Resource Department to be present during any ground disturbing proceedings. Including surveys and archaeological testing.
5. Request that proper procedures be taken and requests of the tribe be honored (Please see the attachment)

Sincerely,

A handwritten signature in black ink, appearing to read "JOE", is written over a horizontal line.

Joseph Ontiveros, Director of Cultural Resources
Soboba Band of Luiseño Indians
P.O. Box 487
San Jacinto, CA 92581
Phone (951) 654-5544 ext. 4137
Cell (951) 663-5279
jontiveros@soboba-nsn.gov

Cultural Items (Artifacts). Ceremonial items and items of cultural patrimony reflect traditional religious beliefs and practices of the Soboba Band. The Developer should agree to return all Native American ceremonial items and items of cultural patrimony that may be found on the project site to the Soboba Band for appropriate treatment. In addition, the Soboba Band requests the return of all other cultural items (artifacts) that are recovered during the course of archaeological investigations. Where appropriate and agreed upon in advance, Developer's archeologist may conduct analyses of certain artifact classes if required by CEQA, Section 106 of NHPA, the mitigation measures or conditions of approval for the Project. This may include but is not limited or restricted to include shell, bone, ceramic, stone or other artifacts.

The Developer should waive any and all claims to ownership of Native American ceremonial and cultural artifacts that may be found on the Project site. Upon completion of authorized and mandatory archeological analysis, the Developer should return said artifacts to the Soboba Band within a reasonable time period agreed to by the Parties and not to exceed (30) days from the initial recovery of the items.

Treatment and Disposition of Remains.

A. The Soboba Band shall be allowed, under California Public Resources Code § 5097.98 (a), to (1) inspect the site of the discovery and (2) make determinations as to how the human remains and grave goods shall be treated and disposed of with appropriate dignity.

B. The Soboba Band, as MLD, shall complete its inspection within twenty-four (24) hours of receiving notification from either the Developer or the NAHC, as required by California Public Resources Code § 5097.98 (a). The Parties agree to discuss in good faith what constitutes "appropriate dignity" as that term is used in the applicable statutes.

C. Reburial of human remains shall be accomplished in compliance with the California Public Resources Code § 5097.98 (a) and (b). The Soboba Band, as the MLD in consultation with the Developer, shall make the final discretionary determination regarding the appropriate disposition and treatment of human remains.

D. All parties are aware that the Soboba Band may wish to rebury the human remains and associated ceremonial and cultural items (artifacts) on or near, the site of their discovery, in an area that shall not be subject to future subsurface disturbances. The Developer should accommodate on-site reburial in a location mutually agreed upon by the Parties.

E. The term "human remains" encompasses more than human bones because the Soboba Band's traditions periodically necessitated the ceremonial burning of human remains. Grave goods are those artifacts associated with any human remains. These items, and other funerary remnants and their ashes are to be treated in the same manner as human bone fragments or bones that remain intact

Coordination with County Coroner's Office. The Lead Agencies and the Developer should immediately contact both the Coroner and the Soboba Band in the event that any human remains are discovered during implementation of the Project. If the Coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, the Coroner shall ensure that notification is provided to the NAHC within twenty-four (24) hours of the determination, as required by California Health and Safety Code § 7050.5 (c).

Non-Disclosure of Location Reburials. It is understood by all parties that unless otherwise required by law, the site of any reburial of Native American human remains or cultural artifacts shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, parties, and Lead Agencies, will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code § 6254 (r). Ceremonial items and items of cultural patrimony reflect traditional religious beliefs and practices of the Soboba Band. The Developer agrees to return all Native American ceremonial items and items of cultural patrimony that may be found on the project site to the Soboba Band for appropriate treatment. In addition, the Soboba Band requests the return of all other cultural items (artifacts) that are recovered during the course of archaeological investigations. Where appropriate and agreed upon in advance, Developer's archeologist may conduct analyses of certain artifact classes if required by CEQA, Section 106 of NHPA, the mitigation measures or conditions of approval for the Project. This may include but is not limited or restricted to include shell, bone, ceramic, stone or other artifacts.

Notice of Preparation - Valley South Subtransmission

Anna Hoover <ahoover@pechanga-nsn.gov>

Tue 6/9/2015 2:22 PM

ScopingCmtLetter

To:Valley-South- Project <Valley-South-Project@aspeneq.com>;

Cc:Ebru Ozdil <eozdil@pechanga-nsn.gov>; Brenda L. Tomaras <btomaras@mtowlaw.com>; Andrea Fernandez <afernandez@pechanga-nsn.gov>;

 1 attachment (72 KB)

Valley South Subtrans - NOP.pdf;

To Whom it May Concern;

These comments are written on behalf of the Pechanga Band of Luiseño Indians (hereinafter, “the Tribe”), a federally recognized Indian tribe and sovereign government. The Tribe formally requests, pursuant to Public Resources Code §21092.2, to be notified and involved in the entire CEQA environmental review process for the duration of the above referenced project (the “Project”). Please add the Tribe to your distribution list(s) for public notices and circulation of all documents, including environmental review documents, archeological reports, and all documents pertaining to this Project. The Tribe further requests to be directly notified of all public hearings and scheduled approvals concerning this Project. Please also incorporate these comments into the record of approval for this Project.

Although these comments are being submitted one day past the requested NOP deadline of June 8, 2015, we request that you please accept our comments and incorporate them in to the Project file and documents. The Pechanga Tribe has worked jointly with the CPUC and SCE on this Project since 2012, including conducting several field visits and meetings. The Tribe does have concerns that the Project could have potential significant impacts to tribal cultural resources. The Valley South Subtransmission Line passes through at least two Luiseño villages and the Alternative Line passes through a third Village. Thus, visual and cumulative impacts to archaeological and tribal cultural resources must be addressed in the EIR.

In order to comply with CEQA and other applicable Federal and California law, it is imperative that the CPUC consult with the Tribe in order to guarantee an adequate knowledge base for an appropriate evaluation of the Project effects, as well as to generate adequate mitigation measures. Thus, the Tribe requests to be involved and participate with the CPUC in assuring that an adequate environmental assessment is completed, and in developing all monitoring and mitigation plans and measures for the duration of the Project. In addition, given the sensitivity of the Project area, it is the position of the Pechanga Tribe that professional Pechanga tribal monitors be required to be present during all archaeological surveys and studies, as well as to be present during all ground-disturbing activities conducted in connection with the Project, including any archeological excavations performed.

The Tribe reserves the right to fully participate in the environmental review process, as well as to provide further comment on the Project's impacts to cultural resources and potential mitigation for such impacts. Further, the Tribe reserves the right to participate in the regulatory process and provide comment on issues pertaining to the regulatory process and Project approval.

The Pechanga Tribe looks forward to working together with the CPUC in protecting the invaluable Pechanga cultural resources found in the Project area. Please contact me at 951-770-8104 or at ahover@pechanga-nsn.gov once you have had a chance to review these comments so that we might begin our consultation. Thank you.

Anna M. Hoover
Cultural Analyst
Dechanga Band of Luiseno Mission Indians
P.O. Box 2183
Temecula, CA 92593

951-770-8104 (O)

951-694-0446 (F)

951-757-6139 (C)

ahover@pechanga-nsn.gov

Private Citizen Comment Letters

Charles Green

31152 Norma Way

Winchester, CA 92596

5/15/2015

Valley South Subtransmission

Project Scoping Comments

Care Aspen Environmental Group

5020 Chesebro Road, Suite 200

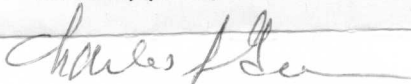
Agoura Hills, CA 91301

Gentlemen:

My comments are as follows: Southern California Edison didn't follow the rules. They never have shown us three alternate routes for this project. They only have shown one alternate route which does not make any sense at all. There are other alternate routes available such as down Highway 79 to Temecula. This could be one alternative. They have not shown this route at all. THIS IS NOT RIGHT.

Thank you

Sincerely yours,



Charles L. Green

From: kirkwho537@roadrunner.com <kirkwho537@roadrunner.com>
Sent: Friday, May 22, 2015 11:37 AM
To: Valley-South- Project
Cc: kirkwho537@roadrunner.com
Subject: Valley South Transmission Project

Gentlemen:

This is a an email copy of letter that was mailed today.

Kirk Douglas

05/22/2015

Gentlemen

I am writing to you to provide my inputs on the Valley South Subtransmission Project (VSSP), CPUC application no. A.12-12-013.

My wife and I have lived in the area for approximately three years. One of the reasons we purchase our home in the area was the open vistas as opposed to those in our last home. I will address my comments to the areas listed on your notice. My address is below, but I am just southeast of intersection of Leon Rd. and Baxter/Jean Nicholas Rd.

Aesthetics: We currently along Leon Road have clear unobstructed views of the sky and our neighbor's homes. There is a landscaped walking/running path along Leon Rd as well as Park below grade level. These areas will be adversely affected with the proposed 66 to 96 foot poles with power lines. The most interesting aspect of the current proposal is that prior to the current neighborhood construction, Edison had power lines running down Leon Rd. When the current neighborhoods were construction, the lines appear to have been placed under ground. Currently there are power lines on Leon Rd through my neighborhood. They go underground about 300 yards north of the Leon Rd. Baxter/Jean Nicholas Rd. intersection. They rise back up on poles on old Leon Rd (abandoned for cars) after Leon turns southeast along a new alignment. Another interesting aspect is that the power lines are on poles until old Leon Rd. intersects Winchester Rd. (State Highway 79), after crossing Winchester Rd the lines go underground again in a vacant field. It makes no sense to simply put the power poles back up when they were removed for aesthetics in the first place.

Utilities and Service Systems: The VSSP will not enhance any electrical issue in my neighbor or area. The power is to be transported to an area east of Temecula for future development (read new housing). Truly believe that the new development will not have 96 foot power poles along their roads and streets.

Hydrology and Water: This is in line with prior paragraph and not really addressed in EIR for project, but power is being taken to an area that has no current water resources in current drought.

In your letter, I noticed that the first 1600 feet of the project is in an underground duct bank. If the VSSP has to go down Leon Rd. as in proposal, why not place the portion of Leon Rd. (addressed by me) in an underground duct bank as well.

Sincerely

Kirk Douglas
35081 Lone Hill Ct
Winchester CA 92596
951-223-3294

From: Kevin Jass <kjass5775@gmail.com>
Sent: Wednesday, May 27, 2015 3:49 PM
To: Valley-South- Project
Subject: Response to Notice of Preparation

To whom it may concern,

I am responding to your Notice Of Preparation. I am a resident in the Spencer's Crossing Development. The proposed Valley South Subtransmission Project transmission lines go right behind my house.

I understand there is a need for infrastructure due to expansion in our valley. However I am opposed to the power lines being above ground, where they go through our community.

When our community was developed a considerable amount of time, effort, and money was put into considering the appearance of our community. With that in mind, the developer paid to move the existing transmission lines underground. I am not referring to the lines supplying our homes. The existing lines that were in place long before our community was built. Of course that cost was included in the price of the homes in our community. Because of this I feel it isn't right for SCE to come through our community with above ground lines on the same route that we already paid to have the lines placed below ground.

One of the excuses SCE gives for not placing them below ground is price. What they don't say is there are also advantages of them being below ground. The lines are less likely to need future repair from wind and other physical objects damaging the lines and towers. All they care about is the cost of installation not what it does to the community or the environment.

Is it fair to ask our community to pay extra to put the existing lines below grade? Causing our property values go down costing us even more money, and have my bill go up to pay for a new transmission line that doesn't benefit my community at all.

I don't believe our community should be asked to shoulder this expense because SCE wants to save money. I don't dispute the need for the lines. I am disputing the need to increase SCE shareholders profits at our expense.

Kevin Jass

kjass5775@gmail.com

909-732-9268