

Administrative Draft PEA Chapters 4, 5, and 6 of SCE's Responses to CPUC Data Gaps

Valley South Subtransmission Project (VSSP)

#	CPUC Comment/Question	SCE's Response and/or Reference to PEA
Section 4.1 Aesthetics		
2-1	Section 4.1.2.1 states that FAA notifications (for determinations of necessary FAA Hazard Lights and Markers) would be filed with the FAA once final engineering is completed and before construction commences. However, an understanding of the potential for FAA Hazard Lights and Markers is needed in order to assess the potential visual impact of such facilities. Therefore, a preliminary determination of potential FAA Hazard Lighting and Marker Balls is required in order to complete the assessment of the Project's (and Alternative's) Aesthetics impacts. At a minimum, please provide the area(s) along the segments where FAA markings would most likely be required.	<p>In accordance with FAA procedures, SCE would submit the FAA Form 7460-1 (Notice of Proposed Construction or Alteration) for those subtransmission structures ("structures") and wire spans exceeding the regulatory thresholds, in this case, primarily due to their proximity to the French Valley Airport. The general areas where the structures and wire spans associated with the Project anticipated to warrant FAA notification, will be identified in the GIS data provided when the PEA is filed with the CPUC.</p> <p>Please note that the filing of the required Notices does not equate to a preliminary determination of potential FAA Hazard Lighting and Marker Balls. In fact, a SCE analysis of the proposed project structures has concluded that the project construction will not warrant lighting or marker balls. SCE has not conducted sufficient preliminary engineering for the Alternative project to determine whether notification to the FAA is required. With respect to the proposed project structures, the FAA will conduct its own analysis and may recommend no changes to the design of the proposed structures; or request redesigning the proposed structures near the airports to reduce the height of such structures; or marking the structures, including the addition of aviation lighting; or placement of marker balls on wire spans. SCE would evaluate the FAA recommendations for reasonableness and feasibility, and in accordance with the Title 14 Part 77, SCE may petition the FAA for a discretionary review of its determination to address any issues with the FAA determination.</p> <p><u>PEA Update: The FAA language above has been provided in Chapter 3, Project Description (Section 3.5.2.2) and in Chapter 4, Section 4.1, Aesthetics (Section 4.1.2.1), Section 4.8, Hazards and Hazardous Materials (Sections 4.8.4.5 and 4.8.4.6), and Section 4.16, Transportation and Traffic (Section 4.16.4.3) for consistency throughout the PEA.</u></p>
2-2	There is no indication in Section 4.1 that the project would require the removal of any trees. Please confirm whether or not any tree removal would be required and if so, provide a map of the locations of any trees to be removed.	A tree and vegetation survey was conducted along the proposed project route within the potential impact area of the Valley South Subtransmission Project. The entire route of the planned transmission route was toured by vehicle during the survey to ensure that all trees and tall shrubs were detected, and areas where trees and tall shrubs were adjacent or within the potential impact area were surveyed and measured by foot. Tree measurements were made using standard arboricultural methods to calculate the diameter at breast height (DBH) and to calculate tree height. Plants were identified using the <i>Jepson's Manual 2nd Edition</i> . The level of tree trimming and/or removal are based on requirements included in <i>CPUC General Order (GO) 95, Overhead Electric Line Construction</i> . Trees were tagged with tree numbers in the field for later identification. Photographs were taken and GPS coordinates were recorded in the field. This data will be included in the GIS files entitled Attachment 1_VSSP_PEA_GIS_SUBMITTAL.zip. Additionally, the full results of the tree and vegetation survey, including the types, number and size of trees, the methods of removal, and types of equipment used are provided in Appendix J: Tree Survey Report and Chapter 3, Table 3.10-A Subtransmission Construction Equipment and Workforce Estimates.
2-3	Section 4.1.4.3 states that no mitigation is available to mitigate the significant visual impacts that would occur with the Project. Please explain if undergrounding would be feasible or appropriate to mitigate these visual impacts.	SCE has not engineered any underground option for this transmission line, and therefore cannot conclusively determine whether undergrounding would be feasible. However, SCE has identified a number of obstacles that would interfere with any attempted undergrounding. For example, undergrounding would require securing new easements. Additionally, air quality may significantly be impacted due to the increase in emissions from diesel equipment usage over a longer construction period to excavate, install duct banks, backfill and potentially repave if easements are in the street. Street traffic would be significantly impacted by lengthier lane closures and the significant increase in construction vehicle traffic for dirt haul-off, concrete/slurry delivery and possible repaving vehicles. In addition, SCE is aware that there are likely a number of different utilities already installed underground along the same route where the project is proposed (including but not limited to water conveyance pipelines).
2-4	Section 4.1.4.4 states "...efforts would be made to minimize [construction night lighting] effect on nearby receptors and the Mount Palomar	It is not anticipated construction will be taking place at night, however, if lighting, is needed to protect the safety of the construction workers; lights would be oriented and shielded to minimize their effect on any nearby sensitive receptors. Potential impacts from lighting that may be needed during construction would be temporary.

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	Observatory." Please provide a description of the lighting control measures that would be put in place to prevent the occurrence of significant construction night lighting impacts on nearby sensitive receptors and Mount Palomar Observatory.	
2-5	Section 4.1.6 provides a brief discussion of Alternative 2 and does not include any visual simulations of this Alternative. Also, the extent of the impact assessment is essentially encapsulated in the statement that: "Due to the larger area covered by the project's facilities, impacts associated with Alternative Project are expected to be greater than the Proposed Project." In order to conduct an analysis of Alternative 2's Aesthetics impacts, a reasonable number of visual simulations are needed in order to accurately assess the Alternative's Aesthetics impacts on adjacent and nearby sensitive receptors. Therefore, please provide a sufficient number of visual simulations to be able to evaluate the potential Aesthetics impacts of Alternative 2. Also, as mentioned above under 2-1, FAA Hazard Lighting and Marker information would also be needed for Alternative 2.	<p>In Section 4.1, Aesthetics, of the PEA, photos of existing views of the Proposed Project and Alternative 2 are provided to depict the existing visual character and quality of the Proposed Project area and Alternative 2 area. Alternative 2, which shares a large portion of the same alignment as the Proposed Project, has the same existing visual character and quality as the Proposed Project. Where Alternative 2 shares the same route as of the Proposed Project, the impacts to visual character and quality would be the same as the Proposed Project, as discussed in Section 4.1.</p> <p>In areas where Alternative 2 would not follow the same route as the Proposed Project, reference photos of existing views of Alternative 2 are provided and discussed. As shown in these reference photos, the visual character and quality of Alternative 2 is similar to the Proposed Project area and would contain similar types of sensitive receptors and scenic resources. Alternative 2 would implement the same type of improvements as the Proposed Project. Therefore, visual simulations of Alternative 2 would not provide any additional or new information beyond what is already described in the text.</p> <p>If visual simulations of Alternative 2 were provided, they would be very similar to the visual simulations prepared for the Proposed Project, thereby illustrating that visual impacts would be similar to the Proposed Project and would not offer anything substantive for comparison purposes. The only difference would be that Alternative 2 would result in greater visual impacts than the Proposed Project since it would be 4 miles longer than the Proposed Project, thereby resulting in a greater "visual footprint," as discussed in Section 4.1. Visual simulations are thus not necessary to conduct an analysis of Alternative 2's impacts to visual character and quality. It should also be noted that per Section 15126.6(d) of the CEQA Guidelines, "if an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed." Section 4.1 describes the significant effects resulting from Alternative 2 in addition to those that would be caused by the Proposed Project, but does so in less detail than the Proposed Project as warranted per Section 15126.6(d) of the CEQA Guidelines. Thus, visual simulations are not necessary for Alternative 2 to evaluate the potential visual impacts of this alternative in comparison to the Proposed Project.</p> <p>Regarding the FAA Hazard Lighting and Marker information for Alternative 2, please refer to response to comment 2-1 above.</p>
Chapter 4.2. Agriculture and Forestry Resources		
2-6	Sections 4.2.4.1 and 4.2.4.2 describe the impact significance of the project on Prime Farmland Unique Farmland or Farmland of Statewide Importance and on Williamson Act land. The discussion does not provide a description of what measures will be taken to ensure that construction activities will limit impacts to agricultural lands to support the less than significant conclusion. In addition, additional information is needed on what agricultural uses are currently on these lands and what agricultural activities, if any, have the potential to be disrupted as a result of the project.	<p>The agriculture construction impact discussion in Section 4.2, Agriculture and Forestry Resources, of the PEA concludes that construction activities would result in a less than significant impact based on the discussion of how construction of the Proposed Project would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to nonagricultural use. Specifically, the Proposed Project would limit impacts to Farmland through avoidance (e.g., staging yards would be sited to avoid conversion of Farmland to nonagricultural uses), and restoring any disturbed areas back to their preconstruction conditions as feasible. The agriculture operation impact discussion in Section 4.2 concludes that operation of the Proposed Project would result in a less than significant impact based on the small percentage of Farmland that would be converted to nonagricultural use. Specifically, the Proposed Project would permanently convert 5.3 acres of Farmland to nonagricultural use because of the installation of anchors, the use and maintenance of a permanent unpaved access road, and installation of subtransmission structures. The conversion of 5.3 acres of lands identified as Farmland would represent a loss of 0.0012 percent of the approximately 433,859 acres of Farmland identified in Riverside County. The impact from converting such a small percentage of the Farmland identified in Riverside County to nonagricultural use would be less than significant.</p> <p>Also, as described in Section 4.2, the agriculture construction and operation impact discussion was based on the significance criteria derived from the CEQA Environmental Checklist, which indicates that a potentially significant impact would occur if the Proposed Project would convert Farmland to nonagricultural use or conflict with existing zoning for agricultural use, or a Williamson Act contract. To evaluate potential impacts on agriculture resources, maps developed by the California Department of Conservation (CDC) Farmland Mapping and</p>

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		Monitoring Program (FMMP) were reviewed to determine whether the Proposed Project would convert Farmland to nonagricultural uses. Williamson Act data and zoning regulations were reviewed to determine where the Proposed 115 kV subtransmission line crosses lands under Williamson Act contracts or otherwise is zoned for agricultural use. Project activities during construction and Operations and Maintenance (O&M) were evaluated within the context of existing agricultural zoning and farmland protections to determine whether the Proposed Project may result in changes that would directly or indirectly lead to conversion of Farmland or timber resources to nonagricultural use. Information regarding the current types of agricultural uses and activities that could be impacted by the Proposed Project were not provided as they were not needed to make an impact determination per the CEQA Environmental Checklist. In general, according to the 2012 Riverside County Agricultural Production Report and CDC FMMP, the current types of agricultural uses and activities found in Riverside County include the production of citrus, tree and vine, vegetables, field and seed, nursery, apiculture, aquaculture crops, livestock and poultry farms, and grazing. These current types of agricultural uses and activities could be temporarily impacted by the Proposed Project during construction, and may be permanently impacted by the Proposed Project (e.g., 5.3 acres converted from Farmland to nonagricultural use).
2-7	In addition, it would be helpful in this section to include figures that show a more detailed view of the proposed project (tower locations/reconducting activity) in relation to agricultural preserve lands and Williamson Act lands (e.g. Sites 2 and 3).	FMMP Farmland, Williamson Act, and agricultural preserves information will be provided in the GIS Map Package (see Attachment 1_VSSP_PEA_GIS_SUBMITTAL.zip) so the CPUC may view a more detailed view of the Proposed Project and its relation to agricultural land.
Chapter 4.3. Air Quality		
2-8	Please supply the air pollutant emissions estimate (Appendix E) as noted on page 4.3-9 of the PEA. If the emissions estimate was completed partially or completely using a spreadsheet program, please provide that in electronic format in the original program (Excel) along with the completed appendix file. If the emissions estimate was completed partially or completely using some other electronic emissions estimating program, such as CalEEMod, please provide those electronic files (input and output files if relevant to that program). Please note that there will likely be additional data requests after a review of the emissions estimate file(s).	The air pollutant emissions estimates Excel files (Appendix E) are attached. Please refer to attachments "VSSP Air Quality Appendix Calculation Tables_081914.xlsx" and "VSSP Air Quality Appendix Calculation Tables_081914_with APMs.xlsx."
2-9	It is our understanding that subtransmission line construction and distribution relocation work would occur within both South Coast Air Quality Management District's designated Source Receptor Area (SRA) 24 and 26, so it would seem that the worst-case Localized Significance Thresholds (LSTs) between these two SRAs should be applied in Table 4.3-5, unless it is clear that the receptor distances are greater along the existing distribution and new subtransmission lines route within the more conservative SRA 24. Please identify if that was the assumption that dictated the use of the less conservative LST CO and NOx threshold values for SRA 26 that are shown in Table 4.3-5.	<p>Yes, the closest receptors to the Project components Construction and distribution relocation work would occur within both South Coast Air Quality Management District's designated Source Receptor Area (SRA) 24 and 26. LSTs for both SRA's were utilized to compare in the localized impact analysis. LSTs for SRA 24 are appropriate for evaluating emissions to from substation modification and subtransmission line work at Valley Substation because the Valley Substation is located in the SCAQMD Localized Significance Thresholds for the geographically accurate SRA, Perris Valley (which happened to be SRA 26) covers Romoland, Perris, and Winchester.</p> <p>LSTs for SRA 26 are appropriate for evaluating emissions from subtransmission line construction, distribution relocation, and telecom construction because these components are located in the Temecula Valley (which covers Murrieta and Temecula).</p> <p>Substation modification construction would only occur in SRA 24. Subtransmission line construction would occur in both SRA 24 and SRA 26 and therefore LSTs for both SRAs were utilized to evaluate localized impacts. Telecom line construction would occur in both SRA 24 and SRA 26 but based on receptor distance of 25-50 meters within SRA 26, SRA 26 was utilized to evaluate localized impacts. Distribution relocation would only occur in SRA 26.</p>
2-10	It is our understanding that there will be six staging yards for this project including one within the City of Perris. Please evaluate the emissions and	SCE identified six staging yard locations in the PEA that could potentially be used for construction of the proposed project. However, SCE recently determined that only two sites will be utilized. The final decision on which sites to use would be evaluated and decided upon by SCEs contractor prior to start of construction. Emissions associated with equipment and vehicles operating at the staging yards were

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	localized emissions impacts from the activities that will occur at these staging yards.	presented in Appendix E, Table 9, Marshalling Yard. Emissions from the operation of one yard were multiplied by a factor of four to represent the emissions from multiple yards. SCE's analysis of the emissions associated with the four staging yards is thus conservative considering it is unlikely that SCE would ever use more than two staging yards. Please note that even with the conservative assumption of four staging yards, emissions associated with those four yards would still be less than significant.
2-11	On page 4.3-17 an OEHHA guidance suggestion is noted. Please provide the complete OEHHA reference citation.	<p><u>PEA Update: Reference below was added to Reference section in Section 4.3</u></p> <p>Office of Environmental Health Hazard Assessment (OEHHA) <i>Technical Support Document for Exposure Assessment and Stochastic Analysis</i>, August 2012. http://www.oehha.org/air/hot_spots/pdf/2012tsd/Chapter11_2012.pdf</p>
Section 4.4 Biological Resources		
2-12	Section 4.4.1 under the Methodology heading, on page 4.4-2, a reference is made to Biological Resource Assessments (BRAs) in Appendix F-1 BRA-Segment 1 and Appendix F-2 BRA-Segment 2. These documents were not provided with the draft PEA and are needed to complete a review of biological resources in terms of methodology, species occurrences, etc.	Please refer to SCE's final PEA Appendices, please refer to Appendix F-1 BRA-Segment 1 and Appendix F-2 BRA-Segment 2.
2-13	Figure references throughout Section 4.4 do not match the provided figures. Please revise accordingly.	Figure references throughout Section 4.4 are revised to match correct figures in SCE's final PEA.
2-14	Section 4.4.1 under the Methodology heading, it is indicated that surveys were not conducted after April 16, 2014 on two inaccessible properties due to the presence of fences and private property signs. The text appears to indicate that surveys were conducted in these areas up until this date. Please provide detail on when surveys were conducted within these areas.	Table 4.4-1 Biological Resource Surveys conducted for the Proposed Project and Corresponding Survey Buffers has been updated to indicate which surveys were conducted on inaccessible properties. Additional information regarding survey summary dates are provided in SCE's final PEA. Please refer to Appendix F-1 BRA-Segment 1 and Appendix F-2 BRA-Segment 2.
2-15	Section 4.4.1 under the Study and Survey Area heading, it is stated that surveys for nesting raptors were conducted in 2012 only. Table 4.4-1 contradicts that text and indicates that nesting raptor surveys were also conducted in 2014. Please indicate when surveys were completed and if not completed in a given year (2012-2014) the rationale for why the surveys were not conducted.	Please refer to SCE's final PEA, Section on page 4.4.1-10, wherein it is stated "Surveys for nesting raptors within 0.5 of a mile of Segment 1 of the Proposed Project were conducted by Bloom Biological Inc. (BBI) of Santa Ana in 2012 and within 500 feet of Segment 2 of the Proposed Project by AECOM biologists in May 2014."
2-16	It does not appear, based on the provided text in Section 4.4, that additional surveys were conducted within Segment 1 in 2014. Please provide 2014 survey information for this segment, if available, or provide rationale as to why surveys were not conducted.	<p>Additional surveys were not conducted in Segment 1 of the Proposed or Alternative projects in 2014 for the following reasons:</p> <ul style="list-style-type: none"> • Focused and protocol survey for potential special status species were conducted in 2012 within suitable survey conditions. • No additional survey data was needed to make assessment of potential special status species impacts. Per Western Riverside MHSCP, additional focused or protocol surveys are not anticipated to be required for this segment, and if so would be conducted prior to construction activities. Surveys to avoid potential impacts to special status species will be conducted prior to construction.
2-17	Section 4.4.1.5 discusses Special Status Plant Species. Several special status plant species, known to occur in the general area, are not identified in this section. Rationale is not provided for those species not discussed, but may be detailed in the BRAs referenced in Appendix F-1 and F-2. Please	All Special Status Plant Species known to occur in the general area were evaluated for their potential to occur within the Proposed Project. Rationale describing the potential for these species to occur is provided in SCE's final PEA, please refer to Appendix F-1 BRA-Segment 1 and Appendix F-2 BRA-Segment 2.

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	provide this additional information or the BRAs if they contain this requested information.					
2-18	Section 4.4.1.6 discusses Special Status Wildlife Species. Several special status wildlife species, known to occur in the general area, are not identified in this section. Rational is not provided for those species not discussed, but may be detailed in the BRAs referenced in Appendix F-1 and F-2. Please provide this additional information or the BRAs if they contain this requested information.	All Special Status Wildlife Species known to occur in the general area were evaluated for their potential to occur within the Proposed Project. Rational describing the potential for these species to occur is provided in SCE's final PEA, please refer to Appendix F-1 BRA-Segment 1 and Appendix F-2 BRA-Segment 2.				
2-19	Section 4.4.4.2 discusses impacts to riparian habitat and sensitive communities. Impact acreages reported in this section are combined for both temporary and permanent impacts. Please report these acreages separately for both temporary and permanent impacts in this section and throughout Section 4.4.	<p><u>PEA Update: Section 3.7.2.3.3 was updated to include "Applicant Proposed Measures (APMs), described in Table 3.13, would limit impacts to special status resources to less than significant levels."</u></p> <p>SCE's final PEA, Section 4.4.4 Impact Analysis will include the acreages for temporary impacted areas in the sensitive habitat communities. The Proposed Project will be avoiding all impacts to riparian habitats (those requiring Fish and Game Code Section 1602 permits). Impacts to other sensitive habitats such as Diegan coastal sage scrub cannot be completely avoided, but will be reduced where feasible.</p> <p>The impacts provided in Section 4.4.4 are based upon preliminary engineering. Temporary disturbed impact acreage is approximately 509 and permanent disturbed acreage is approximately 14. The temporary and disturbed impact acreages are subject to change when final engineering is complete.</p>				
2-20	References are made and summaries are provided throughout Section 4.4 for various plant and wildlife surveys; no specific information on timing (i.e., during blooming period for specific plants, during the active season for various wildlife species, day or night surveys, seasonality of the surveys – spring, summer, fall, winter, etc.) is provided. Generally the year the surveys were completed is the only information provided in terms of methods and timing. This information may be detailed in the BRAs, but was not provided with the draft PEA, and is needed to complete a review of the biological resources section.	SCE's final PEA contains specific information regarding plant surveys. More information is provided in the surveys in SCE's final PEA, please refer to Appendix F-1 BRA-Segment 1 and Appendix F-2 BRA-Segment 2.				
2-21	Section 4.4.5 discusses Applicant Proposed Measures. While many of these measures provide some level of detail, some do not provide the specificity required by CEQA for defensible, enforceable measures. It is recommended that each APM be reviewed and additional specificity added where necessary (i.e., reporting requirements, thresholds, timing of surveys, etc.).	<p><u>PEA Update: Biology APMs revised and provided in PEA, Sections 3.9.2, 4.4.5, and Chapter 5, Table 5-1</u></p> <table border="1" data-bbox="1417 1387 2728 1862"> <tr> <td data-bbox="1417 1387 1566 1862">4.4</td> <td data-bbox="1566 1387 1690 1862">Biology</td> <td data-bbox="1690 1387 2063 1862">APM BIO-1</td> <td data-bbox="2063 1387 2728 1862"> <p>Preconstruction Surveys and Construction Monitoring – Preconstruction biological clearance surveys shall be performed at specific construction and other work sites where potential biological resources are located to minimize impacts on special status wildlife and plant species. If special status species are present, biological monitors shall be on-site, as needed, and shall aid crews in implementing avoidance measures during construction. Special status species observations and avoidance measures will be reported to the appropriate wildlife agencies prior to construction in that area. In addition, appropriate agencies will be provided a monthly</p> </td> </tr> </table>	4.4	Biology	APM BIO-1	<p>Preconstruction Surveys and Construction Monitoring – Preconstruction biological clearance surveys shall be performed at specific construction and other work sites where potential biological resources are located to minimize impacts on special status wildlife and plant species. If special status species are present, biological monitors shall be on-site, as needed, and shall aid crews in implementing avoidance measures during construction. Special status species observations and avoidance measures will be reported to the appropriate wildlife agencies prior to construction in that area. In addition, appropriate agencies will be provided a monthly</p>
4.4	Biology	APM BIO-1	<p>Preconstruction Surveys and Construction Monitoring – Preconstruction biological clearance surveys shall be performed at specific construction and other work sites where potential biological resources are located to minimize impacts on special status wildlife and plant species. If special status species are present, biological monitors shall be on-site, as needed, and shall aid crews in implementing avoidance measures during construction. Special status species observations and avoidance measures will be reported to the appropriate wildlife agencies prior to construction in that area. In addition, appropriate agencies will be provided a monthly</p>			

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					<p>report summarizing all special status species observations and avoidance measures.</p> <p>Nesting Bird Preconstruction Surveys – SCE would conduct preconstruction clearance surveys no more than 7 days prior to construction to determine the location of nesting birds and territories. Nesting survey results and avoidance measures, if applicable, will be reported to the appropriate wildlife agencies prior to construction in that area.</p> <p>An avian biologist would establish a buffer area around active nest(s) and would monitor construction activities. The buffer would be established based on construction activities, potential noise disturbance levels, and behavior of the species. A monthly report summarizing all active nest observations and avoidance measures will be provided to the appropriate agencies on a monthly basis, during the nesting season, or until all active nests have been determined to be inactive.</p> <p>Nesting Bird Management Plan– SCE shall develop a Nesting Bird Management Plan with input from CDFW. The plan shall include (1) nest management and avoidance; (2) field approach (survey methodology, reporting, and monitoring), including information related to areas of occupied habitat for coastal California gnatcatcher; and (3) avian biologist qualifications. Avian biologist(s) shall be subject to review and approval by CDFW, and shall be responsible for determining the buffer area around active nest(s). Biological monitors shall monitor nests and construction activities.</p> <p>Avian Safe Design – The 115 kV subtransmission structures would be designed consistent with the Suggested Practices for Avian Protection on Power Lines: the State of the Art in 2006 (Avian Power Line Interaction Committee, 2006).</p>
				APM BIO-2	
				APM BIO-3	
				APM BIO-4	

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					<p data-bbox="2069 254 2716 566">Stephens' Kangaroo Rat and Los Angeles Pocket Mouse Mitigation and Avoidance - An SCE qualified biologist shall conduct preconstruction surveys (see APM BIO-1) in suitable habitat for Stephens' kangaroo rat and Los Angeles pocket mouse at specific work areas along the Proposed Project and Alternative Project for impact avoidance and minimization.</p> <p data-bbox="2069 606 2716 838">To address impacts to Stephens' kangaroo rat, within the boundaries of the Stephens' Kangaroo Rat HCP, SCE shall apply to participate in the plan through an agreement with the Riverside County Habitat Conservation Agency (Riverside County, 1996).</p> <p data-bbox="2069 878 2716 1070">To address impacts to Los Angeles pocket mouse, within the boundaries of the WRCMSHCP Plan Area, SCE shall apply to participate in the WRCMSHCP and shall follow provisions of the WRCMSHCP as they apply to this species.</p> <p data-bbox="2069 1110 2716 1372">Stephens' kangaroo rat and Los Angeles pocket mouse observations and avoidance measures will be reported to the appropriate wildlife agencies prior to construction in that area. In addition, appropriate agencies will be provided a monthly report summarizing all special status species observations and avoidance measures.</p> <p data-bbox="2069 1473 2716 1695">Burrowing Owl Preconstruction Surveys and Monitoring - A preconstruction nonprotocol burrowing owl survey shall be conducted no more than 30 days prior to commencement of ground-disturbing activities within suitable habitat to determine if any occupied burrows are present. SCE</p>
				APM BIO-5	
				APM BIO-6	

					<p>would establish a buffer area around active nest(s) and would monitor construction activities.</p> <p>If occupied burrows or other evidence of presence are found, adequate buffers shall be established around burrows. Adequate buffers shall be 160 feet from occupied wintering burrows (December 1 through January 31) and 250 feet from occupied breeding burrows during the breeding season (February 1 through August 31). A qualified avian specialist may increase or reduce these buffer distances on a case-by-case basis.</p> <p>Biologists shall monitor all construction activities that have the potential to impact active burrows.</p> <p>In addition, potential unavoidable impacts to burrowing owl and its habitat shall be mitigated by participation in the WRCMSHCP. SCE's participation, as a PSE, shall include following the provisions and measures outlined in the WRCMSHCP.</p> <p>All reporting requirements would be conducted as described in APMs BIO-1 and BIO-2.</p>
				APM BIO-7	<p>Coastal California Gnatcatcher Impact Minimization and Mitigation – Avoidance of active nests shall be accomplished through APMs BIO-2 and BIO-3, described above.</p> <p>In areas of occupied habitat for the coastal California gnatcatcher, a buffer area around active nest(s) would be established by the SCE biologist and provided to USFWS and CDFW for concurrence. The buffer would be established based on construction activities, potential noise disturbance levels, and behavior of the species.</p> <p>Construction activities in occupied habitat/suitable habitat for the coastal California gnatcatcher, will be monitored by a qualified biologist.</p> <p>SCE shall apply to participate in the WRCMSHCP and shall follow provisions of the WRCMSHCP as they apply to coastal California gnatcatcher. Where</p>

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					<p>Proposed Project design allows, SCE shall avoid or minimize impacts to Diegan and coastal sage scrub vegetation.</p> <p>All reporting requirements would be conducted as described in APMs BIO-1 and BIO-2.</p>
				APM BIO-8	<p>Listed Riparian Birds Impact Minimization – Based on current design, SCE shall avoid direct construction impacts to riparian and other wetland habitats suitable for listed riparian bird species (least Bell's vireo, southwestern willow flycatcher). Avoidance of active nests shall be accomplished through APMs BIO-2 and BIO-3, described above.</p> <p>All reporting requirements would be conducted as described in APMs BIO-1 and BIO-2.</p>
				APM BIO-9	<p>Quino Checkerspot Butterfly Impact Minimization and Mitigation – To address impacts to Quino checkerspot butterfly, within the boundaries of the WRCMSHCP Plan Area, SCE shall apply to participate in the WRCMSHCP and shall follow the provisions of the WRCMSHCP as they apply to this species.</p> <p>All reporting requirements would be conducted as described in APMs BIO-1 and BIO-2.</p>
				APM BIO-10	<p>Vernal Pool Resources – A qualified biologist shall conduct preconstruction marking of previously mapped basins suitable to support vernal pool species within the potential Proposed Project Impact Corridor and depict them on construction plans with specifications for avoidance. Facts about the vernal pool habitat and potential impacts from construction and O&M activities shall be included in the WEAP materials. Wet season protocol level surveys for special status vernal pool resources will be conducted prior to construction. If special status species are detected, SCE shall follow the</p>

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					<p>provisions of the WRCMSHCP as they apply to these species.</p> <p>All reporting requirements would be conducted as described in APMs BIO-1 and BIO-2.</p>
Section 4.5 Cultural Resources					
2-22	<p>Section 4.5.1.4 summarizes information about records searches, Native American communication, and surveys conducted for the proposed project. However, no reference is given to a technical report(s). Please provide a copy of all cultural resources technical reports prepared for the project. In addition, please provide copies of the paleontological technical reports prepared for the project, which are referenced as follows: Aron and Kelly, 2012 and Aron, et al., 2014.</p>	<p>SCE will send copies of the cultural and paleontological technical reports and confidential GIS files to Applied Earthworks. Each technical report covers the entire project as now proposed. We will not be submitting a copy of Aron and Kelly 2012 paleontological technical report, which reflected the earlier project configuration that lacked the reconductoring element, because it was included within and is superseded by Aron et al. 2014.</p> <p><u>PEA Update: Section 4.5 and technical reports were updated.</u></p>			
2-23	<p>Section 4.5.4.1 provides impact assessments of cultural resources within the proposed project corridor. Please provide a copy of any technical report that evaluates the eligibility of cultural resources. Please note that evaluations of prehistoric bedrock milling sites will likely need to be reconsidered in light of recent evaluations of these site types in Riverside County. In addition, please note that further consideration to indirect impacts, such as visual impacts, will need to be addressed. This is especially important for Segment 1, as this involves the construction of a new subtransmission line.</p>	<p>The cultural resources technical report discusses potential CRHR eligibility for all resources within the proposed project's study corridor, none of which would be impacted by the project. Where applicable, the eligibility discussions reference formal or informal evaluations made on behalf of other (non-SCE) projects in the context of a site record form, survey report, test excavation report, or data recovery report. SCE believes that these discussions are adequate, and that more extensive evaluation supported by informal consultation with the SHPO is not necessary, since none of the resources would be impacted by the project. SCE is not aware of "recent evaluations of these [bedrock milling] site types in Riverside County." SCE also does not understand the reference to "indirect impacts, such as visual impacts" as being "especially important for Segment 1, as this involves the construction of a new subtransmission line." Segment 1 would entail rebuilding an existing subtransmission line along substantially the same route, with a few minor route modifications such as from one side of a road to the other side, or from running across the top of a prominent small hill to a route extending around its base on one side.</p>			
Section 4.6 Geology and Soils					
2-24	<p>Please provide the full reference source for the geologic mapping in Figure 4.6-1. The sources listed on the figure are not included in the reference list for this section. Please provide GIS files of the geology, if available.</p>	<p><u>PEA Update: References have been added to the Reference section in Section 4.6.</u></p> <p>References for Figure 4.6-1 are provided below:</p> <p>SCE, 2014. Project GIS Database.</p> <p>Riverside County, 2014. Geographic Information Services, Countywide GIS Data. Available at: http://gis.rivcoit.org/GISData.aspx</p> <p>USGS Mineral Resources, 2005. Mineral Resources Online Spatial Data, Mineral Resources Data System. Available at: http://mrddata.usgs.gov/mrds/select.php</p> <p>Google Earth Pro, 2012 and 2014</p> <p>GIS files of the geology are attached files titled "landslides, Perris Quad Geology and Riverside County Geology."</p>			

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2-25	Please provide the full reference source for the landslide susceptibility mapping in Figure 4.6-5. The sources listed on the figure are not included in the reference list for this section. Please provide GIS files of the landslide susceptibility mapping, if available.	<p><u>PEA Update: References have been added to the Reference section in Section 4.6.</u></p> <p>References for Figure 4.6-5 are provided below:</p> <p>SCE, 2014. Project GIS Database.</p> <p>Riverside County, 2014. Geographic Information Services, Countywide GIS Data. Available at: http://gis.rivcoit.org/GISData.aspx</p> <p>Google Earth Pro, 2012 and 2014</p> <p>GIS files of the geology are provided in the attached files titled "landslides, Perris Quad Geology and Riverside County Geology and DR_2_52 Cumulative Project Sources."</p>
Section 4.7 Greenhouse Gas Emissions		
2-26	Please supply the greenhouse gases emissions estimate (Appendix E) as noted on page 4.7-6 of the PEA. If the emissions estimate was completed partially or completely using a spreadsheet program please provide that in electronic format in the original program (Excel) along with the completed appendix file. If the emissions estimate was completed partially or completely using some other electronic emissions estimating program, such as CalEEMod, please provide those electronic files (input and output files if relevant to that program). Please note that there may be additional data requests after a review of the emissions estimate files.	The greenhouse gas emissions estimates Excel files (Appendix E) are attached. Please refer to attachments "VSSP Air Quality Appendix Calculation Tables_081914.xlsx" and "VSSP Air Quality Appendix Calculation Tables_081914_with APMs.xlsx."
2-27	On pages 4.7-7 and 4.7-8 there is a discussion regarding compliance with State GHG emissions reduction policies, where it is stated that "SCE complies with all Climate Action Team guidance." Please identify the specific Climate Action Team guidance, if any, which is relevant to this project.	<p>The California Climate Action Team published their "<i>Climate Action Team Report to Governor Schwarzenegger and the California Legislature</i>" in December 2010, which included a comprehensive strategy for California to address climate change risks. The guidance re-emphasized existing regulations such as, Assembly Bill 32.</p> <p>Among Climate Action Team strategies is a recommendation that low emission vehicles be used in vehicle fleets. The SCE fleet incorporates a significant number of clean diesel, electric, and hybrid-electric service vehicles. In addition to meeting CARB emission standards for air quality criteria pollutants, SCE is lowering GHG emissions from SCE fleet operations.</p> <p>Goals for utilities within the Climate Action Team report include improving energy efficiency. The CPUC requires SCE have energy efficiency programs that target seven sectors: Residential, Commercial, Industrial, Agricultural, New Construction, HVAC, and Lighting.</p> <p>De-carbonizing the electricity supply is also a key strategy for achieving the state's GHG emission reduction goal. SCE is moving towards compliance with CARB's Renewable Electricity Standard that requires 33 percent of the electricity delivered in the state come from qualified renewable sources by 2020.</p>
2-28	One potential GHG emission reduction measure to consider, as noted by various State agencies, is the recycling of construction waste. In Section 4.17, on page 4.17-10, it notes that "Construction of the Proposed Project would result in generation of various waste materials, many of which could likely be recycled and salvaged." Can SCE commit to the feasible recycling/reuse of all construction wastes, including the removed	The removed metals (conductor, bolts, nuts, and brackets, etc.,) would be recycled. Some of the wooden distribution poles may be reused depending on condition. The majority of the wooden poles, however, would be unsuitable for reuse due to wood deterioration and therefore would be hauled to an approved disposal site. As such, a requirement for SCE to reuse all construction waste is infeasible and would not provide a directly measurable GHG reduction. Furthermore, as indicated in Section 4.7.4 of the PEA, the Project would not create significant impacts to greenhouse gases and additional APMs for GHG impacts are not needed.

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	distribution poles, and add a greenhouse gases emissions reduction/waste reduction Applicant Proposed Measure (APM) to that affect?	
Section 4.8 Hazards and Hazardous Materials		
2-29	Please provide an electronic copy of the Environmental Data Resources (EDR) database for the project: EDR 2014, EDR DataMap for Corridor Study of Winchester, Ca. Inquiry Number 03933623.5r, date requested from EDR May 9, 2014. (Appendix G, EDR Report) We may have additional comments on this section based on our review of this report.	EDR 2014, EDR DataMap for Corridor Study of Winchester, Ca. Inquiry Number 03933623.5r, date requested from EDR May 9, 2014 is provided in the attached files titled "VSSP EDR Map and VSSP-EDR."
2-30	In the discussion of fire impacts, this section should identify what other measures from the approved fire protection plan will be taken in the high and moderate fire hazard area, in addition to vegetation clearing. More detail should be provided.	Portions of the Proposed Project would be located within moderate or very high fire hazard zones, however, wildland fire risks during construction of the Proposed Project would be generally low. To minimize the potential fire risk during construction and O&M, SCE would implement standard fire prevention protocols and comply with applicable laws and regulations. Prior to construction, contractors would be required to submit a fire prevention plan to SCE construction management for review and approval. Once the fire prevention plan is finalized by SCE the document will be forwarded to the CPUC.
Section 4.9 Hydrology and Water Quality		
2-31	Section 3.7.1.2 (Work Areas) states "The graded area would be compacted to at least 90 percent relative density..." What BMPs would be used to avoid adverse drainage effects associated with increased ground surface compaction, such as increased rate of runoff and associated erosion?	Per the State Water Resources Control Board's (SWRCB) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ), a Storm Water Pollution Prevention Plan is to be prepared and implemented to protect water quality during construction activities. Temporary best management practices (BMPs) will be implemented to mitigate concerns regarding adverse drainage effects related to the grading and compaction of these temporary working areas. This can be addressed by utilizing additional erosion and sediment control BMPs in combination with the compaction method to minimize the potential for erosion to occur downstream from the site. The BMPs selected will take into consideration the topography and site conditions when being evaluated for use and effectiveness to maintain compliance with the requirements set forth in the Construction General Permit (CGP) and the SWPPP. In addition to implementation of BMPs, SWPPP inspections will be performed to evaluate and modify BMP implementation as conditions change to ensure compliance with the CGP and SWPPP.
2-32	Section 3.7.1.6.2 (Dust Control) states that water trucks "and other dust control measures" may be used. What other dust control measures could be used?	SCE's final PEA, Section 3.7.1.6.2 will be updated to clarify "other dust control measures may include dust suppressants. Dust suppressants work by either agglomerating the fine particles, adhering/binding the surface particles together, or increasing the density of the road surface material. They reduce the ability of the surface particles to be lifted and suspended by either vehicle tires or wind. PEA Update: Chapter 3, Section 3.7.1.6.2 was updated with language clarifying other dust control measures.
2-33	How much total water would be used during construction of the project (e.g., dust abatement, fire safety, re-vegetation, etc.)?	SCE will make reasonable attempts to reduce overall water use during drought conditions as declared by the State of California. SCE will prepare and submit a Water Efficiency Plan to the CPUC that details the estimated water usage, water efficiency measures that will be implemented as well as the source(s). PEA Update: Section 4.9.4.2 was updated to include the approximate amount of water to be used throughout the duration of the project. The estimated amount of water needed to support construction activities related to fugitive dust mitigation, vegetation restoration, and soil compaction for the Valley South 115 kV Subtransmission Project was developed using assumptions related to the area of land disturbance, project duration, seasonal timing of work (i.e. evapotranspiration), type of construction activity, and roadway access/conditions. It is estimated that SCE could use up to approximately 75 to 110 acre-feet of water throughout the duration of the project related to construction. The estimated amount of water is reflective of a high case scenario in order to allow for a conservative environmental

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		<p>analysis. SCE is currently refining the engineering design and the development of the construction plans, which would result in a modification to the estimate presented in this response.</p> <p>Once final engineering is completed, SCE will attempt to use non potable water or best management practices when feasible to reduce the amount of fresh water to be used on the project for construction activities.</p>
2-34	What is the source(s) of water to be used during construction and operation of the project?	<p>SCE plans to use potable water sourced from local agencies. SCE will prepare and submit a Water Efficiency Plan to the CPUC that details the estimated water usage, water efficiency measures that will be implemented as well as the source(s).</p> <p>The estimated amount of water needed to support construction activities related to fugitive dust mitigation, vegetation restoration, and soil compaction for the Valley South 115 kV Subtransmission Project was developed using assumptions related to the area of land disturbance, project duration, seasonal timing of work (i.e. evapotranspiration), type of construction activity, and roadway access/conditions.</p> <p>It is estimated that SCE could use up to approximately 75 to 110 acre-feet of water throughout the duration of the project related to construction. The estimated amount of water is reflective of a high case scenario in order to allow for a conservative environmental analysis. SCE is currently refining the engineering design and the development of the construction plans, which would result in a modification to the estimate presented in this response.</p> <p>Once final engineering is completed, SCE will attempt to use non potable water or best management practices when feasible to reduce the amount of fresh water to be used on the project for construction activities.</p>
2-35	How will it be determined whether insulators require washing (visual inspection, regular schedule for the area, etc.)? Approximately how much water would be required for each washing of an insulator during project operation?	Polymer insulators will be installed. Polymer insulators do not require washing.
2-36	If dewatering of groundwater becomes necessary during construction, where would it be disposed of off-site? Under what circumstances would it be returned to the subsurface rather than transported off-site for disposal?	As groundwater levels are anticipated to be found deeper than 250 below ground surface, according to the PEA, it is not likely that groundwater will be encountered during construction activities. In the unlikely event that it is found, the best practice would be to collect the groundwater into containers as necessary, collect representative samples from the collection container, and dispose of the groundwater offsite based on those sample results. Collecting groundwater will require a permit from the local CUPA, a process which can take 60 days or more, so it is a good idea to have water quality SMEs procure a permit well in advance of any construction activities so as to not interfere with the operational tempo of the Proposed Project if groundwater is hit. If it can be worked out with the CUPA, non-hazardous groundwater may be able to be let loose on the Proposed Project grounds in a manner which does not interfere with natural erosion processes.
2-37	What BMPs would be applied if upset of existing water facilities (e.g., water mains, storm drains, sewer lines) accidentally occurs during construction?	SCE will implement the Underground Service Alert to locate and mark all substructures. In the event of unintentional damage to any other utility substructure, the appropriate utility company or agency would be contacted immediately to make repairs. If there is an upset of the existing facilities, the goal is to insure that no pollutants leave the construction site. All personnel will be aware of shut-off valves to cease the flow of water. The storm drains will have inlet protection BMPs in place throughout construction, such as filter fabric along with gravel bags, to mitigate pollutant-laden water from leaving the facility. In addition, a supply of gravel bags will be present to construct check dams to reduce the flow of water if necessary.
Section 4.10 Land Use and Planning		
2-38	Figures 4.10-1, 4.10-2, and 4.10-3 provide a lot of useful information. Please also provide these maps in a larger format so that the land uses and zoning are easier to read.	SCE's GIS files include information on Land Use and Zoning in the attached files entitled, Attachment 1_VSSP_PEA_GIS_SUBMITTAL.zip.

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Section 4.11 Mineral Resources - None		
Section 4.12 Noise		
2-39	Several statements are made throughout Section 4.12 that Proposed Project activities would be restricted to the hours specified in the County or respective city's municipal code, ordinances, etc. (Page 4.12-21, 22, 27). There are no APM(s) in Section 3.9 (Applicant Proposed Measures) related to Noise that could confirm these assumptions, and no mitigation measures presented. Furthermore, the hours of construction are not stated in Section 3.7 (Construction).	As presented in Tables 3.10-A, 3.10-B, and 3.10-C of Chapter 3, the daily duration of equipment in operation during construction is anticipated to range between 2 and 8 hours, indicative of "normal" daytime hours. SCE would conduct construction during daytime hours, unless there are emergency (power outage) or safety concerns (such as construction near traffic corridors) that would necessitate construction during times other than daytime hours. While the text included in the impact assessment of Section 4.12 describes that construction activities would be "restricted" to the hours specified in the County or respective city's municipal code, ordinances, the intent of the assessment is to confirm that construction activities would occur during normal daytime hours, not "restrict" construction to daytime hours. Additionally, the impact evaluation provided in the PEA demonstrates that the Proposed Project would not expose persons to or generate construction noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Therefore, APMs and or mitigation measures are not necessary and not proposed to reduce a potentially significant noise impact.
2-40	Section 4.12.4.1, Page 4.12-23 states that "inspections and maintenance as a result of the Proposed Project is not expected to be beyond the inspections and maintenance that is currently required within the existing rights-of-way." Does the Proposed Project result in new ROW where there are currently no O&M activities? If so, please address.	Yes, the Proposed Project does result in new subtransmission ROW where there are currently no subtransmission infrastructure or O&M activities. However, there are currently distribution facilities in some locations where there are O&M activities performed.
2-41	Section 4.12.4.4, Page 4.12-27 states that CEQA has not defined what is considered a substantial increase in ambient noise levels, so Caltrans' definition of an increase of approximately 10 dBA is referenced. Suggest considering a more conservative noise threshold. In the Tehachapi Renewable Transmission Project (TRTP) EIR/EIS, an increase of 5 dBA over ambient was considered to be a substantial increase when occurring in proximity to sensitive noise receptors, including private residences, schools, churches, and medical facilities (TRTP Final EIR/EIS, October 2009, Page 3.10-19 to 20).	The threshold utilized to evaluate construction noise impacts from the Proposed Project was equal to a daytime 1-hr Leq of 90 dBA at 50-feet, consistent with FTA's 2006 Transit Noise and Vibration Impact Assessment for linear construction projects. The threshold of 5 dBA Ldn utilized in the TRTP noise analysis is meant to evaluate average noise level increases over a 24-hour period. Because construction associated with the Proposed Project is linear in nature, with intermittent equipment operation, the 1-hr Leq of 90 dBA is the most appropriate and conservative threshold for evaluating noise impacts.
2-42	The modeled construction noise levels (Tables 4.12-11 and 4.12-12) are not compared to the measured ambient noise levels (Table 4.12-3). Ambient noise levels range from 46-62 Leq at 50 feet and the modeled noise levels for construction range from 78.5-86.1 dBA at 50 feet. This would appear to exceed the 10 dBA increase noted by Caltrans. No analysis of this issue is provided, and instead the analysis states that the noise levels are typical and do not exceed the FTA's daytime hourly Leq of 90 dBA. Please provide more analysis to support the conclusion.	The methodology utilized to evaluate potential noise impacts from the Proposed Project was based on comparison of construction noise to the daytime 1-hr Leq of 90 dBA at 50-feet, consistent with FTA's 2006 Transit Noise and Vibration Impact Assessment. While a noise level increase of 10 dBA is described in Section 4.12 as an increase resulting in a doubling of loudness and likely resulting in community response, this was not the threshold utilized to evaluate potential construction-related noise level impacts. Because atmospheric conditions can fluctuate measured noise levels by more than 10 dBA, comparing modeled 1-hr noise level impacts to a 1-hr Leq of 90 dBA was the most appropriate methodology for evaluating potential noise level impacts at nearby sensitive receptors.
2-43	Consider applying mitigation to reduce noise levels during construction, including limiting the hours of construction (Riverside County General Plan Policy N 12.2), and requiring all construction equipment to utilize noise reduction features (e.g., mufflers and engine shrouds) that are no less	As presented in Tables 3.10-A, 3.10-B, and 3.10-C, the daily duration of equipment operation during construction is anticipated to range between 2 and 8 hours, indicative of "normal" daytime hours. SCE would conduct construction during daytime hours, unless there are emergency (power outage) or safety concerns (such as construction near traffic corridors) that would necessitate construction during times

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	effective than those originally installed by the manufacturer (Riverside County General Plan Policy N 12.4), among others.	<p>other than daytime hours. Additionally, since the conclusion of the construction impact evaluation is that there is a less <i>than significant</i> impact, SCE is not proposing any specific mitigation measures.</p> <p><u>PEA Update: Section 4.12.4.1 was updated with the revised language below.</u></p> <p>For additional clarification, please revise Section 4.12.4.1, paragraph 7, as follows: "In the event construction activities are anticipated on days or hours outside of what is specified by the local ordinances (for example, if existing lines must be taken out of service for the work to be performed safely and the line outage must be taken at night for system reliability reasons, or if construction needs require continuous work), SCE would provide five-day advanced notification, including a general description of the work to be performed, location, and hours of construction anticipated, to the CPUC, the local jurisdiction, and residents within 300 feet of the anticipated work, as well as route all construction traffic away from residences, schools, and recreational facilities to the maximum extent feasible. Additionally, potential noise impacts would be further reduced and controlled during equipment operation from noise reduction features (e.g., mufflers and engine shrouds) typically installed on SCE and SCE contractor equipment."</p>
2-44	Section 4.12.4.4, Page 27 discusses the periodic increases in ambient noise levels during "Operation". The first paragraph discusses O&M activities including inspection and maintenance, which may include biennial airborne inspections. No related noise levels are provided. The impact analysis discussion instead presents the operational noise level from corona noise (33.5 dBA), and states that it is minor and not substantial. The analysis does not present the full range of O&M activities and associated noise levels, which are likely the activities that will have the highest periodic noise levels. This does not present a complete, transparent picture of the Proposed Project impacts. Please provide additional information on these aforementioned activities (inspection, helicopter use) and associated noise levels, and how often these activities would be occurring. It would also be worthwhile to make statements regarding whether or not this would be a change from existing O&M activities.	Helicopters will not be used during construction of the Proposed Project and O&M inspection of the subtransmission circuit and facilities would be similarly conducted by a ground patrol vehicle, as currently for existing subtransmission and distribution infrastructure, and not by helicopter.
2-45	Sections 4.12.4.5 and 4.12.4.6, present an analysis of how the Proposed Project construction noise levels would be below the acceptable levels for aircraft noise. The impact assessment should be focused on whether or not the airport noise would impact the people residing (no permanent employees/residences associated with the project) or working in the project area to excessive noise levels. Namely, would construction workers be exposed to excessive airport-related noise?	The PEA analysis indicates that the proposed project is not located within the highest 70 CNEL airport noise contour and consequently would not expose construction workers to excessive airport related noise levels.
Section 4.13 Population and Housing		
2-46	In addition to the approximate number of construction workers provided in Section 4.13.4, please specify the maximum number of employees at the project site on any given day during construction and the approximate number of employees for specific construction activities. The distribution of the workforce over the 16 month construction period would also be helpful.	The maximum number of workers on any given day is conservatively estimated at approximately 75 along the 15.4 mile linear project area. The final construction schedule is typically completed by the contractor. This schedule, which would be in detail as to the type and timing of the various construction elements typically would not be developed until 1 to 2 months prior to start of construction. Therefore, the distribution of workforce by specific activity would not be known until that time.
Section 4.13 Public Services - None		

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Section 4.15 Recreation		
2-47	<p>Figure 4.15-2 shows that several existing trails cross the proposed project route. Please provide more information on what activities would occur near these crossings and what measures will be taken, if needed, to reduce impacts to these trail crossings. Also, it looks like one of the trails and a bike path follow portions of the project route. Please also describe how impacts to this trail and bike path will be avoided. For these areas, it would be helpful to have a detailed map to show the location of the trail/bike path versus the project alignment.</p>	<p>SCE's GIS Map Package includes Recreation Figures pertaining to trails so the CPUC may view the Proposed Project and the relation to the trails in the vicinity.</p> <p>The existing trails that cross this linear project would be guarded when overhead conductor stringing occurs. Please refer to the table in Data Gap 2-48 for all locations, including trails that would be guarded along with the method. Additionally, a new table and revised Figure in Chapter 3 have been provided, Table 3.6 Guard Structure Locations and Figure 3.7 Proposed Pull & Tension Sites, Splicing Sites & Guard Structures, which identifies Guard Structure locations throughout the Proposed Project. Furthermore, Table 3.10-A Subtransmission Construction Equipment and Workforce Estimates has been updated to include additional boom trucks that may be used to lessen impacts to trails and bike paths during construction.</p> <p>As described in Section 4.15, Recreation, of the PEA, several stringing (pulling, tensioning, and splicing) sites are proposed where a trail, bike path or bike lane would cross between the poles or under the circuits. Trails that would be crossed by the Proposed Project include the Salt Creek Recreational Trail and levee road, an informal neighborhood walking path parallel to Old Leon Road (referred to as Old Leon Road for purposes of analysis), and a Class II Bike Lane along State Route (SR) 79. This construction activity may be restricted and could have short-term and temporary effects on the flow of bike, trail, or pedestrian traffic. Temporary impacts associated with structure work areas, guard structure, and tower temporary disturbance areas. Pole sites located within the right-of-way (ROW) would be off limits to public during active construction. Access to the trail would be restricted during wire stringing activities. The use of hazard signage and on the ground pedestrian control to limit access during active construction has proven successful on other projects and would be utilized for this project in order to minimize closure durations and avoid exposing public to construction hazards. Need for closure is expected to be intermittent with a total cumulative duration estimated to be no more than two weeks for wire stringing activities (removal and install) for the portion of the trail that is within the ROW.</p> <p>The stringing sites associated with the Proposed Project would be temporary and the land would be restored to its previous condition following completion of pulling and splicing activities. Because construction work would be of limited duration and land would be restored to its previous condition, effects on trails would be temporary and would not cause substantial deterioration. Furthermore, SCE would implement Applicant Proposed Measures TRA-1 and TRA-2 to reduce potential impacts related to Class I Bike Paths, Class II Bike Lanes, pedestrian sidewalks, and trails as described in Section 4.16, Transportation and Traffic, of the PEA. Specifically, Applicant Proposed Measure TRA-1 includes preparation of traffic control or other management plans (such as detour plans) to minimize impacts on local streets, highways, freeways, or other forms of transportation (Class I and II bicycle route). Also, Applicant Proposed Measure TRA-2 includes providing alternate pedestrian routing during construction activities where the Proposed Project work area encroaches on public right-of-way and reduces the existing pedestrian path of travel to less than 48 inches wide.</p> <p>Also, as described in Section 4.15, O&M of the Proposed Project would not block or hinder the flow of traffic along existing trails. Subtransmission lines are generally compatible with trails because the components would be located at an elevated height that does not interfere with ground activities such as trail use. Where the Proposed Project would cross over the top of trails, bike paths, and bike lanes, pedestrians and bicyclists would be able to pass between the poles and underneath the circuits. No physical barriers would prevent access and movement along these trails, bike paths, and bike lanes. Thus, the impact to these recreational amenities would be less than significant.</p> <p>It should be noted in Section 4.1, Aesthetics, of the PEA, view simulations are provided that illustrate detailed photo-realistic images of the Proposed Project (before [existing conditions] and after images) from various view locations in the Proposed Project area, including trails and roads with bicycle lanes that are adjacent to or are crossed by the Proposed Project (e.g., refer to Key Observation Points 4 through 9, and 12).</p>

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Section 4.16 Transportation and Traffic																																																																																									
2-48	Please provide a list of all road and highway segments crossed by the Project and alternatives (noting any differences for alternatives). Please identify which crossings SCE anticipates traffic control would be utilized.	<p>PEA Update: Table 3.6 Guard Structure Locations was provided in Chapter 3 (Please see Data Gap Response 1-15).</p> <p>The table below (not included in PEA, for CPUC references purposes only) identifies the locations and all types of crossings that would be guarded during construction:</p> <p>Table: Other Crossing Locations</p> <table border="1" data-bbox="1423 586 2728 1848"> <thead> <tr> <th data-bbox="1423 586 2122 802">Location</th> <th data-bbox="2122 586 2374 802">Guard Method¹ GS=Guard Structure BT=Boom Truck TC=Traffic Control</th> <th data-bbox="2374 586 2728 802">CrossingType²</th> </tr> </thead> <tbody> <tr><td>Menifee Rd, ~2,600 feet south of Hwy 74</td><td>TC</td><td>Road</td></tr> <tr><td>Briggs Rd & McLaughlin Rd</td><td>GS & TC</td><td>Road, Pedestrian</td></tr> <tr><td>Briggs Rd & Meadow Oaks St</td><td>BT & TC</td><td>Road, Pedestrian</td></tr> <tr><td>Leon Rd & Grand Ave</td><td>GS</td><td>Road</td></tr> <tr><td>Leon Rd & Simpson Rd</td><td>GS</td><td>Road, Pedestrian</td></tr> <tr><td>Leon Rd & Salt Creek Recreation Trail</td><td>TC</td><td>Pedestrian & Bike</td></tr> <tr><td>Leon Rd & Domenigoni Pkwy</td><td>GS/TC</td><td>Road, Pedestrian, Bike, Street Light</td></tr> <tr><td>Leon Rd & Scott Rd</td><td>GS</td><td>Road & Wire</td></tr> <tr><td>Leon Rd & Baxter Rd (Jean-Nicholas Rd)</td><td>GS/TC</td><td>Road & Pedestrian</td></tr> <tr><td>Old Leon Rd at Winchester Rd & Max Gillis Blvd</td><td>GS/TC</td><td>Road, Pedestrian & Bike</td></tr> <tr><td>Leon Rd & Benton Rd</td><td>GS/TC</td><td>Road</td></tr> <tr><td>Leon Rd & Auld Rd</td><td>GS/TC</td><td>Road & Wire</td></tr> <tr><td>Nicolas Rd, ~975 feet west of Calle Medusa</td><td>GS/BT/TC</td><td>Road, Pedestrian & Wire</td></tr> <tr><td>Briggs Rd & Case Rd</td><td>GS</td><td>Road</td></tr> <tr><td>Leon Rd & Holland Rd</td><td>GS</td><td>Road</td></tr> <tr><td>Leon Rd & Wickerd Rd</td><td>GS</td><td>Road</td></tr> <tr><td>Leon Rd & Keller Rd</td><td>GS/TC</td><td>Road</td></tr> <tr><td>Leon Rd & train track (~700 feet south of Grand Ave)</td><td>GS/BT</td><td>Train Track</td></tr> <tr><td>Briggs Rd & ~1,300 feet north of Case Rd</td><td>BT</td><td>Road</td></tr> <tr><td>Leon Rd & Perrine St</td><td>BT/TC</td><td>Road</td></tr> <tr><td>Leon Rd, ~250 feet south of Aaron Rd</td><td>BT</td><td>Private Driveway</td></tr> <tr><td>Leon Rd, ~380 feet north of Curzulla Rd</td><td>BT</td><td>Private Driveway</td></tr> <tr><td>Leon Rd & Allen Rd</td><td>BT</td><td>Road</td></tr> <tr><td>Leon Rd & Olive St</td><td>BT/TC</td><td>Road</td></tr> <tr><td>Leon Rd & Ano Crest Rd</td><td>BT/TC</td><td>Road</td></tr> <tr><td>Leon Rd, ~150 feet north of Ano Crest Rd</td><td>BT/TC</td><td>Road</td></tr> <tr><td>Leon Rd, ~1600 feet south of Ano Crest Rd</td><td>BT/TC</td><td>Road</td></tr> <tr><td>Leon Rd, ~2100 feet south of Ano Crest Rd</td><td>BT/TC</td><td>Road</td></tr> </tbody> </table>	Location	Guard Method ¹ GS=Guard Structure BT=Boom Truck TC=Traffic Control	CrossingType ²	Menifee Rd, ~2,600 feet south of Hwy 74	TC	Road	Briggs Rd & McLaughlin Rd	GS & TC	Road, Pedestrian	Briggs Rd & Meadow Oaks St	BT & TC	Road, Pedestrian	Leon Rd & Grand Ave	GS	Road	Leon Rd & Simpson Rd	GS	Road, Pedestrian	Leon Rd & Salt Creek Recreation Trail	TC	Pedestrian & Bike	Leon Rd & Domenigoni Pkwy	GS/TC	Road, Pedestrian, Bike, Street Light	Leon Rd & Scott Rd	GS	Road & Wire	Leon Rd & Baxter Rd (Jean-Nicholas Rd)	GS/TC	Road & Pedestrian	Old Leon Rd at Winchester Rd & Max Gillis Blvd	GS/TC	Road, Pedestrian & Bike	Leon Rd & Benton Rd	GS/TC	Road	Leon Rd & Auld Rd	GS/TC	Road & Wire	Nicolas Rd, ~975 feet west of Calle Medusa	GS/BT/TC	Road, Pedestrian & Wire	Briggs Rd & Case Rd	GS	Road	Leon Rd & Holland Rd	GS	Road	Leon Rd & Wickerd Rd	GS	Road	Leon Rd & Keller Rd	GS/TC	Road	Leon Rd & train track (~700 feet south of Grand Ave)	GS/BT	Train Track	Briggs Rd & ~1,300 feet north of Case Rd	BT	Road	Leon Rd & Perrine St	BT/TC	Road	Leon Rd, ~250 feet south of Aaron Rd	BT	Private Driveway	Leon Rd, ~380 feet north of Curzulla Rd	BT	Private Driveway	Leon Rd & Allen Rd	BT	Road	Leon Rd & Olive St	BT/TC	Road	Leon Rd & Ano Crest Rd	BT/TC	Road	Leon Rd, ~150 feet north of Ano Crest Rd	BT/TC	Road	Leon Rd, ~1600 feet south of Ano Crest Rd	BT/TC	Road	Leon Rd, ~2100 feet south of Ano Crest Rd	BT/TC	Road
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2-49	Please provide a list of roadway segments where temporary encroachment into pedestrian, bicycle, or vehicle lanes is expected during construction.	<p>See response to item 2-48, "Table: Other Crossing Locations" above for all locations, including pedestrian, bicycle, or vehicle lanes that would be guarded along with the guard method.</p> <p><u>PEA Update: Table 3.6 Guard Structure Locations was added to Chapter 3 (Please see Data Gap Response 1-15).</u></p>																																																																																							
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2-50	Please confirm the water source and amount of water that will be used during construction. This information should be consistent with the discussion in the Hydrology and Water Quality section.	<p>Refer to SCE's responses to Questions 2-33 and 2-34.</p> <p>The estimated amount of water needed to support construction activities related to fugitive dust mitigation, vegetation restoration, and soil compaction for the Valley South 115 kV Subtransmission Project was developed using assumptions related to the area of land disturbance, project duration, seasonal timing of work (i.e. evapotranspiration), type of construction activity, and roadway access/conditions.</p> <p>It is estimated that SCE could use up to approximately 75 to 110 acre-feet of water throughout the duration of the project related to construction. The estimated amount of water is reflective of a high case scenario in order to allow for a conservative environmental analysis. SCE is currently refining the engineering design and the development of the construction plans, which would result in a modification to the estimate presented in this response.</p> <p>Once final engineering is completed, SCE will attempt to use non potable water or best management practices when feasible to reduce the amount of fresh water to be used on the project for construction activities.</p>
2-51	Section 4.17.4.7 should also identify any recycling of construction materials that will be conducted as part of the project.	All removed wood poles would eventually be hauled to an approved disposal site except for any reusable poles. Removed insulators would be appropriately disposed; any metals (bolts, brackets, conductor) would be recycled.
Section 4.18 Cumulative Impacts		
2-52	Please provide information on how cumulative projects were identified and when (date) they were identified.	Projects considered in the cumulative impact assessment were selected based on proximity to the Proposed Project (within 1-mile) and the following criteria: approved projects that have not yet been constructed; projects that are currently under construction; projects requiring an agency approval for an application that has been received at the time a Notice of Preparation is released; and projects that have been budgeted, planned, or included as a later phase of a previously approved project. Projects, which met these criteria, were identified through review of Specific Plans, General Plans, and approved project lists obtained from city and county planning departments. Sources of reference materials used to evaluate cumulative projects and material access dates are provided in the attached file titled "DR_2_52 Cumulative Project Sources." The data for SCE's cumulative projects was projected on 3/20/14 and 10/10/14.
Section 5 Description of Project Alternatives and Impact Analysis		
2-53	The discussion of alternatives should include more detail on the environmental characteristics of each proposed alternative. This additional detail will help with the comparison of the project alternatives in the environmental document. Another consideration under CEQA is that we will need to identify an alternative that reduces identified significant project impacts.	Environmental impacts associated with the Alternative Subtransmission Line Route are detailed in Section 5.2.3.3, which includes a discussion of the environmental impacts associated with the Alternative Subtransmission Line Route. While, for certain resource areas (cultural resources in particular) there are unique characteristics beyond those identified for the Proposed Subtransmission Route, those unique characteristics are explained in detail and analyzed in the PEA, Section 5.2.3.3 which includes Table 5-2. However, for the remaining resource areas, the existing environmental conditions associated with the Alternative Subtransmission Line Route are similar to the Proposed Route and do not include unique characteristics beyond those identified for the Proposed Subtransmission Line Route; therefore, additional analysis was not included. Moreover, environmental documents prepared under CEQA are required to identify reasonable alternatives and describe impacts to inform public and agency decision-making but are not required to evaluate impacts to the same degree as the proposed project. Therefore, additional detail on environmental impacts of Alternative 2 have not been provided.
Chapter 6 Other Process-Related Data Needs		
2-54	Chapter 6 provides the 300-foot mailing list. Please confirm when this data was compiled. Is it current (September 2014)?	The data compiled for the 300 foot list provided in Chapter 6 was current as of August 2014. An updated list will be provided in SCE's final PEA.
2-55	Please provide the 300-foot mailing list as an excel spreadsheet to facilitate use of this list for future public noticing efforts.	300 foot mailing list dated December 3, 2014 provided in Chapter 6.