

Responses to Comment Set A

California Department of Transportation, District 9

A-1 The commenter stated that the location State Route (SR) 202 is incorrect in the Draft IS/MND and included an Enclosure showing the rerouted roadway. The affected segment of SR-202 is located east of the proposed substation site and it is not part of proposed Telecom Route #2, which parallels West Valley Boulevard/SR-202 from Giraudo Road to Woodford-Tehachapi Road. The Draft IS/MND analysis is not affected, by this revision and regional access would still be provided to the substation site by SR-202, as described in Section 5.16 (Transportation/Traffic). Nonetheless, Figures 4-1, 4-5, 4-6, 5.14-1, and 5.15-1 have been revised to show the correct and current location of SR-202.

A-2 The commenter states that California Manual of Uniform Traffic Control Devices and the California Department of Transportation (Caltrans) Standard Plans for traffic control within the ROW must be utilized and thus cited in the IS/MND. Table 4-6 in the IS/MND summarizes the permits from other federal, State, and local agencies, including the California Department of Transportation, that may be needed for the project. A description of the construction activities within the ROW that would require an encroachment permit has been revised, as follows, to add the activities specified by the commenter:

Table 4-6. Permits that May Be Required for the SCE Banducci Substation Project

Agency	Jurisdiction	Requirements
FEDERAL / STATE AGENCIES		
California Department of Transportation	For use of California State highways for other than normal transportation purposes, including construction activities completed within the ROW, <u>pole replacement, utility line crossings, and for use of California Manual of Uniform Traffic Control Devices and Caltrans Standard Plans for traffic control within the ROW.</u>	Standard Encroachment Permit

A-3 In accordance with General Order 131-D, the CPUC has notified all property owners of the Proposed Project within 300 feet of the centerline of the ROW for all project components. The CPUC’s project website will also provide project information and status during construction. Implementation of Mitigation Measure T-2 (Ensure Emergency Access and Response) would require SCE to notify police departments, fire departments, ambulance services, and paramedic services serving the project area 30 days in advance of construction. In addition, under Mitigation Measure AG-1 (Minimize Impacts to Agricultural Resources), SCE would be required to notify all adjacent agricultural operations of construction schedules at least 30 days in advance of the start of construction-related activities. The area surrounding the substation site, subtransmission line, and distribution line components is primarily agricultural land, and thus these surrounding properties would be notified. As described in Section 4.10.5 (Telecommunications Lines) of the Draft IS/MND, work associated with the telecommunication upgrades would include replacement of 39 of 751 existing poles with similar poles and would include approximately 4 miles of underground fiber optic telecommunications cable, some of which would be installed in existing conduit. The trench for new conduit would be excavated to approximately 12 to 18 inches wide and a minimum of approximately 36 inches deep in various areas along the routes.

As described in Response to Comment A-2, traffic controls would be implemented as part of issuance of Caltrans encroachment permit. Furthermore, Section 4.13.4 (Traffic Control) of the Draft IS/MND also states that construction activities undertaken within public street ROW would require the use of a traffic control service, and all lane closures would be conducted in accordance with applicable requirements. These traffic control measures would be consistent with those published in the *California Joint Utility Traffic Control Manual*. Impacts to traffic would be short-term and determined to be less than significant with implementation of Mitigation Measures T-1 (Restrict Lane Closures), T-2 (Ensure Emergency Access and Response), and T-3 (Implement Traffic Management Plan).

Given the level of construction, with the notification described above, and specifically with implementation of Mitigation Measure T-1 (Restrict Lane Closures), which would limit all necessary lane closures or obstructions on major roadways to off-peak hours, no additional public outreach campaign is deemed necessary to ensure that residents in the area would be informed about the project and traffic-related impacts would be less than significant.

A-4 In this comment, Caltrans identifies that any new utility line crossing of SR-202 or SR-58, either overhead or underground, would require a Caltrans encroachment permit. The comment is noted. Please see Response to Comment A-2 regarding Caltrans encroachment permit requirements related to utility line crossings associated with the Banducci Substation Project.

A-5 In this comment, Caltrans identifies that any new poles constructed to replace existing poles would require a new Caltrans encroachment permit. The comment is noted. Please see Response to Comment A-2 regarding Caltrans encroachment permit requirements related to pole replacements as part of the Banducci Substation Project.

A-6 The commenter states that the sentence in Section 5.16.1 of the Draft IS/MND stating that there are no Applicant Proposed Measures (APMs) related to traffic is an error since there are three traffic related mitigation measures. APMs are different from mitigation measures. APMs include environmental measures that are already required by existing regulations and/or requirements, or are SCE's standard practices that would minimize or prevent potential impacts. APMs are designed to address temporary and/or permanent impacts, as well as impacts anticipated during operations and maintenance of the completed project. These measures would be implemented regardless of any regulatory oversight by the CPUC and are not measures added to the project based on the IS/MND analysis. Rather, they are proposed by SCE to be integrated as part of the project description.

The APMs proposed for the Banducci Substation Project are listed in Table 4-5 in Section 4.14 of the IS/MND. As correctly stated in Section 5.16.1 (Transportation/Traffic) on page 5-234 of the Draft IS/MND, there are no APMs proposed by SCE for transportation and traffic. However, under the discussion of Environmental Impacts and Mitigation Measures in Section 5.16.2 of the IS/MND, Mitigation Measures T-1 (Restrict Lane Closures), Mitigation Measure T-2 (Ensure Emergency Access and Response), and Mitigation Measure T-3 (Implement Traffic Management Plan) have been proposed to ensure that potential impacts related to construction traffic and interference with emergency access during construction would be less than significant. These three mitigation measures have also been incorporated into the Mitigation Monitoring Plan included in Section 6 of the IS/MND.

A-7 The commenter provided a link for further information on encroachment permits for utilities in the Caltrans Encroachment Permit Manual, as well as a contact at the District 9 Permits Office. The information is appreciated and the comment has been noted.