Attachment D

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

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

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

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

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

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

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

Short-Term and Temporary Construction-Related Impacts

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

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

Long-Term Operation-Related Impacts

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

E.2.2 Environmentally Superior Alternative

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

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

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

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

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

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

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

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

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

Conclusion

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