



United States Department of the Interior

BUREAU OF RECLAMATION
Lower Colorado Regional Office
P.O. Box 61470
Boulder City, NV 89006-1470

IN REPLY REFER TO:
LC-2620
2.1.4.17

SEP 06 2019

VIA ELECTRONIC MAIL

Ms. Billie Blanchard
California Public Utilities Commission
c/o Aspen Environmental Group
235 Montgomery Street, Suite 640
San Francisco, CA 92311
elm@aspeneg.com

Subject: Southern California Edison's (SCE) Eldorado-Lugo-Mohave Series Capacitor Project
IS/MND (Application A.18-05-007) – Notice of Intent to Adopt, and Notice of
Availability – IS-MND

Thank you for your memorandum dated August 2019 (Due Date September 13, 2019)

The Bureau of Reclamation (Reclamation) has received California Public Utilities Commission's Notice of Intent to Adopt and Notice of Availability for the Eldorado-Lugo-Mohave (ELM)/ Initial Study (IS)/Mitigated Negative Declaration (MND). In accordance with the National Environmental Policy Act, Reclamation is participating as a cooperating agency on the Environmental Assessment being prepared by the Bureau of Land Management (BLM) for the ELM project. Reclamation is participating because existing ELM transmission lines cross Reclamation land in Nevada. We have reviewed the ELM IS/MND and offer the following comments.

Section 1.5, Paragraph 2, Page 1-4

This paragraph states "...Therefore, the mitigation measures adopted as a condition of project approval and agreed to by the Applicant shall be implemented throughout the project except where federal agencies or agencies outside California with jurisdiction over lands or resources through which the project passes (collectively, "Other Agencies") impose equivalent or more effective measures, in which case such equivalent or more effective measures will be implemented." This statement appears to conflict with information given in Section 3.2.2, Paragraph 4 which states: "...The CPUC would also require that for actions on federal lands within California, SCE must implement the mitigation measures in this IS or equivalent or more effective measures, recognizing that the federal approval bodies may impose the same mitigation measures as identified in this document, or may instead formulate their own mitigation requirements." The information in Section 1.5 refers to federal agencies or agencies outside of California, while the information in Section 3.2.2 only refers to federal lands within California. Please clarify whether the equivalent or more effective measures requirement applies to federal lands outside of California.

Section 4.3, Property Description, Paragraph 1, Page 4-9

We recommend that you add information about the Right of Use that SCE has requested from Reclamation. The transmission line on Reclamation land was originally authorized by the BLM; that authorization has expired. As part of the proposed action, Reclamation will directly authorize SCE to operate, maintain, and eventually decommission the components of the transmission line on Reclamation land. This includes removing existing overhead ground wire and installing overhead optical ground wire on approximately 0.60 linear miles of existing transmission line. Information about the width of the right-of-way on Reclamation land and other details can be obtained from SCE.

Section 4.6 Right-of Way Requirements, Paragraph 1, Page 4.27

We recommend that information about the Use Authorization that SCE has requested from Reclamation be included in this section. See our comment on Section 4.3 above.

Section 5.11 Land Use and Planning, Federal Land Use, Bureau of Reclamation, Page 5-259

This paragraph incorrectly states that local offices may implement Reclamation Manual Directives and Standards at their discretion. All requirements in the Reclamation Manual are mandatory for Reclamation. We recommend this paragraph be revised as follows: "Reclamation manages lands in accordance with applicable laws, regulations, orders, policies, and directives and standards. The Reclamation Manual, Directives and Standards, LND 08-01 - Land Use Authorizations, provides procedures for issuing use authorization documents for the use of Reclamation land, facilities, and waterbodies."

Thank you for the opportunity to review the ELM IS/MND. Please maintain Reclamation on your mailing list for the project. Future correspondence should be sent to: Bureau of Reclamation, Attn: Ms. Mary J. Reece, Chief, Resource Management Office, LC-2000, P.O. Box 61470, Boulder City, NV 89006.

If you have questions, please contact Ms. Faye Streier, National Environmental Policy Act Coordinator, at 702-293-8132 or fstreier@usbr.gov.

Sincerely,



Mary J. Reece, Chief
Resource Management Office